

HOUSING AND TRAVELLER SITES PLAN –
ADDITIONAL SITES JUNE 2014

Representations by Capel Parish Council in relation to:-

- (i) Site BG09 Land South of Beare Green
- (ii) Site CP11 Land at 'Hurst,' Vicarage Lane, Capel.

1. **Resolution**

- (i) Capel Parish Council **OBJECTS** to the proposed development site south of Beare Green (BG09).
- (ii) Capel Parish Council **SUPPORTS** the proposed redevelopment of land at 'Hurst,' Vicarage Lane, Capel (CP11), subject to the provisions detailed in this representation.

2. **Consideration of the Sites**

These representations are considered in two parts. First the Parish Council (PC) has regard to the proposals for consideration detailed in the Report of Mole Valley District Council dated 28th May, 2014. Secondly, the PC details its objections and these are identified by the residents of the Parish and Beare Green in particular.

3. **Site BG09 Land South of Beare Green**

- 3.1 Following the consideration of the Report by Mole Valley District Council the Parish Council was advised that proposed Option (2) for 200 homes, open space and allotments had been withdrawn. The response by the PC only has regard to Option 1 for 400 homes, a new primary school and open space.
- 3.2 The PC also considered it important to have regard to proposals for the development/ redevelopment of The Weald School. Representations have been submitted by the Diocese of Guildford for the redevelopment of the School for housing (as enabling development) for a new Primary School.
- 3.3 Their submission remains extant with Mole Valley District Council in response to the initial Green Belt sites consultation but does not form part of any Mole Valley proposal.
- 3.4 Representations of the Diocese confirmed the following position to the PC:-
 - (i) the proposals for the Weald School do not form any part of the BG09 submission, although the proposals for BG09 include the provision of a 3 Form Entry Primary School;

- (ii) the Diocese of Guildford will not be submitting a planning application in advance of the consideration and the determination of the site allocation by an Inspector;
- (iii) in the event BG09 is allocated and planning permission granted, the Diocese of Guildford would not be making any financial contribution for the new school from the Weald School, funding for that being through the C.I.L.
- (iv) with the Grant of Planning Permission for BG09 and the provision of a new Primary School on that site the Diocese will consult with the local community and Capel Parish Council as to the future of the existing site.
- (v) In the event BG09 is not allocated the Diocese of Guildford would in turn have regard to any decision of the Local Plan Inspector relative to the Weald School and its option to provide an ongoing Primary School on the site.

3.5 Site BG09 is bounded by the A.24 and A.29 and to the west by the main railway line from Dorking to Horsham. To the north lies the village of Beare Green.

3.6 The site is as described in the Committee Report comprising undulating arable land, woodland and hedgerows. It is open in nature and visible from Coldharbour and the Surrey Hill AONB.

3.7 The Sustainability Appraisal (SA) addresses a number of issues, the majority of which score in the 'negative.' Insofar as they relate to the consideration of the proposal by the PC the following comments are made:-

(i) **SA4 – Flooding**

The PC does not support the SA as flooding issues do prevail.

(ii) **SA5 – Services/Facilities**

Reference has already been made in relation to the Weald School and its possible relocation (Paragraph 3.1).

With regard to the ability to improve 'services and facilities' there is no prospect in the short or medium term for the new development to provide either, the SA score should therefore be negative.

(iii) **SA6 – Greenfield sites**

This is a Greenfield site in the Green Belt. Any development would be contrary to the key objectives of the Green Belt. Any development would have significant harm to the rural landscape in this important countryside location.

SA10 – Light Pollution

The Environmental Policies of Mole Valley District Council are a material consideration having regard to the AONB and AGLV.

The light pollution which would result from any development would cause unacceptable harm in what is principally an area where the villages only have very limited public lighting.

Any development would result in high levels of light pollution from roads, dwellings and facilities.

- (iv) **SA9 – Noise/SA11 – Rivers and Streams/SA12 - Biodiversity/SA13 – Landscape** all are indicated as being ‘negative,’ a view endorsed by the PC.

The two key considerations of Mole Valley as to the sites suitability, which the PC considers as being unwarrantable, are the links to the existing village and being contrary to the adopted Core Strategy for Mole Valley.

