Examination – Note for Inspector

HSG02 TDC Rebuttal Comments on Turley Information on Flood Risk Issues – December 2019
1. This note sets out the Council’s position in relation to policy HSG02 and a previous Environment Agency Response to a Permitted Development proposal as touched upon at the Tandridge Local Plan Examination Hearings.

2. Our Local Plan 2033 sets out at policy HSG02 to allocate a brownfield site within the built up area boundary of Smallfield for residential uses. The site is currently a small employment site surrounded by residential development in the centre of the village and has been promoted as available for redevelopment for residential uses.

3. The site in question is acknowledged to be identified within a number of floodzones including Floodzone 3b where residential development should not occur owing to a high probability of flooding.

4. During 2018 a Prior Approval application was submitted under reference 2018/628/NC for Permitted Development conversion of part of the site from B1 offices to C3 Dwellings and the Environment Agency objected on the basis of floodzone 3b.

5. The Council recognises this objection, however, notes that this was in relation to a Permitted Development Scheme as opposed to a scheme put forward as a planning application. The prior being a relatively light touch to bring forward development proposals and the latter be subject to more detailed design work and scrutiny.
6. The Council has been very mindful of the floodzones in this location and has undertaken a flood risk sequential and exceptions test (WTR1 of the Examination Library) where it can be seen that this site was taken through the exceptions test.

7. Furthermore, the Council discussed those sites it had identified as needing to be taken through the Exceptions Test with the Environment Agency and discussed each site. At that time the Environment Agency confirmed that the default position would be to object to residential development in floodzone 3b, however, it was recognised that there are other factors that may merit the site to come forward. It was further discussed that there may be technical available solutions which could be addressed at planning application stage, for example but not limited to:

- Undercroft parking with residential above
- Upside down housing scheme which has been implemented elsewhere historically for example in Folkestone and Hythe
- Creation of refuge points to provide alternative means of escape

8. As such, taking into account all of the above and the fact that current uses of the site there exists some scope for an appropriately mitigated scheme to come forward at this location during the plan period.