



# The countryside charity Surrey

Planning Policy Team  
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14th March 2020

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## Future Mole Valley: Draft (Regulation 18) Local Plan CPRE's Consultation Response

Dear Planning Policy Team,

We are the Surrey branch of CPRE, the countryside charity. We work for a countryside that's rich in nature, accessible to everyone and playing a crucial role in responding to the climate emergency. As such, we are opposed to the loss of precious countryside, open spaces and especially Green Belt land. However, we are pragmatic. We are pleased to provide the following submission to the Regulation 18 Consultation on the Mole Valley Draft Plan 2018-2033. This submission has been prepared by CPRE Surrey's Local Plan team including our Planning Advisers, Gillian Hein and Keith Tohill, our branch chair, Kristina Kenworthy, and our Mole Valley group chair, Max Rosenberg.

CPRE recognises that Mole Valley Council is required to plan for the future growth of the District, but we believe that the Local Plan must be robust, practical and sustainable; balancing development with protection of our environment. We agree with the Planning Officer of Surrey Hills AONB who, in his Reg.18 submission, urges the Council to use the Local Plan to protect and enhance the District's valued landscapes and biodiversity to create a more sustainable future, and in particular to meet the Council's declared climate-change and ecological goals. The Plan must reflect the Government's 25-Year Environment Plan and its 2020 Environment Bill Policy Statement, as well as the Climate Change Act 2008, the Paris Agreement 2016 and the forthcoming United Nations Climate Change Conference (COP26), not merely recognising that we are in the midst of a climate and ecological emergency but offering long-term solutions in a local context.

Our submission is divided into two main sections. CPRE's comments on the Plan Policies are in the first section (pages 1-30) and our detailed comments on the Housing Target and the Allocations are contained in the second section (pages 31-97) including our comments on the individual allocated sites. We set out here what we believe the Council should do to produce a robust, sound Plan that will meet the District's needs, which we do not consider the draft Plan, in its current form, to be. In particular, we reject the Council's total acceptance in its draft Plan of housing targets derived from the DCLG's 'Standard Methodology'. We believe these numbers can and should be significantly reduced; in our submission we provide a more considered housing figure for Mole Valley in the Plan period and explain how this can be met without unnecessary loss of Green Belt countryside.

We argue in the following pages that the Council has not been able to demonstrate 'exceptional circumstances' for re-drawing Green Belt boundaries, and we contend therefore that the District's Green Belt should be largely unaltered. However, we also argue for a modest extension of the Green Belt into areas of greenspace that are currently categorised as 'Countryside beyond the Green Belt' in order to provide more defensible Green Belt boundaries for the future.

Yours faithfully,

Andy Smith, Director CPRE Surrey



**Future Mole Valley: Draft (Regulation 18) Local Plan  
Consultation Response Form**

**Consultation Period: 3 February to 23 March 2020**

This response form will allow you to comment on each section of Future Mole Valley if you wish. To view the draft Local Plan and associated documents, please visit [www.futuremolevalley.org](http://www.futuremolevalley.org). Alternatively, the draft Local Plan and supporting evidence documents are available to view in hard copy at Mole Valley District Council (MVDC)'s offices in Dorking, the HelpShop in Leatherhead and libraries in the district. Consultation responses can also be submitted online by visiting the same website.

By submitting a representation to us, you consent to being notified of other upcoming Local Plan consultations. Please notify us if you wish to opt out of future correspondence.

**Your personal information will be held confidentially by us, and will not be shared with third parties.** More information about how your personal data will be held is contained in the Future Mole Valley privacy notice available on the Council's website. By submitting a consultation response using this form, you agree that we may process your information in accordance with these terms.

Fields marked with a \* must be filled in for validation purposes. Fields not marked with a \* are optional. Anonymous responses cannot be accepted.

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Please submit your consultation response:

- To reception at the Council Offices, Pippbrook, Dorking, Surrey, RH4 1SJ.
- By email to [planning.policy@molevalley.gov.uk](mailto:planning.policy@molevalley.gov.uk)
- By post to Planning Policy, Mole Valley District Council, Pippbrook, Dorking, Surrey, RH4 1SJ



## Our approach

We have taken a 'brownfield first' approach, with the need for new development being met within built up areas or on previously developed land as far as possible. Do you agree with our 'brownfield first' approach?

**Yes but**       No

Any other comments:

*CPRE Surrey is the local branch of CPRE, the countryside charity. CPRE works for a countryside that's rich in nature, accessible to everyone and playing a crucial role in responding to the climate emergency. We therefore oppose the loss to development of precious countryside, open spaces and especially Green Belt land.*

*CPRE supports the brownfield-first policy but we do not feel that it has been sufficiently strongly adhered to in the draft Plan. There has been an inadequate search for brownfield sites across the District, and some of the rejected sites in the urban areas should be reassessed. In addition, we believe that densities on some sites, both urban and rural, are too low, necessitating the allocation of more greenfield sites than necessary to meet the target (which in any event we dispute). Please see our separate statement.*

*There are no policies in the Plan for bringing forward brownfield sites and the less sensitive greenfield sites first. A policy on phasing plus a requirement for higher densities could obviate the need for some of the allocated greenfield sites.*

We have sought to make more efficient use of brownfield land through:

- town centre redevelopment
- limited reallocation of employment land
- mixed-use redevelopment
- increasing densities in opportunity areas

Do you broadly agree with these approaches?

**Yes but**       No

Any other comments:

*In principle CPRE supports this approach, but please see our detailed comments on the relevant policies and our comments on individual sites as we dispute how the principle is being applied in some cases.*



However efficiently brownfield land is reused, there is still an unmet need for housing which can only be met on land that has not previously been built on. Do you agree with the use of a small amount of undeveloped greenfield land for this purpose?

Yes                       **No**

Any other comments:

*We accept the need to develop some greenfield land but we object to the scale of such land which is allocated in the Plan.*

*As set out in our accompanying statement, we object to assessment of need and the lack of consideration of constraints before identifying the amount of undeveloped greenfield required. Paragraph 11 of the NPPF states that Councils should provide for the objectively assessed needs for housing unless policies in the Framework protect assets of particular importance which provide a strong reason to restrict the scale of development. Footnote 6 refers inter alia to the Green Belt and AONBs as constraints which can lead to reductions in housing numbers. It is clear from the guidance that allowance for these constraints is applied after the assessment of housing numbers.*

*In the case of Mole Valley there is no adjustment of the housing need figures to reflect the very real constraints in the district and the safeguarding of valuable greenfield sites. Both Woking and Reigate & Banstead ( in both the 2014 Local Plan and 2019 revision) councils did not meet the full needs because of constraints, particularly Green Belt, and Tandridge is also proposing a housing shortfall and is currently awaiting the Inspector's report following the EIP.*



**Which part of the draft Local Plan do you wish to comment on?**

Please use a separate sheet for each policy or site allocation.

**General comments on the Policies**

Comment:

*We set out below CPRE's comments on the policies and site allocations. (Where we make no comment, we are in support of the Plan.)*

*As a general comment, we feel that with some of the policies much of the justification would be better placed in the policy box as the text is actually policy rather than a justification of policy. This will also give it greater weight at appeals.*

*We also feel that many of the policies are so general that they give little guidance to developers. This applies particularly to heritage and climate change. More specific targets should be required to reflect the need in particular to address the climate emergency which Mole Valley has declared in the District.*

*There are also instances where it is necessary to look at other documents to determine what is required – which is annoying and difficult for users of the document. This applies, for example, to parking standards which are in a separate SPD. Other authorities have not taken this approach.*

*Thus, we urge Mole Valley Council to rework the policies, taking these criticisms into account.*



**Strategy 2 Scale and Location of Development**  
**Policy S2.1a and 1d p. 15/16**

Comment:

*S2.1a*

*We object to the statement that at least 6,735 net additional dwellings will be provided. Firstly we regard the 6,735 figure as suspect. We accept that the government methodology figure has been used but there is no breakdown on how the figure has been arrived at. For example SHMA data shows that there is no need for inward migration yet locally generated housing need will be considerably lower than this figure. We believe that the figure should be questioned with the Government rather than accepting this as the target.*

*Secondly, as stated in our accompanying statement, no account has been taken of the environmental constraints in Mole Valley, in particular the Green Belt and especially well performing GB as judged against the 5 (4) purposes of GB as set out in the NPPF, and to a lesser extent impact on the AONB, which should lead to a considerably lower figure.*

*We object to the exclusion of the table in the SHELAA showing how the Council intends to meet the housing target, with the contribution of all sources of housing supply, and also the lack of a table showing a spacial analysis of the locations of the proposed dwellings. A graph and explanation of the housing trajectory should also be included. (Please see Guildford's Local Plan for example). Transparency is required on how the target is to be met. It is also not clear why the trajectory is for 7827 dwellings. There should be an explanation of why there is an 18% uplift.*

*S2.1d*

*This policy is vital for a District which is proposing a large uplift in Housing and with an already overstretched and inadequate infrastructure of all types (including medical and other services). We comment further on the Infrastructure section of the Plan but do not consider that it is correct to state that the Local Plan makes provision of 'infrastructure to support housing and other development'.*



**Strategy 2 Scale and Location of Development  
Policy S2 2. Page 15**

**Comment:**

*CPRE strongly supports the principle behind the 'brownfield first' approach but there is nothing in the Plan to indicate how development will be phased and how land in the larger urban centres will be developed first. There needs to be a specific phasing policy showing how specific urban land sites will take priority in the early stages of the Plan, and the implementation monitored. Without this, the policy is meaningless.*

*There is a very real danger that some of the easier, yet more sensitive, greenfield sites will be developed first, or several greenfield sites developed at the same time in the same area placing a burden on the highway network during construction and other infrastructure.*

*We note that Reigate & Banstead's Development Management Plan contains a policy on Managing Land Supply.*

**Strategy 2 Scale and location of development  
Policy S2...3 d. Page 15**

**Comment:**

*We object to higher densities being limited to the Development Opportunity Areas, as identified in Policy H4. We comment on this in Policy H4 but at this stage we wish to emphasise that there are other locations in the urban areas where higher densities should be encouraged whilst still retaining the character of the area.*

*Please see also our separate statement.*



**Strategy 2 Scale and Location of Development  
Policy S2.4 Page 15**

**Comment:**

*CPRE objects strongly to many of the proposed Green Belt boundary revisions, including some of the urban and village extensions. Please see our separate site specific objections. This policy should be amended to exclude reference to significant extensions to, for example, Hookwood and Beare Green.*

**Strategy 2 Scale and Location of Development  
Policy S2.5. Page 15**

**Comment:**

*CPRE suggests that in view of the proposed loss of a considerable area of the Green Belt, the 'Countryside Beyond the Green Belt' be redesignated as Green Belt, particularly bearing in mind that part is currently designated as AGLV and may in future become an extension to the AONB. This would obviate the need for this part of Policy S2. (This is on the assumption that our request, that some of the major Green Belt development sites be deleted, is ignored.)*

*We accept there are policy barriers to overcome if new Green Belt is to be designated to replace that lost. However, this process is a clear option set out in the Framework. We urge Mole Valley to consider this option and to progress it urgently and robustly.*



**Strategy 2 Scale and Location of Development**  
**New policy**

**Comment:**

*We request a new policy indicating that the Council will ensure that planning briefs/ master plans will be prepared on the larger development sites to ensure that the required infrastructure and services are provided either on site or a financial contribution made to ensure they are provided in the vicinity. The justification is to ensure the proper planning of the area.*



**Housing 1 Housing Delivery**  
**Policy H1. Page 25**

**Comment:**

*We object to the housing target of 6,735 set out in H1.1. (Please see separate sheet on this and our objection to S2.)*

*We object to the lack of transparency on how this figure has been arrived at as consider it is in excess of need. We assume it includes a figure for inward migration from London even though this was not required in the SHMA and contains a projection greater than internally generated population growth. We therefore request a breakdown and justification of this need target.*

*Secondly, we object to the fact that no account has been taken of the constraints as set out in the NPPF, particularly the impact on the Green Belt and AONB, when accepting this target unchanged. Again, please see our separate critique of this target.*

*As we object to H1.1, it follows on that we object to the scale of development and site allocations referred to in the following bullet points 1- 3. We consider that this section should in any event be included in the policy box as it constitutes the fundamental spatial strategy of the Plan.*



**Housing 2 Affordable housing**  
**Policy H2 Page 26**

**Comment:**

*CPRE supports this policy, including the 40% affordable and requirement in rural areas for an affordable housing requirement where there is a net increase of 6 dwellings. However, we request, as has been done elsewhere, that the definition of affordable housing is changed from 80% market value/ rental to a calculation based on income. Most residents without private assistance cannot afford a house at 80% market value. Therefore a more realistic criterion is required.*

*We should also like to see a commitment in the policy for the provision of social rented housing and other low cost schemes in view of the need for this form of tenure, plus an intention to work with registered providers.*

**Justification:**

*We welcome the paragraph in the justification relating to the subdivision of a site but in practice it is often impossible to get a specific contribution for affordable housing as the total number of units is frequently not known in the early phases, and also legal advice in Reigate & Banstead indicates it is not possible to total the various phases/ subdivisions and calculate an affordable housing contribution, even if the same developer has built all phases each of less than 10 units.*

*We support the viability section but request that reference is made in the accompanying legal agreement that the Council will receive a proportion of the uplift for affordable housing if the sale prices are higher than indicated in the viability calculation, (unless this is implied in the existing wording.)*



**Housing 3 Housing Mix**  
**Policy H3 Page 28**

**Comment:**

*We support the policy but request a specific policy on tenure, in view of the unaffordability levels due to high house prices in Mole Valley, and include reference to social rented housing and other forms of low cost housing.*

*Presumably the final version will also need to refer to the Government's first-time buyer policies.*



**Housing 4 Development Opportunity Areas**  
**Policy H4. Page 30**

**Comment:**

*CPRE does not object to the majority of this policy but we have a number of reservations.*

*2. Making more efficient use of land should apply across the District, not just in or adjacent to the three main town centres and Local Shopping areas.*

*3. Higher densities of more than 50 dph should be the aim in all developments, particularly on the larger sites, providing they are sensitively designed and are not harming the character of adjoining areas. Low densities are wasteful of land and will lead to the loss of yet more Green Belt in future Plan revisions if not in the current Plan.*

*We also object to how the Development Opportunity Areas are defined. There are areas outside these Opportunity Areas and designated principal roads where higher densities would be appropriate – particularly in the main urban areas. Account should also be taken of proximity to bus stops where there is a good service. The 479 Arriva bus service is a case in point.*



**Housing 5 Technical Standards**  
**H.5 page 32**

**Comment:**

*We support this policy but consider that it should be aiming higher. This Plan is to run until 2033 and by that time there will be increased legislation to counter climate change.*

- 1. With an aging population, the accessible and adaptable dwelling standards will have to increase. We appreciate that the policy states minimum requirements of 10% and 5% respectively but regardless of current building regulations, we should be aiming for a much higher percentage.*
- 2. We support the principle of water reduction but would like to see the Council **requiring** that developers introduce rainwater harvesting and water reuse measures rather than just encouraging them in the justification.*
- 3. Similarly, regarding the minimum space standards, the policy should say '**must meet**' instead of 'should meet'.*



**Housing 9. Gypsies, Travellers and travelling Showmen**  
**Policy H9 Page 39 - 40**

**Comment:**

*We support this policy but would expect it to include an assessment of need and how the target will be met, based on the information in the evidence document.*