In addition, in relation to the protection of the Green Belt the proposal would be contrary to the purpose of “***Safeguarding the countryside from encroachment***” (NPPF Paragraph 80).

3.8 **The objections to BG09 by the Parish Council and on behalf of the Community**

(i) **The Green Belt**

Paragraph 79 of the NPPF outlines the ‘great importance’ of Green Belts. Having regard therefore to the objectives any development would be in conflict. In particular:-

- keeping land permanently open
- safeguarding the countryside from encroachment
- development which would be harmful to the Green Belt and would affect the character of the village (Beare Green)
- significant harm to the Green Belt has now been recognised by The Secretary of State for a major housing development which included the provision of shops, health facilities, a primary school on the ground that its development would cause harm to the GB through loss of openness, permanence, encroachment into the countryside. The site in question did not benefit from high quality agriculture (in common with BG09) nor also in common was the lack of a five year housing supply to justify a GB release.

(ii) **Access**

This can **only** be achieved by the constructions of a major new junction, and road improvements to the A.24/A.29 roundabout at Beare Green.

This would require major highway infrastructure works disproportionate to the scale of development envisaged.

While physically links are possible to the village, the road network within the village prevents **any** achievable vehicular links. The roads are narrow with the majority of dwellings depending upon 'on street' parking. This would not only compromise normal vehicular links but make public transport and emergency service links impossible.

To access the existing village from any proposed development would require movements onto the A.24 (going north) and to achieve links back into any development crossing the dual carriageway with movements to the south via any new roundabout. This is an unacceptable highways interaction.

With 400 new dwellings the peak and off-peak movements would be significant, further compounded by movements to and from a new school serving a wider than local population.

(iii) **Flooding**

The existing stream already causes flooding of the land and within the village.

(iv) **Facilities**

The proposals have no regard to providing new facilities other than a school, open space and land for recreation (although reference has been made to a doctors surgery, funding would be an issue.

The reliance therefore, would be upon the existing village (shops and community uses). We do not consider a development circa 400 dwellings is of a size to provide new medical services which would not, in any event, be capable of being accessed from Beare Green village.

The existing shopping 'centre' remains sustainable to meet the needs of the community. It would not be reasonable for a new development to compromise that viability by any new provisions.

(v) **Transport**

The prospect is that the new residents will travel by car to Dorking/Horsham (and beyond). This will impact upon the A.24, in particular, at the junction at North Holmwood (single carriageway to the north) and to the south the single carriageway from Clarks Green roundabout to the north of Horsham.

Proposals to improve the A.24 south of Clarks Green roundabout are no longer part of a national strategy. With increased traffic generation adding to what is already a congested and dangerous stretch of road this 5 mile stretch of narrow meandering and undulating highway with a poor accident record would be unacceptable.

To the north beyond North Holmwood roundabout road improvements are incapable of implementation.

Public transport to and from Beare Green is provided by British Rail and a limited bus service.

While a Green Travel Plan could improve the bus links in sustainable transport terms, without the prospect of reasonable link areas little or no benefit would be achievable.

Pedestrian links to the station could be achieved but with the reliance on movements to the station no prospect exists to accommodate car parking.

In relation to an enabling highways provision it should be noted that the Regulation 123 list has been extended to include agreements under section 278 of the Highways Act 1980 which allows highways authorities to make deals with developers requiring them to pay for alterations or improvements to the public highway. The change is crucial to BG09 (and other sites) as it prevents agreements from being used to fund infrastructure for which CIL has been earmarked.

(vi) **Footprint**

Any new development would increase the 'built' footprint of Beare Green by more than 100%. This would totally compromise the village character.

An organic expansion of the village cannot be achieved other than by moderate levels of development to be easily absorbed into the village framework (physically) and into the community. The recent development of the 'brownfield' Godwins Nursery has still to be absorbed as it has only recently commenced. A limited expansion of the area north of the Nursery would maximise the scale of new housing to be absorbed into the village. This is consistent with (saved) Policy RUD1 of the Mole Valley Local Plan.

(vii) **The Village**

The village of Beare Green is already 'split' by the A.24. This limits integration between the existing community. This would be further compromised by any new development of a significant scale.

