Housing Allocations

Issue: Are the proposed housing allocations justified, effective and consistent with national policy

HSG01: Land at Plough Road and Redehall Road, Smallfield

6.11 What are the exceptional circumstance for the release of the site from the Green Belt?

6.12 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework

6.13 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework? Would the requirement to explore opportunities for junction improvements at Plough Road/Redehall Road/Chapel Road/Wheelers Lane be effective and is it justified? Is it effective to require the provision of amenity green space in accordance with the ‘most up to date open space assessment’ when it is not part of the development plan?

We do not consider that the Plan meets the standard for the following reasons.

TDC Part 3 Site assessment on SMA 008 says ‘It is not within satisfactory distance of public open space, and consideration would need to be given to whether or not this could be provided on or off-site, whilst it’s acceptability in relation to the landscape setting of the village will be dependent upon a sensitive design, which respects this setting and form and scale of the settlement’

Yet there is no provision within the TDC Infrastructure Plan for a green space in this area. The IP proposes that instead the existing provision at Plough Rod Rec is expanded. The IP also details the funding arrangement as jointly Parish Council & TDC – Burstow PC has not been asked to consider funding this proposal.

The IP allocates £65,000 for junction improvements. Given a pelican crossing costs in the region of £100,000 this allocation will not lead to any significant improvement on what is already a dangerous crossing point.

Plough Road, Redehall Road, Chapel Road and Wheelers Lane are all designated as ‘unclassified’ and meet in the centre of the village to form a staggered junction. There are issues daily, with near misses and minor shunts happening frequently. There have also been two major, life changing, collisions with pedestrians. Smallfield has an ongoing problem with speeding traffic through the village and also a very high number of HGV’s moving through the Parish. We have an active Speed Watch Group and statistics for just one road (Plough Road) show that is 66 one-hour sessions between January 2018 and March 2019 recorded in excess of 1000 offending vehicles. On another road (Weatherhill Road) due to the consistently high number of offender recorded as speeding, Surrey Police removed the site from the Speed Watch’s purview and set up their own mobile unit. Earlier this year the Police declined a request to return the site to the Speed Watch Group as they did not have a site of greater risk in the County. A large number of HGV operators operate in our area and others use Smallfield as a ‘cut through’ between the A22 and the M23. In one 8-hour
session, on a Friday, a volunteer group recorded 172 HGV’s (excluding all vans and LGVs) travelling through the centre of Smallfield. Any additional traffic movements, created by the increase in housing in the area, will further exacerbate existing problems.

All the various scenarios modelled in the Strategic Highway Assessment carried out by Surrey County Council carry a detrimental impact on traffic movement and safety through Burstow. The Assessment further reports that Scenario 3 has a considerable impact on the road network and that these effects are mainly seen on B and minor roads.

The Parish Council understands and recognises the need for more housing and believes that, with significant improvements to infrastructure and careful location of development, Smallfield will cope with the additional earmarked 300+ dwellings. Scenarios 2A and 2B would see the least deterioration on both the Level of Service (LOS) and the Rate of Flow to Capacity (RFC) and with some junction improvements are less likely to put road users in Burstow at risk. Burstow Primary School is bordered on three sides by Weatherhill Road, Redehall Road and Wheelers Lane and at school peak times there are parents and children attempting to cross the roads; which is very dangerous. We have been informed that from September 2019 there will no longer be a crossing attendant and with no safe crossing point the risk will only increase.

Despite detailed examination of the technical supporting documents, the Parish Council can find no evidence that Tandridge District Council have carried out any studies, beyond basic modelling, of LOS and RFC at the Plough Road/Redehall Road/Chapel Road/Wheelers Lane junction. Until clarity is provided and road junction improvements are carried out here, no increase in vehicle numbers passing through the junction should be permitted through increased development in the locality.