*In addition, most travellers' sites require an area for the parking of commercial vehicles and storage. There is no reference to the commercial activities which usually take place on most travellers' sites and the need to ensure there is no harm in terms of noise/ vibrations/ light and air pollution etc. to the surrounding area.*

*We support the reference to a search for a transit site which would reduce the number of illegal incursions, but regret that agreement has yet to be reached to provide a site somewhere in Surrey.*



**Environment 1. Development of the Green Belt**  
**Policy EN1 Page 57 / 58**

**Comment:**

*CPRE's views on the developability of areas of the Green Belt are set out in the accompanying document. We are particularly concerned that whereas elsewhere in Surrey sites which are calculated as having moderate harm are retained as Green Belt, in this Plan they are regarded as expendable. The bar for protection/ retention is set too low with the result that many areas which largely meet some of the 4 purposes are proposed for development. The survey data needs to be reassessed and appropriateness of sites for development reconsidered.*

*We would have liked an initial general statement on the importance of the Green Belt, ensuring it is robust and defensible and its coherence is protected.*

*As stated in our comments on S2. we also suggest that the area covered by the Green Belt be extended to include the land to the South, bearing in mind the large areas of the Green Belt which will potentially be lost if development sites are confirmed.*

*A minor point but extensions and replacements should relate to lawful and permanent structures.*



**Environment 2. Development in the Countryside beyond the Green Belt.  
Policy EN2 Page 59**

**Comment:**

*As stated above, we suggest that this land be incorporated into the Green Belt, in part to replace what is being lost to the north. Many of the policies are similar and the countryside would have greater protection.*



**Environment 3. Development in Rural Villages**  
**Policy EN3. Page 61**

**Comment**

*We support this policy.  
Please see our detailed comments on site allocations in the accompanying report and reference to prioritising villages with good public transport, where appropriate. We note NPPF guidance which allows for Green Belt washed-over villages to be inset, thus allowing for development to take place, again where appropriate.*



**Environment EN 4.  
Policy EN4 Design and Character**

**Comment:**

*We recommend separate sub - policies in EN4 or separate policies to cover shop fronts and advertisements. There are special requirements relating to these types of development which should not be confined to the justification.*

*We would like to see specific reference to backland development and the impact of new accesses on the street scene. Also, account should be taken of cumulative impact on the local road network.*

*In addition to integrating parking, there should be reference to the ability to manoeuvre vehicles on site.*

*We would also like to see a requirement that, with developments of several dwellings, where appropriate, the highway specification, lighting and drainage are required to be built to adoptable standards and adopted by Surrey County Council. There is a side problem, that recent developments, where the internal infrastructure is built to lower standard, residents are left having to pay into leasehold agreements with limited powers to prevent exploitation. This situation can be prevented in future by ensuring, together with the Highway Authority, the adoption of new highways together with associated lighting, drainage and landscaping.*



**Environment EN 5. Inclusive Environment**  
**Policy EN5 Page 65**

**Comment:**

*Presumably this policy also covers residential developments where safety and informal surveillance is required for pedestrian access and parking. The policy should specifically cover estate design and reference should be made to 'Secured by design'.*



**Environment 6. Conservation and Enhancement of Heritage Assets**  
**Policy EN6 Page 66/ 67**

**Comment:**

*We object to the short, very general policy covering a wide range of heritage issues.*

*We propose that the sentence in the justification referring to the Council, in its decision making, using opportunities created by the planning process to conserve and enhance the significance of Mole Valley's heritage assets both designated and undesignated, becomes a policy.*

*We would like to see separate policies for listed and locally listed buildings, conservation areas, archaeology sites and historic parks/ gardens etc. As it stands the policy is too general. We appreciate that some of the relevant policy is in the justification or government guidance. However, for clarity and robustness some of the relevant text needs to be upgraded, in a succinct way, to the policy, thus strengthening it.*

*For example, with archaeology, there should be a policy requiring a desk-based assessment where appropriate together with a field excavation and written report if required. With conservation areas, there should be a policy on only agreeing to demolition where it will not detract from the character of the conservation area and merits of the replacement. Similarly a policy on enabling development would be useful.*

*Strong heritage policies will assist the Council if it is minded to refuse an application or make a strong case on appeal.*



**Environment 8. Landscape Character**  
**Policy EN8 Page 70**

**Comment:**

*We support EN8 1., although suggest a reference also to green corridors in EN 1b.*

*We request that EN8 2- 4 be revised so that it is clear that the policy in EN8 4.for the AONB will apply also to the AGLV until such time as the boundary review takes place. It is not enough that development in the AGLV will be assessed only on its impact on the AONB. It should protect and enhance the AGLV in its own right.*

*We feel that the policy on AONB policy in EN8 4 is too weak. It should emphasise that it should have the highest level of protection in relation to scenic beauty and the landscape with a strong presumption against inappropriate development. In fact, we would like to see a policy included that all major development will be refused unless there are special circumstances.*

*It should also include a requirement that development beyond the AONB boundaries should protect the AONB setting, including views both to and from the AONB.*

*The policy text should also be revised to include reference to the Surrey Hills AONB Management Plan and not just refer to it in the justification, The policy should either state that development should comply with the Management Plan or it is an important material consideration.*



**Environment 9. Enhancing biodiversity**  
**EN 9 Page 72**

**Comment:**

*We generally support this policy but suggest that it should be strengthened in view of evidence from Surrey Wildlife Trust that several species of flora and fauna are declining at a rapid rate with the danger of county-wide extinctions. It is also relevant to climate change, as increased tree cover and enhanced biodiversity can reduce flooding, improve soils, and mitigate carbon emissions. We suggest a new policy at the beginning which reflects the initial paragraph of the justification.*

*We also suggest that EN9 1 be changed so that 'should seek' will be replaced by 'will require'. EN9 2 should be strengthened in view of the Government's promised policy of requiring a net increase, possibly 10% in biodiversity value for future development schemes.*

*We welcome the promotion of ecological networks in EN9 5.b, but suggest that these be promoted and funded by developers in appropriate locations where it is not possible to achieve increased biodiversity on site. A 10% net gain in biodiversity will be difficult to achieve, for example, in high density residential or commercial developments, (although high quality landscaping with native planting should still be a requirement.)*

*Presumably the Council has developed the Surrey Wildlife Trust / Surrey County Council work on identifying important habitats and promoting green linkages, so developments should be refused if they impinge on the alignment of these potential green corridors. We suggest a policy stating that development will be refused where it not only harms the biodiversity of protected areas but prevents important links between them.*

*In conclusion, in view of the scale of development proposed on greenfield sites, CPRE feels that this policy needs to be far more proactive and specific if the Council is to be successful with appeals when dealing with applications which fail to enhance biodiversity.*



**Environment 11. Green Infrastructure and play space**  
**EN11 Page 74**

**Comment:**

*We suggest EN11 also includes reference to allotments and outdoor sports facilities, instead of only in the justification. We would also like to see a reference to providing offsite facilities particularly in areas which are currently deficient.*



**Environment 12. Protecting Local Green Space**  
**EN12 Page 76**

Comment:

*We suggest that the last sentence of the policy is revised so that it reads 'Limited built development **may be** allowed' (instead of 'will be' allowed). The justification correctly states that development should be subject to other relevant policies.*



**Environment 13. Promoting Environmental Quality**  
**EN13 Page 77**

**Comment:**

*CPRE supports this policy but we would have preferred it to include more detailed guidance and specific standards although with the flexibility to adjust if standards are raised in future. For example, we note that Mole Valley currently does not monitor air pollution so it is difficult to see how some of the proposed developments will not increase air pollution to unsafe levels.*

*In view of the likelihood of more low-flying flights as a result of possible Heathrow Airport expansion, policy EN13 2 should also refer to Heathrow.*



**Environment 14. Responding to the Climate Emergency**  
**EN 14 Page79**

Comment:

*We do not object to the proposed measures but would have preferred a more dynamic approach which reflects the urgency of the situation. This should include requiring more specific standards where appropriate instead of leaving the construction details to the developers.*

*There should be a zero carbon emission objective with all new development.*

*The inclusion of light pollution measures would be desirable in view of the associated energy wastage. Also considerations like requiring solar power installations where appropriate, high standards of building insulation, building orientation, water recycling and saving mechanisms and requiring the provision of charging points for electric cars etc are all issues the Council can influence when in discussion with developers.*

*Consideration should be given to a policy which states planning permission will be refused if developments fail to respond adequately to the climate emergency. At the very least EN14. 1 should state Measures to mitigate the effects etc 'must include' instead of 'can include'.*



**Infrastructure 1. Promoting Sustainable Transport and Parking**  
**Inf. 1 Page 83**

Comment

*We support this policy but would have liked to see car parking requirements in this document instead of having to refer to a separate document. The approach used by Reigate & Banstead Council, where parking standards are included and account is taken of proximity to and merit of public transport facilities, is preferred.*



**Infrastructure 2. Managing Flood Risk**  
**INF 2 Page 85**

**Comment:**

*We support this policy but in view of the pressure for development in flood plains, 1.a should be modified to include suggestions such as dwellings with garaging at ground level and living accommodation above.*

*In view of the recent heavy rains and flooding in many parts of the district, including Leatherhead, we suggest that the Environment Agency flood risk areas need to be reassessed.*



**Infrastructure 4. Infrastructure delivery**  
**INF 4 Page 88**

**Comment:**

*Policy INF 1 is too weak. The necessary infrastructure should be in place and available to the residents when first required. We appreciate that phasing may be necessary but this should not prejudice the quality of life of the initial occupiers.*

*The policy should state that Grampian conditions will be applied if there is a danger the developer will not agree to the required provisions.*

*We would like to see a policy included which requires that a master plan is agreed with the developer at an early stage on all sizeable sites, setting out the infrastructure and services to be provided, thus ensuring that the developer has not overpaid for a site, affecting its viability at a later stage.*

*We have stated in relation to another policy that sites should be phased with preference given to developing brownfield/ urban sites first. This would allow the Council to ensure priority is given to providing the infrastructure for these sites first.*

*We are also concerned that the list of infrastructure requirements in the Plan does not reflect what will be required to accommodate the scale of residential development being proposed. A more detailed list of schools, health facilities, water/ sewage treatment facilities and transport improvements etc. should be included with dates related to the new development.*

*We suggest a new policy on **Managing Delivery** which would probably come at the end. We have stated in relation to other policies that it is essential that developments should be phased with the development of brownfield sites at or near the beginning of the plan period. It is vital in an area such as Mole Valley where the Green Belt is under so much pressure that there is an effective and robust brownfield land first policy. Mole Valley's well performing, valuable Green Belt should not be sacrificed because greenfield land is cheaper, easier and more profitable to develop.*



**Infrastructure 5. Safeguarding**  
**INF 5 Page 90**

**Comment:**

*We support this policy but, as stated in response to INF 4 are surprised that there are so few sites being safeguarded to accommodate the scale of development proposed.*



### **Comments on the Housing Target and the Allocations.**

CPRE Surrey is the local branch of CPRE, the countryside charity. CPRE works for a countryside that is rich in nature, accessible to everyone and playing a crucial role in responding to the climate emergency. We therefore oppose the loss to development of precious countryside, open spaces and especially Green Belt land. We are pleased to provide the following comments on the Housing Target and Allocations in the draft Mole Valley Local Plan.

#### **1. What we believe Mole Valley should do to produce a robust, sound Plan.**

CPRE believes that in the case of Mole Valley, with the presence of so much Green Belt and AONB land in the District, the Council should **not** be accepting before an Examination the very high housing targets the Government is pressing for, without arguing for some reduction in numbers. [Ref AONB and AGLV designated landscapes, please see our comments on Policy EN8.]

We are fully aware of the arguments the Council is using to accept the Government's housing figure, i.e. that the housing numbers are being imposed on the District, and that the major discussion at the Inspector's Examination of the Plan will be on housing numbers, with professional arguments and eloquent submissions from planners and lawyers representing housebuilders and developers. Further, we understand and appreciate the risks posed if the District is not able to produce and adopt an up-to-date, NPPF-compliant, Local Plan.

Nevertheless, we believe it is morally right for Mole Valley Council to make its case in the strongest possible terms for its well-performing Green Belt areas and sites. At elections, both local and general, political parties, councillors and prospective MPs have stated clearly in their election literature to the public that they strongly support the Green Belt and will do all they can to protect it. However, now, when faced with the first real test of this determination to protect the Green Belt, Mole Valley Council appears to have given in without a fight.

The Council has already stated that the housing target for the District is too high and suggests that only through a public consultation which demonstrates that the harm outweighs the benefits will it be possible to bring pressure to bear on the Government to reduce the housing numbers. This approach is not sensible or sustainable.

- The draft Mole Valley Plan clearly sets out the Council's proposals to meet (and exceed - by a large amount) the housing target derived from the Government's 'Standard Methodology', and, further, stipulates that to achieve this target a number of sites must be released from the Green Belt.
- Having done so, the Council argues that a negative reaction to this approach from residents would lead to a complete change of direction, contrary to all the evidence presented in the Plan and in much of the detailed evidence contained within the Evidence Papers (especially the SHELAA). We believe this approach is unwise, unworkable and unsustainable; it will leave the Council in a weak position at the Plan Examination, and will inevitably be seized on by the Inspector and the major objectors.

It would have been more sensible for the Council to have delayed the Plan's publication again and to produce one that all parties on the Council could agree upon and unite behind, and defend at the later stages of the Plan process.



As for having a position that individual Green Belt sites should only be developed 'if supported by local residents', this is unworkable and unrealistic, is not based on planning guidance, and would result in planning chaos. It is highly unlikely that any proposal for development of a green space would ever receive support from those who live close to the site. A District-wide Plan would be impossible to prepare and take to examination if every Green Belt site could be vetoed in this way.

It is the responsibility of the Council to take strategic decisions on development sites for the benefit of the District as a whole. Producing a sound Plan is the Council's statutory duty. Relying on negative responses to a public consultation cannot possibly be a successful approach to Plan-making, and will not provide effective protection of the Green Belt in Mole Valley, as experience in other Surrey Districts that have recently been through the Local Plan process, including Waverley and Guildford, shows.

## **2. Mole Valley's housing numbers:**

Policy H1 states that the housing requirement is to deliver at least **6,735** additional homes within the Plan period (2018-33). But turning to Appendix 6: Housing Trajectory, we find that the number of dwellings within the Local Plan period to be **7,827**. (made up of 2855 for years 1-5, 3260 for years 6-10, and 1712 for years 11-15. A note states that these figures exclude an anticipated windfall up lift as a result of increase densities within Development Opportunity Areas.

The SHELAA Potential Dwellings: We broadly accept how the housing figures contained in the SHELAA Volume 1 pages 2-4 Executive Summary, have been compiled. They contain a breakdown of the various categories of dwellings that Mole Valley have identified as likely to come forward in the Plan period, 2018-2033.

We have two observations:

- The base date is 31/03/2019, i.e. a year ago. Of course we accept the reason for this, but would urge that the Council should, as soon as possible, rework these figures to be up-to-date, especially before any decisions are taken on the Allocation of many of the larger Green Belt sites. A reworking to a date in 2020 will very likely identify an increased capacity of permissions and brownfield capacity as previously unidentified potential or additional actual sites come forward. This increase may only be relatively small, but every addition helps to reduce dependency on Green Belt sites, and so reduce the difference between what is identified and the required District total to be reached.
- We note the omission of the 180 dwellings figure, called 'Uplift in Windfall Provision over and above the historic average anticipated in Development Opportunity Areas.' Although a windfall figure we believe it has validity and so should be counted, or at least be more robustly accounted for, in Mole Valley's housing total. At present it appears as rather an 'after thought' (increasing the grand total to 8,007). Doing so would again reduce slightly the need to propose Green Belt land for development. We argue elsewhere that the 180 estimate is an underestimate and should be increased because of some changed assumptions in the drawing up of the Development Opportunity Areas.

