



Quod

Planning Statement

Land west of Chapel
Road, Smallfield

DECEMBER 2023

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1 Introduction

- 1.1 This Planning Statement has been prepared by Quod on behalf of Rydon Homes Limited ('the Applicant') in support of an outline planning application ('Proposed Development') to Tandridge District Council ('TDC') for the redevelopment of Land West of Chapel Road, Smallfield ('the Site').
- 1.2 The Proposed Development is submitted as an outline application, with all matters reserved except access.

Description of Development

- 1.3 The description of the Proposed Development is as follows:

An outline for residential development (Use Class C3); private parking; landscaping and public open space; SUDs; and flood alleviation measures and land reserved for education use.

The Applicant

- 1.4 Rydon Homes Ltd is a well-established firm of house-builders, which has been building high quality housing, mainly in the Kent, Surrey and Sussex areas for 40 years. Its main office is in Forest Row, East Sussex. Rydon Homes is part of the Rydon Group, which comprises a range of property-based companies. In addition to constructing housing for the private market, the Group also has particular expertise through both its Homes and Construction companies in the provision of affordable housing. Further details are available on its website www.rydon.co.uk.

Scope of Planning Statement

- 1.5 This Planning Statement provides a detailed description of the Proposed Development and reviews the extent to which the proposals comply with the National Planning Policy Framework, local planning policy and other material considerations through a review of the relevant documents and guidance.
- 1.6 The remainder of this Planning Statement is structured as follows:
 - **Section 2 – The Site and its Context** details the Site and surrounding area and provides a summary of the relevant planning history;
 - **Section 3 – Consultation and Engagement** provides an overview of the consultation measures that have taken place in advance of the submission of the application;
 - **Section 4 – The Proposed Development** provides a summary of the proposals and the benefits the scheme will deliver;
 - **Section 5 – Planning Policy Overview** provides a review of the relevant planning policy, guidance and material considerations of pertinence to this application;

- **Section 6 – Planning Assessment** provides an assessment of the proposals against relevant planning policy, including the very special circumstances case; and
 - **Section 7 - Conclusion and Scheme Benefits** sets out a summary of the conclusions in relation to the application proposals along with the scheme benefits.
- 1.7 This Planning Statement should be read in conjunction with the application drawings and supporting documentation, which are listed within the covering letter submitted with the application but set out below.
- Arboricultural Implications Assessment, including Tree Constraints Plan and Tree Protection Plan; prepared by Broad Oak Tree Consultants
 - Affordable Housing Statement; *prepared by Tetlow King*
 - Biodiversity Net Gain Assessment; *prepared by Ecology Solutions*
 - Design and Access Statement; *prepared by Omega Architects*
 - Design Code; *prepared by Omega Architects*
 - Draft Construction Traffic Management Plan; *prepared by Velocity Transport Planning*
 - Energy Strategy; *prepared by Desco*
 - Environmental Statement; *prepared by Trium*
 - Flood Alleviation Scheme; *prepared by Stuart Michael Associates (SMA)*
 - Flood Risk Assessment and Drainage Strategy; *prepared by Stuart Michael Associates (SMA)*
 - Historic Environment Desk Based Assessment; *prepared by Orion*
 - Landscape Masterplan; *prepared by Liz Lake Associates*
 - Statement of Community Involvement; *prepared by ECF*
 - Sustainability Statement; *prepared by Desco*
 - Transport Assessment; *prepared by Velocity Transport Planning*
 - Travel Plan (Framework); *prepared by Velocity Transport Planning*
 - Utilities Report; *prepared by Stuart Michael Associates (SMA)*
 - Plans; *prepared by Omega Architects*
 - Access and Movement Parameter Plan
 - Building Heights Parameter Plan
 - Density Parameter Plan
 - Green Parameter Infrastructure Plan
 - Illustrative Masterplan
 - Illustrative Masterplan (including Land for education)
 - Land Use Parameter Plan
 - Levels Parameter Plan
 - Site Location Plan

- Zone Boundary Parameter Plan

2 The Site and its Context

2.1 This section provides an overview of the Site and the surrounding area.

The Site

- 2.2 The land to the west of Chapel Road extends to c.15 hectares and is currently used for arable farming. It is one of the few sites in Smallfield located within flood zone 1. The land has an existing access off Chapel Road, overhead power lines cross the northern section of the land running NE-SW and there is a World War II Pillbox in the far north western corner of the field.
- 2.3 To the north west of the Site is Smallfield Raceway Track (listed on its web site as a stock car racing dirt track in Surrey), and a number of small industrial units. There are some residential properties to the north east and agricultural land is directly to the north of the tree belt which marks the land boundary.
- 2.4 Chapel Road forms the eastern boundary of the site and there is a ribbon of residential properties opposite the site. To the south is Careys Wood, a residential road. Residential use also extends round to the south west of the Parcel, with agricultural land to the west.
- 2.5 The land is designated as Green Belt in the Tandridge Core Strategy (2008). Whilst located beyond the built area of Smallfield, it is contained by urbanising features which limit its openness. There are no other designations or protections applicable to the Site. The Site is shown below at Figure 1.



Figure 1 Site Location Plan

Surrounding Context

- 2.6 To the east of the Site is Chapel Road, which is lined with residential development properties and leads south into Smallfield. To the south of the site is Careys Wood, a residential road. Residential use also extends round to the south west, with agricultural land further west towards the M23.
- 2.7 To the north west is Smallfield Raceway and a number of small industrial units. There are some residential properties to the north east. There is agricultural land directly to the north of the tree belt which marks the northern and north eastern boundary of the site.
- 2.8 As shown in Figure 2, the Site (indicatively shown with a red rectangle) is not within a conservation area and does not include any heritage assets. In the surrounding area are four heritage assets:
- Manor Cottage, a Grade II Listed Building is located on Chapel Road, to the south east of the Site;
 - Twyners Croft, a Grade II Listed Building is located to the south west of the Site, on Hathersham Close; and
 - Burstow Lodge, a Grade II* Listed Building, and a Barn to the south west of Burstow Lodge, a Grade II Listed Building are located to the north west of the Site.

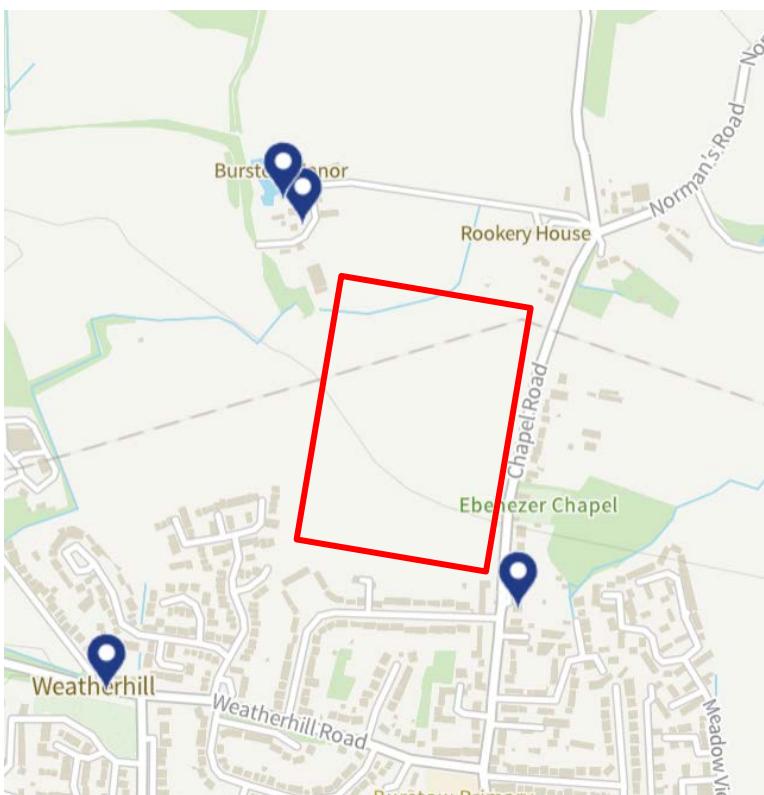


Figure 2 - Heritage Assets with indicative Site boundary

Access

- 2.9 Currently, access to the Site can be taken from a gate onto Chapel Road, towards the northern edge of the eastern boundary of the Site.
- 2.10 Adjacent to the Site on Chapel Road are two bus stops. The bus stops are served by bus services 315 and 612. These offer services into Reigate, Oxted, Earlswood and Dormansland.
- 2.11 The existing access point (orange) to the Site and the two bus stops (blue) are shown on Figure 2 below.

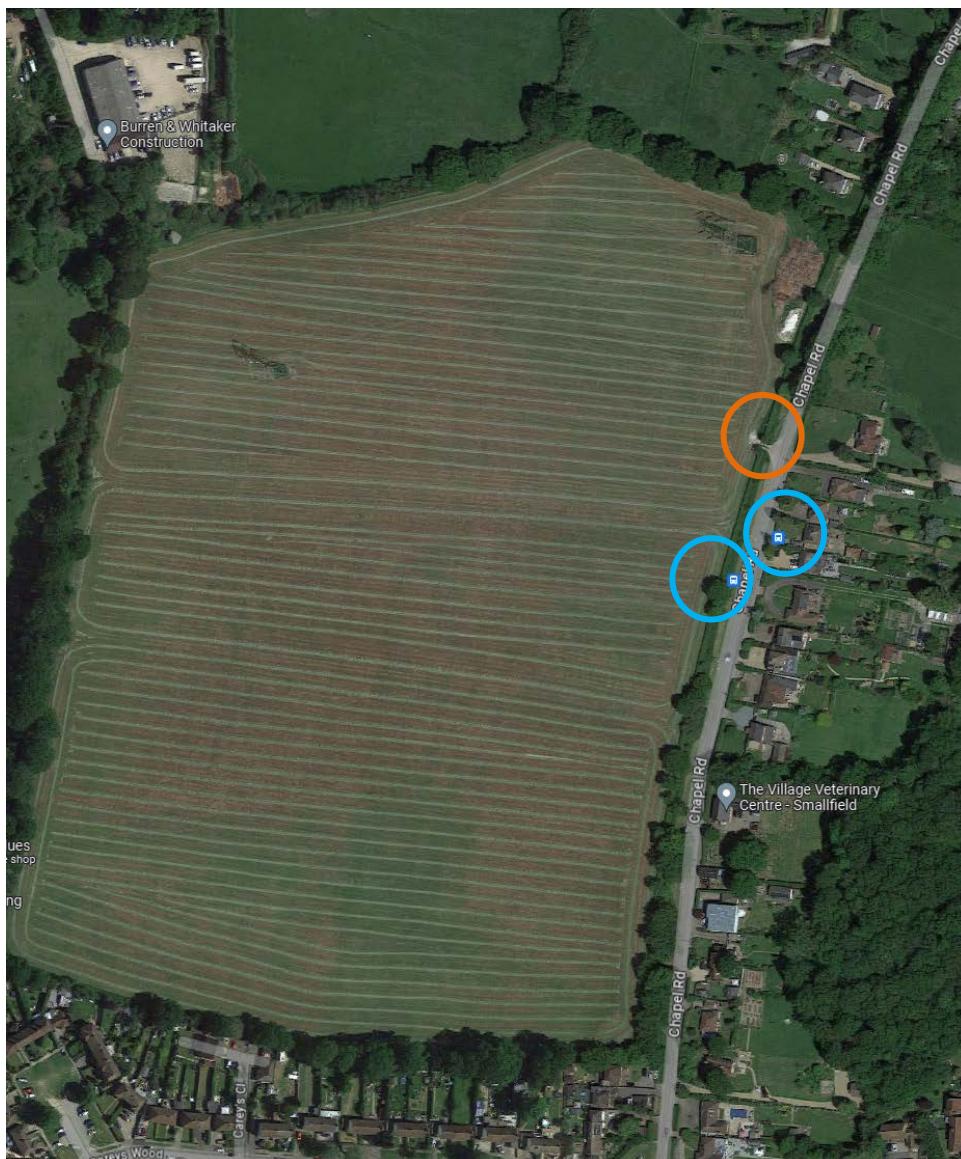


Figure 2 – Existing Access point and bus stops along Chapel Road

Planning History

2.12 There is no recent relevant planning history applicable to the Site.

Relationship of the Proposed Development with Burstow Primary School

2.13 The current Burstow Primary School is located approximately 400m to the south of the Site, off Wheelers Lane. The Primary School site faces a number of significant issues:

- It is in the flood plain and in major storm conditions has been flooded resulting in sewage spilling out onto the playground and children's toilets backing up.
- It is close to a notoriously difficult staggered crossroads in the centre of Smallfield and as recently as 2022 a driver misjudged the junction and landed their car in the school playground. (Thankfully out of term time).
- The buildings are in poor condition. They are difficult to heat, difficult to cool and some of them have asbestos. A conditions survey has been carried out by the Applicant.
- The primary school is separated across three locations. The school buildings being off Wheelers Lane, the swimming pool on a site also off Wheelers Lane but separated from the main site by a public footpath and the playing fields being off Redehall Road. The journey from the school to its playing fields is difficult as they are located across a main road and via a narrow pavement south of the main site. There are no toilet facilities with the playing fields and they also suffer from poor drainage. The combination of the above means that children from Year 2 up are able to use the field and only in the summer term.

