

**ISSUE: Whether the proposed site allocations are justified, effective and consistent with national policy in the NPPF**

**9a) Sustainable Urban Extensions (in respect to Policy NWH2 – Land at Bonehurst Road, Horley)**

*1. Are the reasons for selecting the sites soundly based? Is there evidence that the development of each allocation is suitable, available, sustainable, viable and deliverable?*

Land at Bonehurst Road, Horley has been promoted by Linden Homes for a number of years and has been assessed within the Council's Sustainable Urban Extensions Report (stages 1, 2 & 3)(SD7,8 &8a), Viability Report (SD42) and numerous versions of the Council's HELAA (site HW03), most recently in May 2018 (SD13).

As a result of this assessment work it has been concluded by the Council that land at Bonehurst Road, Horley is available, achievable and deliverable. It is considered that the overall approach taken by the Council in identifying the site for allocation is sound and is supported. Furthermore, pre-application meetings have taken place with the Borough Council and Environment Agency whilst discussions are ongoing with the Highway Authority. Throughout this process no in-principle issues have been identified and so this dialogue is considered to further support the fact that the site is suitable, sustainable, viable and deliverable. We are currently in the process of preparing a planning application for the site which will be submitted shortly.

*3 What type of uses and scale of development would each site be expected to deliver? Are these appropriate and deliverable?*

The proposed allocation on land at Bonehurst Road is expected to deliver new housing and open space (to form a continuation of the Riverside Green Chain around the northern edge of Horley). Linden Homes has a controlling interest over the whole of the site and therefore is capable of delivering the uses anticipated for the site by the Council. The provision of an extension to the Riverside Green Chain is logical whilst the site is surrounded on all sides by predominantly residential development. On this basis, it is considered that these uses are appropriate for the site.

In terms of scale of development, we consider that there is scope for additional residential development, over and above that anticipated by the proposed allocation (40 new homes). Based on detailed flood risk work (see Appendix 4 of our Regulation 19 representations), we consider that a greater proportion of the site falls within Flood Zone 1 than shown on the EA's current mapping and so is suitable for additional new housing. Given that the Environment Agency has acknowledged issues with its own modelling, discussions are taking place with the EA with the aim of agreeing the detailed flood zones for the site which in our view will increase the extent of Flood Zone 1 across the site. On this basis, we consider that Policy NWH2 needs to be flexibly worded to allow for additional development to take place at the site once agreement has been reached with the EA. In pre-application discussions, planning officers have confirmed that should the EA be satisfied, officers would not object to additional development at the site on flood risk grounds.

*4. What are the site constraints, potential impacts or infrastructure requirements of the allocation and how could these be addressed?*

There are no site constraints or site specific infrastructure issues that would prevent the proposed allocation of 40 new homes from being delivered. Based on Policy NWH2, access is to be taken from the A23, the design of which is currently being discussed with the highway authority. It is noted that based on the historical flood mapping the access road would be within Flood Zone 2 however the sequential approach advocated within NPPF (2012) will be applied in the layout of the access road and the design will meet the requirements of paragraphs 102 and 103.

As explained within our response to question 3 (above) it is considered that a greater proportion of the site would fall within Flood Zone 1 meaning that additional residential development at the site could be accommodated. In the event that additional development is delivered at the site we consider that all other site specific issues could be satisfactorily addressed by an appropriately designed scheme.