CPRE questions why the housing trajectory figure is 1,100 dwellings (over 18%) more than that in Policy H1. We accept Policy H1 states '*at least*', and we also accept there needs to be a 'buffer' or headroom figure to allow for some sites not coming forward or at a smaller scale, but the 1,100 figure seems excessive and results in more Green Belt land being put forward for development.



In conclusion, therefore, we would strongly question why this excess is so large (and it excludes any figure of at least 180 for the anticipated windfall uplift) or necessary and therefore why so many well-performing Green Belt sites are included as Housing Allocations.

### **3. Mole Valley's decision to meet the District's full housing target**

CPRE Surrey is concerned at Mole Valley Council's decision to meet its full housing target, which has been calculated by the standard methodology, using a formula imposed by the Government. Thus, Mole Valley is providing land for building at least an average of **449** net homes per annum for 2018-2033 and a total of **6735**. Even this is lower than the housing trajectory figure with an added buffer/headroom element. This larger housing figure for the 15 years is **7827**, or **522** net per annum.

However, in contrast the actual net figure for annual average completions over the last **3** years is only **335** (2016 /17-2018/19). This figure is considerably higher than an average for the last **5** years is applied which is only **271 net**.

CPRE believes it is not possible for a small Local Authority, in a largely Green Belt location, to increase its annual building rate to a minimum of **449 net** or up to **522 net**, without severe adverse effects on the landscape, the fabric of the towns and villages and significant strains on all types of infrastructure and services.

The latest 2020 figures from Central Government have increased the build rate by an additional 5-20% for the next 5 years (the different percentages depend on which previous 3 years are used), which makes the proposed build rate even more improbable. The Council needs to recognise that these levels of buildings are verging on the absurd and should not be taken forward in any Plan.

It is our contention that although the Council uses words such as 'required to provide' and 'imposed,' there are grounds (in the circumstances that exist in Mole Valley, where 76% of the area is Green Belt) for attempting to produce a Plan that does NOT reach the standard methodology figure. We accept that, as the Council says: *'housing numbers will be a key factor examined by a Government appointed Inspector when deciding whether or not to sign off the plan.'*

We believe that instead of accepting straight away the Government's completely unrealistic and unreasoned housing targets, the Council should fight for its principles, so long expressed, that its precious Green Belt should be largely protected. Of course, we are fully aware that this will not be an easy task, as the Planning Guidance has been rewritten to favour the Government's policy to build very more dwellings (up to 300,000 homes a year by the early 2020s), and the final result could be that an Inspector will require 'Major Modifications' or a partial rewrite of the Plan.

However, nothing ventured nothing gained, and when the cost is the destruction of hundreds of hectares of Green Belt over the next 15 years, with the resulting increase of pressure on the already inadequate District's infrastructure, whether that is hospitals, medical facilities doctors dentists and the subsequent large increase in traffic movements and congestion, we consider the Council should at least put forward a case against such a high loss of countryside and Green Belt.

The National Planning Policy Framework (NPPF): The principal Planning Guidance has been revised, but still retains some helpful wording that can be used to build a case for a reduction in housing numbers. Paragraph 11 states:



*'Strategic policies should as a minimum provide for objectively assessed needs for housing ... unless the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason to restrict the scale ...of development in the Plan area .6'.*

Footnote 6 says: *'The policies referred to are those in this Framework relating to habitat sites, and or designated as SSSI, land designated as GREEN BELT....'*

Thus, Green Belt is specifically referred to as a constraint that, if present, could well lead to a restriction/reduction in the housing numbers.

Further, it is part of guidance that housing numbers are just *'the starting point'*, to which many environmental factors need to be applied, before a final figure is adopted.

Turning to the PPG, it is clear that Housing Need is recognised as an 'unconstrained', or 'Policy Off' assessment of the number of dwellings needed in an area. Applying constraints, of all types, a 'Policy On' reduced figure can be put forward in a Local Plan.

However, the Council has taken the Housing Need figure, as expressed in the Standard Methodology as their final Need figure, without, it appears, any reference to the constraints (including Green Belt as outlined in footnote 6 of paragraph 11 in the NPPF), existing in the District.

**We suggest that Mole Valley Council reconsiders its whole approach and strategy on this vital aspect.**

#### **4. Mole Valley Green Belt Review (MVGBR):**

It is accepted that Green Belt boundaries can be changed at the Local Plan stage, if exceptional circumstances are proven to exist, if there is robust evidence and a full Green Belt Review is produced and forms part of the evidence base. It is our contention that the Mole Valley Green Belt Review, although probably adequate in its scope and contents, could have been more robust and comprehensive.

Additionally, we believe that the Review is too subjective in some aspects. Whilst we accept, of course, that such documents are by their nature based on the author's judgement (and are therefore partly subjective), we contend that the Mole Valley Green Belt Review could have been more detailed in places, contain some definitions, and be less qualitative.

For example, there appears to be insufficient explanation as to why an allocated site, which is one part of a larger land parcel which is rated/scored in the Review, has been down rated, or scored lower in the SHELAA.

We disagree with a number of the Review's conclusions and the rating according to the four purposes of Green Belts. In particular, we believe that the ratings given to some of the proposed allocated sites for preventing encroachment into the countryside are too low. Many that have been scored 'minimal' or 'moderate' are, in our opinion, significant. Other Green Belt reviews go into greater detail on this aspect using a quantitative analysis, often grading the sites, according to how open or free from 'urbanising' features or structures the individual sites are. Sites are then scored and divided into four or five sub categories of 'encroachment' and fed into the final scoring for all the four Green Belt purposes.

Also, we disagree with Mole Valley's approach to rating sites on the fourth Green Belt purpose (i.e. preserving the setting and special character of historic towns). CPRE does not accept that the



approach that has been taken conforms sufficiently to what the NPPF intends. The approach taken by the Council has been to attempt to define this purpose in purely local terms, which we believe dilutes the purpose and is not what was intended by the NPPF. We believe that giving a 'significant' or 'moderate' rating for setting and special character if a site is within or adjacent to a Conservation Area, or if there are some Listed Buildings nearby, as Mole Valley has, is an incorrect approach.

We disagree with the assumption made in the draft Plan that Green Belt sites labelled as 'strongly performing' for one purpose, or as 'moderately performing' for, say, three purposes, can be considered for release and put forward for development. We feel that if land is moderately performing against at least three purposes then it should not be selected for an allocation to be developed in the future; it is in reality a high-performing Green Belt site and so should remain Green Belt.

Thus, we also dispute the conclusions reached on the ranking against some of the purposes of Green Belts of various proposed Green Belt Allocations.

Furthermore, other Green Belt Reviews, undertaken by professional consultants for nearby Local Authorities, have undertaken rigorous reviews and have concluded that largely that it is only the weakly performing parcels of Green Belt land that should be identified for Local Plan Housing Allocations. In some instances moderately performing sites have been considered. This, however, does not appear to be how Mole Valley Council has concluded its Review.

Below we give CPRE's comments on the Allocated Sites in the Plan, and we expand on which sites (often the Strategic sites/allocations, but not exclusively so) we believe have been under- or over-rated.

##### **5. Are there 'exceptional circumstances' in Mole Valley?**

If it is decided that it is absolutely necessary for any Green Belt land to be released for development, there needs to be shown conclusively that there are 'exceptional circumstances'.

The Evidence Base Document entitled 'Constraints Analysis January 2020' considers, among other things, the question of whether exceptional circumstances exist in Mole Valley District, in order to consider Green Belt releases for housing and other development. It concludes that there are. CPRE refutes that assertion.

Section 2, pages 18-25, Green Belt, of the MVDC document states that the NPPF emphasises Green Belt's essential characteristics are Openness and Permanence, and '*Green Belt boundaries should only be altered where Exceptional Circumstances are fully evidenced and justified, through preparation or updating of a Local Plan*' (Para 50 of the Document)... '*It falls to Mole Valley District Council to analyse... whether exceptional circumstances exist.*'

Paragraph 52 of the Document refers to the updated NPPF 2019, (where at paragraph 137), before concluding that exceptional circumstances exist a LPA should be able to demonstrate that it has fully examined all other reasonable options for meeting identified need. These are (a) makes as much use as possible of brownfield and underutilised land, (b) optimises the density of development including a significant uplift in minimum density standards in locations well served by public transport, and (c) has been informed by discussions with neighbouring authorities whether they could accommodate some of the identified need.



The Council suggests that they have met these tests. They therefore go on to identify the exceptional circumstances that would enable them to consider Green Belt releases.

Quite correctly at Paragraph 78, the document mentions that the NPPF (at paragraph 11) lists Green Belt as one of a number of constraints which indicate that development should be restricted.

At paragraph 79, the document states: *'in order to strike a balance between meeting OANs in full and continuing to safeguard the openness and permanence of the Green Belts,'* Mole Valley has undertaken a Green Belt Review which *'focuses on the extent to which all parts of the Green Belt continues to serve one or more of the following 5 purpose as set out in paragraph 134 of the NPPF.'*

Paragraph 80 states that the Review provides a tool *'to inform the selection of sites to meet MVDCs identified development needs, while minimising the loss of Green Belt land, which performs strongly against the above purposes.'*

We have a number of criticisms.

- The Council, at paragraph 79, refers to striking *'an appropriate balance'* between meeting OANs in full and safeguarding the permanence of the Green Belt. CPRE does not see this balance being carried forward at all in any evidence or documentation. The draft Plan is very clear it intends to meet in full the OAN figure. Why is that, when it is clear that the NPPF states that Green Belt is a constraint, which indicates development **should** (not 'could') be restricted. So, where is this balance? And where is the restriction on development in Mole Valley?
- Paragraph 80 says the Green Belt Review provides a tool that enables the development needs to be **met** (not restricted), while minimising Green Belt loss that performs strongly against the purposes of the Green Belt. However, we question why the Review sets the bar so high, suggesting that only strongly performing Green Belt land should be protected.
- In other Green Belt Reviews, carried out by planning consultants, including Arup, the bar is somewhat lower, i.e. only weakly performing and some moderately performing Green Belt is identified as possible for release. Why has Mole Valley taken such a hard-line approach, with such a high bar, which appears somewhat out-of-step with some professionally produced Green Belt reviews?
- Many parcels and sites of Green Belt in Mole Valley's Review are identified as strongly moderately performing (there are 3 categories: strongly, moderately and minimally-performing) and subsequently are identified for future development. We question this analysis and suggest that if parcels and sites of Green Belt are found to moderately perform for a number of purposes, they should **not** be identified for release.

In the Green Belt box (page 25) in the MVGBR, there are listed five factors that Mole Valley consider together could be regarded as exceptional circumstances, which justify some degree of Green Belt release. CPRE considers that these are not exceptional at all. They are factors that occur quite regularly in other Districts/Boroughs, and so by being relatively common, cannot be labelled as exceptional.

One: A shortfall in capacity to meet OANs on PDL and through higher densities, even after options to maximise capacity have been explored.

We do not consider this is an exceptional circumstance. It is listed in the NPPF as an exercise to go through in order for exceptional circumstances then to be identified, NOT as an exceptional circumstance in its own right.



To quote Paragraph 137 of the NPPF - '**BEFORE** concluding that exceptional Circumstances exist..' The clue is the word 'before'.

Two: Limited apparent opportunities for cross boundary cooperation to meet housing needs.

As in One, this is not an exceptional circumstance, but one of the NPPF exercises to go through before a Local Authority can go on to seek to identify exceptional circumstances. In any case in no way is this limited opportunity unusual, let alone exceptional, as the instances where neighbouring authorities coming to an agreement to take another Local Authority's unmet need are impossible. In Surrey, or other South East Districts we know of no such agreements.

Three: A range of housing needs including specialist forms of housing necessitates larger scale development to create viable options that provide a mix of housing types and address lower value needs.

These circumstances exist in many Districts as the norm. In no way are they exceptional. All LPAs require a range of housing including specialists' forms and a need for affordable housing and especially social housing, as opposed to housing which is only 80-90% of market values.

Four: Sustainability issues and other significant policy constraints within the Countryside beyond the Green Belt. The area of Countryside beyond the Green Belt in Mole Valley is very limited and quite remote. It is most unlikely to contribute to much development. However, to include this issue as an exceptional circumstance, warranting loss of Green Belt, is totally incorrect.

Five: Options for allowing modest growth in rural villages to maintain sustainability and community cohesion. We do not see this an exceptional circumstance warranting major growth in other parts of the District. Guidance exists in the NPPF for rural Green Belt washed-over villages to be inset, thus allowing for some development to take place if the correct circumstances exist.

In conclusion we find the list of so-called exceptional circumstances to be incorrect, spurious and insubstantial and so cannot be regarded as meeting the required standard. Therefore, we contend that exceptional circumstances have **NOT** been proven or identified, in order for there to be Green Belt releases.

Individual exceptional circumstances for the individual Green Belt sites in the draft Plan.

We consider that as well as having to show exceptional circumstances at the Strategic / Local Plan area level, Mole Valley is required to show that there are exceptional circumstances for EACH INDIVIDUAL SITE. We have found no reference to any exceptional circumstances existing in any of the Evidence or the draft Plan itself. In that case we would conclude that the District is not in a position to put forward Green Belt allocations or smaller-sized Green Belt sites. It has simply not put forwarded a reasoned case for Green Belt releases.

## **6. The allocation of Green Belt sites**

CPRE is in principle against the development of Green Belt land but we recognise that we must be pragmatic. We believe that the number of allocated sites in the draft Plan can and should be reduced. We accept with great reluctance that some development may have to take place within the 15 year period of the Plan and we further accept that there should be some modest additions to rural villages within the Green Belt, and limited development and infilling on land inset from the Green Belt and on Countryside beyond the Green Belt within certain villages, and limited infilling on land 'washed over' by Green Belt.



However, if it is finally decided it is absolutely necessary for Green Belt land to be released, there needs to be shown conclusively that there are exceptional circumstances at both the strategic/District-wide level AND ALSO at the individual site level. As we have concluded in section 5 above, we believe that Mole Valley has not shown that exceptional circumstances exist.

#### **7. Consideration of higher urban densities and higher densities on some allocated sites:**

We are fully aware of the pressures on Mole Valley District Council. We note that the draft Local Plan advocates a 'brownfield first' policy. This is totally correct, in line with Planning Guidance and we support it wholeheartedly. However, we question whether the Council has been robust enough in applying sufficiently high densities on many of the allocated sites, other sites included in the SHELAA, and possibly a number of the rejected sites, in the urban areas, that may well, if re-examined by the Council, have some potential over the later years of the Plan period to be included in the Plan. On some of the major brownfield sites, especially in Leatherhead and Dorking town centres, we accept that the Council have applied high densities and therefore achieved the optimisation of the land.

We see the same lack of robustness in applying higher densities to a proportion of the Green Belt allocated sites. If Green Belt land is to be sacrificed, there surely is a duty on the Council to develop the land as effectively as possible and as many smaller and affordable dwellings as possible (in general smaller dwellings enable higher densities to be achieved).

We will outline below where we believe higher densities can be achieved on various sites as part of our comments on the allocated sites. We also question whether the Council's Evidence Paper, entitled 'Development Opportunity Areas', is sufficiently robust, or indeed correct in the way it has identified all the possible Development Opportunity Areas.