Byers Lane, Smallfield Road and Bones Lane all feed traffic into Plough Road

<table>
<thead>
<tr>
<th>Name</th>
<th>2031 do Min Flow (vbp)</th>
<th>2031 Scenario 3</th>
<th>Absolute Increase in Flow (vph)</th>
<th>% Increase in Flow</th>
<th>2031 Do Minimum RFC</th>
<th>2031 Scenario 3</th>
<th>2031 Do Minimum LOS</th>
<th>2031 Scenario 3 LOS</th>
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</thead>
<tbody>
<tr>
<td>Smallfield Rd</td>
<td>236</td>
<td>616</td>
<td>380</td>
<td>161%</td>
<td>0.22</td>
<td>0.55</td>
<td>B</td>
<td>D</td>
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<tr>
<td>Byers Lane</td>
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<td>584</td>
<td>348</td>
<td>148%</td>
<td>0.22</td>
<td>9.52</td>
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<td>D</td>
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<tr>
<td>Plough Road</td>
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<td>219</td>
<td>72%</td>
<td>0.26</td>
<td>0.45</td>
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<td>D</td>
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<tr>
<td>Bones Lane</td>
<td>105</td>
<td>292</td>
<td>186</td>
<td>177%</td>
<td>0.09</td>
<td>0.25</td>
<td>A</td>
<td>B</td>
</tr>
</tbody>
</table>

Table showing increase in absolute flow between the minimum do-minimum scenario and Scenario 3, during weekday average AM peak hour (0700 - 1000)

These four roads feature in the top ten with highest increase in absolute flow between the do minimum (S1) and S3 during the weekday average AM peak hour (0700 – 1000) for the whole of the Tandridge Division. The peak hour of 0800 – 0900 will have greater delays within this timeframe.

The SCC report also stated that ‘due to the large increases in flow, all the top ten links are forecast to experience a deterioration in the level of service. Such large increases are likely to have an impact on the operation of local junctions, especially those in Smallfield, Oxted and Hurst Green’
6.14 Are there any matters which would mean that the site should not be considered to be deliverable or developable as per Footnotes 11 and 12 to the Framework?

6.15 – Are the proposed Modifications necessary for soundness?

**HSG02: Chapel Road, Smallfield**

6.16 In terms of flood risk, is the allocation of the site justified in respect of the Sequential Test and the Exception Test? Has it been demonstrated that a housing development at the site would be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere?

It is mandatory that TDC’s sequential flood test must be passed. An exception test is required for more vulnerable and essential infrastructure located in Flood Zone 3a and/or if highly vulnerable development is located in Flood Zone 2 or 3a. According to Tandridge District Council’s Exception Test; FZ 2 and 3 should be preserved as public green space with built development restricted to FZ1. As HSG02 is all FZ2 and 3 we do not consider the site suitable for development.

6.17 Are there any constraints which would mean the site should not be considered to be deliverable or developable as per footnotes 11 and 12 to the Framework?

Yes, as the site is at risk of flooding we do not consider it to meet Footnote 12

12 *To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.*

6.18 Are the proposed modifications necessary for soundness?

**HSG03: Land North of Plough Road**

6.20 What are the exceptional circumstances for the release of the site from the Green Belt?

To deliver a flood alleviation scheme that would help protect large areas of Smallfield once constructed

6.21 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the framework?

Meets a number of the objectives
6.22 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework? Would the requirement to explore opportunities for junction improvements at Plough Road/Redehall Road/Chapel Road/Wheelers Lane be effective and is it justified? Is it justified to seek a financial contribution to Plough Field Park Youth provision?

As per HSG01

6.23 Are there any matters which would mean that the site should not be considered to be deliverable or developable as per Footnotes 11 and 12 to the Framework

Don’t think so

6.24 Are the proposed Modifications necessary for soundness?

No comment

HSG04: Woodland Garage, Chapel road, Smallfield – I cannot find the site assessments for here at the moment!

6.25 In terms of flood risk, is the allocation of the site justified in respect of the Sequential Test and the Exception Test? Has it been demonstrated that a housing development at the site would be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere?

6.26 Are there any matters which would mean that the site should not be considered to be deliverable or developable as per Footnotes 11 and 12 to the Framework

6.27 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework?

6.28 Are the proposed Modifications necessary for soundness?