

1. These comments are made on behalf of M F Strawson Ltd, promoter of land west of the A60, Redhill, for 150 dwellings. The site is assessed as site 6/778 in the Sustainability Appraisal of Reasonable Alternative Sites. This Position Statement follows on from representations made to the Publication stage of the Local Planning Document, reference lpd\_pub\_b/218 and lpd\_pub\_b/221.

**Issue 7d: Lodge Farm Lane (H5) [Policy LPD 64]**

**Q28. Is the proposed allocation justified and appropriate in terms of the likely impacts of development?**

2. Both site 6/778 and the site at Lodge Farm Lane (H5) were assessed within the Sustainability Appraisal ("SA") as outlined in Appendix C to the SA (May 2016) [LPD/REG/14]. Both sites were also considered within the Site Selection Document (May 2016) within Appendix A [PD/GRO/06].
3. Site 6/778 scores better than Site H5 in two respects; flooding and transport. Each of these are addressed further below. On all other considerations the sites are comparable in terms of the Council's conclusions against the criteria within their appraisal.
4. With regards to flooding, it is noted that within the surface water flood risk map Site H5 is indicated as having a 'high risk surface water flooding issue to the south of the site'. Whereas for Site 6/778 there are no flood risk issues associated with the site. Site H5 therefore scored lower than Site 6/778 in respect of this issue.
5. Site 6/778 benefits from access to an additional bus service providing services on a 15 minute frequency, with a total of three services within a 400m radius. Site H5 only has access to two services, one on a 10 minute frequency and one on an hourly frequency. Again, Site H5 scored lower than Site 6/778 on this issue.
6. Therefore it is considered that Site Allocation H5 is not justified by the SA and potentially has a greater impact on surface water flooding and sustainable travel choices than Site 6/778.

**Q29. Is the proposed allocation deliverable? In particular, is it:**

- a. confirmed by the landowner involved as being available for the use proposed?
- b. supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?
- c. deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?

7. No comment.

**Q30. Would the development of housing on H5 harm the clay extraction and landfill operations at Dorket Head? Would these operations result in a delay to this housing allocation coming forward for development? [Policy LPD 64]**

8. No comment.

**Q31. Would the development of housing on H5 accord with the County Council's policy on minerals, the National Planning Policy Framework (paras. 143 and 144), the Planning Practice Guidance and advice from British Geological Survey? [Policy LPD 64]**

9. No comment.

**Q32. Has full consideration been given to the loss of agricultural land?**

10. No comment.

**Q33. What are the exceptional circumstances which justify the removal of this site from the Green Belt?**

11. No comment.

**Q34. Should the land allocated be extended to the north?**

12. It is considered that the land to the north of this site should not be allocated when site 6/778, which scores similar or better in the SA process, is available, viable and suitable for development.



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