We understand how the Council has identified them using certain criteria. These we accept, BUT believe in order to optimise higher densities in sustainable areas within the urban areas, another category and therefore other areas should be added. Paragraphs 51-59 lists the various areas in the District selected, number 2 being along principal roads (within walking distance to good public transport routes outside of the towns and local shopping centres). To this should be added the areas within **walking distance of the bus stops** of the various bus routes. Some well-used and not infrequent bus routes traverse parts of the District. In a time when bus travel is being strongly encouraged by Central Government, we believe this public transport mode and the areas around the bus stops should be included in the District's Opportunity Areas, where some higher density development can be sought, actively encouraged and eventually permitted (subject of course to not adversely affecting local character).

We use as an example the bus services and routes/stops that exist in Bookham. The 479 Arriva bus service runs from Guildford (outside the District) into Little Bookham, down Little Bookham Street to Bookham Station, through Great Bookham and Fetcham to Leatherhead and Ashted and then into Epsom. The route includes parts of the Ashted, Leatherhead, Fetcham and Bookham urban areas, which is further expanded when a reasonable walking distance to the bus stops is included. (Another line, the 408, Quality Line, runs from Banstead, Epsom, and Ashted into Leatherhead and to Cobham.)

Thus, we believe with this reasoned addition (the areas of walking distance around the bus stops) the windfall estimate of 180 for the Plan period should be increased. We leave it to the Council to provide an increased accurate figure for insertion into the Plan and associated evidence.



Affordable Housing levels: Providing truly affordable and especially equity share and social rented housing is a vital requirement in a District such as Mole Valley for all the reasons we are all familiar with. This is especially important if any Green Belt or Greenfield areas are proposed and eventually developed for housing. We support the Council's policy for 40 % all housing to be affordable and would stress the vital need for much of the stock to be genuinely affordable to local residents and especially those attempting to gain access to the housing market for the first time. We urge the Council to resist developers' attempts to reduce the percentage of affordable housing on future sites by suggesting, sometimes spuriously, that without a considerable reduction in the numbers of affordable housing their particular development would not be 'viable'. We are conscious that to be considered viable, a profit close to 20% is required, which we find little short of objectionable.

**Conclusion:**

We urge the Council to comprehensively reconsider, before the Regulation 19 Plan is finalised to actively revisit the whole question of (i) seeking more brownfield sites and (ii) applying higher densities where ever possible on both sites within the urban areas and any Greenfield sites that are included in the Plan and (iii) Actively and robustly encourage high levels of genuinely affordable housing across the District in the period of the Plan to 2033.

Comments on Individual Site Allocations

CPRE has considered the following allocations, by reference to two major pieces of evidence produced by the Council. (i) Mole Valley Green Belt Review (MVGBR), dated 2020, and (ii) the Strategic Housing and Economic Land Availability Assessment (SHELAA), Volumes 1-5, dated January 2020, which includes comprehensive information on the various allocations.

See following pages for our comments.



## **Ashtead**

### **SA01: Land south of Ermyrn Way: Total area of allocated area 55.5ha**

250 dwellings, with 8.3ha of POS, and 3.0ha is retained for protected tree belts across the site.

CPRE notes that the total size of the site is 55.5ha, of which some 70%, or just 10.5ha, is to be developed with housing. We further note that the actual 250 dwellings are to be built at a density of 35dph. We question whether 35 dph is the correct level. A small increase to 40 dph could provide an additional 35 dwellings. We would suggest that at least 40 dph should be investigated in order to make the very best use of the site as stated in the NPPF.

The MVGBR has rated the larger land parcels AF, of which this site is a small part, as moderate on sprawl, moderate on merging, moderate on encroachment and minimal on setting. The Review considers that the site itself would have a similar rating for all four Green Belt purposes. CPRE questions the Council's Green Belt rating for this site.

We fail to see how the site, which is situated between the existing urban area of south Ashtead and the M25 with an eastern boundary comprising a dense and wide tree belt can be scored as Moderate for sprawl, merging and encroachment, when only under 10ha is being built on and that part is closely bordered by existing dwellings and the hard urban edge of the M25, which already has a landscaped tree belt alongside the Motorway. The M25 thus effectively cuts the proposed area of housing from other open land in the wider area. The site therefore is partly enclosed (and even more when only the proposed housing area is considered) and thus plays a limited role for Green Belt purposes. We agree with the minimal rating for setting.

The existing tree areas on the periphery of the site will, we understand, be retained -to the south along the M25, the wide tree belt along the northern and western boundary, and woodland and hedgerows around the fields of the wider site. There are TPOs covered treed areas within the north and the western boundary. A concern is the noise pollution along the M25 affecting some proposed new housing nearby. We support the construction of noise barriers and buffer zones, which can alleviate noise and air pollution to an extent.

**The impact of increased traffic:** This issue is of concern, but we note the comments in the SHLAA on page 5 Appendix 2 which could help to alleviate, to some extent, the increased traffic levels at peak times. It is absolutely necessary, if development does eventually take place, that funding is obtained for road improvements, both at the new access points to and from the proposed housing and in the wider area.

We are pleased to see that much of the 'open unsettled landscape' will be retained, as will wider open views. We note too that any built development would be located on the part of the wider site that would be least visible from the open landscape, and limited to arable fields which are of lower ecological value.

**Conclusion:** We accept that this proposed site, if developed, would pose considerable challenges to parts of Ashtead in terms of additional traffic levels, and pressure on local infrastructure. However, District-wide, we believe that this site, in Green Belt terms, is weakly performing, and if new dwellings in Mole Valley are needed that cannot be located within the urban areas then this site may need to be released from the Green Belt.



SA02: Ermyn House Ermyn: 200 dwellings. 8.7ha. with reduced office space

This site is not in the Green Belt. We do not object to its development but encourage as high a density as possible. We would suggest the residential development should be at least 40dph net in this location, resulting in possibly an additional 30 dwellings. We are fully aware of the difficulties that the area of South Ashted could well experience over the lifetime of the Plan, in the way of increased traffic movements and pressure on infrastructure, resulting from the construction of up to 450 additional dwellings by 2033. We urge Mole Valley Council and others to tackle this problem and put in place what alleviation measures are possible.



SA03: Murreys Court, Agates Lane, Ashted: 30 dwellings, 1.9ha

This site is situated within the urban area. Retain and reuse 10, and 12 Agates Lane and consider the setting of the Grade 2 Listed Barn. Depending on how much of the curtilages of 10 and 11 are retained, although the density of surrounding existing development is not high, the size of the site enables a higher density to be provided. It is accepted that no 10 and 12 will be retained and there needs to be acceptance of the listed Barn, however it does appear that the suggested dwelling figure of 30 dwellings is too low, considering the total site is 1.9ha. We strongly suggest that a higher density is considered. If only half of the site is available, and that surely is a conservative estimate, it should be able to achieve at least 40 dwellings, an increase of 10.



SA04: Marsden Nurseries Pleasure Pit Road. 20 dwellings, 1.2ha

The site is the Green Belt, but is previously developed land. The site is a garden centre with buildings and hardstanding. The MVGBR scores the site, surprisingly, as moderate on sprawl and setting, and minimal on merging and encroachment. We disagree with the scores for sprawl and setting. The site is partly covered by buildings, and we see no role for this site in contributing to preventing sprawl; even though the area to the north is open Green Belt. We cannot understand the moderate scoring for setting as there is only a Conservation Area (Ashted House) to the west.

We accept the constraints existing, i.e. the adjacent Conservation Area to the west, which includes a pool and the Coach House, and the listed buildings adjacent. However, these assets are not within the site. We consider the assumed density is too low. We suggest applying a slightly higher overall density which could enable, with good design, a possible increase over 20 to at least 35 dwellings.



## **Beare Green**

SA05: Land south of Beare Green: 480 dwellings, 2 gypsy pitches and primary school. 32.3 ha

We object strongly to this site being allocated. This is a very substantial Green Belt site south of the modest village of Beare Green. What is proposed is totally out of proportion to what exists at present, placing large pressures on the very modest infrastructure and services of the nearby village. We accept the western boundary is the railway line, part of the northern boundary abuts the existing village, and an area of woodland and the eastern boundary is close to the A24. However, the southern boundary is much weaker, being the Bognor Road, which is rural and narrow. It is more likely this situation could encourage possible further urban sprawl to the south in the future.

**The site:** The site consists of open arable fields, divided by hedgerows. There are also isolated tree clumps and watercourses and extensive views in places around the perimeter into the site from south, east and west. All these features give a very rural appearance over the total site.

Two public rights of way run through the site, providing access to this open largely rural area, which is extensive, with the wooded area excluded is up to 40 hectares. The whole provides an area of pleasant countryside.

Although not within the AONB or the AGLV, these designations are immediately to the west of the railway line. This is higher land which enables views into the open site from the AONB.

**Green Belt purposes:** The MVGBV scores the site minimal on sprawl, merging and setting. We would not object to these ratings. On encroachment into the countryside, Mole Valley rates the site's Green Belt purpose as moderate. We disagree strongly with this. Because the site is very large, in the Mole Valley context, open attractive countryside with a feeling of ruralness, no urban features, and attractive tree cover, a moderate scoring is incorrect. Very probably this site is the most attractive one, in countryside terms, of all of the proposed sites in the draft Plan. We believe the site should therefore be rated as highly performing in preventing encroachment into the countryside and that it should not therefore be included as an allocated site in the Plan. It should not be developed for housing or other development uses.

**Access:** We are unable to find any reference to a satisfactory access or accesses. Certainly, a single access for so many dwellings would not be acceptable in highway terms. We note the reference in the SHLAA *'an indicative layout has been prepared which lacks vehicular accesses between the existing village and proposed development.'* We do not consider accesses should be provided from or onto the Bognor Road, which is narrow and has a rural appearance throughout.

**Drainage and flooding:** There are risks of flooding in the lower ground in the centre of the site and also along the water courses at the northern boundary of the site.

**Conclusion:** We believe that for the valid reasons outlined above, this site should be excluded from the draft Plan's Housing Allocations. We object strongly to its inclusion in the draft Plan.



SA06: Land at Breakspear Farm, Old Horsham Road, Beare Green. 55 dwellings, 3.6ha

Situated in the Green Belt, and adjacent to the AONB and AGLV on its western boundary. However strong vegetation belts separate the site. We agree with the MVGBR that the site is scored minimal for all four Green Belt purposes. There are strong defensible boundaries to the west and east, while to the south there is part of the village of Beare Green. The northern third of the allocated site is to remain in the Green Belt, and is divided by a strong tree belt, which limits encroachment. Views into the site are limited from the Horsham Road (to the east) and also from the Old Horsham Road, (to the west), where the tree belt along the boundary, is especially dense. Proposals includes a new car park in the southwest for commuters using the nearby station. The proposed development is strongly sustainable as it is very close to a station.

The proposed 55 dwellings are to be built on the southern two thirds of the site (2.4ha). CPRE Surrey consider the proposed net density of 23 dph is too low, even though some trees exist within the site. An increased density of 35-40 dph would result in a capacity of 84-95 dwellings. (An increase of 30). We consider this aspect should be actively considered by Mole Valley.

**Conclusion.** If it is finally necessary for any Green Belt land to be lost in the District, which we are opposed to in principle, then we reluctantly conclude that this land may have to be one of the sites that is released.



## **Betchworth**

### SA07: Land between Bumblebees Cottage & The Firs, Betchworth. 9 dwellings net 1.2ha

The site is retained as washed over Green Belt. It is not within a Conservation Area or the AONB/AGLV. It is a general infilling of the village, through surplus garden land, plus a former tennis court.

The proposed development would include an element of affordable dwellings as the rural threshold is five dwellings not 10. It is surrounded on the eastern side by dwellings in large curtilages. The site boundary is well defined by trees and vegetation.

We agree with the MVBGR scoring as minimal for all four Green Belt purposes. However, if the decision has been taken to develop this site, then an additional 9 dwellings on a reduced site area of possibly 0.7ha, appears not to be making the most of the site's potential, especially as affordable dwellings are included. We suggest a fresh appraisal to consider increasing the density and the number of subsequent dwellings to possibly up to a net 14. (An increase of 5). We note the statement in the SHELAA that the 9 figure is based on 'discussion' with landowners. The Council should press for an increase in density.

**Conclusion:** If it is finally necessary for any Green Belt to be lost in the District, which we are opposed to in principle, then we reluctantly conclude that this land may have to be one of the sites that is released.



## **Bookham**

SA09: north west of Preston Farm, Bookham. 250 dwellings and two gypsy pitches on 27.4ha

We **object strongly** to this site being developed and included as an allocation. This is a large site on the western extremity of Bookham. The proposal is to retain the western third in the Green Belt and use it as a country Park and SANG (the SANG amounts to 10.3ha). Of the remainder of the allocation, it is proposed to develop for housing the eastern eight hectares area.

**The site access and views:** The site is surrounded to the north, east (Little Bookham Street) and the south by existing development and so views into the site are limited from these directions. Except of course the considerable number of dwellings fronting Little Bookham Street who at present have extensive views into this open rural area. However, there is a public right of way running across the very northern tip of the site, which enables views of the openness of the site, this provides public views into the northern part of the site. In addition, Water Lane, running north from the Lower Road provides views across the developable area. From these view- points the open rural nature of this Green Belt land can be appreciated.

**Vehicular access and traffic levels:** Access is proposed from the Lower Road, close to the 4-way junction of the Lower Road, Little Bookham Street and Rectory Lane. This is a busy junction which is physically difficult to negotiate. The evidence in the SHELAA states *'there are no identified congestion hotspots in the vicinity although it is recognised that school traffic can cause localised issues along the Lower Road. Opportunities exist for junction improvements if required.'*

We would take issue with this summary. It is well known the traffic chaos at the morning and afternoon peaks related to the school traffic. This secondary school is due to be rebuilt and considerably enlarged -resulting in increase traffic at the morning and afternoon peaks.

The traffic levels however will be hugely increased with two residential permissions: the 295 dwellings to be built half a mile to the east on former Green Belt land close to the school (just within Guildford Borough). It is anticipated that this number will be increased further, plus the 25 dwellings being built now close by. With the proposed 250 dwellings on this site AND an additional 164 dwellings on Rectory Lane, the total of new dwellings in this relatively small area around Little Bookham and eastern Effingham amounts to not far short of 750 dwellings.

**Adverse effects of 750 new dwellings** in Little Bookham, Great Bookham and Effingham. The effects of all these new dwellings, and probably an additional **1,875** people on local infrastructure and services, is likely to be very significant. Nothing appears to mentioned or discussed in the Council's evidence how communities will cope with these additional people and their need for medical care, doctor's surgeries, dentists and education. The Council is also silent on the strains and stresses of an additional 1,000+ cars using the local roads.

**Green Belt purposes of the site:** The MVGBR states that the larger land parcel rates as moderate for preventing sprawl, significant for preventing merging and coalescence of settlement, and moderate for preventing encroachment into the countryside. For the actual site the Review scores are:



moderate on sprawl, minimal on merging, moderate on encroachment and moderate on setting. CPRE broadly agrees with these assessments.

