

BURSTOW PARISH COUNCIL

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TOWN AND COUNTRY PLANNING ACT 1990 SECTION 78

(Procedure-Part 2 of The Town and Country Planning (Appeals) (Written Representations Procedure) (England) Regulations 2009)

SITE	Land at Dowlands Park, Plough Road, Smallfield RH6 9SD
APPLICATION	TA/2019/1115
APPEAL REF	APP/M3645/W/19/3243231

Dear Sir

My Council would like to add the following for your consideration, in addition to the previous comments we have made.

The national Planning Policy Framework (NPPF) at paragraph 213 states that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the Framework. Due weight should be afforded to them according to their degree of consistency with the Framework,

Policy DP10 point out that only in exceptional circumstances will the Green Belt (GB) boundaries be altered and that this should be through a review of the GB. This echoes the beliefs behind paragraphs 136 and 143 of the NPPF.

Policy DP13 says that subject to a list of exception, the construction of new buildings in the GB is inappropriate. Again this aligns with paragraph 145 of the NPPF

Tandridge, through their GB review excluded this site from their Local Plan and we do not believe there are any special circumstances that outweigh the harm that would be caused to the openness of the GB.

Smallfield is one of just 5 larger rural settlements that are inset from the GB in Tandridge. The GB performs a vitally important and effective means of preventing sprawl outside of Smallfield and should therefore be protected.

The proposed development is set on a junction of an unclassified road (Plough Road) and a narrow single lane track (Dowlands Lane). There is a low hedge surrounding the site in

otherwise flat terrain and any development would be clearly visible to passers-by. This would be a permanent change to the special openness of the site that no amount of landscaping could mitigate. In addition, the scale of the development, together with its access, parking and other hard landscaped areas would be apparent to the many residents and visitors to the site, to the occupiers and visitors to the existing few adjacent dwellings and to all those who pass by the site. There would be considerable loss of both special and visual openness and would cause significant harm to the GB.

The built development would be on current undeveloped land that is used for grazing of horses, in open countryside, outside of the Smallfield settlement and is not spatially contained by other developments.

Section 66 of the planning (Listed Building and Conservation Areas) Act 1990 says that special regard should be had to the desirability of preserving a listed building and its setting when determining a planning application. Smallfield Place is a Grade 2* listed Jacobean house dating back to 1600. It has been restored and renovated to return it to its former state having at some point been divided into two dwellings. The County Heritage officer and Historic England have both strongly opposed this development as causing significant harm to the character and setting of the listed building. The size and scale of the proposed development means it will not be possible to mitigate the impact upon the setting of this great house.

Highways & Traffic

In addition to previous comments made by the parish council to this application, we ask that the Inspector takes into account the number of recent vehicle collisions and other incidents along Dowlands Lane. Plough Road was recently closed to allow for main sewer replacement immediately west of the junction with Dowlands Lane. Whilst inadequate diversion signage was in place we had multiple incidents each day of vehicles falling into ditches at the sides of the road whilst attempting to pass an oncoming vehicle or head on collisions where vehicles crashed into each other due to lack of visibility on bends.

Affordable Housing Need

The applicant sets out in his statement of case that there is currently a need for 310 new affordable homes per year for Tandridge District.

Work has commenced on a development of 51 affordable units within the settlement of Smallfield (TA/2014/1809 – Land west of Grasslands)

Tandridge have included provision within the draft Local Plan for this, for example, with up to 1,000 units in the South Godstone Garden Village. In addition, up to 40% of dwellings on the following sites included in the emerging Local Plan in the Smallfield area will be affordable housing:

HSG01: Land at Plough Road and Redehall Road	160 units
HSG 02: Chapel Road, Smallfield	15 units
HSG03: Land North of Plough Road, Smallfield	120 units

Burstow Parish Council carried out a Housing Needs Survey in September 2019 and this assessed a considerably smaller need set at 16, of which 7 have confirmed they are already on the housing register with Tandridge. The Parish Council has included a copy of the housing needs survey to assist the Inspector in assessing the need for affordable housing. We do not believe there is a need for a further affordable 88 dwellings. proposed location.

Proposed Location

We also consider the proposed site to be utterly inappropriate as it is approximately 1000 m from the centre of Smallfield. The Manual for Street considers that there should be a range of

facilities within 800m. This site does not have shops, schools, medical or other services within this distance. Residents living there would need to walk along an unlit road. Even though there is provision within this application for a footpath this is limited to just the frontage of the development. Residents would then have to walk along an unlit, unclassified small road with no footpath for approximately 400m. This road is regularly used by HGV drivers accessing a number of soil and concrete processing sites adjacent to Smallfield. Where there is a footpath, the width is below 1.5m for much of its length and below 1m in parts of it. These widths are not sufficient to allow persons pushing prams, pushchairs and wheelchairs to be able to pass one another without straying into the road. There are no proposals to remedy these deficiencies or to improve the disintegrating pavement and lack of street lighting.

Bus service – Route 315 serves Plough Road offering links to St Bedes and Reigate schools and East Surrey hospital. There is no service at the weekend or on public holidays. There are 4 busses at 7.40, 7.55, 10.17 and 13.42 approximately. There is no provision within the application to increase the frequency of the service and even if there was it would be, a fixed amount, for a limited duration before ceasing.

Sustainable transport – The distance of the site from Smallfield, the inadequate pedestrian and cycling facilities, the disrepair and lack of lighting and the extremely poor public transport would almost certainly dissuade many residents of this site from using any sustainable transport and instead make it highly likely they would use private cars for any journeys in contravention of Section 9 of the NPPF. The Framework, at paragraph 103, also states that significant development should be focused on location which are or can be made sustainable through limiting the need to travel and offering a **genuine** choice of transport. This site does not realistically offer genuine choice.

The applicant refers to 'The McIntosh Foundation' in application TA/2019/1115 (Affordable Housing Statement: Page 48 par 3.36 and 3.39) as being the agency responsible for managing the affordable housing. However, as of today's date, this charity has still not been registered with The Charity Commission. The applicant fails to address this in the Statement of Case submitted to the Planning Inspector in February 2020. There is no explanation offered which leaves the Council concerned about how permanent or robust the affirmation to provide 100% affordable housing in perpetuity is. In addition, the Parish Council is dismayed that the applicant is seeking to use the current Covid-19 crisis to further his cause, breaking Government requirements to 'stay at home'. We have received reports from our residents that, in the last 24 hours, a large flyposting campaign has been carried out in our parish urging people to support the application. We find this distasteful.

We ask that you refuse consent for this application due to the harm it would cause to the Green Belt, the unsustainable location, damage to the character of the area and damage to the heritage of Smallfield Place.

Yours faithfully

Jeannie Ryan
Burstow Parish Council