

Response to the Mole Valley Local Plan to 2033 from Mole Valley and Epsom and Ewell Green Party

We are grateful for the opportunity to respond to the future plans for Mole Valley. We welcome the proposed approach to planning for development by prioritising brownfield sites, but question the need to de-designate swathes of the Green Belt in Mole Valley. This is both damaging and unpopular. The whole plan should be framed by the Climate Emergency the Council has signed up to – concreting over Green Belt land is not the way forward. We do not accept the Government's imposed housing targets and urge Mole Valley District Council to challenge that unsustainable imposition, alongside other local authorities.

Mole Valley is ideally placed to make a significant contribution to carbon sequestration and climate mitigation through forestry, agricultural and industrial processes, as well as to developing renewable energy sources, sustainable local produce markets and low-carbon transport, educational, social and cultural services in a circular economy. These considerations need to take centre stage, alongside the need for affordable housing that really does meet local needs.

Policy S1

- This policy needs to reflect the NPPF position clearly: that sustainable development is a balance of social, environmental and economic interests.

Sustainable development is often misrepresented. The policy has a presumption in favour of sustainable development as set out in the National Planning Policy Framework. This policy, which balances social, environmental and economic interests, should be properly explained in the plan. It is not a presumption in favour of development per se. The Plan states 'where there is no policy, approval will be granted', this is too open and leaves the district vulnerable to new, unplanned or unconsidered types of development in the future.

Policy S2

- The Plan needs to be based on an up to date evidence-based assessment of truly local housing need

We do not accept that the housing targets handed down by the Government equate with the needs of Mole Valley. Other local councils – eg Tandridge – have rejected these unsustainable housing targets which are more about addressing the housing market in the South East and London, rather than addressing the needs of local communities in Mole Valley. The plan should work on the premise of providing truly affordable homes for people who need to live and work locally. It should not be about providing 4/5 bedroom houses on the Green Belt to provide profits for developers (we welcome Policy H3 which deals with this). We ask that our local Council rejects these numbers, which are two years out of date in any case. We would like to see a proper, evidence-based assessment of housing need for Mole Valley. This is made more urgent by the fact that the plan starts in the past (2018) and it is unclear how it would catch up with the targets, given that it is still in draft and may not be approved for some time. A plan is for future events and the plan should be retimed.

This means being led by local experience and knowledge and taking into account:

- a) the demographic character of different areas within Mole Valley under consideration for development
- b) the economic potential of the area, with a view to meeting employee-housing need from this

- c) local community-led searches to identify brownfield development sites, and
- d) whether a designated site is brownfield, employment ready or not for development because it is essential to sustaining nature, or unfit/unsafe for development.

Policy S2.4

- An exhaustive search for more brownfield sites, more creative use of them, more efficient housing densities on those sites, plus windfalls will meet any shortfall without building over swathes of Green Belt land

We particularly object to the change to the policies set out for protection of the Green Belt. No evidence is presented that the one-third apparent shortfall on the handed down housing targets needs to be built, let alone at the expense of our Green Belt. There is no convincing evidence that MVDC has carried out an exhaustive search for brownfield sites because the process has not been community-led and no demonstrated calculation that the number of proposed homes is actually the number needed. The adult education centre in Dorking which is on public land and has been vacant for years is not included, nor the old BT building next to Pippbrook. How many other brownfield sites have been missed? Has an exhaustive search been carried out of premises over shops? How many of these are vacant in Mole Valley? How many of these would be suitable for increasing in height by 1 - 2 additional storeys? Have public bodies been invited to bring forward proposals for their brownfield sites which could be used? Have supermarkets and large employers been approached with regard to building above existing car parks? The approach to finding locations has at least partially relied on private landowners coming forward (the same approach which was unsuccessfully followed in 2014). This has resulted in large tracts of Green Belt land being proposed at low housing densities. This is not the approach the Plan should follow when alternative brownfield sites exist.