We note the comments made in the SHELAA: *'... the southern part of the site has more significant setting, merging and sprawl issues, however since the Lower Road frontage is already developed there would be little change to the general perception of setting and merging. The proposed development would be well contained between the existing built up area and the line of ponds and would not amount to unrestricted urban sprawl.'* We do not accept all this reasoning; the perception and value of Green Belt land openness is **not** just limited to visual perception, although this is one aspect. Even though the site is described as *'well contained,'* according to the Council, there are views into the site from the public right of way in the north and from Water Lane to the east. Also, of importance is the land's Green Belt intrinsic value as it exists on the ground, so the concept of sprawl is relevant. Of most importance is the purpose of preventing encroachment into the countryside. The site is rural, open countryside with very minimal non countryside features. We therefore would score this site as Significant for preventing Encroachment into the countryside.

Thus, we would score the Green Belt purposes as moderate, minimal, significant and moderate. With two moderates and one significant, we believe the site fulfils a strong Green Belt purpose and on that issue alone it should not be developed for hundreds of dwellings.

We do not accept the statements in the Council's evidence (the SHELAA remarks for this site referring to the purposes of the Green Belt) that, as the site is largely enclosed, the value of the Green Belt purposes is therefore lessened. The Supreme Court in February 2020 found that *'The visual quality of a landscape is not in itself an essential part of openness, for which Green Belt is protected.'*

Residents claim from first-hand experience that there are flooding issues, even though the evidence base claims the flooding risk is focussed around the Pond area, which are to be retained. It is claimed surface water problems can be attenuated. We would, however, raise local flooding issues as a real constraint. Biodiversity issues are also of a concern. Even though the pond area is to be retained, there will be losses of habitats and wildlife from the loss of the open area. There have been sightings of flying bats and other valued wildlife in the open areas to the rear of Little Bookham Street.

CPRE **objects** to the allocation of this open area of Green Belt, for the reasons outlined above.



SA10: Land north of Guildford Road, Bookham. 164 dwellings and two gypsy pitches 10.3ha

We **strongly object** to this site being allocated. It is fairly large in size, only a few hundred metres from the proposed large Lower Road /Little Bookham Street, and abuts into the rural Green Belt on the western periphery of Bookham.

Whilst there is an existing defensible boundary in the form of the built up area of Bookham to the east, the Guildford Road to the south and the recreation ground to the north the proposed new boundary to the west is largely non-existent and very 'soft'. This is unacceptable in planning terms and will encourage further sprawl in the future to the remainder of the open land.

**High visibility and views of openness:** The site is highly visible from various viewpoints to the south, west and a public footpath running along the southern boundary of the recreation ground. It is one part of a larger open area that is being artificially divided on poor planning grounds. It has probably only been selected because it is in the ownership of a developer/housebuilder who has stated it is deliverable. This attractive open area of countryside is highly visible and for that reason alone it should be retained in the Green Belt and NOT developed.

**Green Belt purposes:** The MVGBR scores the site as moderate for all four Green Belt purposes. We accept this assessment for three purposes but consider the third purpose of preventing encroachment into the countryside as an under-estimate. The site is an attractive, open rural countryside area, being one half of a larger area, the boundary between the two is very weak. The land has no urban features, except for the nearby urban edge of Bookham. We therefore consider that the correct scoring for preventing encroachment is significant. With a combined scoring of one significant and three moderates, we consider on this alone that the site should remain in the Green Belt and not be allocated for a large number of new dwellings.

**Landscape/ AONB:** the site is highly visible, undulating, attractive and treed and represents an open countryside area on the western edge of Bookham. It represents a highly-performing Green Belt area, mature trees are present along its borders to the south, including from houses to the east as well as bisecting the site from west to east. It is **not** within the AONB, however land south of the site across the Guildford Road is designated as AONB.

**Proximity to services:** The evidence states that the site is within walking distance to local shops and services (a point highlighted by the developer.) However, the developer does not highlight that it is within an area which is proposed for 750 dwellings (some 1,875 people) which would place huge strain on all Bookham's amenities, infrastructure and services.

**Agricultural land Grade 2:** An area in the south west corner is Grade 2 and although not in '*productive agricultural use*' should not be lost or built on.

**In conclusion,** CPRE objects strongly to the allocation of this site for housing and 2 gypsy pitches, for the reasons given above.



SA11: Land at Chalkpit Lane, Guildford Road, Bookham. 11 dwellings 0.5ha

This site is to remain in the Green Belt, although proposed for housing. It is surrounded on three sides by existing housing and the A246 Guildford Road, and therefore, in our view, it only performs Green Belt purposes weakly. The MVGBV has given it a moderate rating for preventing sprawl but we disagree with this rating as the site is surrounded by existing dwellings and the Guildford Road. The proposed density and number of dwellings appears appropriate. CPRE would not oppose on planning grounds.

**Conclusion:** If it is finally necessary for any Green Belt to be lost in the District, which we are opposed to in principle, then we reluctantly conclude that this land may have to be one of the sites that could be released.



SA13: Land to the rear of Hunters Moon, Maddox Park, Bookham. 6 serviced residential plots 0.5ha

A Green Belt site on the periphery of a very low-density area of Bookham. It is not clear why this small site has been selected for serviced plots but could be the proposers wish. Most probably in this exclusive area, any new plots should be no smaller than just under 0.1ha. The site only performs any Green Belt purposes weakly, and thus, as the proposal can be described as 'rounding-off', CPRE would not feel able to object on planning grounds.



## **Brockham**

### SA14: Land at the Bungalow, Kiln Lane, Brockham. 44 dwellings 2. 1ha

We **object** to the allocation of this prominent open site on the western edge of Brockham.

Situated in the Green Belt, on the western edge of the village proper, between the village and lower density development further to the west. Kiln Lane, is to the north with some very limited scattered housing and the Dorking Rugby Club, and associated parking area. The site abuts the existing urban area to the east.

This large site appears prominently as one travels along Kiln Lane away from the established village built up area. The whole appears rural and peaceful, indeed Kiln Lane at this point has a largely rural appearance with some trees and other vegetation along both sides. The difference between Brockham village and this site is striking as one moves from an urban environment to a largely rural one.

The site is very prominent from the road as it rises up from the north and east to the southern part where the southern treed area provides a wooded background.

**Green Belt purposes:** The MVGBR scores the site as moderate on merging, encroachment and setting, and minimal on sprawl. CPRE believes the rating is an underestimate for preventing encroachment, as in our opinion the site performs a significant role in this.

We do not accept the comment in the *MVGBR* 'that the significant score relates to the land further east beyond Nutwood Avenue'. Significant encroachment prevention is relevant here as we contend. Development on this site would radically change the appearance of western Brockham, introducing a large housing area of 44 dwellings into a relatively small village. The site prevents encroachment into the open, prominent, rural countryside to the south west of the village, and prevents sprawl of the existing village further west.

The site is not within a Conservation Area or the AONB, although it is adjacent to the Brockham Conservation Area. The existing scattered housing to the west of the site along Kiln Lane is largely rural in appearance, of low level and set back from the Lane. It does not give an appearance of an urban environment, giving a rural appearance instead. There is the possibility of the site to function as bat foraging/commuting habitat; and it contains other nature conservation and biodiversity, although not formally protected.

**Conclusion:** The site provides an attractive rural appearance and very prominent, at the western end of the village. Further scattered housing is low key and largely rural too. It performs strongly in preventing encroachment into the countryside and has an important role in preventing merging too. We object to this site being proposed for a housing allocation.



SA15: Land at Tanners Meadow, Stroud Green, Brockham. 30 dwellings 3.5ha

Situated in the Green Belt. It is surrounded on three sides by existing development. The boundary to the west is a mature hedge that separates the sites from the wider open Green Belt. The site probably performs Green Belt purposes weakly, although it is a not unsubstantial size when compared to the modest size of Stroud Green. We understand there are some issues of surface flooding and a small area is required for car parking for a nearby medical centre. There are substantial hedges around the site, which would help to alleviate some of the adverse effects of new building for nearby residents. However, we recognise that the views of some residents that at present enjoy an open view into the site, will be lost.

In planning terms if some Green Belt land is required to help to achieve a higher build rate than at present, this site probably has less disadvantages than most. We note the very low density proposed. Even taking onto account the flooding issues and some land set aside for car parking the proposed gross density of 8dph appears very low especially as an element of affordable housing is proposed. We suggest consideration should be given to a higher figure IF the site is allocated in the Adopted Plan. Probably at least another 20 dwellings could be achieved without any more adverse effects.

**Conclusion:** If it is finally necessary for any Green Belt to be lost in the District, which we are opposed to in principle, then we reluctantly conclude that this land may have to be one of the sites that is released.



SA16: Land west of Wheelers Lane, Brockham. 8 dwellings 0.3ha (total site is 1.2ha)

Situated in the Green Belt. Could possibly be described as infilling, along a residential road, although not a strong defensible boundary to the to the west, with only a hedge. A Grade II listed building is sited opposite. The western part of the site is liable to surface flooding and so should not be developed.

We agree with the MVGBR that for the Green Belt purposes of sprawl and merging the rating is minimal. We are not convinced the setting score should be moderate, as it is not within, or adjacent to, a Conservation Area, although a Grade 11 listed building is close by. We are ambivalent on a moderate score for the purpose of preventing encroachment, as encroachment is minimal as the site is small.

The proposed density appears low and is underdevelopment of the site. The suggested use of only 0.3ha of the site, adjacent to Wheelers Lane, we consider is too conservative. Most probably the use of a third to a half of the site could be developed, amounting to possibly 0.6ha. CPRE suggests a reappraisal to consider a higher number of dwellings, on a larger portion of the total site, possibly amounting to an additional 8 dwellings.

**Conclusion:** If it is finally necessary for any Green Belt to be lost in the District, which we are opposed to in principle, then we reluctantly conclude that this land may have to be one of the sites that is released.



SA17: Former Sewage Works, Brockham. 7 dwellings on 1.2ha

Previously Developed Land in the Green Belt. It has not used for 30 years and contains concrete and brick structures. We agree with the site's scoring for Green Belt purposes as minimal for preventing sprawl, merging and encroachment, but consider that for setting it is also minimal, not moderate as proposed by the Council. The presence of the remains of Betchworth Castle to the west, over the River Mole, and the proximity of the Conservation Area, do not warrant a moderate rating, in our view. The eastern boundary abuts the urban area, while to the west there is the River Mole, so CPRE would not object on planning grounds to the release of this site for housing.

However, the proposed density and the number of dwellings appears low, even though most probably the western half of the site would not be built on, due to being in Flood Zone 3. Even if 0.6ha could potentially be developed, then we consider up to 20 dwellings could be built. Thus, we consider the Council needs to urgently consider increasing the potential number of the proposed dwellings on this site.



### **Buckland**

These 6 very small Green Belt sites (SA 18,19,20,21,22, 23) are situated in a 'washed over' village which we support continuing being so. All can be described as limited infill, in a Green Belt location. We consider all the sites perform all four purposes of Green Belt to a minimum extent. CPRE would not object to their limited development. The total new dwellings proposed is 13 gross, 11 net, which appears reasonable.



## Capel

### SA24: Land at Brook Cottage Wolves Hill, Capel. 46 dwellings 3.9ha

This site, which we object to, is where a single dwelling existed until 2010, is situated in Countryside beyond the Green Belt. The proposal is for not insubstantial number of dwellings (46) at the southern extremity of Capel along Wolves Hill. The represents a considerable increase in dwellings for a small mainly rural village.

The site is detached and, on the ground, completely separate from the present village, which is situated very mainly to the west of the rural Road (Wolves Hill and The Street) extending northwards. Wolves Hill itself is a reasonably narrow, rural arcadian road, fronted on both sides, to east and west by semi mature deciduous trees, which allow some views into the site through tree gaps. In the seven months of the year when there no leaves the views into the site are however extensive. Opposite the site is an extensive oblong area fully treed which is adjacent on the west to the dual carriageway A24.

Thus, the site on the ground is separate from Capel Village, and within a rural open and treed area extending south along Wolves Hill. To the north of the site are two dwellings set back from the road which cannot be seen from it, and a public footpath which as the evidence states '*defines the current southern boundary of Capel*'. To the south of the site are two or three more modern dwellings fronting the Road, which are largely set back from the road- about, but in a largely open and verdant area. Further east from the site is open fields and beyond is a SNCI.

The site is apparently the previous location of one dwelling, demolished in 2010, is a single field comprising, the evidence states '*as degraded grassland interspersed by several areas of native shrub as well as immature trees and young saplings.*' We believe the term '*degraded grassland*' is intended to convey a poor semi derelict area which therefore has development potential. This is incorrect.

We accept that '*a strong tree line that separates the site from the road*', but that does not result in a reason for development of some 3.9 hectares of land in a rural position, separated from any other development associated with Capel Village. Again, the evidence associated with this site in the SHELAA states '*the site sits on a crest on a hill and development may therefore provide a visual intrusion to the landscape if not considered sufficiently*'. We accept this assessment and would suggest that it is a valid reason for not developing this fairly large site with 46 dwellings. We do not consider any '*consideration*', however carefully undertaken (presumably careful design) could alleviate the real harm to the landscape and rural appearance of this site and the wider rural area.

**Conclusion:** CPRE **objects** to this site being put forward as a housing allocation.



18-CP-004: Boxhill Caravans Old Kiln Farm Coles Lane, Capel. 37 dwellings on 5.7ha

The site is within the Green Belt, but immediately adjacent to Countryside beyond the Green Belt. Capel Village, which is immediately adjacent, to the east, is inset from the Green Belt.

**Green Belt purposes:** CPRE broadly accepts Mole Valley's rating of the site's Green Belt purposes: minimal for sprawl, merging and setting, and moderate for encroachment. We believe the rating applied to the site for encroachment into the countryside is excessive, and should also be scored minimal. The majority of the site is classed as landfill.

**The site** is situated between the A24 to the west, existing residential to the south and east and a fairly well-defined tree border to the north, Part of the land in the centre is used by caravans and a haulage land use with offices, workshops and hardstanding. We are not convinced of the long-term suitability /viability of retaining of all the employment uses and associated area, and so we consider, with careful design, more than a quarter of the site (the suggestion of the Council) could be used for housing in the Plan period. A first phase could be the eastern quarter, suggested by the Council as achievable in years 1-5. Thus, we believe the number of future dwellings could be possibly increased by up to 35 dwellings within the next 13 years of the Plan. We urge Mole Valley to reappraise their calculations and assumptions for the total Plan period.

**Conclusion:** If it is finally necessary for any Green Belt to be lost in the District, which we are opposed to in principle, then we reluctantly conclude that this land may have to be one of the sites that is released.



SA26: Land at Capel House Farm The Street, Capel. 10 dwellings net 0.6ha

This site is a large curtilage of a detached dwelling. Only the eastern part is within the Green Belt. It is all within the Capel Conservation Area. The proposal, could be described as 'infilling' having existing development on three sides. We see little or no harm to any assets, either of landscape or Green Belt if the site is partly developed. The eastern part of the site, in the Green Belt, is not at present within the inset boundary of Capel Village, although we believe there are valid reasons for believing it should be. The whole site, including Capel House Farm, is hidden from the Street by a high coniferous hedge.

**Green Belt purposes:** We consider all four purposes of Green Belt for this site are minimal, as opposed to moderate for setting, as proposed by Mole Valley. The location within a Conservation Area is insufficient for a moderate score for Green Belt purposes. There do not appear to be any nature conservation or biodiversity constraints, although there is a pond on the site. The assumed density and number of proposed dwellings appear correct due in part to the presence of a pond in the north east corner.

**Conclusion:** If it is finally necessary for any Green Belt to be lost in the District, which we are opposed to in principle, then we reluctantly conclude that this land may have to be one of the sites that is released.