2.14 These factors are recognised in the Tandridge Infrastructure Delivery Plan (IDP) 2019 which identifies the school as needing major investment/replacement. The IDP (2019) sets out that this is a desirable priority, and the infrastructure support would be via the Local Plan. However, the Local Plan (the status of which is set out in Section 5 of this Planning Statement) did not offer a solution for the growth of re-provision of Burstow Primary School. The expansion on their existing sites, do not make any logical sense and would compound the existing issues faced by the school. The full details of which are set out in the School Use Condition Statement Survey at Appendix 1

2.15 The Applicant began discussions with the Governors and the Head of Burstow Primary School in 2021. The purpose was to find a way to deliver new school alongside housing on the Chapel Road site.

2.16 Detailed discussions took place throughout 2022. The Applicant employed specialist school architects and they engaged extensively with the school team (Head and Governors) over the detailed design of a replacement school and legal documents were drafted. There were also discussions with Surrey County Council's Education Place Planning Team regarding the proposals.

2.17 An indicative school layout was prepared by Miller Bourne. This demonstrates how a 3 form entry primary school could be accommodated on Site. This is shown below in Figure 3.



Figure 3 Indicative School Layout

2.18 Pre-application consultation with Tandridge District Council, Surrey County Council, stakeholders and the local community began in 2022 on a development strategy involving a hybrid application across three sites in Smallfield. The emerging proposals comprised the following:

- On land west of Chapel Road - The erection of up to 300 new residential units, a new landscaped publicly accessible area to the north of the site in outline and a full application for a replacement 2FE primary school, nursery school, playing fields to replace the Redehall Road playing fields, replacement school swimming pool to the south of the site plus associated parking, access, landscaping and other works.
- On the existing Burstow Primary School site (Wheelers Lane) – The Redevelopment of existing school site to provide a new access, highways improvement measures, a new area of publicly accessible open space in the centre of Smallfield with flood alleviation measures, a new area of public car-parking and commercial floorspace with residential accommodation above.
- On the Redehall Road Playing Fields - Redevelopment of existing school playing field site to provide accommodation for older people plus associated access, parking and landscaping.

2.19 However, in summer 2022 the Head left Burstow School, and the Chair of Governors changed. The new Chair of Governors understandably wanted time to review the plans for herself. However, she has since informed the applicant that the school is not ready to proceed, and they have no clear timetable as to when they will want to resume discussions.

2.20 Without the Wheelers Lane and Redehall Road sites the wider strategy including the construction of the new school cannot be delivered. Accordingly, the Applicant cannot promote a planning application at this stage to include a replacement school. Nonetheless, as explained below, the present application will enable the future relocation of the school should such a proposal be supported in the future.

3 Pre-Application and Engagement

- 3.1 This section of the statement provides a summary of the pre-application engagement undertaken to date.

Engagement with Tandridge District Council Officers and Stakeholders

- 3.2 A series of pre-application meetings were held between the applicant team and the pre-application officer at Tandridge District Council between February 2022 and May 2022.
- 3.3 At this time the Applicants were close to concluding land agreements with the Governors of Burstow primary school and a three-site strategy was being pursued. This strategy included the application site (Chapel Road site), the existing Burstow Primary school on Wheelers Land and the school playing fields site further south of the village off Redehall Road. In summary the proposals in 2022 were for:
- New open space, residential development, and the delivery of a new 2FE primary school with associated playing fields on the Chapel Road site,
 - The redevelopment of the existing school site with a village green and a scheme designed to cope with the flood zone status of this location,
 - An extra care residential scheme on the playing fields,
 - Flood alleviation measures providing benefits beyond the sites, and
 - Highway safety improvements
- 3.4 This linked-sites strategy was based on extensive discussions with the Governors and the Head of Burstow primary school in the centre of Smallfield. However, in July 2022 there was a change in both Governors and the Head. The acting Chair of Governors wrote to Rydon Homes in May 2023 advising that the Governors are not ready at the moment to sign the drafted agreements for the land exchanges necessary to deliver the linked-sites strategy.
- 3.5 Since 2022 the case officer, the head of development management and the head of planning at Tandridge have all ceased their employment at the Council. There has been no new engagement with TDC in 2023.
- 3.6 A full schedule of engagement and meetings which took place in 2021 and 2022 is included at Appendix 2 of this statement. This engagement was based on the linked-sites strategy. It established the base line for a number of the studies and a working understanding of the officer's priorities for Smallfield. Engagement with Surrey County Council in respect of Educational needs, Highways and Flood Alleviation measures is ongoing in respect of these application proposals.
- 3.7 Rydon Homes are obliged to submit an application through their agreement with the landowners of the site. These proposals have been adapted to enable the re-provision of Burstow Primary School in the future, through the offer of land sufficient for a new 2FE school with associated playing fields.

Engagement with the Local Community

- 3.8 The applicant team kept the local MP, the local ward councillors, leader of TDC, SCC Councillor and the parish council informed by writing to them about the proposals and inviting them to meetings and the engagement events. The applicant team presented to the Parish council in February 2022 and 28 June 2022. However, neither the MP, local ward Councillors or Leader of TDC responded to an invite for a meeting or further information despite four offers.
- 3.9 To engage with the local community directly, public exhibition events were held on 3rd and 5th March 2022 and on 14th and 16th July 2022. These events were well attended, and a report of the views received are set out in the Statement of Community Involvement. Unsurprisingly there were objections to the proposed introduction of new housing onto green belt land in Smallfield and the impact on the local area. However, the applicant team were also struck by how much of the feedback from local residents was focussed on road safety, their concerns over heavy goods vehicles (from local quarries) ‘thundering through their village’. There were also comments about the parking issues in the centre of the village at school drop off and collection times.
- 3.10 Indicative layout proposals for the Chapel Road site were developed in response to helpful sessions with independent experts from Design South East in June and August 2022. The indicative layouts coming out of the June workshop were shared with the local community at the July 2022 public exhibitions.

Engagement with Design South East

- 3.11 In June 2022, the Applicant arranged for an independent design review of the proposals with Design South East (DSE). The DSE Panel and the Design Team undertook a site visit followed by a workshop to discuss the proposals. A framework of ideas was presented relating to the three-site strategy forming the basis of a constructive discussion with the Panel. A feedback report of the Panel meeting provided the following areas for consideration:
 - Improvements to permeability and connections
 - Consideration of the functionality of open space and play space
 - Review relationship of houses with the pylons
 - Ensure the green corridor leads to somewhere
 - Create a green corridor along the boundary with the land for education
 - Create a more formal grid pattern to the framework plan
 - Consider opportunity parking within the street network outside of the land for education.
- 3.12 The Design Team took the helpful comments from DSE on board and made a series of amendments to the proposals.
- 3.13 A second design review took place in August 2022 to discuss more detailed worked and the amendments made. Revised framework plan options were produced and discussed at the meeting.

3.14 A review of the framework plan alignment was presented, showing a direct green route from the open space in the north to the land for education in the south. A green corridor also was presented east-west along the northern edge of the land for education. The framework plan followed a stronger grid pattern, aligning access points from Chapel Road with housing typologies to fit within a hierarchy of streets. Further details are set out in Section 3 of the Design and Access Statement.

4 The Proposed Development

4.1 This Section of the Planning Statement provides an overview of the proposals at the Site.

Description of Development

4.2 Outline planning permission, with all matters reserved except access is sought, for the following:

An outline for residential development (Use Class C3); private parking; landscaping and public open space; SUDs; and flood alleviation measures and land reserved for education use.

4.3 The following section provides an overview of the Proposed Development with a detailed description of the Proposed Development provided in the accompanying Environmental Statement and Design and Access Statement.

Proposed Development

4.4 The Proposed Development comprises:

- 270 residential dwellings;
- 40% affordable housing;
- 4.95ha of publicly accessible open space;
- 36.24% Biodiversity Net Gain for onsite habitat;
- Two new vehicular access points directly from Chapel Road;
- Sustainable Drainage System (SuDS) comprising attenuation basins and swales;
- Flood Alleviation Scheme; and
- 2.86ha of land secured for future education use.

Parameter Plans

4.5 The following parameter plans are submitted.

- Zone Boundary Parameter Plan
- Land Use Parameter Plan
- Access and Movement Parameter Plan
- Building Heights Parameter Plan
- Levels Parameter Plan
- Green Parameter Infrastructure Plan
- Density Parameter Plan

4.6 An illustrative masterplan (Figure 3) is also included in the Design and Access Statement.



Figure 4 Illustrative Masterplan

Residential development

- 4.7 The Proposed Development involves residential development of 7.19 hectares, accessed directly from Chapel Road via two entrance points. The Development comprises 270 residential dwellings.
- 4.8 The site will comprise a mix of market and affordable homes, flats and houses, and a mix of sizes. Each dwelling will have designated parking along with opportunity parking throughout the development for visitors and deliveries.

Safeguarded land for education

- 4.9 A school site of approximately 2.86ha of land is proposed to be safeguarded for future educational use. This will be suitable for a 2-form entry primary school with potential to expand

to a 3FE school. The Illustrative Masterplan demonstrates how a school and associated playing fields could be potentially accommodated on Site.

- 4.10 We understand that there is no planned investment for Burstow Primary School. The condition of its buildings remains poor and it still needs to move from their current location. However, they are unable to confirm a timescale for any such relocation.
- 4.11 The south western attenuation basin is sized so as to accommodate a large amount of surface water run off from the school and playing field. It is located outside of the land safeguarded for education so that land within the school boundary is maximised, and that health and safety issues for students are minimised.

Flood Alleviation

- 4.12 A comprehensive surface water drainage strategy is proposed for the scheme, consisting of a series of detention basins. These will capture and attenuate runoff from the Site with a controlled outfall into watercourses near the western boundary. This outfall will be at a lower rate than the existing greenfield runoff rate.
- 4.13 A series of detention basins are proposed to the west of the residential development. It is proposed to discharge waterflow through the land west of the site, towards Hathersham Stream, at a rate of 4.0l/s/ha which is lower than the Greenfield runoff rate. It is proposed to provide bioretention and swales adjacent to access roads to attenuate runoff towards the basins at the west of the site. It is also proposed to provide porous paving where possible within the residential development.
- 4.14 The Site presents an opportunity to provide flood alleviation storage. Flood alleviation basins are also in the north of the Site which will divert runoff from the Weatherhill Stream catchment as well as provide flood alleviation storage. A peak flood flow rate in excess of 130l/s could be removed from entering the Weatherhill Stream catchment, water that will otherwise flow down Chapel Road. These basins will be sculpted as part of the landscaping proposals and will provide up to 12,000m³ of flood alleviation storage, to provide significant protection for Smallfield from surface water flooding events.
- 4.15 The Proposed Development would not increase the risk of flooding within the Site or elsewhere, and indeed will lead to a reduction in flooding in Smallfield.
- 4.16 Overall, with the proposed SuDS and flood alleviation proposals, there will be a significant benefit with a reduction flood risk within the village centre.