While the NPPF (Para 36) states that **“all developments which generate significant amounts of movement should be required to provide a Travel Plan”** the benefits of such a plan are unlikely to be achieved at Beare Green.

(viii) **The Sustainable Agenda**

With poor physical links, we do not consider the proposals have the capacity or capability of providing an 'inclusive' sustainable community.

Given the likelihood of this being a 'large scale' development in this rural location the mix of uses to promote a sustainable development could not be achieved. The localisation of any new development would not promote walking movement.

Nor would it be capable of providing a sustainable and viable Green Travel Plan promoting opportunities for public transport.

3.9 **Conclusion**

Paragraph 17 of the NPPF sets out the core planning principles.

- (i) Bullet point 12 states that planning should **“take account of and support local strategies to improve health, social and cultural well being for all, and deliver sufficient community and cultural facilities and services to meet local needs.”**
- (ii) Paragraph 28, bullet point 4 requires that **“to promote a strong rural economy, local and neighbourhood plans should promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.”**
- (iii) Paragraph 58, bullet point 3 states that **“Planning policies and decisions should aim to ensure that developments optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks.”**
- (iv) Paragraph 81 relates to planning for land identified within the Green Belt, and states that:-

“Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”

(v) Paragraph 171 states that:-

“Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and places of worship), including expected future changes, and any information about relevant barriers to improving health and well-being.”

(vi) In relation to light pollution it states at Paragraph 125:-

“By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”

3.10 In summary, the proposals for BG09 are not compliant with Government Policy or with the Conditions of the Mole Valley District Council Core Strategy. Mole Valley District Council should not include the site as one of the options to achieve housing numbers up to 2026.

3.11 Finally the PC reaffirms its position that any major development should relate to urban areas of Mole Valley (Dorking, Leatherhead and Ashted).

A reasonable expectation prevails for windfall sites coming forward, plus the ‘urban’ related Green Belt site at Leatherhead (550 dwellings) to meet the Green Belt contribution to the housing requirements.

3.12 Having regard to the Mole Valley Local Plan Core Strategy the saved Policy of the Plan in relation to the “General Approach to Development in Rural Areas” (Beare Green is identified as being a rural village in Policy ROD1). It states: ***“The Council considers it important to maintain the existing character and setting of the villages..... in rural areas of the District.”***

The statement should be applied to remove any prospect of BG09 coming forward for development.

4. **Site CP11 – Land at ‘Hurst,’ Vicarage Lane, Capel**

- 4.1 The site comprises a single (large) detached house in a large garden, close to the core centre of Capel Village and its Conservation Area.
- 4.2 It is located at a point of transition between The Street and the informal sporadic pattern of development along Vicarage Lane. The character transition is ‘marked’ with a mixture of detached, semi-detached and terrace houses interspersed with pockets of farmland.
- 4.3 The PC consider the retention of the mature trees and hedgerows as being fundamental to the site’s character, and the need to maintain the dominant landscape and character feature of the village.
- 4.4 The PC recognises the capability of a very limited redevelopment opportunity. This can be achieved by a small development concentrated around the footprint of ‘Hurst’ (the dwelling) which could be achieved with a flatted scheme of no more than 4 units.

Design quality would be crucial given the proximity to the Conservation Area and the village core an objective consistent with Paragraph 56 of the NPPF which states that **“Good design is a key aspect of sustainable development, indivisible from good planning.”** The protection and relation of trees would ensure the important transitional location of the site and the village character will prevail.

- 4.6 Paragraph 55 states that **“housing in rural areas should be located where it will enhance and maintain the vitality of the rural community.”** Capel is a village within and forming part of the rural community.

Bullet point 3 of Paragraph 55 emphasises the objectives of the PC for the site in that it should:-

- reflect the highest standards of architecture
 - significantly enhance its immediate setting and
 - be sensitive to the defining characteristics of the local area.
- 4.7 Being adjacent to the Conservation Area, account must be taken of the “desirability” of (the) new development (to) make a positive contribution to local character and distinctiveness.

Conclusion

- 4.8 An acceptable form of development can be achieved by a single 'block' flatted development (maximum 4 units). The limitation imposed by the development relating to the dwelling footprint with limited parking will achieve that objective.

Development should not extend into the Green Belt.