SA27: Rear of Redlands House 62 The Street. 6 dwellings 0.4ha

This site is a large residential garden, abutting existing development. Only part of the site is in the Green Belt. Its western boundary contains some large mature trees which provide a screen from the open areas to the north and west of northern Capel, which abut the main Road running through the village.

CPRE considers that the site performs weakly against all the Green Belt purposes, encroachment and setting are not moderate in our opinion, as Mole Valley Council claims.

It is adjacent to a Conservation Area; but the site could be described as almost backland. However, if adequate access is provided, by an existing driveway and the amenity of surrounding dwellings is protected, then we would find it difficult to object on planning grounds.

The three adjoining dwellings (one being number 62) have spacious and fairly long gardens, which would help to alleviate any adverse effects of future housing. We consider that the proposed density of 15 dph and 6 semi-detached dwellings probably correct due to the proximity to the open areas westward, the nature of the immediate area site and the presence of trees

**Conclusion:** If it is finally necessary for any Green Belt to be lost in the District, which we are opposed to in principle, then we reluctantly conclude that this land may have to be one of the sites that is released.



## **Dorking**

### **SA28 & SA29: Pixham End, Pixham Lane & Dorking Railway Station Approach. 4.1ha**

These sites are not in the Green Belt. The combined capacity is some of 500 dwellings, with an element of offices. Both sites are very sustainable, being close to the railway station and town centre. We would support the redevelopment of these sites with a high number of new dwellings and new Offices, although at Pixham Lane the presence of trees to the rear of the site needs to be considered in any design. At the Dorking Railway Station site, additional car parking should be considered.



SA30: Sondes Place Farm, Westcott Road, Dorking. 170 dwellings on 8.1ha

This site is situated in the Green Belt.

**The site** is surrounded on three sides by development, the one to the north is across the Westcott Road, which has attractive trees on both sides, the southern boundary abuts a school complex and their playing fields. The site comprises two fields with the western boundary comprising a continuous hedgerow. At least in summer the site is partly obscured by the Road verge's trees, however when travelling towards Dorking, via the Westcott Road, it is possible to view parts the open site.

**Green Belt purposes:** The MVGBR scores the site as moderate for preventing sprawl and for setting, but minimal for preventing merging and encroachment into the countryside. We agree broadly with these ratings, although the moderate rating for preventing sprawl is somewhat ambitious, as any prevention of sprawl can be equally undertaken by the open areas to the east further along Westcott Road. As for reaching the moderate score for setting, we fail to see much evidence, although admittedly there are attractive views of the urban fabric of Dorking with a church spire partly visible and the presence of a former model farm (now in residential use). On the whole we do not believe the site warrants a moderate score for setting.

**Landscape:** the site is not within the AONB or the AGLV and is only a gently sloping open field without trees, although the hedgerow running through the middle of the site needs to be retained if housing is built. It is therefore not of significant landscape value, although an open area on the outskirts of Dorking providing some relief from the urban elements existing on three sides. An attractive higher stretch of hilly, open land can be viewed from the site and the A24, behind the school buildings and residential, providing a green and varied backdrop. This will remain in all circumstances as it is far from the site.

**Access and traffic:** Access would be provided by a junction onto Westcott Road. Apparently, a school staff car park would be provided, as well as a coach and student drop off area and a pedestrian link to the school complex. These additions are small scale, but welcome. However, of concern is the potential increase in traffic levels generated by any future housing. CPRE is aware of the considerable traffic levels along Westcott Road and the problems additional accesses and dwellings will cause to the wider area. Certain unspecified mitigation measures have been explored, especially improvements to the congested junction of the Westcott Road and Vincent Lane. We are under no illusions that if developed this site would add to the traffic congestion levels of the area especially into West Street.

Development is proposed for 70% of the site with land retained as open where the hedgerow exists. A net residential density of 30dph is proposed. We believe that if Green Belt land is to be lost, then probably a slightly higher density should be actively considered by the Council. This could well be possible, as an element of higher density affordable housing will be included. Even if an increase to 35dph is adopted then an additional 12 dwellings is possible. CPRE considers that as the site performs Green Belt purposes weakly then we would not formally object, although a real concern is the certainty of additional traffic.

**Conclusion:** If it is finally necessary for any Green Belt to be lost in the District, which we are opposed to in principle, then we reluctantly conclude that this land may have to be one of the sites that is released.



SA31: Land at Milton Court Lane, Dorking. 80 dwellings on 4.3ha

The site is in the Green Belt.

**The site:** There is existing development is on three sides, to the south and west, with an industrial area of Curtis Road and a water pumping site to the north. The site consists of two fields divided by a hedgerow. The western field is Grade 3 agricultural land used for grazing of animals. The western proposed boundary is relatively weak being another hedgerow. Open fields in the same ownership exists further to the west. There is likely to be pressure for this larger parcel to be developed in the future.

**Access:** is proposed via Milton Court Lane to the extreme west. Possibly an access could be obtained via Nutcombe Lane, as the promoters have appropriate rights of access. The Vincent Lane /Westcott Lane junction is congested, the land promoters have suggested that works could be employed to mitigate the existing pressures. However, whether these would be successful must be doubtful.

**Green Belt purposes:** the MVGBV has scored the total site moderate for preventing sprawl and setting, but minimal for merging and preventing encroachment. We however consider the western field of the site increases the likelihood that a correct score for encroachment is also moderate and as there is much less development on the northern side of the western field. This corrected score gives three moderate ratings for the total site. We therefore are of the opinion that only the eastern, smaller field should probably be allocated and the western field, closer to the large open area removed from the allocation. This revised solution may cause problems for access however.

**Landscape:** The Site is not within the AONB or AGLV. However, there are views from the AONB, the Pipp Brook Valley and the North Downs Ridge to the west into the site. Milton Court, a Grade II listed building to the west also has views into the open site. These views provide further evidence that the western field should be excluded from the allocation.

It is clear a reduced residential capacity would only be possible on this smaller site, especially as some land would be required for noise mitigation from the industrial area. If 1.5ha was developed for housing then possibly only a maximum of 40 dwellings could be built.

**Conclusion:** There are stronger planning grounds for not objecting to some more limited development on the weakly performing Green Belt on the eastern part of the site.



SA32: Land at Chennells Nursery Ridgeway Road, Dorking. 55 dwellings 2.6ha

This site is within the Green Belt the AONB and the AGLV.

**The site:** was a former nursery with a few derelict buildings and covered by mainly young trees and shrubs. This site is bordered by a dense wide tree belt and public footpath to the west, separating it from open agricultural fields, while to the south there is a narrower tree belt, allotments to the north and residential to the east from where access would be obtained. The site is clearly an outlier, jutting out into more open countryside.

**Green Belt purposes:** The MVGBR scores the site as Moderate for preventing sprawl and encroachment but Minimal for merging and setting. We would broadly agree with these ratings. Of particular concern is the possible encroachment and sprawl.

**Landscape:** The site is within the AONB and AGLV, however the contribution the site pays may not as high as some land further to the west, but it still has value. The existing trees provides some barrier between the site and the wider AONB to the west. Existing onsite is a central Priority habitat (deciduous woodland) area located on the central part of the site.

**Access:** Would have to be provided from Ridgeway Road via a private Road called Ridgeway Drive. However, there could well be problems achieving a successful solution and the large number of cars resulting from the proposed new 55 dwellings would have considerable adverse effects on many of the occupants of Ridgeway Drive and other existing roads nearby.

**Conclusion:** CPRE objects to the allocation of this site as it is a valuable part of the wider AONB and AGLV that stretches from the fringes of the built-up area of Dorking through this site to the rural areas to the west. The sites 'juts' out into the wider countryside to the west which would result in almost an 'artificial' new built-up urban boundary. Access problems are also likely to be an issue.



SA33: Downs Meadow Stables & Northside Works, Ranmore Road, Dorking. 12 dwellings 0.65ha

In the Green Belt but on Previously Developed Land, so in principle acceptable for appropriate development, the site is near the urban edge of Dorking but separated by a school and its playing fields. It is within the AGLV and adjacent to the AONB.

**Green Belt purposes:** The MVGBR scores the site as moderate for preventing sprawl, but minimal for the other three purposes. Being a previously developed site, which does jut out into largely open land there is an element of preventing merging but as the site is small this is relatively minor. We cannot understand as part of the site is developed why it is in the AGLV. It has no landscape value.

The assumed density if all the site is used is only 18dph, to provide 12 dwellings, possibly as only the southern part is considered suitable, as the northern part is undeveloped. In these circumstances the number of proposed dwellings assumed is probably correct. CPRE considers that even though it is a small site there are planning reasons to consider an element of new dwellings on the part of the site that is already developed, even though it is Green Belt and in the AGLV.



SA 37: Former Chalcraft Nurseries, Reigate Road, Dorking. School, 2.6ha

A former nursery, not now in use, which contains many young trees and former nursery buildings. A new school is the proposed land use. This is a Green Belt site, well contained, as it is located between existing residential and a railway cutting, while to the north over the main road is a Cemetery. It is within the AGLV and adjacent land is within the AONB. There are views from the distant North Downs.

**Green Belt purposes:** The MVGBR scores the site as moderate for sprawl, encroachment and setting, and minimal for merging. We question whether this scoring is correct. As the site is enclosed between existing developments, we would consider the preventing sprawl purpose is less than moderate. Preventing encroachment into the countryside is unlikely, as the site is not considered to be valued countryside.

**Nature conservation and biodiversity:** There is potential for bat foraging and use by Bechstein's bats. Mitigation measures would be required if a school is proposed. We are dubious of the site's contribution in landscape to being in the AGLV, and believe this is not a reason for opposing a future school on the site.

CPRE does not object to the development of this site, as the planning reasons for retaining it as protected land are not strong (with its special circumstances for providing a site for a required school).

**Conclusion:** If it is finally necessary for any Green Belt to be lost in the District, which we are opposed to in principle, then we conclude that this land may have to be one of the sites that is released and used for a school that is required urgently over the Plan period.



SA38: Dorking Civic and Cultural Centre, Dorking. 5.4ha in size.

It has as a variety of civic and recreational uses. We are surprised that the plans for this site, within the town centre of Dorking do not include an element of housing. The site is very sustainable, being within the town centre, where residential development should be encouraged, and thus CPRE strongly suggests consideration should be given in the Masterplan for mixed-use site and including an element of housing. We consider on part of the site consideration should be given to a multi-storey car to replace the existing surface parking.



## **Fetcham**

### **SA 39: Land at Elmer Works, Hawks Hill, Fetcham. 55 dwellings, on 2.3ha**

**The site:** which is in the Green Belt, is adjacent to the residential area of Fetcham to the north, the railway line to the east the main road and housing the east. To the south is the SES water Treatment Works.

**Green Belt purposes:** The MVGBR scores the site as minimal for three Green Belt purposes and moderate for preventing sprawl. We do not consider the moderate scoring for preventing sprawl is correct. Any sprawl is contained by the water works and existing adjoining residential. Therefore, this site performs no real Green Belt purpose in this location, and could be developed with very limited adverse effects.

It is in a very sustainable location, being close to central Leatherhead with its town centre land uses. The railway station is within walking distance.

**Landscape:** Not in the AONB or the AGLV, but the site contains many trees especially around the perimeter. There is potential for a bat foraging area and their possible presence will require further assessment and possibly mitigation measures. Part of the site is covered with Priority Habitat (Deciduous woodland).

The site is not a level area and mature trees will need to be retained, this will restrict the developable area to some extent. The proposed density and dwellings numbers appears realistic, although in this near town centre location it may be well possible to increase the density by 5dph which would give an extra 8 or 9 dwellings.

**Conclusion:** If it is finally necessary for any Green Belt to be lost in the District, which we are opposed to in principle, then we conclude that this land may have to be one of the sites that could be released.



## **Headley**

SA41: Headley Court, Headley Road. 90 dwellings net on 33.4ha (of which 3.0 ha is brownfield)

**The site:** Now vacant, after a Defence Medical Rehabilitation Centre vacated last year, this large site comprises at its centre a Listed Grade II former Mansion. There are numerous outbuildings scattered across the site and hardstanding, plus open space and formal gardens. It is vital that a new use is found to offer protection for the listed building which will result in new dwellings being provided.

Development should not have a greater impact on openness than the present buildings, car parking and service areas which comprise some 3.0 ha. The NPPF allows for redevelopment of pdl in the Green Belt subject to impact on openness etc.

There are mature trees and ancient woodland around the wider site and the listed mansion on the site. CPRE would support the proposed level of new housing, which will remain in the Green Belt, but **oppose strongly** the high level of development that the developers are putting forward, that clearly do not conform to planning guidance.

The MVGBR scores the site as significant for encroachment but minimal for the other three purposes. We agree with this assessment.

According to guidance and Policy it was a 'Major Developed Site' in the Green Belt (in saved Policy RUD 21 in the Mole Valley Plan) and therefore some limited redevelopment is appropriate. However, there are constraints such as heritage issues and nature conservation interests. All these factors limit the degree of new housing.

The site is not very sustainable, but it is self-contained in the Green Belt and there are special circumstances which would permit some limited redevelopment.

The impact of additional traffic generated by the proposed new dwellings should be carefully assessed, as the original use, although quite extensive, generated small levels of traffic.

**Conclusion:** Given the special circumstances existing, CPRE does not object to the redevelopment proposed in the draft Plan.



## **Hookwood**

SA 42: Land west of Reigate Road, Hookwood. 450 dwellings and 2 gypsy pitches on 22.3ha

Situated in the Green Belt site. **We object very strongly** to this very substantial encroachment into unspoilt Green Belt.

**The site:** This Green Belt allocation extends north and westward from Hookwood village and the Reigate Road into open countryside. It comprises a number of open fields in productive agricultural use. Surrounding the site are more open fields to the north, west, and part of the south. The eastern boundary lies behind some housing, fronting the main road

Also, to the south is the Gatwick Business Park site. There are poor defensible boundaries to the west and south with some narrow hedges along the individual field boundaries, although to the north there is a narrow watercourse, with a substantial tree belt. The proposed site appears to be largely artificial, probably just defined by ownership. We cannot believe that this area would be proposed unless it has been put forward in the Call for Sites as being deliverable and available. The site is largely level with a large area of vegetation in the centre.

**Flooding:** parts of the northern area is Flood Zone 3 and 2, however the majority is Zone 1, and will not affect any building on the majority of the site IF other constraints are overcome.

**Green Belt purposes:** The MVGBR has scored the site as moderate for preventing sprawl, and preventing encroachment into the countryside, but minimal for preventing merging and setting. We believe, however, that this large site is under-scored in respect of preventing encroachment into the countryside, and possibly in terms of preventing sprawl. The site is fundamentally open rural countryside with no urban features and very limited urban adjacent uses, except for the large building to the southeast and the sporadic housing along the Reigate Road. With the suggested revised to a Strongly Performing score for preventing encroachment into the countryside and preventing sprawl, we consider that this alone is a valid and strong reason for not including this site as a housing allocated one.

**Landscape.** The site is not within the AONB or AGLV. The boundaries of the various fields and the boundaries of the site are, on the whole, composed of weak/narrow hedgerows. There is an area of extensive deciduous woodland (a Priority Habitat) in a central portion of the site, and within the western boundary an area of traditional Orchards Priority Habitat. Part of the tree belt in the southern part of the site has Tree Preservation Orders.

**Access:** A public footpath crosses the southern part of the site between Kennel Lane and Farmfield Road, this therefore provides public access to appreciate the open nature of the site and the wider area.