Highways and Access

- 4.17 The proposals include a significant range of measures to reduce traffic speeds on Chapel Road and to prioritise pedestrian safety. The proposed off-site highway works include the following:
 - A number of proposed raised tables along Chapel Road;

- A reduction in the speed limit to 20mph on Chapel Road, linking to the existing 20mph speed limit to the south, making the full length of Chapel Road and Redehall Road down to 20mph within the village centre;
 - A 2m footway on the western side of Chapel Road linking from the two proposed priority junction access points towards the village centre of Smallfield;
 - Upgrades to the existing footways on the western side of Chapel Road;
 - A proposed zebra crossing outside the land safeguarded for education use;
 - Resurfacing improvements to the Chapel Road/ Weatherhill Road mini roundabout; and
 - A new zebra crossing on the western arm of the Chapel Road/ Weatherhill Road junction.
- 4.18 Two new priority vehicular access junctions are proposed from Chapel Road in addition to a new pedestrian access via Chapel Road and the bridlepath adjacent to west of Chapel Road site.
- 4.19 Future access to the school would be able to utilise the new vehicular access points off Chapel Road. The draft location and layout for the school, worked up with the Governors, Head and with Surrey CC in 2022, was designed to encourage sustainable travel to school. The layout does not provide a drop off parking area. Parents and carers who insist on driving would be able to park within the new development. Measures were proposed to prevent parking on Chapel Road.
- 4.20 These measures have been designed to address the highway safety issues raised with the applicant team at the public exhibitions in 2022 and in other correspondence. The introduction of new robust raised tables are designed to slow all traffic including the heavy vehicles that have worn down other calming measures over the years.

Public Realm, Landscaping and Open Space

- 4.21 The Site provides a significant increase in publicly accessible open space for Smallfield. The proposed development includes a large area of open space (c.4.95ha) to the north of the Site, as well as landscaping and flood mitigation measures along the western boundary.

Parking

- 4.22 Each dwelling will have designated parking along with opportunity parking throughout the development for visitors and deliveries.
- 4.23 Car parking for the proposed development will be provided in accordance with the SCC ‘Vehicular, Cycle and Electric Vehicle Parking Guidance for New Development’ (2023) requirements for a ‘Suburban edge, Village and Rural’ location. The standards state the following maximum standards:

- 1 and 2 bed flats - 1 space per unit;
- 1 and 2 bed houses - 1.5 spaces per unit; and
- 3 and 4+ bed houses - 2+ spaces per unit.

4.24 Details on car parking will be secured by way of condition and provided as part of the future Reserved Matters application.

Housing Mix and Typology

4.25 The Site will comprise a mix of market and affordable homes, flats and houses, and a mix of sizes.

4.26 The Design and Access Statement includes an indicative dwelling mix which is in line with policy requirements. The indicative mix is as follows:

- 1 and 2 bed apartments – 61 dwellings
- 2 bed houses – 62 dwellings
- 3 bed houses – 96 dwellings
- 4 bed houses – 51 dwellings.

4.27 The Illustrative masterplan provides 40% of the new homes as affordable tenure, equating to 108 dwellings.

4.28 Affordable rent accounts for 75% of the total affordable provision and the 25% intermediate component is to be provided as First Homes which reflects the Tandridge Housing Strategy 2019-2023 and supersedes the development plan in terms of tenure split.

Biodiversity Net Gain

4.29 The Site itself is of low ecological value. A series of ecological enhancements in the form of proposed habitats are included in the illustrative masterplan. This includes trees, hedgerows, grassland and a proposed ditch. Together, significant net gain in biodiversity can be achieved, to the order of 36.24%.

Public Footpaths

4.30 Two additional points of entry for cyclists and pedestrians will be introduced to the existing public footpath which forms the western boundary of the Site. Access is proposed in the north western corner of the Site, providing access to the north of the Site, which is proposed as a large area of open space. In the south western corner of the Site, another access point from the footpath is proposed which will provide an alternative route for residents to walk to the centre of Smallfield, in addition to the main Chapel Road, and will also provide easy access for existing Smallfield residents to the future school.

5 Planning Policy Context

- 5.1 This Section of the Planning Statement provides an overview of the planning policy relevant to the Site.
- 5.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise.

Development Plan

- 5.3 The Development Plan for the Proposed Development comprises:
 - Tandridge Core Strategy (2008); and
 - Local Plan Part 2 Detailed Policies (2014).
- 5.4 The following documents are also of relevance to the application:
 - The National Planning Policy Framework ('NPPF') (2023) and Planning Practice Guidance ('PPG') (2014 with subsequent updates);
 - Supplementary planning documents ('SPDs'): Parking Standards (2012) and Trees and Soft Landscaping (2017); and
 - The CIL Charging Schedule (2014).
- 5.5 The Tandridge Local Plan 2033 ('Our Local Plan') was submitted for independent examination in January 2019. Hearings concluded in November 2019. Since that time, there has been extensive correspondence between the Inspector and TDC. The most recent letter, dated 10 August 2023, confirmed the Inspectors intention to recommend that the Plan is unsound in his forthcoming report of the examination. TDC have agreed that they wish for the Inspector to issue his final report, rather than withdraw the Local Plan. The date for publication of the Inspector's Report is unknown at this time, but any draft policies proposed within the Local Plan 2033 now carry extremely limited weight.
- 5.6 The Emerging Burstow Neighbourhood Development Plan Regulation 14 Consultation took place in February and March 2023. The Applicant submitted extensive comments to the consultation, highlighting the inadequacies of the Neighbourhood Plan as drafted. The draft plan had not been positively prepared and in places it read as no more than a vehicle for objection to proposals in the parish. The document lacks technical analysis in both the assessment of existing issues in the area and the potential impacts of future development. The lack of substantive evidence to corroborate the points raised, as well as the admission that many of the decisions are based on subjective assessment, means the document lacks credibility. There is no publicly available information to suggest that any further work has been undertaken on the Neighbourhood Plan. Given their status the Proposed Development has not been assessed against the Neighbourhood Plan 'draft policies'.

Tandridge District Core Strategy (adopted 2008)

- 5.7 The Core Strategy was adopted in October 2008 and sets out the key planning policies for the District. Relevant policies are summarised below.
- 5.8 **Policy CSP1: Location of Development** states that there will be no change in the Green Belt boundaries, unless it is not possible to find sufficient land within the existing built up areas and other settlements to deliver current and future housing allocations. The policy identifies Smallfield as a Larger Rural Settlement (Category 2).
- 5.9 **Policy CSP 2: Housing Provision** seeks to deliver a sufficient supply of homes that meet the needs of all sections of the community by making the best use of previously developed land. It makes provision for 2,500 dwellings over the period 2006 to 2026 (125 dwellings per annum).
- 5.10 **Policy CSP4: Affordable Housing** indicates that the Council will require development to deliver up to 34% affordable housing.
- 5.11 **Policy CSP7: Housing Balance** requires housing development of 5 units and above to contain an appropriate mix of dwelling sizes. The Council will encourage the provision of housing for the elderly and for people with special needs where appropriate.
- 5.12 **Policy CSP11: Infrastructure and Services** states that the Council will have regard to cumulative impact of development when assessing infrastructure and service requirements. Developers will be required to contribute to improvements necessary to support the proposed development.
- 5.13 **Policy CSP12: Managing Travel Demand** requires new development to, where appropriate, make improvements to the existing infrastructure network.
- 5.14 **Policy CSP13: Community, Sport and Recreation Facilities and Services** encourages dual use of community and sports facilities. Residential development may be required to include appropriate open space, play areas or other accessible green space. The standard of 1.27ha of play space per 1000 population to development will apply.
- 5.15 **Policy CSP14: Sustainable Construction** requires residential development of 10 units or more to reach a minimum saving in carbon dioxide emissions of 20%, through the provision of renewable energy technologies.
- 5.16 **Policy CSP15: Environmental Quality** promotes high quality, flexible and safe living environments which minimise the impact on natural resources. This includes through meeting Secured by Design standards, requiring the use of Sustainable Drainage Systems, encouraging the provision of Lifetime Homes and utilising innovative construction methods and recycling opportunities.
- 5.17 **Policy CSP17: Biodiversity** indicates that proposals should protect biodiversity and provide for the maintenance, enhancement, restoration and, if possible, expansion of biodiversity, by aiming to restore or create suitable semi-natural habitats and ecological networks.

5.18 **Policy CSP18: Character and Design** requires new development to be of a high standard of design which reflects and respects the character, setting and local context.

5.19 **Policy CSP19: Density** sets out density parameters for new development whereby for Smallfield, development is to be within the range of 30 to 40 dwellings per hectare.

The Tandridge Local Plan Part 2: Detailed Policies 2014-2029 (adopted July 2014)

5.20 The Tandridge Local Plan Part 2 was adopted in July 2014 and supports the implementation of the Core Strategy. Relevant policies are outlined below.

5.21 **Policy DP1: Sustainable Development** states that when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.

5.22 **Policy DP5: Highway Safety and Design** indicates that development will be permitted where it complies with the relevant Highway Authority's and any other highways design guidance and provides safe and suitable access to the site which is achievable by all and promotes access by public transport, foot and bicycle.

5.23 **Policy DP7: General Policy for New Development** sets out that all new development will be expected to be of a high quality design and integrate effectively with its surroundings, reinforcing local distinctiveness and landscape character.

5.24 **Policy DP10: Green Belt** states proposals involving inappropriate development in the Green Belt will only be permitted where very special circumstances exist, to the extent that other considerations clearly outweigh any potential harm to the Green Belt by reason of inappropriateness and any other harm.

5.25 **Policy DP11: Development in Larger Rural Settlements** states that development in Smallfield will be permitted where:

“1. Infilling within an existing substantially developed frontage. Infilling does not include the inappropriate subdivision of existing curtilages to a size below that prevailing in the area;

2. The partial or complete redevelopment of previously developed land, even if this goes beyond the strict definition of infilling;

3. The development of sites within the settlement boundaries following allocation for affordable housing;

4. Extensions or alterations to buildings and the erection of new ancillary domestic buildings within the curtilage of a dwelling;

5. Development that provides new, or assists in the retention of, community facilities.”

5.26 **Policy DP19: Biodiversity, Geological Conservation & Green Infrastructure** seeks to protect, enhance or increase the provision of and access to the network of green infrastructure.

5.27 **Policy DP21: Sustainable Water Management** states that proposals should seek to secure opportunities to reduce both the cause and impact of flooding.

National Planning Policy Framework ('NPPF') (2023)

5.28 The NPPF is a material consideration in the appraisal of planning applications. It sets out the Government's planning policies for England and how these are expected to be applied. It is underpinned by a presumption in favour of sustainable development, which is embodied within **Paragraph 11** which states that decisions should apply a presumption in favour of sustainable development and for decision taking this means:

- "c) approving development proposals that accord with an up-to-date development plan without delay; or*
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:*
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁷; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole".*

5.29 **Footnote 7** of Paragraph 11 includes the Green Belt as a protected area. **Footnote 8** states that *"This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 74); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years"*. This is clear that where there are no relevant development plan policies, or where the relevant policies are out of date, applications should be approved, unless the application of policies in the NPPF provide a clear reason for refusal or any adverse impacts would significantly and demonstrably outweigh the benefits when assessed as a whole.