**Unsustainable site:** The very large number of dwellings and some 1100 potential people will have a very significant adverse impact on the area, both in Hookwood village and the wider area. The site is close to a small rural village, with limited services, which could not possibly cope with the large number of new residents and cars.



The major services, required by the potential 1100 people are some distance away in Horley town centre. Thus, travel levels/journeys and congestion will increase significantly making this proposed development a very unsustainable one.

**Conclusions:** For the reasons above, including strongly performing Green Belt purposes, the adverse effects on the local area, the lack of available services for a potential 1100 new people, increased levels of travel by private car, making this a hugely unsustainable site, we strongly object to the allocation of this site for housing and 2 gypsy pitches.



SA 43: Land south of Kennel Lane, Hookwood. 21 dwellings 0.7ha

In the Green Belt. This small site does not perform any Green Belt purposes, strongly or moderately. We do not agree with Mole Valley's ratings of moderate for sprawl and encroachment. There is a strong potentially new boundary to the north, west and south. It is surrounded on two sides by existing development and partly to the west by a large Gatwick Airport facility. Thus, the site is relatively enclosed.

The density equates to 40 dph on 80% of the site which is probably about correct as the site is long and narrow.

**Conclusion:** If it is finally necessary for any Green Belt to be lost in the District, which we are opposed to in principle, then we reluctantly conclude that this land may have to be one of the sites that is released.



SA44: Land adjacent to Three Acres, Hookwood. 19 dwellings net, 1.0 ha

A Green Belt site, although the existing property on the eastern part of the site is inset from the Green Belt, with existing hardstanding and storage. It is therefore partly previously developed land; it is surrounded on two sides by housing and a third by a recreational facility. We consider it does not perform Green Belt purposes to any degree (although Mole Valley gives it a moderate rating on sprawl and encroachment). In part the site is used for car parking, although there appears to be limited hardstanding. There is an extensive tree boundary to the west and south into the open Green Belt (which can act as a defensive, clear and strong new boundary). We do not consider there are convincing planning grounds to oppose its allocation.

However, we would urge Mole Valley, if they decide to include this site as a housing allocation, in the Regulation 19 Plan, that a higher density, with additional housing numbers is actively considered. A figure of 25dph is too low, and an increase to 30dph on 0.8ha would yield an additional 5 dwellings.

**Conclusion:** If it is finally necessary for any Green Belt to be lost in the District, which we are opposed to in principle, then we conclude that this land may have to be one of the sites that is released.



## Leatherhead

SA 45: Land to the north and south of Barnett Wood Lane, Leatherhead. 550 dwellings, primary school and 3 gypsy pitches. 13.2 ha

**We object most strongly** to the allocation of this site.

The eastern area is Green Belt, although the allotment area is within the Leatherhead 'urban' area.

This is a linear site, divided by Barnett Wood Lane, adjacent to the M25 and to the east of the residential area of Leatherhead. It consists to the south partly of allotments, which would have to be moved to an alternative location. This has been described as potentially being on the Ashtead side of the M25, which would both disruptive and problematic for users.

**Green Belt purposes:** Mole Valley Green Belt Review January 2020(MVGBV) is an important piece of evidence when considering the future of this site. The site forms the majority of the area M25 corridor LH in the Review. It has been rated against four purposes of Green Belt as moderate for preventing sprawl, significant for preventing merging, moderate for preventing encroachment into the countryside, and minimal for setting/character. CPRE broadly agrees with these conclusions.

Of most importance is the concept of preventing merging of settlements. The site is generally open grassland. The separation between Ashtead and Leatherhead is very narrow and *'the narrowness of the Green Belt at this point gives it value as a gap of open land between Ashtead and Leatherhead.'* We would agree that *'in places a feeling of separation between Ashtead and Leatherhead has already been eroded by the urbanising effect of the M25/A243'*. The Report concludes that there are two ways of looking at the issue of merging in this case. (i) *the land remaining in the Green Belt is so narrow that its value is all the more significant, the open fields provide the only remaining separation between Ashtead and Leatherhead (the site is one half of this).* (ii) *the land is so compromised by the M25 that its value in separating the two communities is very limited'*. The Report goes on to say *'that the merging value varies across the area with land north of the railway playing a more limited/minimal role, than land immediately adjoining Barnett Wood Lane... The Lane provides a point where both Leatherhead and Ashtead can be viewed and there is a stronger sense of leaving and entering one settlement and entering another. This is not possible further north and south.'*

We would **strongly support** the first (i) statement and agree that Barnett Wood Lane is at the heart of the proposed development site and provides an important viewing point. The NPPF and Courts are clear that visual impact has a part to play in openness. We note that on page 148 of the SHELAA evidence for this site at requirement (3) the Text states that *'the site layout shall incorporate areas of green open space to both sides of Barnett Wood Lane to maintain sense of openness along the route between Leatherhead and Ashtead'*.

This is clearly an attempt by the Plan to overcome the loss of openness and the disadvantages of developing this site, in what the Council admit will lead to a loss of *'at a point where both Leatherhead and Ashtead can be viewed and there is a strong sense of leaving one settlement...'* However, we cannot accept that providing, which would only be a narrow open area either side of the Lane, would in reality be more than a very inadequate substitute.



The allocation involves the moving of the existing large allotment area, apparently to a location possibly on the other side of the M25 to the north, or north of the proposed site at Land off Clare Crescent. This would inevitably lead to major disruptions for allotment holders and increased travel in almost all cases by car.

There is the large number of new dwellings and associated new people, probably 1250. This will inevitably cause major traffic congestion in the already very crowded town of Leatherhead, and the associated pressure of other infrastructure, amenities and services. It is not just this site that will produce more cars and people, but the Council are proposing large numbers of new dwellings at Randalls Road (150 plus 45), Bull Hill (450) Clare Crescent (150), Sorting Office (96), The Swan Centre (55), and other smaller sites. The cumulative impact of another 1500 dwellings and 3,700 people is very significant for the town of Leatherhead, which has overburdened services and very hard-pressed infrastructure. We support development on the brownfield sites, which are a priority in Planning Guidance, but we have severe reservations on the allocation of the larger Green Belt sites, on this issue alone.

**Conclusion:** With the site being rated as significant on one Green Belt purpose and moderate on another two, we believe that this site performs a major Green Belt role and for this reason should not be allocated for major development.



SA46: Bull Hill, Leatherhead. 450 dwellings. 3.0ha Offices, Parking, Public Open Space, Community Hub

We support in principle the comprehensive development of this town centre site, with its emphasis on higher density housing. We note the very extensive numbers of new dwellings suggested. In principle we support high densities in town centre locations (as does the NPPF).

We have concerns, however, about the proposed height of the buildings proposed and resultant scale on the development. Higher densities can be achieved through innovative design without the requirement for high-rise buildings. The character of this part of historic Leatherhead will be altered adversely. This area is part of the green approach into the centre of the town and is visible from a number of directions, and this could be compromised by insensitive and high bulky development. CPRE would encourage the Council, as the landowner, to be receptive to the views of the public and amenity groups, to ensure there is no loss of green views and the character of this approach into central Leatherhead is protected.

We are also aware of the increase in car movements this size of development will generate. This factor must be considered carefully by Mole Valley and future developers.



SA47: Land at Clare Crescent, Leatherhead. 150 dwellings, 2 gypsy pitches on 2.7ha

**The site:** A northern extension of SA45 (north and south of Barnett Wood Lane), this is mostly within the Green Belt, although there is an area designated as a reserve housing site in the Local Plan. It is bordered to the south by the railway, to the west by mixed development at a reasonably high density, which is part of north Leatherhead and the M25 and feeder Roads is to the east, although there is open land closer to the actual roads, which will be retained.

The site is open field used for informal horse grazing and bordered by a wide tree buffer to the east and north which separates it from the M25 and the A243.

**Green Belt purposes:** It is part of Green Belt Review Parcel M25 corridor, and is scored as moderate for preventing sprawl and preventing merging, and minimal for setting and preventing encroachment.

We consider however that Mole Valley's score for preventing both sprawl and merging is optimistic. Certainly, the site does not prevent sprawl to any real extent, whilst preventing merging is, we believe, between moderate and minimal. Certainly, the open area around the M25 would be reduced. SA47 is much more of a natural extension of the urban area of Leatherhead than SA45. It is true that the merging argument we put forward as very important for site SA45, to the south is much weaker here. The site to the north is very narrow, some 35 metres and to the south 150 metres. Although about half of the width of the open Green Belt wedge would be lost to the west of the M25, the wider width on the Ashted side remains. In total, therefore, the site does not contribute to any of the four Green Belt purposes to any extent.

**Careful design:** is necessary to alleviate noise and pollution from the M25: Great care would be required in the design of any future dwellings, so that noise and air pollution from the M25 and other Roads is minimised for future residents.

**Landscape:** The site is flat and featureless and has limited landscape and biodiversity value. It is surrounded on all four sides by trees and hedges but especially on its western boundary, where a thick tree belt prevents it being seen from the M25 or its feeder road.

With this site developed there is a danger of increased traffic levels and congestion into Leatherhead, which for any future housing site in Leatherhead is a negative factor.

We suggest, on balance, that there are some valid planning reasons, in the situation relating to housing numbers, that Mole Valley is faced with, to not oppose some development of THIS site. We support the high dwelling density proposed.

**Conclusion:** If it is finally necessary for any Green Belt to be lost in the District, which we are opposed to in principle, then we reluctantly conclude that this land may have to be one of the sites that is released.



SA48: Land to the rear of 5-53 Randalls Road, Leatherhead. 150 dwellings, plus 2 gypsy pitches. 6.4ha

This site is within the Green Belt. We **object** to the allocation of this site.

**The site:** This open field is enclosed on two sides to the north and west by existing development (housing to the north and the Leatherhead Business Park to the east.) To the west is the Randalls Park Crematorium, with a road running parallel to the boundary. To the south the site slopes down to a stream and beyond that is the River Mole and a railway line. South of the railway line is an area of open common land and to the west the built-up area of Fetcham. The site is bordered by tree and hedge belts, especially wide to the east, although all are reasonably effective.

**Green Belt purposes:** The MVGBR scores the site as moderate for preventing sprawl, merging and encroachment, and significant for setting. We accept the ratings for sprawl and encroachment, but consider the rating for merging is incorrect. The site is located in a reasonably narrow open wedge between the large built up area of Leatherhead and Fetcham (which together with Bookham forms another large built up area to the south). The site is one half of the open gap that exists between the two built up areas to the west, although to the east the open area is much wider as the area to the south is the Fetcham Common Land. Even with the southern portion of the site down towards the watercourse not being developed, we consider this important gap will be significantly reduced if the site is allocated and subsequently developed. We therefore believe that the Green Belt purpose of helping to prevent merging is Significant. On this issue alone we believe the site should NOT be developed and should therefore be removed from the list of allocated sites.

**Landscape:** The site is surrounded by tree belts, especially to the east, with some tree clumps in the centre. The site is identified as a Wood Pasture and Parkland Priority Habitat and 50 % lies within the 7km zone of the SPA. There is a public foot path on the southern boundary of the stream. This gives public views to the north up the slope into the site which would be compromised if the site was developed. The loss of openness would be clearly seen.

**Flooding:** a strip around the southern site boundary is Flood Zone 2, the remainder is Zone 1.

**Access and traffic:** Access would be onto the busy Randalls Road. This development for 150 dwellings would add even more congestion at peak times to the already congested junction of Randalls Road (A 245) and both Cleeve Road and Station Approach. The later junction forms a major part of the gyratory system that flows around Leatherhead. At peak times this road system is very heavily congested.

**Conclusion:** For the major reason of a significant contribution to preventing merging, and for the others reasons given above, we believe this site should be deleted from the Plan's Allocations. We therefore object strongly to the allocation of this site for housing.



SA49: Sorting Office and Telephone Exchange. 96 dwellings on 0.74ha

We support this residential allocation on this urban site, if the existing user can be relocated, and with the high density proposed.



SA50: Swan Centre, Leatherhead. Convenience/ retail, office, hotel, cinema, 55 dwellings.1.24ha

We support the comprehensive redevelopment of the Centre, including an element of housing to enhance and improve Leatherhead town centre. We would have hoped that possibly when detailed planning is undertaken that the number of dwellings could be increased.



SA51 Land to the rear of Two Ways House, Leatherhead. 57 dwellings net 2.1ha

This is a Green Belt site proposed for development at 27dph. There is a requirement to safeguard existing trees.

The site has existing development on three sides. There exists a clear boundary on the western /new side with extensive tree cover, where Teazle Wood, an SNCI, is located. The site fulfils Green Belt purposes only weakly, in our opinion, even though the MVGBR scores the site as moderate for preventing sprawl. Because of the limited size of the site and a clear boundary on the western edge of the site, we do not believe that a score of moderate on sprawl is justified.

There are some treed areas within the site, and a TPO on the best trees.

In this location, if released from the Green Belt, we would suggest a reappraisal to consider increasing the dwelling capacity of the site. A flatted development is appropriate on the southern part of the site adjacent to Tesco's.

**Conclusion:** If it is finally necessary for any Green Belt to be lost in the District, which we are opposed to in principle, then we reluctantly conclude that this land may have to be one of the sites that is released.



A52 36-69, Randalls Road, Leatherhead. 45 dwellings 1.4ha

This is a narrow Green Belt site adjacent to the main Randalls Road. It serves little or no Green Belt purposes in our opinion. There is existing residential on three sides. (North across the A245, east and west). To the south the site abuts the open area of Randalls Park Crematorium, which would prevent any encroachment south for further housing development. Although the MVGBR scores the site as moderate on sprawl and setting and minimal for merging and encroachment, we consider this is too excessive. No sprawl is likely and so that scoring should be reduced to minimal. Also, the score for setting, we believe should be reduced to minimal as the vistas/views into Leatherhead is insignificant.

We would suggest that there is a possibility that at least 50 dwellings (at 45dph) or more, could be successfully built on this 1.4ha site, without detriment to the surrounding area, although we accept the site and any future dwellings will need to be so constructed to prevent excessive noise and air pollution affecting future occupants. The limitation to 80% of the total site because of extensive frontage appears correct.

**Conclusion:** If it is finally necessary for any Green Belt to be lost in the District, which we are opposed to in principle, then we conclude that this land could be one of the sites that is released.



SA53. Land adjacent to Crestawood, Leatherhead. 12 dwellings 0.6ha

This site is within the Green Belt. Comprising two vacant paddocks, adjacent to existing development on three sides, the site is open to the south, although a residential road crosses east/west a short distance further south would limit any significant sprawl south.

**Green Belt purposes:** CPRE considers that this site fulfils no significant or moderate Green Belt purposes (in contrast with the Council's evidence which rates the site as moderate for preventing sprawl and encroachment). The proposal can probably accurately describe as rounding-off of the adjacent urban area. The site is adjacent to reasonably low-density housing, but we question if 20 dph is still too low if Green Belt land is sacrificed. The Green Belt boundary to the south is 'soft' on the ground, but appropriate. We agree with the text of the draft Plan that a clear and definitive boundary is required to prevent further development pressures to the south.

**Conclusion:** If it is finally necessary for any Green Belt to be lost in the District, which we are opposed to in principle, then we reluctantly conclude that this land may have to be one of the sites that is released



SA55: Land at River Lane, Leatherhead: 7 extra gypsy pitches

This site with extensive planning history has existing pitches which have a permission. Because of the difficulty of finding new gypsy sites, this existing one is probably as good as any other for expansion.



## **Leigh**

### **SA57: Land at the Priest's House Leigh. 13 dwellings. 0.5ha**

It is situated within a Conservation Area. This Green Belt site that will remain as 'washed over,' along with the rest of the village.

**The site** is part of a residential garden of Priests House an extensive dwelling. Only southern part of the garden would be developed in part where there is a tennis court. The proposed site is well contained separated in the east from the open fields outside Leigh by extensive tree boundaries. There is existing development along the road on either side of the site

Views from the Road into open countryside are non-existent because of the thick treed area fronting it. The site could be probably classed as infilling in Green Belt terms according to the NPPF, although we recognise the rear of the site is surrounded by open Green Belt.

**Green Belt purposes:** We agree with the minimum rating of the first three Green Belt purposes, but consider Mole Valley's score of moderate for setting as excessive. (It appears this modest scoring is only because of its presence within a Conservation Area which we consider an incorrect interpretation of the NPPF). We do however recognise the proximity of Priest's House to the north.

The propped density of 26dph and capacity of 13 dwellings is probably correct, given the site's characteristics and the reasons above, and we would find it difficult on planning grounds to oppose this site's allocation.

**Conclusion:** If it is finally necessary for any Green Belt to be lost in the District, which we are opposed to in principle, then we reluctantly conclude that this land may have to be one of the sites that could be released.



SA58: Land at Tapner's Road, Leigh. 10 dwellings 0.4ha

Another Green Belt site that will remain as washed over. It is not AONB or AGLV. It is a natural extension of Tapner's Road, being bounded by a clear defensive boundary to the north and west where there is open Green Belt land beyond. The site is well screened from the Road by trees and hedges and comprise vacant scrubland with some tree cover. It lies adjacent to the Leigh Village boundary to the south east.

**Green Belt purposes:** Generally, we consider the site performs Green Belt purposes poorly (we believe the Council's score of moderate for merging, encroachment and setting is excessive). This small site, at 0.4ha, does not lead to merging and encroachment. The score of moderate for setting is, we believe, incorrect too. Although a pleasant village there is nothing of high architectural and historic value nearby.

The proposed development would be fundamentally an extension of the housing along Tapner Road.

**Conclusion:** Basically, this site is infill along a residential road, so it would be difficult to object on planning grounds. If it is finally necessary for any Green Belt to be lost in the District, which we are opposed to in principle, then we reluctantly conclude that this land may have to be one of the sites that is released.



## **Mickleham**

### SA59: Land at Dell Close, Mickleham. 10 dwellings. 0.4ha

This site is situated in the Green Belt and also within the AONB and AGLV, although those are of very limited relevance as it is located within a built-up village setting. The site is within the village, close to the school and surrounded by residential on three sides. It was used for market gardening and recreational uses -structures still exist, although they are largely derelict.

**Green Belt purposes:** We broadly agree with Mole Valley's Green Belt scoring as minimal for the first three purposes, but believe the moderately scored setting purpose is excessive, even though it is within a Conservation Area. We disagree that being only adjacent to a Conservation Area, which contains a number of listed buildings, should result in a moderate score. This does not accord to the NPPF and takes the application of applying Green Belt purposes to a purely local level, too far.

**Landscape:** Although within the AONB, there are very limited landscape features of any value and views to and from the AONB (to and from a small site very much enclosed between residential areas on three sides). dwellings will need to take into account viewpoints within the North Downs.

We note the possibility of bat foraging and commuting habitats, which will need investigation and possible mitigation measures.

The proposed density, of 30 dph, on 80% of the site is probably correct in the circumstances of this lower density settlement with adjoining heritage assets.

**Conclusion:** If it is finally necessary for any Green Belt to be lost in the District, which we are opposed to in principle, then we conclude that this land may have to be one of the sites that is released.



SA60: Hall Farm, Swanworth Lane, Mickleham. 6 dwellings 0.3 ha

This site is within the Green Belt, being the curtilage of two dwellings, with sheds and greenhouses. It will remain as a washed over Green Belt village, so the site will remain Green Belt. The site is within the AONB and AGLV and on the edge of the village, within a Conservation Area. The Green Belt purposes of this site we consider are minimal, including setting, which MVGBR rates as moderate, presumably as the site lies within the village Conservation Area. We consider this scoring is excessive and an incorrect interpretation of the NPPF. The proposed dwelling density at 30 dph on 80% of site would appear correct given local circumstances.

Although within the AONB and AGLV, the site has extremely limited landscape value in itself. A very modest extension of the village would not compromise views and into the landscape designated areas.

**Conclusion:** If it is finally necessary for any Green Belt to be lost in the District, which we are opposed to in principle, then we conclude that this land may have to be one of the sites that is released



## **Newdigate**

### **SA61: Land to the rear of the Six Bells Village Street, Newdigate. 10 dwellings 0.7ha**

Within the Green Belt but not within a Conservation Area or the AONB/AGLV, this is a small open area surrounded on three sides by residential development. Mature trees line the site on most boundaries. There are some listed buildings along Village Street to the east, although the rear gardens are relatively long. The site is therefore fundamentally enclosed. CPRE considers that the Green Belt scoring should be minimal for all four purposes. We do not accept the MVGBR scoring for setting as moderate. (The presence of listed buildings, and a Conservation Area close by, does not justify a moderate scoring,.)

Given the circumstances, with the site and village remaining in the Green Belt, and the very limited Green Belt purposes of this site, we would not object to this allocation.

We would question whether it is necessary to avoid any development on 30 % (0.2ha) of the site, even though listed buildings abut the eastern site boundary and the existing treed boundaries. We question whether a density of 25dph is rather too low, even given the site circumstances. Thus we consider that if more of the site is developed at 30dph another 8 dwellings could be achieved.

**Conclusion:** If it is finally necessary for any Green Belt to be lost in the District, which we are opposed to in principle, then we conclude that this land may have to be one of the sites that is released.



## **Ockley**

### SA62: Land at Friday Street, Ockley. 25 dwellings 3.1ha

The site is not in the Green Belt, but lies in Countryside beyond the Green Belt, and is not in the AONB or AGLV. The site consists of two fields with hedgerows on the boundaries, with most being with a Conservation Area. Mole Valley considers that only the northern field has development potential.

Ockley is a small linear village without limited development not being directly adjacent to the two main roads, this site is at the junction of these roads, but the road frontage here is largely open and undeveloped. There do not appear to be nature conservation or biodiversity constraints.

The northern field (half of the site) is more centrally located at the junction so is best suited to develop. There are a few small buildings not only to the north but also along Stane Street to the south. There are trees and a hedgerow separating the northern field from the southern one.

If a decision has been taken to build on the northern parcel, we support the decision not to build also on the southern field, which has no high brick wall or tree cover on its boundary with Stane Street to lessen the visual harm of new buildings. Views from Stane Street into the southern field are extremely attractive with mature trees in the mid distance. A density of up to 25 dph would appear to be appropriate for this location.

We are not aware of valid planning reasons to oppose this limited development on this central part of Ockley.



SA65: Land at Cricketers Close, Ockley. 9 dwellings 0.3ha

The site is not in the Green Belt, but Countryside beyond the Green Belt.

This site is comprised of hardstanding, between existing housing and a sewage works. There are many trees along the southern, western and southern boundaries. The site is within the AGLV but not the AONB.

It undertakes little purpose in the AGLV, being hardstanding with a partial urban appearance, although there are trees on the site. Trees separate the site from open countryside to the west which clearly has a much higher landscape appearance.

We are unaware of any valid planning reasons why this small area should not contribute in a small way to the District's housing target. The numbers of proposed dwellings appear appropriate.



SA64: Land at the Village Hall, Stane Street, Ockley. 10 dwellings 0.3ha

The Site is not Green Belt or AONB/AGLV, but is within a Conservation Area. However, a planning permission for ten affordable dwellings has lapsed. CPRE has no objection to this site's development as long as the eventual design pays particular attention to its location within the Conservation Area. Given the above circumstances and the trees and hedge that prevents a view into the site from Stane Street and mature tree belts that separates the site from open fields to the east, we do not have objections to this modest development.



SA63: Figgs' Field, Ockley. 18 dwellings 0.9ha

Again, this Ockley site is not within the Green Belt or the AONB but is within the AGLV. It is largely surrounded by existing housing with tree belts on its boundaries, although a small part can be seen from Stane Street. It is located within the built-up western portion of the village. Although within the AGLV the site itself contributes minimally to landscape value. Any views from or into the AGLV are limited the enclosed nature of the site.

There is a flooding risk on part of the western half of the site. For that reason, we consider possible development should only be actively considered on the eastern two thirds of the total site. The density and dwelling capacity proposed appear appropriate, given the site's characteristics. We are not aware of a valid planning reasons to oppose the allocation of this site.



## **Westcott**

SA66: Westcott House, Guildford Road, Westcott. 30 dwellings on 6.2ha

We **object** to the allocation of this site.

This site is within the Green Belt and situated on the eastern edge of the village. It is enclosed by extensive tree cover, which on its western edge is extensive, so separating it from the existing Village, and cannot be viewed from the Guildford Road. Although there is an existing care home complex along the Guildford Road and other very limited housing in the south west corner, the site is almost all open with has a rural appearance. The northern part of the site includes the Pipp Brook and an associated pond which is Flood Zone 2 and 3.

The site is within the AONB and AGLV, being enclosed and with only a small developed area in the south west corridor.

**Green Belt purposes:** The MVGBR scores the site as minimal for sprawl and merging, moderate for encroachment and setting. We agree that the total site should score moderately for preventing encroachment. A mitigating factor is the presence of strong trees boundaries, resulting in the site being well enclosed. We believe the moderate score for setting is somewhat over-rated, as there appear to be few architectural or historic feature nearby.

**Probable dangers of further development to the northern and eastern parts of the site.** We accept that the proposal in the Plan is only to promote housing (a surprisingly large number of 30 dwellings) on land south of the pond area and the field north of the Care Home complex, presumably because that area is closer to this building. This part of the site to the south potentially only amounts to 1.4ha of land, which is less than 25% of the site. However, we fail to understand the difference in openness of this part from the majority of the rest of the site further north. Proposing a smaller area to the south and letting the rest remain undeveloped would most probably result in strong pressures (perhaps irresistible) to develop on much of the rest of the overall site, especially as all of the 6.2ha is proposed to be taken out of the Green Belt. We believe that there are no compelling planning reasons to take this site out of the Green Belt and develop a part for 30 dwellings. The site performs a moderate purpose in preventing Encroachment further north and east.

It lies with the AONB and there is deciduous woodland on the area north of the Care Home that is designated as a priority habitat.

The most compelling reason to oppose this allocation is the Green Belt purpose it performs outside of the established village in preventing further development pressures i.e. encroachment into more Green Belt land to the north and west, within the 6 ha site, if only part is initially built on.

**Conclusion:** For the reasons given, CPRE **objects** to the allocation of this site for housing.



SA67: Heathcrest, Bramley House (18-WC-003) and Mill Way House (004) Guildford Road, Westcott. 14 dwellings. 2.3ha

The site is within the Green Belt, the AONB and AGLV and the Westcott Conservation Area. It is however within the built-up area of the village, although not the inset part, and surrounded by existing houses, which are at a lower density to the west and north. The listed Church of Holy Trinity, within the open Westcott Heath, lies across the Guildford Road to the south. Adjoining land to the north of Heathcrest (two curtilages) increases the size of the potential development site and would enable a low-density comprehensive development.

Although the site is within landscape designations, their value here is limited, as the area is already low-density housing. We do not believe the wider AONB/AGLV would be adversely affected to any extent by this proposal.

This land although classified as Green Belt is previously developed land. The MVGBR scores the area as minimal on sprawl and merging, moderate on encroachment and significant on setting.

We disagree that this already-developed site should be scored by Mole Valley as significant and moderate for two of the Green Belt purposes. In our opinion they should also be scored as minimal. The use of the combined three small curtilage sites, totalling some 2.3 ha, makes it possible for 14 dwellings to be provided. (at a density of 6dph). This low density reflects the low-density character of the area with its sylvan nature.

**Conclusion:** Because of the actual circumstances of the site being previously developed, the Green Belt and AONB status are largely academic, and we would not therefore object to the combined sites' development, as long as a design is of a high standard and sensitive to its location.



## **Westhumble**

### **SA68: Land Fronting Westhumble Street, Westhumble. 16 dwellings, 0.7ha**

The site is within the Green Belt and in the AONB and AGLV. Although outside the 'inset' existing village boundary it will be within a proposed new boundary. The site is surrounded on three sides by housing, only to the north are open fields that border the River Mole.

The MVGBR scores the site as minimal for three Green Belt purposes, but for preventing of encroachment it scores as moderate. We question whether in fact moderate is correct for this small site, although we accept that it abuts open land and open fields on one boundary. Although officially within the AONB an AGLV, in practice the landscape value of the site is small.

Thus, we view this site, even with the environmental and landscape constraints, as having some potential for development, as it is very largely within the village envelope. There is heavy tree cover within the site, but none are covered with a TPO. A density of 30 dph, on 80% of the site (only 80% because of the presence of the mature tree cover), would appear to be probably appropriate, given the characteristics of most of the surrounding dwellings.

The open nature of the site, with open views further north does have some value, especially for the adjacent residents. Because of the existence of a dense tree boundary along the southern boundary, the site cannot be viewed or seen from the road (Westhumble Street).

**Conclusion:** We are not opposed to a sensitive development of this site.

For other Allocated sites in the Draft Plan that we have not made any comments on above, our position is that we have no fundamental objections to what is being proposed by the Council.



### Final Conclusions on Housing Numbers and a way forward for the Regulation 19 Plan

We are objecting to eleven of the proposed Allocated Sites in the Plan. These sites have a potential housing total of at least **2,259** dwellings. This is **28.8%** of the 7,827 figure in the Housing Trajectory for the period up to 2033. We are therefore not objecting to approximately a District-wide 5,568 dwellings figure.

However, to this 5,568 figure can be added:

- Some higher densities on some of the sites which we have proposed that adds up to over 200 dwellings.
- We also propose that consideration is given to increasing the density and numbers on other sites, over 5, within the urban area that have already been identified, by the Council, except the large allocated urban sites that are already proposed for a high number of dwellings.
- An increase over the 180 figure proposed as a windfall figure for expanded Development Opportunity Areas, as discussed elsewhere in this submission.
- Consideration be given to reappraise the urban discounted sites, with the view to ascertain whether some may be suitable for development at sometime within the Plan period.

We cannot put figures on the last three points above, but over the Plan period it could possibly amount to several hundred dwellings. So, probably, the 5,568 total could increase to somewhere between 5,800 – 5,900.

We recommend that Mole Valley Council carefully considers this approach, reducing the number of dwellings (and allocated sites) in the Local Plan. The figure is below the Standard Methodology (6,735) and the higher original housing trajectory figure in this draft Plan. However, we consider this is a realistic approach to take forward and defend, because of the strong constraints within Mole Valley District, and especially the presence of strongly performing Green Belt sites.

The NPPF contains wording that allows a Local Authority to restrict its housing numbers if it can show conclusively there are effective constraints such as Green Belt (and, especially, higher performing Green Belt). We believe that this is the case in Mole Valley District. We have shown that some of the Green Belt sites put forward as housing allocations in this draft Plan are actually performing a strong Green Belt purpose and should therefore not be developed, and so should be removed from the Plan.

We urge the Council to produced a revision to the draft Regulation 18 Plan along these lines, which can then form the basis of the forthcoming Regulation 19 Plan.