5.30 **Chapter 2** of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, with the three dimensions to sustainable development being economic, social and environmental.

5.31 **Chapter 5** of the NPPF is clear that on the Government's objective of significantly boosting the supply of homes and ensuring that the needs of groups with specific housing requirements are addressed. Paragraph 74 requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide at least five years' worth of housing, against their housing need.

5.32 **Chapter 8** provides guidance on policy and decision making in order to achieve healthy, inclusive and safer communities. Paragraph 95 makes it clear that it is important that a sufficient choice of school places are available to meet the needs of existing and new communities, and that great weight should be given to the need to create, expand or alter

schools and work with promoters to identify and resolve planning issues before applications are submitted.

- 5.33 **Chapter 11** of the NPPF promotes the effective use of land in meeting the need for homes and other uses.
- 5.34 **Chapter 12** accentuates the importance of design in creating high quality, beautiful and sustainable places.
- 5.35 **Chapter 13** of the NPPF acknowledges the importance attached to Green Belts, restating the fundamental aim of Green Belt policy and setting out the five purposes that it serves. Paragraphs 147 and 148 set out the approach to be taken in respect of proposals for development in the green belt.
- 5.36 **Chapter 14** deals with the challenges of climate change and flood risk. It promotes a sequential test approach and guides new development to areas of the lowest flood risk (paragraph 162).
- 5.37 **Chapter 15** relates to the enhancement of the natural environment and is relevant to the proposals particularly in relation to providing biodiversity net gain.

Policy Summary

- 5.38 The above policy context confirms that there are two areas of focus in the consideration of the application; firstly that development in the Green Belt will be permitted if very special circumstances can be demonstrated; and secondly that TDC's current development plan and policies relating to housing are out of date and therefore, the tilted balance is engaged, as per paragraph 11(d) of the NPPF 2023.

6 Planning Assessment

- 6.1 This section of the Planning Statement sets out the assessment of the Proposed Development against the planning policy context. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise.
- 6.2 The principle planning considerations relevant to assessing the acceptability of the Proposed Development include:
- Principle of development;
 - Very special circumstances;
 - Design; and
 - Transport and access.

Principle of development

Policy Context

- 6.3 There are two separate elements to consider in relation to the principle of development: the principle of tilted balance and the principle of development in the Green Belt.
- 6.4 The Site is located outside, but immediately adjacent to, the defined settlement boundary of Smallfield which is identified by TDC as a tier two settlement. The site is designated as Green Belt land. Tandridge District has the highest proportion of Green Belt land of any local authority in the country, at 94%.
- 6.5 The fundamental aim of Green Belt policy is set out in paragraph 137 of the NPPF (September 2023). In summary it's primary function is to prevent urban sprawl by keeping land permanently open.
- 6.6 The five purposes of the Green Belt are detailed at paragraph 138 in the NPPF:
- "a) to check the unrestricted sprawl of large built-up areas;*
 - b) to prevent neighbouring towns merging into one another;*
 - c) to assist in safeguarding the countryside from encroachment;*
 - d) to preserve the setting and special character of historic towns; and*
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land".*
- 6.7 At a local level, the approach towards development in the Green Belt is articulated by:

- Core Strategy **Policy CSP1** (Location of Development) which states that there will be no change in the Green Belt boundaries, unless it is not possible to find sufficient land within the existing built up areas and other settlements to deliver current and future housing allocations, and;
 - Local Plan **Policy DP10** (Green Belt) which indicates that inappropriate development in the Green Belt will only be permitted where very special circumstances exist.
- 6.8 The NPPF states at paragraph 11, that when determining an application, planning policies are to be considered out of date when the application involves the provision of housing and the local planning authority cannot demonstrate a five year supply of deliverable housing sites, or where the Housing Delivery Test was less than 75% of the housing requirement over the previous three years.
- 6.9 TDC fails on both of these counts, with further detail set out below. The clear and prevalent failure leaves no doubt that the presumption in favour of sustainable development applies.

Tilted Balance

- 6.10 There is an acknowledged and severe unmet need for housing within Tandridge. The Council is plainly unable to demonstrate a five year housing land supply against its local housing need (as per paragraph 74 of the NPPF). The most recent appeal decision (at the time of writing) relating residential development in Tandridge confirms this¹. The Inspector confirmed in his report at paragraph 84 that the Council cannot demonstrate a five year housing land supply, with supply at just 1.54 years. Given that the emerging Local Plan is shortly to be recommended as ‘unsound’, the likelihood of the housing land supply position being rectified is even slimmer. Another recent appeal decision² was helpful in the consideration of the development plan policies. The Inspector that appeal concluded at paragraph 48 that “*by virtue of the shortfall in housing land supply, the development plan policies which are most important for determining the application are deemed to be out of date. As a result, the development falls to be considered against Framework paragraph 11, which articulates a presumption in favour of sustainable development*”. This conclusion is of the utmost importance in the consideration of the Proposed Development, and it is reasonable to assume that the presumption in favour of sustainable development would also apply here.
- 6.11 In the Housing Delivery Test 2021 measurement published 14th January 2022³, Tandridge has been identified as a ‘presumption authority’ by the Department for Levelling Up, Housing and Communities (DLUHC). The Housing Delivery Test results published in January 2022 show that Tandridge delivered only 38% of its housing target in the years 2018 to 2021. As a consequence, Paragraph 11d of the NPPF is applied which states that:

“where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

¹ APP/M3645/W/23/3319149

² APP/M3645/W/22/3309334

³ Note that as at November 2023, these are the latest HDT results.

- i. *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*
- 6.12 Due to the Tandridge Local Plan having been adopted more than five years ago, the Council must use the standardised methodology to determine their housing need. The Council's housing need is 644 homes per annum as per the MHCLG Housing Projections 2014. Given the significant under delivery against the housing need over recent years, it is appropriate for a 20% buffer to be applied. As referenced above, the most recent appeal decision relating to housing confirmed a land supply of just 1.54 years. Therefore, the Council are not able to demonstrate a five year housing land supply and this is cited in the Tandridge Authority Monitoring Report (2021).
- 6.13 The test to determine whether policies are out of date has been met and therefore, subject to being able to demonstrate very special circumstances which outweigh the adverse impacts, planning permission should be granted.

Development in the Green Belt

A Green Belt Review (Applicant GBR) has been undertaken to support this outline planning application and is included as Appendix 3 to this Planning Statement. To support the preparation of the draft Local Plan, Tandridge undertook a three stage Green Belt Assessment (Tandridge GBA) and our GBR provides a critique of that.

- 6.14 The first part of the Tandridge GBA considered to what extent broad areas of land served the five Green Belt purposes. This broad assessment at a District wide scale is useful for background context, but it has limited use at a Site level and is therefore not relied upon for the consideration of the Site. Stage 2 followed the District wide assessment of the Tandridge GBA and considered local level parcels, with the Site being located within parcel GBA038. A summary of the assessment with our commentary in *blue italics* is set out below.

Table 1 Summary of Tandridge Green Belt Assessment

Purpose	Assessment
To check unrestricted sprawl of large built-up areas	<p>The parcel was found not to serve purpose 1, as built form has not been contained within the boundaries of the inset settlement of Smallfield, and therefore sprawl has occurred.</p> <p><i>However, the assessment failed to recognise the ribbon development extending north from the village along Chapel Road, and instead focuses only on the ribbon development which has spread southwards. Had the northern spread been considered, it is unlikely that the conclusion would have changed and the parcel would still not serve purpose 1.</i></p>

To prevent neighbouring towns merging into one another.	The parcel was found to play a minor role in serving this purpose as it prevents Smallfield and Outwood merging. However, the distance between these two settlements is such that it is highly unlikely they would merge. <i>However, the GBA wrongly assessed the separation between an inset village (Smallfield) with a washed over village (Outwood) as opposed to the correct consideration of two neighbouring towns, as per the NPPF. Therefore, the conclusion should in fact be that the land plays no role in prevention of merging of neighbouring towns.</i>
To assist in safeguarding the countryside from encroachment	The assessment found that whilst there is considerable countryside in the parcel, there are large concentrations of development.
To preserve the setting and special character of historic towns	The assessment only considered the significance of Outwood Conservation Area and found that the Green Belt helps to preserve its setting and special character. <i>However, whilst it is acknowledged that Outwood has a conservation area, it is a village settlement and not a town.</i>
To assist in urban regeneration by encouraging the recycling of derelict and other urban land.	This was not considered applicable to the GBA Part 1 as it can only be assessed on a case by case basis.

- 6.15 A summary of the Tandridge GBA of parcel GBA038 is provided below, alongside the Applicant GBR summary. It demonstrates that the Council have overstated the contribution of the parcel to the purpose of the Green Belt when in fact, parcel GBA038 makes a weak contribution to the Green Belt purposes.

Table 2 Summary of parcel GBA038

	Council Assessment	LLA Assessment
Purpose 1	No Contribution	No Contribution
Purpose 2	Minor	No Contribution
Purpose 3	Partial	Partial
Purpose 4	Strong	No Contribution
Purpose 5	Not Assessed	Not Assessed

- 6.16 The Tandridge GBA Part 1 concluded that some of the parcel was identified as an area for further investigation to understand its importance further. The Site itself however did not form part of the further investigation.

6.17 The Applicant GBR provides an assessment of the Site against the five Green Belt purposes and the results summarised below and also set out in the Liz Lake report submitted with this application.

Purpose	Assessment
To check unrestricted sprawl of large built-up areas	<p>It is of primary importance when considering this purpose to be clear on the meaning of a large built up area. Smallfield is designated as a Tier 2 settlement in the TDC Settlement Hierarchy. At a recent appeal⁴, the Inspector found that given the site in the case was on the edge of a Tier 2 Settlement, that settlement did not therefore form the large built up area outlined in this purpose and therefore the proposed development in that instance results in no harm to that purpose.</p> <p>Notwithstanding the above, the Site is contained by residential development surrounding it to the south, east and in part along the western edge. A strong defensible boundary runs along the remainder of the western edge and the northern boundary of the Site. this serves to enclose the Site and prevent any additional sprawl</p> <p>Whilst development at the Site would result in the extension of the current village boundary to the north, this would not be in such a way that it is incongruous with the current form of the village. Development would result in a logical extension to the village, retaining a clear and sensible relationship with the existing residential area and associated facilities.</p> <p>The area of land is contained would not leave an open boundary to the north of the Proposed Development which would be vulnerable to further development. The ability of the Green Belt in this location to check unrestricted sprawl would not be negatively impacted.</p>
To prevent neighbouring towns merging into one another.	<p>The closest town to the Site is Horley. The easternmost part of the town of Horley, which is therefore in closest proximity to the Site, is 2.1km to the west of the Site. Horley, has in effect, already merged with the town of Crawley, to its immediate south, with Gatwick Airport forming the urban connection between the two towns.</p> <p>The Site plays no role in prevention of any further merging of these two towns nor in the prevention of merging of any other towns.</p>

⁴ Appeal Decision APP/N1920/W/23/3314268

	<p>The parcel is contained by the existing settlement pattern as well as the M23 to the west which provides a physical prevention to any merging with towns to the west.,</p> <p>In terms of the reduction of a gap between the proposed built development and the nearest development to the north, this is extremely limited. The extent of the proposed development extends less than 200m further north than the edge of the village at Hayes Walk.</p> <p>The development along Chapel Road extends as far north as the Proposed Development and therefore there is no impact on the gap between built form and the closest built form in Outwood, even if that were to be considered a town.</p>
To assist in safeguarding the countryside from encroachment	<p>The characteristics of the countryside in this location are limited, with the Site being entirely contained. Whilst the Site itself does not contain any urbanising characteristics, it is influenced by the busy highway and ribbon residential development to the east and more dense residential development to the south. Development of the parcel beyond the current development proposals would lead to some encroachment on the countryside and a loss of openness, but this has already been partly compromised to a degree by existing influences, as described. The integrity and openness of the wider Green Belt would not be affected.</p>
To preserve the setting and special character of historic towns	<p>The Site is not in close proximity to any historic town and therefore the contribution the Site can make to this Green Belt purpose is limited. The closest designated Conservation Areas are in Burstow and Outwood, and visibility to these areas from the Site is non-existent. As such, the Site does not meet this purpose of the Green Belt.</p>
To assist in urban regeneration by encouraging the recycling of derelict and other urban land.	<p>The Site neither positively or negatively contributes to this objective and does not prevent regeneration of brownfield sites either within Smallfield or more widely in the District. It is therefore of no relevance in the consideration of the Proposed Development.</p>
6.18	From a review of the above assessment, it is clear that the Site does not serve fully any of the five purposes of including land within the Green Belt. Therefore, the proposals would give rise to only limited harm to the Green Belt and would not undermine the wider Green Bet objectives.
6.19	A fundamental characteristic of the Green Belt is its openness. The Site is in a unique location in that its contained nature results in it having a minimal contribution to the wider openness of the Green Belt. The Site is contained by mature trees and hedgerow to the north and west. However, the Applicant GBR does acknowledge that the only effect on the Green Belt that the Proposed Development would have, would be a limited effect on the openness of the land.

6.20 The next steps in consideration of the acceptability of development, which is determined to be inappropriate, is set out in Paragraph 148 of the NPPF which states:

147. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

148. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

6.21 There is no definition of Very Special Circumstances either within the TMBC Core Strategy or NPPF. However, it is widely regarded that in order to qualify as ‘very special’, circumstances do not have to be rare or uncommon⁵. The test of balance against very special circumstances, is that they will not exist unless the potential harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

6.22 As has been set out above, the Site does not have the necessary characteristics of the Green Belt. The surrounding context has heavily altered the characteristics of the Site which is now fully contained on all sides by some form of development.

6.23 This Statement will demonstrate that there are no other considerations, other than Green Belt, that would outweigh any benefits with reference to all other considerations as the proposals generate negligible – no harm and ultimately is a sustainable high quality development.

6.24 The test comes down to balancing the potential harm to the Green Belt, of which the functions are to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (NPPF Paragraph 137).

6.25 Whilst development with the Green Belt will inevitably result in a degree of encroachment into the countryside. The extent to which it is harmful is related to the spatial and visual aspect of openness.

6.26 Sales LJ in Turner [2016] EWCA Civ 4666 sets out that:

“ The concept of ‘openness of the Green Belt’ is not narrowly limited to the volumetric approach suggested by [counsel]. The word ‘openness’ is open-textured and a number of factors are capable of being relevant... Prominent among these will be factors relevant to how built up the Green Belt is now and how built up it would be if redevelopment occurs ... and factors relevant to the visual impact on the aspect of openness which the Green Belt presents. ”

⁵ Wychavon DC v Secretary of State for Communities and Local Government and Butler [2008] EWCA Civ 692.

⁶ Paragraph 14

- 6.27 As highlighted throughout this Planning Statement and other planning application documents, the Site is well related to the existing context, being surrounded by and influenced strongly by built development on all sides, which have already changed the openness of the surrounding land, as a result of other developments in the locality and development has influenced the openness of the Site. In addition, the Site is contained by strong, defensible boundaries that will endure for the longer term.
- 6.28 The scheme includes sensitively designed features with appropriate landscape buffers and new green infrastructure which will further reinforce the containment of the site.
- 6.29 The visual assessment has concluded that there are very few views from the which the proposed scheme will be visible, and none in the wider landscape. Accordingly, the visual aspects are openness are limited and localised to a few viewpoints immediately adjacent to or within very close proximity to the Site. As such, the effects to openness will be limited to spatial changes within the Site itself that will cause no harm to the wider openness of the Green Belt, whose integrity will remain intact.
- 6.30 Crucially too, the Proposed Development will not appear out of character in the settlement of Smallfield as a whole due to the proposals looking to knit in with the local vernacular.
- 6.31 As set out above, the Site makes an extremely limited contribution to the Green Belt Purposes. The Proposed Development would result in a loss of openness in visual terms but this harm would be very limited due to the Site's existing context, being fully enclosed on all sides by development and road/rail infrastructure as well as the existing strong boundaries which are proposed to be strengthened through the development.
- 6.32 It is not disputed that the Proposed Development is ultimately inappropriate development in the Green Belt and that this is afforded substantial weight in the planning balance. However, as set out above, it is noted that the impact on the functionality of the wider Green Belt and resultant change on the openness is not significant.
- 6.33 The lack of a five year housing land supply and the chronic record of housing delivery in Tandridge District means that suitable and available sites in the Green Belt are among those that have to be considered in order to meet the housing needs of the district. The application site is suitable and available for housing. It is not in an area of special designation; it is not in a conservation area. Unlike many other sites in the Smallfield area it is not in flood zone 2 or 3. It is close enough for residents to walk to existing services in the centre of Smallfield and it is large enough to be able to offer significant benefits to outweigh any harm to the Green Belt.
- 6.34 A major benefit of this site is the ability for it to offer a new location for the Burstow Primary School and playing fields together.

Alternative Site Assessment for Burstow Primary School relocation

- 6.35 It is already identified in other supporting materials that the current issues with Burstow Primary School are:

- The school is split across three sites, the playing fields located some distance from the site. The split nature means that expanding on the existing site would severely compromise the immediately available outside play and recreation provision.
 - The playing fields are in poor condition, detached from the main site for the school with no toilet facilities. The drainage on the field is poor with no engineered solution to ensure use throughout the year. Coupled with the dangerous route to the field on narrow pavements and crossing a road, there are both limited times of the year the field is useable (summer term only) and safety concerns which limits the year groups who use the playing field (Year 2 plus).
 - The main school site and swimming pool site are located within Flood Zone 3b and have experienced high levels of flooding. In instances of significant rainfall, there have also been occasions where foul sewage has entered the building via the toilets overflowing and into the play ground.
 - The main school site is surrounded by three busy roads on all sides. Accidents have been recorded both vehicle and vehicle and on some occasions pedestrians. Whilst traffic calming is explored, with the school in situ there are limited opportunities for improvement.
- 6.36 In essence, the above defines that Burstow Primary School needs to be relocated as opposed to being left in its existing site as there are limited opportunities to improve the school and no real opportunity for growth without comprising the recreation/play provision on the main school site. The School staying in situ does not resolve the flooding even with mitigation proposals nor would the road network change despite the SCC proposed works.
- 6.37 When looking at the scope for a new site for Burstow Primary School the following requirements were needed:
- A single site of 2.86ha, this would allow for future expansion to 3FE and provide all the same facilities currently offered by the school on one site, as opposed to across 3.
 - As a more vulnerable use, a site in Flood Zone 1 should be the target. However, Flood Zone 2 would be acceptable and not require a sequential test.
 - A site that is in an area with at worst a low surface water risk but ideally have no surface water risk.
 - A site with capacity to have the surface water drainage solution for the school site outside the 2.86ha on additional land.
 - A site which is within 500 metres of existing school.
 - Direct access to the school for pedestrians from a main road.
 - Suitable walking routes to the school, i.e. pavements which are wide enough for buggies.
- 6.38 In reviewing which sites to review as part of this process, those submitted and assessed by TDC as part of the Call for Sites for the Local Plan were assessed. This assessment is set out at Appendix 4.
- 6.39 The Very Special Circumstances and overall planning balance of the Proposed Development is discussed below.

Very Special Circumstances

Policy context

6.40 The NPPF requires that local planning authorities ensure substantial weight is given to any harm to the Green Belt. Paragraph 143 asserts that very special circumstances will not exist unless:

“...the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”.

6.41 It is up to the applicant to demonstrate that very special circumstances exist that outweigh the harm to the Green Belt caused by the development.

Planning assessment

6.42 Below we set out the very special circumstances that weigh in the planning balance:

- The delivery of 270 homes in an area of significant housing land supply shortfall;
- The delivery of 108 affordable homes in an area of “extremely bleak” affordable housing provision;
- Provision of land for education purposes to meet the future needs of Burstow Primary School;
- The delivery of a flood alleviation scheme for Smallfield;
- Provision of substantial open space;
- Biodiversity Net Gain in excess of any policy requirement; and
- Additional benefits.

Contribution to housing supply

6.43 The lack of housing supply in Tandridge is undisputed. In the appeal in Warlingham⁷ the Inspector concluded that *“Irrespective of the definitive supply figure, it is clear that the identified future housing land supply is substantially short of the 5-year requirement”*. This position has not changed and is unlikely to in the near future given the extremely slow progress in the adoption of a new Local Plan.

6.44 The Proposed Development will deliver up to 270 residential units in a District with an acute under delivery of housing.

Contribution to affordable housing supply

6.45 The provision of affordable housing is a requirement of all major development, and for development within TDC, the requirement is for a site to provide 34% affordable housing.

⁷ Appeal Decision APP/M3645/W/22/3309334

- 6.46 A recent appeal decision⁸ in Warlingham, in the north of Tandridge, cites helpful commentary on the need for affordable housing in the district. The Inspector of that appeal stated;

"The Council's updated Strategic Housing Market Assessment Affordable Housing Needs Assessment (June 2018) (CD8.11) and the appellant's Affordable Housing Needs Update Note (CD8.28) outline there is an identified affordable housing need of 310-391 home per year in Tandridge. However, the Council's latest Annual Monitoring Report (CD8.12) indicates that an average of just 68 affordable homes have been completed annually in Tandridge since 2006. This is exacerbated by the uncontested affordable housing evidence from the appellant which demonstrates an enormous shortfall in delivery of homes over the next 5-year period equating to about 53 affordable homes per annum."

- 6.47 In the case of the appeal, the Council acknowledge that the delivery of 40% affordable homes was not insignificant, and the Inspector too gave *significant weight* (our emphasis) to the contribution of the appeal scheme to the 'very serious affordable housing shortfall'.

- 6.48 In the Lingfield appeal⁹, the Inspector agreed with the decision of the Warlingham appeal and confirmed that the "*affordable housing situation in Tandridge is "extremely bleak"*". Additionally within the Lingfield Inspectors' Report, he states that:

"The appeal scheme would deliver 40% affordable housing, which would be in excess of the CS Policy CSP4 requirement for 34% in this location. Through the submitted S106 this would be direct, on-site provision, over which the District Council would have nomination rights applying its choice based letting scheme to align provision with greatest need. Accordingly, I afford the benefit of 40% on site delivery of affordable housing very significant weight in favour of the appeal proposal".

- 6.49 The Proposed Development will provide 40% affordable housing, equating to 108 affordable homes. This would counter over two years of shortfall as cited in the aforementioned appeal decisions in Warlingham and Lingfield and as such is a substantial benefit, amounting to a very special circumstance in the balance of Green Belt policy.

- 6.50 Whilst a review of recent appeal decisions in the District is helpful for context, an Affordable Housing Statement (AHS) has been prepared by Tetlow King in support of this application. This includes a more refined examination of the affordable housing need in Tandridge and the Burstow, Horne and Outwood ward more specifically.

- 6.51 The AHS reviews the three housing needs assessment undertaken over the course of the last 16 years which set out the affordable housing needs for the District. A summary of this is as follows

Table 3 AHS - Summary of Housing Needs Assessments in Tandridge District

Document	Base date	End date	Annual affordable housing need
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⁸ APP/M3645/W/22/3309334

⁹ APP/M3645/W/23/3319149

2008 SHMA	2008/09	2012/13	720 dwellings
2015 AHNA	2015/16	2019/20	456 dwellings
2018 AHNA	2018/19	2022/23	391 dwellings

- 6.52 The AHS then review past affordable housing delivery between 2006/7 and 2021/22. This is found to be an average of 76 affordable homes per annum, representing a total of 33% gross affordable housing delivery of the total completions. However, it is important to recognise that this does not take account of any loss of affordable units and the AHS reviews Right to Buy Sales which are further depleting the affordable housing stock.
- 6.53 Turning specifically to Burstow Civil Parish, over the course of 2006/07 to 2022/23, 64 affordable housing units were completed in Burstow Civil Parish, averaging 3.5 dwellings per year. For context, 115 households were on the waitlist in March 2022 with Burstow Civil parish specified as the preferred location.
- 6.54 It is clear there is a persistent under delivery of affordable housing both in Burstow and Tandridge.

Promoting Healthy and Safe Communities

- 6.55 The National Planning Policy Framework places a strong emphasis on promoting healthy and safe communities, with Chapter 8 dedicated to this topic.
- 6.56 The applicant has therefore considered thoroughly the contribution that the site can make to Burstow, including an audit of community facilities and engagement with the District and County Councils and local providers.
- 6.57 Its assessment, based on objective evidence of need and current and emerging policy is that the main contribution that the site can make is through ‘future proofing’ the ability to meet educational needs, and through new open space and recreation provision.

Provision of land for education

- 6.58 Surrey County Council is the local authority with responsibility for education (LAER). It has a statutory duty to secure sufficient school places in the County but is no longer the default provider for new or expanded schools.
- 6.59 The County Council produces a School Organisation Plan to enable it to meet its statutory duty to provide sufficient school places. The current Plan (2022-32) finds that the nursery and primary aged school population is likely to plateau before gradually increasing (page 6). It also suggests that housing is now the major contributor to planning place pressures (page 7) as Government seeks to increase the level of housing that Surrey can provide. In Tandridge therefore whilst there is some current school capacity, it is prudent for the Council to plan for expansion where necessary.
- 6.60 For this reason Tandridge’s Infrastructure Delivery Plan (IDP) (2019) highlights the need for Burstow Primary School to be either expanded or re-provided.
- 6.61 In addition to the ability of schools to provide sufficient capacity to meet demand, there are also significant concerns about the condition of school buildings, the suitability of buildings too

meet modern teaching requirements, and their ability to meet environmental standards and particularly the challenge of net zero. Poorly insulated and energy inefficient buildings also have significant additional running costs, particularly given recent increases in energy prices.

- 6.62 The National Audit Office published two reports in June 2023, one on Condition of School Buildings¹⁰, and an Environmental Sustainability Overview¹¹.
- In recent years, funding for school buildings has not matched the amount DfE estimates it needs, contributing to the estate's deterioration.
 - The Education Estate is responsible for 37% of public sector emissions, but only 2% of the school estate will be net zero after the current rebuilding programme;
 - 10,710 schools have a significant risk of flooding at least once in 75 years;
- 6.63 There is a mismatch between the funding allocated for sustainability and net zero and the ambitions of the strategy.
- 6.64 Burstow Primary School, located approximately 500 metres to the south of the site displays several of the features identified in these reports. It is in post war buildings with poor energy efficiency, and which require significant investment to be brought up to modern standards. However it is not in the small group of schools identified by Government as being in urgent need of investment, which are now mainly those schools where the standard of buildings threatens the basic functioning of the school.
- 6.65 It is located within the flood plain (Flood Zone 3) and at a busy road junction in the village of Smallfield. This means the school's playground floods during periods of heavy rainfall and there are significant road safety and congestion concerns. The propensity of the school site to flood means that there have been cases of raw sewage seeping into the playground and toilets within the school not being able to be flushed. Its location at a crossroads has meant that in the last five years there have been two serious accidents on the roads around the School, including to a young child and a parents both of whom were run over on separate occasions.
- 6.66 Although there is no current funding or plans for the school to be expanded, refurbished or rebuilt, there will undoubtedly be a medium-term requirement for significant investment. Given the current location on the flood plain, transport and access issues and the practicalities and costs of significantly re-modelling a school while it is in operation the School and Surrey County Council may find it preferable for the school to be re-located.
- 6.67 The Proposed Development therefore safeguards 2.86 hectares of land for a primary school, which meets the requirements for a three form entry secondary school as set out in Building Bulletin 103, Area Guidelines for Mainstream Schools¹². This would allow for the current two

¹⁰ <https://www.nao.org.uk/wp-content/uploads/2023/06/condition-of-school-buildings.pdf>

¹¹ <https://www.nao.org.uk/wp-content/uploads/2023/06/environmental-sustainability-overview.pdf>

¹²

https://assets.publishing.service.gov.uk/media/5f23ec238fa8f57acac33720/BB103_Area_Guidelines_for_Mainstream_Schools.pdf

form entry school to be relocated, and for expansion should additional primary school places be required.

6.68 If the site is not required for a primary school the Applicant also proposes to allow the option for Surrey County Council to take up the site to help meet its need for children with additional needs and disabilities. Surrey is facing unprecedented demand for such provision, with demand more than doubling since 2015 and 97% of places occupied (School Organisation Plan, 2022 to 2032). As a result the Council aims to deliver 2,440 permanent additional specialist school places in Surrey between 2019 and 2026 and to create capacity for 5,760 planned places by 2030/31¹³.

6.69 Paragraph 95 of the NPPF states that:

6.70 "It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted".

6.71 Therefore, the ability of the site to be used for as a school now or in the future and the fact that land would be reserved for it should carry great weight. Land suitable for educational purposes does not tend to be readily available, particularly in such a sustainable and unconstrained area, and the opportunity proposed at this Site is rare.

6.72 Until the land is either transferred to Surrey County Council or Burstow Primary School, the land reserved for educational use will be retained by the Applicant and maintained.

New Open Space and Recreation Provision

6.73 The NPPF encourages Local Authorities to plan positively to enhance the beneficial use of the Green Belt, by providing opportunities for access, outdoor sport, and recreation, enhancing landscapes, visual amenity and biodiversity, or improving damaged and derelict land. These land uses have been interpreted as exhibiting open characteristics which are an essential component of the Green Belt.

6.74 In identifying opportunities for improving the quality, condition, and accessibility to the landscape, "*....They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land*" (NPPF paragraph 142). The development will comprise new planting, ecological features, enhanced buffers where appropriate, as well as

¹³ <https://news.surreycc.gov.uk/2023/11/07/more-than-230-new-specialist-school-places-created-for-surreys-children-with-additional-needs-and-disabilities/#:~:text=Surrey%20County%20Council's%20ambitious%20Capital,planned%20places%20by%202030%2F31>

improved access routes to connect with existing public rights of way, resulting in a beneficial change to the condition and quality of the remaining land.

- 6.75 There are a number of existing open space and play spaces within ‘Burstow, Horne and Outwood’ ward. However, most are not located within close proximity of the village centre, as shown in Figure 5. The closest open space to the site is Broadbridge Lane Open Space, which is located less than 700m west of the site. There are a total of 13 open spaces that fall within Burstow, Horne and Outwood ward. In addition to these open spaces, there are also three play spaces, three allotments/community growing areas, and four religious grounds within the local ward area.

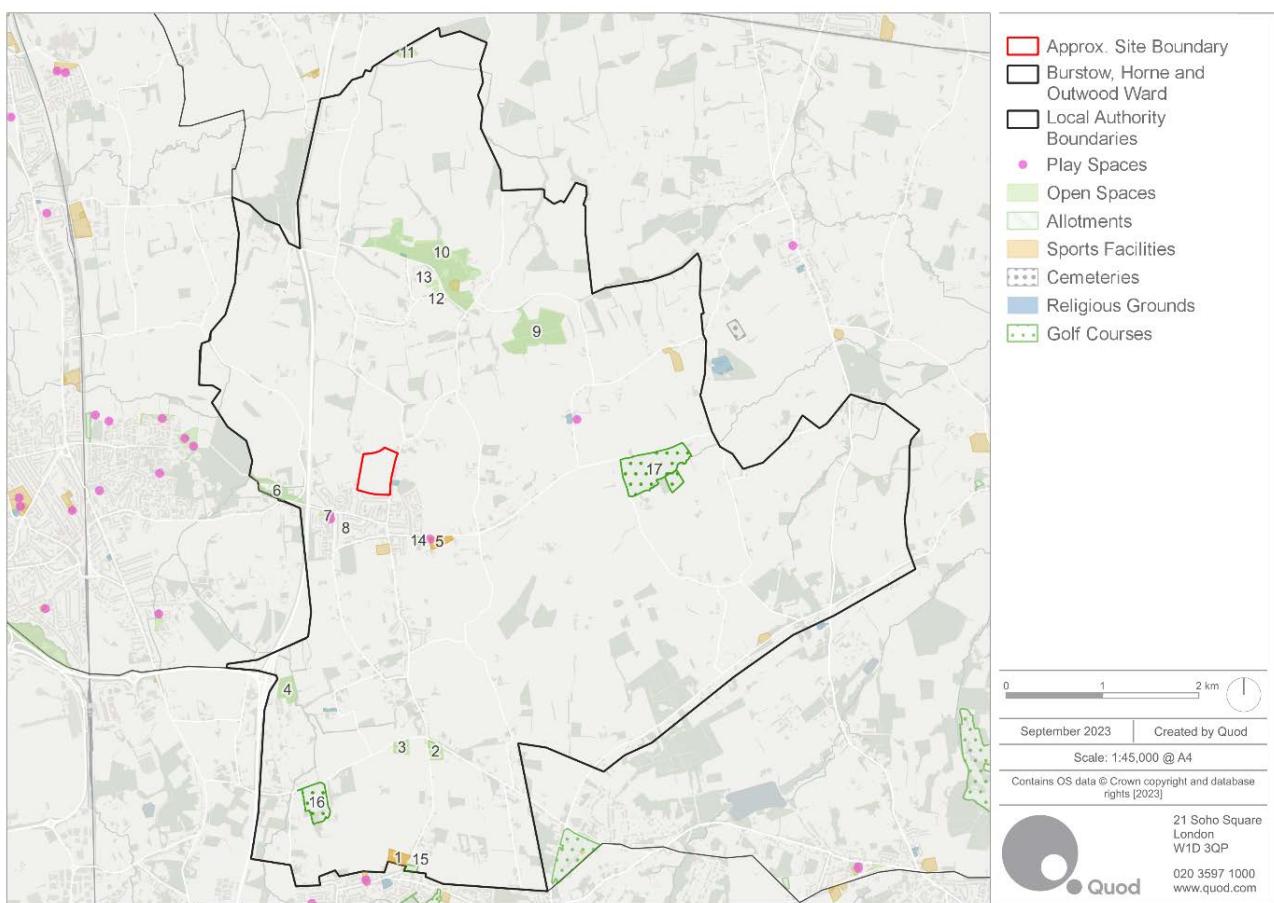


Figure 5 Open Space in Burstow, Horne and Outwood ward

- 6.76 There are several open spaces within the local area. However, the Tandridge Open Space Strategy identifies a deficit of children’s play space and youth provision across the area. The Strategy also sets out standards that new developments should seek to meet to ensure they do not place additional pressure on existing spaces.
- 6.77 The northern 4.95ha of the Proposed Development is identified on the parameter plans as open space. The Proposed Development will offer access to the Green Belt which is currently restricted, therefore increasing the areas of accessible recreation space within Smallfield.

6.78 A Local Equipped Area for Play (LEAP) is proposed to the south east of the area for residential development. This will be accessible to existing and future residents of Smallfield, as well as pupils of any forthcoming school.

6.79 In total, the Proposed Development will deliver approximately 4.95ha of open space. As the proposals are in Outline, the detailed design and types of open space will be confirmed later as part of Reserved Matters Applications. This level of provision is nearly double local requirements. Applying Tandridge's quantity standards for open space provision would generate a requirement for 2.8ha of open space on-site.

Flood Mitigation Measures

6.80 The Site is wholly within Flood Zone 1 where there is low probability of river or sea flooding. The majority of the Site is located within an area at very low risk of surface water flooding.

6.81 However, parts of the village of Smallfield are subject to flooding. The centre of the village is classed as Flood Zone 2 and 3 by the Environment Agency, meaning there is a high probably of flooding from rivers and sea, and historic records show that in some flood events residents and the primary school have been severely affected.

6.82 Surrey County Council ('SCC') have been looking at proposals for a Smallfield Flood Alleviation Scheme for some years in order to reduce the flood risk, to people and property in Smallfield. SCC have considered a wide range of flood risk management options, and five were shortlisted. However, the delivery of these options is uncertain as they still require discussions with landowners and potential developers. SCC are continuing to review the business case for these options and the Environment Agency and Atkins Consultants are undertaking several further iterations of flood modelling. There is not yet a timeframe for the completion of the modelling and hence nor a timeframe for the flood alleviation scheme to be delivered but it is likely this is still a number of years away.

6.83 Whilst the Proposed Development cannot solve the flood risk issues of the whole village, alleviation measures are proposed which will serve to significantly decrease the number of homes in the village which are at risk of flooding. An Impact Zone of the Proposed Flood Alleviation Scheme has been assessed and has considered which buildings would no longer be at risk of flooding as a result of the implementation of the Scheme. When comparing actual curtilages in the 'defended' and 'undefended' scenarios, it was found that the number of residential and commercial properties with a reduced flood risk is **78**. In addition to the reduction in risk of flooding for up to **78** residential and commercial properties the proposed Flood Alleviation Scheme results in a general reduction in the extent and depth of flooding across the Impact Zone.

6.84 As well as the provision of attenuation measures to provide sustainable drainage solutions for the Site itself, the Proposed Development will also serve to alleviate flooding risks for other parts of the village.

6.85 The drainage systems across the Site will ensure that the surface water runoff from the Proposed Development is contained within the drainage network and it will ensure that there is no flooding to any new or existing building during a 1 in 100 year event, including a +40% allowance for climate change. Such that a betterment to the existing situation is provided, it is

proposed that the discharge rate will be reduced to 4.0l/s/ha compared to the existing rate of 5.8l/s/ha. Porous paving, swales, bioretention systems and detention basins are proposed as part of the surface water management strategy.

- 6.86 The alleviation measures are proposed in the north of the Site, in the form of flood alleviation storage. The flood alleviation basin will provide up to 12,000m³ of storage, diverting additional run off towards the Hathersham Street catchment. This will reduce the areas within Smallfield at risk of flooding.

Biodiversity Net Gain

- 6.87 The Biodiversity Net Gain Assessment has been based upon the proposed illustrative masterplan (2734-LLA-ZZ-00-DR-L-0001) and flood alleviation scheme (6716.413) for the site.
- 6.88 Existing habitats within the site include modified grassland, developed sealed surface, bramble scrub, mixed scrub, ruderal vegetation, a manure pile (assigned artificial unvegetated unsealed surface) and rural trees.
- 6.89 Habitats retained as part of the proposals include mixed scrub, developed sealed surface and hedgerows. Created habitats include other neutral grassland, mixed scrub, developed sealed surface, modified grassland, other neutral grassland, vegetated gardens and a total of 186 small urban trees.
- 6.90 A total of 4 hedgerows are present within the Site consisting of 3 species-rich native hedgerows with trees associated with a ditch or bank (H1,H2 & H3) and one species-rich native hedgerow with trees (H4). Hedgerows H1, H2, H3 and H4 are to be fully retained as part of the proposals. Minor losses are proposed to hedgerow H4, with the remainder retained and enhanced as part of the proposals.
- 6.91 As a stream lies within 10m of the northern Site boundary, this stream was included as part of the Biodiversity Net Gain Assessment. The existing condition of the stream was calculated as moderate. The proposed condition of the stream has been based upon the proposed illustrative masterplan and was calculated as moderate post-development. No encroachment is proposed to the stream or riparian zone as a result of the proposals and as such, the stream has been inputted as retained within the calculation. A new ditch is proposed as part of the proposals, which equates to a total length of 296m.
- 6.92 Following calculations based upon the illustrative proposals undertaken using DEFRA Biodiversity Metric 4.0 Calculation Tool, it can be seen that a net gain in biodiversity can be delivered as a result of the proposed development. Specifically, an increase in onsite habitat units from 24.36 units to 33.19 units (which equates to a 36.24% increase). An increase in hedgerow units has also been calculated, from 18.12 units to 20.87 units (which equates to a 15.20% increase) and an increase in watercourse units from 2.75 units to 5.24 units (which equates to a 90.52% increase). The Secretary of State for a planning inquiry in Rainham¹⁴

¹⁴ APP/A2280/W/20/3259868

found that significant improvements in terms of ecology and biodiversity attract substantial weight.

- 6.93 The calculation indicates that a significant net gain in biodiversity can be achieved under all elements of the metric applicable to the proposals (area-based habitats, hedgerows and watercourses) under the current development proposals. It has also been demonstrated that the proposals would achieve a net gain in excess of 10% within all categories (area-based habitats, hedgerows and watercourses) which is expected to become the minimum net gain requirement following the adoption of a regulation within the Environment Act.

Additional benefits

- 6.94 The Proposed Development will provide economic benefits by way of employment opportunities during the construction period of the development. Further economic benefits will be brought about by increased expenditure in the local area once the development is occupied.
- 6.95 TDC have prepared a Housing Delivery Test Action Plan as a result of having failed the test. This includes the publication of an Interim Policy Statement for Housing Delivery. The aim of this is to provide a criteria based policy to assist in bringing forward new homes in the short term.

"The Interim Policy states that Applications will be invited to come forward that meet the following criteria and are in accordance with the Council's development plan and with the National Planning Policy Framework (NPPF) and with national planning guidance:

...viii) Sites that deliver flood mitigation measures for already identified areas of the District at serious risk of flooding;

and any such sites identified according to the above criteria must be deliverable and viable, having regard to the provision of any necessary onsite and off-site infrastructure, affordable housing requirements and payment of the Community Infrastructure Levy."

- 6.96 The Interim Policy also notes that special consideration will be given to the development of sites that overcome existing infrastructure deficits.
- 6.97 This Interim Policy has not been subject to public consultation and does not form part of the development plan, however the Inspector in a recent appeal¹⁵ was minded to give it limited weight. The provision of flood mitigation measures and the delivery of land for education purposes should be regarded as benefits in line with this Interim Policy.

Summary

- 6.98 Paragraph 147 of the NPPF clearly sets out that inappropriate development is "...by definition, harmful to the Green Belt and should not be approved except in very special circumstances" and notes that 'very special circumstances' will not exist unless "...the potential harm to the

¹⁵ Appeal Decision APP/M3645/W/22/3309334

Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”.

6.99 As outlined above, the benefits that the Proposed Development will deliver in terms of housing and education need, flood mitigation, highways improvements, extra care provision, open space and community facilities outweigh the harm associated with releasing the Site from the Green Belt and constitute very special circumstances. As such, the proposals accord with local policies DP10 and DP13 which permit development in the Green Belt where very special circumstances exist.

6.100 An Energy Strategy has been prepared which demonstrates that measures can be incorporated within the scheme which could reduce the carbon emissions by up to 68% and provide over 10% of energy from renewable systems.

Design

6.101 The importance of good design has been paramount in the evolution of the scheme. The Proposed Development is intended to be a high quality extension to the village of Smallfield. A Design and Access Statement supports this application and sets out the design rationale behind the proposals. A Design Code has been prepared and submitted to ensure that this ambition comes to fruition.

6.102 An Illustrative Masterplan supports this application and confirms the access point to the Site, as well as providing an illustrative layout including residential parcels, areas of formal and informal open space and flood alleviation and attenuation measures.

6.103 The Illustrative Masterplan confirms that there will be two main vehicular access points which will lead residents directly into the development parcels where a clear road hierarchy has been proposed. These access points are towards the northern boundary of the Site, along Chapel Road, and additionally further south along Chapel Road toward the existing village centre.

6.104 There are areas of formal open space to the north and west of the Site, along with incidental areas of open space throughout the development. Within the green space areas are the indicative SUDS location, flood detention basins and swale locations. these will ensure that residents are within close proximity to a range of easily accessible amenity areas.

6.105 A series of parameter plans have been submitted for approval as part of the application to guide future development.

- A Zone Boundary plan has been prepared to identify the development areas, the access routes, and the areas for green infrastructure.
- The Land Use plan outlines the specific uses proposed for the Site by way of residential use, land reserved for education use, access routes and green infrastructure.
- The Access and Movement Plan shows the access points for vehicles and pedestrians plus the primary access roads and secondary/tertiary roads as well as the public parking zone.
- The Building Heights plan outlines the minimum and maximum ridge heights for each development parcel.

- The Levels plan stipulates the minimum and maximum finish flood levels for each of the parcels.
- The Green Infrastructure plan indicates the areas safeguarded for public open and amenity space, including sustainable drainage locations.
- The Density plan outlines the proposed density parameters for the proposed residential development.

6.106 The Parameter Plans set the general layout of the scheme whilst the Design Code will inform the development management process and ensure the development is a high quality environment. The Design Code includes mandatory design coding principles along with recommended principles. Precedent and contextual images are also included to guide the user.

6.107 The Design Code also sets out Character Area Guidance, providing plot and block principles along with public realm principles.

6.108 Careful consideration has been given to Policy CSP18: Character and Design when preparing the Design Code and Illustrative Masterplan.

Transport and access

Policy context

6.109 Paragraph 104 of the NPPF asserts that transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places”*

6.110 Paragraph 110 of the NPPF is clear that when considering specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users; and*

c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree".

6.111 Paragraph 111 of the NPPF states that "*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe*".

6.112 The importance of catering to a range of transport modes is also emphasised by Local Plan Policy DP5 which requires development to provide safe and suitable access to the site which is achievable by all and promotes access by public transport, foot and bicycle.

Planning assessment

6.113 The Site is located to the north of Smallfield. Smallfield is a sustainable village, with a range of local facilities including a primary school, doctors surgery, community hall, pharmacy, post office and local convenience stores. These services are approximately 450m to the south of the Site.

6.114 A Transport Assessment (TA) has been prepared and submitted in support of the application. The TA has reviewed the accessibility of the Site in the context of the Proposed Development and has set out the proposed off-site highways mitigation measures. It has reviewed the trip generation and associated traffic impacts.

6.115 The proposed development will include two new priority vehicle accesses from Chapel Road, both providing access and egress for the residential area. The southern access would also allow for potential access to the adjoining land safeguarded for future education uses.

6.116 Key junctions were assessed to evaluate the impact of the development on the local road network. The junction capacity assessments identified that there is spare capacity across all junctions assessed. Therefore, the traffic impact of the development can be accommodated on the local highway network with no severe highway's impacts. As per paragraph 111 of the NPPF, there is therefore no reason for the development to be refused on highways grounds.

6.117 Further, a series of off-site improvements will provide traffic calming and enhanced pedestrian facilities which will provide significant benefits to the local area. Further detail is provided in the TA.

6.118 In accordance with paragraph 104 of the NPPF and Local Plan Policy DP5, a Travel Plan has been submitted with the application to promote sustainable transport methods.

7 Conclusion and Scheme Benefits

- 7.1 This Planning Statement has been prepared by Quod, on behalf of Rydon, in support of an outline planning application for the development of up to 270 homes at Land to the west of Chapel Road, Smallfield. It has considered the Proposed Development against the relevant planning policy and material considerations.
- 7.2 The Applicant has positively engaged with a range of stakeholders, including statutory and non-statutory consultees, to obtain their input into the overall principal of the scheme.
- 7.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended), requires that planning decisions are made in accordance with the Development Plan unless material considerations indicate otherwise.
- 7.4 The tilted balance is engaged due to the lack of a 5 year housing supply in Tandridge and the woeful record of housing delivery. Two recent appeal decisions in the district in recent years (Warlingham and Lingfield quoted above) have described the enormous shortfall of housing provision in Tandridge. The position on affordable housing was described by the Inspector determining the Lingfield appeal as “extremely bleak” with an average of just 68 affordable homes being completed annually in Tandridge since 2006.
- 7.5 The Framework [NPPF] sets out that identified harm to the Green Belt may be weighed with other material considerations in order to determine if there are very special circumstances which may justify inappropriate development. This Planning Statement has served to demonstrate that whilst there is modest harm to the Green Belt, very special circumstances do exist which are to be considered as material considerations. The Proposed Development:
- Will deliver much needed market and affordable housing for residents of Smallfield and the wider Tandridge Area;
 - Provide c3ha of suitable and available land for educational purposes – an area large enough to accommodate the relocation of the Burstow Primary School, its swimming pool, and its playing fields all on one site.
 - Provide almost 5 hectares of public open space, offering opportunities for recreation in the countryside;
 - Include drainage attenuation to assist with flooding problems in Smallfield, removing the flooding risk to up to 78 buildings; and
 - Highway safety and traffic calming measures to help to address some of the concerns raised by the local community.
- 7.6 This Planning Statement has demonstrated that the tilted balance is engaged and that very special circumstances exist to outweigh the harm that development would cause to the Green Belt.
- 7.7 The District is subject to a number of constraints that serve to limit the ability of the Council to meet its housing needs. TDC comprises the highest percentage of Green Belt in the country, at 94%, contains two Areas of Outstanding Natural Beauty as well as numerous areas being

at risk of flooding. The benefits therefore of developing a high-quality residential scheme in the proposed location are evident. Whilst development in the Green Belt is unavoidable in TDC if it is to attempt to meet its housing need, the Site does provide a location free from flood risk and in a location that is sustainable with a strong relationship to the existing settlement.

Appendix 1 – School Use Condition Statement

Burstow Primary and Nursery School
Smallfield, Surrey

Use and Conditions Statement



MILLER BOURNE ARCHITECTS

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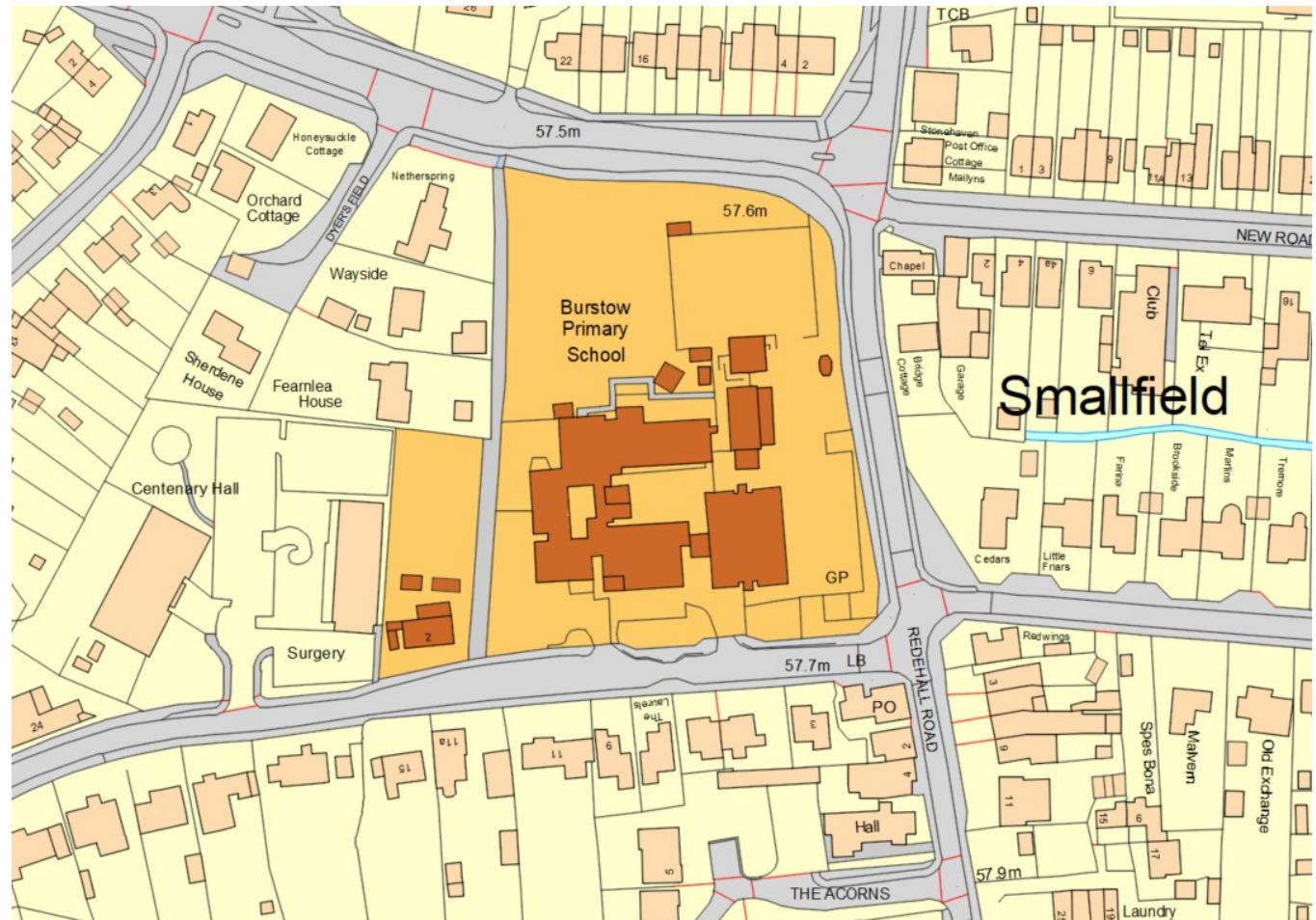
1.0 Introduction

Miller Bourne Architects are based in Hove and have been established for over 60 years. They are specialists in the education sector, undertaking the design of whole new schools, individual buildings, extensions, refurbishments and school master plans. Working on new and existing schools across the South East.

Miller Bourne have been commissioned by Rydon Homes to design a new Primary and Nursery School for Smallfield in Surrey, as part of a larger mixed use development for the village. The design process for the new school has included a review of the existing school facilities, looking at the variety of different buildings that make up the school, their layout, typical age, construction and services.

This document is an overview of the existing school with comparison to what would be expected from the design and layout of a new school of similar size.

It is not a building survey report and is not intended to be used as a guide for the repair and maintenance of the buildings, or health and safety of the facilities.



2.0 Overview

Burstow Primary and Nursery School is a two form entry school located in the centre of the village of Smallfield. Information gained from the school indicates the school was first established on the site in the 1960s. It was then expanded over the 70s and 80s in a somewhat adhoc fashion as demand for additional space was required. This was inline with the main residential population growth of the village.

The School is now made up of a varied collection of buildings, some interconnected and some standalone. A two storey building contains KS2 classrooms and staff administration rooms. The remaining teaching accommodation for Early Years and KS1 is all within single storey buildings and structures. Approximately seven are what would be considered permanent structures, two are modular 'porta-cabins' of a semi permanent nature and three are timber cabins of a more domestic style. In addition to this there are three separate timber garden sheds used for storage.

The main grounds for the school are restricted in area and there is only space for hard and soft informal play areas. Formal sports pitches are located on a separate site to the south of the school. This is accessed along Redehall Road.

There is an additional small plot of land immediately to the West of the main site that has a small outdoor swimming pool with changing room hut and a copse of trees used for forest school style activities.



3.0 Accommodation Layout & Circulation

Due to the piecemeal expansion of the school over many decades, the layout and adjacencies of the classrooms and support spaces are quite convoluted and inefficient. Whilst this can be typical of many small schools, it does appear Burstow is an excessive example. There is no natural flow and progression through the school that would be expected if it had been set out as one. There are limited adjacencies between different year groups and most classrooms are smaller than current standards require.

3.1 Corridors:

Only half the school is served by an interconnecting corridor linking the different buildings, therefore some classes have to pass through adjoining classrooms or cross outdoor playgrounds to get to communal use spaces such as the hall/dining room, music room, science room and library. This can be challenging and disruptive in wetter colder months of the year.

Corridors are mostly without natural light and have ceiling heights down to 2.1m compared to a DfE minimum of 2.7m. This creates a cramped intense environment, encouraging noisy behavior during busy periods. Corridors are also used for coat and bag storage outside Early Years and KS1 classrooms throughout the school. This adds to the intensity of activity in an already crowded area. Where possible, a cloaks area is best provided within the classroom or in an alcove off a corridor, where the coats and bags can be observed.



Where space allows in some circulation areas, creative group spaces have been created. These have been themed with the Ocean, Jungle or Space, using super graphics on the wall. These are imaginative and inspiring spaces that help to break up the more cramped corridors.



3.0 Accommodation Layout & Circulation

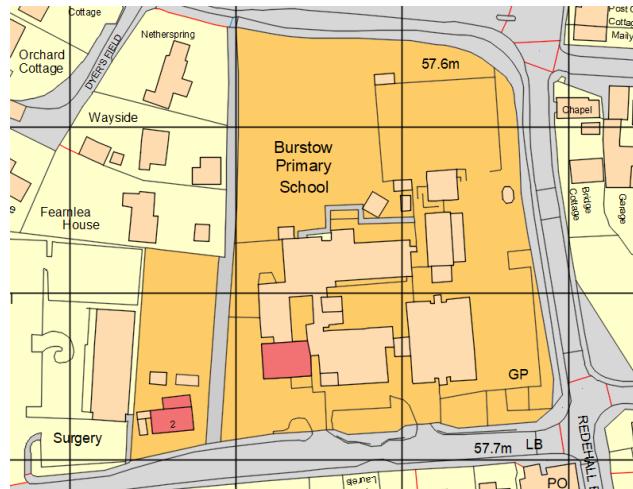
3.2 Early Years - Nursery:

The nursery, which is for ages 3-4, is based in two buildings which are separated by the staff carpark and a public footpath. One building is purpose built and the other is converted from a residential bungalow.

Having the nursery split results in a number of inefficiencies: additional staff are required, common facilities are duplicated and children from the Bungalow have to go outside and cover a considerable distance to access the Main Hall, where lunch is served. The Bungalow building is still laid out with the smaller cellular rooms associated with a home. There is no large, flexible group playroom, resulting in difficulties with supervision and monitoring of the children. This means either reduced child numbers or increased staff numbers above the standard for the room area.

Ceiling heights are approximately 2.3m compared to the standard requirements of 2.7m. All walls and ceilings have a smooth plaster finish which will add to sound reverberation. Without absorbent materials sound can quickly increase making it harder for staff and children to be heard.

The purpose built nursery building is more typical of a good nursery space. It comprises an open plan playroom for improved supervision, with better natural light and sound absorbent ceiling tiles for improved acoustics. The playroom is imaginatively laid out to provide a wide variety of different activities and a creative learning environments.



3.0 Accommodation Layout & Circulation

3.3 Early Years - Reception:

The reception classrooms are located in the centre of the school, away from the Nursery. The Early Years adjacencies and progression are therefore split.

The internal layout has the cloaks and toilet area separate to the main classroom space. A child of this age group cannot leave the classroom unaccompanied, resulting in continual disruption to the class and a layout that is difficult for the teacher to manage.

As reception age children require the toilet more often and commonly require assistance, the layout of a reception class should have toilets that are directly accessible from the classroom and partitions and cubicle are at a lower height to allow safe observation by the teaching staff so lessons are not disturbed.

The facilities associated with these classrooms are considered tired, out of date and in need of replacement to meet basic standards.