MVDC should further investigate the 'stack and wrap' technique of converting surface-level parking into multi-storey structures with flats above, which we believe could provide high-quality affordable housing in central locations close to public transport and other amenities (as with site SA29 at Dorking Railway Station). Careful design would be needed to ensure vehicle emissions are vented so as not to endanger public health, and in order that structures blend into the townscape. Similarly, consideration should be given to adding further storeys to existing developments. Any 'stack and wrap' developments or addition of storeys to existing buildings should be broadly consistent with the height of buildings in the area, and not obscure or disrupt popular viewpoints, but should be considered as sustainable development.

MVDC should consider innovative funding models, housing policies and land acquisition practices to support the objectives of the Local Plan (for example bye-laws outlawing the use of dwellings as second homes in the District; the use of compulsory purchase to assemble areas with fragmented ownership and buy the land at existing use value; the creation of Community Land Trusts; more proactive use of Empty Dwelling Management Orders).

Where owners of brownfield land designated for development in the Local Plan fail to bring it forward for development in a timely manner (land hoarding), the District Council should exercise compulsory purchase orders in the public interest.

Further use of these kind of approaches will enable us to protect the Green Belt. The Green Belt is important, not only for the reasons set out in legislation to protect it, but also because of the need to use land to mitigate against climate change. It is vitally important to protect green areas and particularly wooded land, which will sequester carbon and slow down rain runoff which causes flooding. The Green Belt should be safeguarded and prioritised for tree and hedgerow planting and growing local food, not concreting over which will increase the risk to our local communities as well as diminishing the quality of life for so many people. Exceptional circumstances do not exist which justify using the Green Belt for development – an irreversible loss.

We suggest that an exhaustive search for more brownfield sites, and more efficient housing densities on those sites, plus windfalls, will meet any shortfall.

There are a small number of sites in the plan which are in the Green Belt but which are effectively brownfield sites. We do not object to such, previously developed sites, being used for development and do not object to Policy S2.5.

Policy H1 – Housing Development

We do not agree with parts of this policy for the reasons set out above: H1.1. and the approach to site allocations in the Green Belt. We have provided more detail below on the individual sites.

Affordable Housing Policy H2

- A definition of affordable housing should be adopted that reflects real affordability for key workers and people on lower incomes and the target for such housing should be increased from 40% minimum

This policy should define what is meant by affordable housing, as definitions vary. These homes should be truly affordable based on availability for social rent and part ownership (with the greater proportion for rent otherwise key workers can be priced out). These homes should be socially rented at 50% of the market rent, not under the current government definition which is up to 80%. Other local authorities are adopting this definition and we urge Mole Valley to do the same.

The target of a minimum 40% social housing will not meet the needs of the local community. This figure should be higher (at least 50% would be in line with other local authorities in the South East but we suggest a more ambitious target of 65% would be more suitable for our needs locally). The Council should be able to calculate the appropriate minimum from assessing the housing waiting list for houses of different sizes, rather than relying on developers' quotas.

We are concerned that too much weight has in the past been placed in the hands of private developers which led to the under-provision of affordable housing and other community benefits. MVDC should adopt a policy of ensuring all viability assessments are published for public inspection, and of requiring maximum developer profits of 15%.

Housing 5: Technical standards

- Building standards should reflect the latest best-practice on net zero carbon building, whilst supporting excellent design and incorporating green space into living environments

The technical standards should address the urgent need to cut carbon emissions to net zero – new build is a huge opportunity to do that.

Where development is on public land, the internationally recognised 'Passivhaus Standard' should be adopted as this offers an alternative to the UK's diminished energy efficiency ambitions for new-build housing. The Passivhaus standard complies with UK Building Regulations and can deliver heating bills of less than £100/year for the average three bedroom terrace.

Extreme energy efficiency can be combined with affordability and excellent design: Goldsmith Street project in Norwich won the RIBA Stirling prize for architecture in 2019. Dorking deserves the same standards for its new housing.

We support the submission of Dorking Climate Emergency on technical standards, rather than going into similar detail here. It is remarkable that the Plan does not include policies for carbon neutral development given the Climate Emergency.

Missing Policy on Housing Density

The Plan should include a policy on optimising housing density – low housing density sprawling across the Green Belt is unacceptable. The policy should zone the minimum housing density depending on location: near transport hubs and town centres, density will be higher (100-200 dwellings per hectare). Further away a lower density may be more acceptable.

Economy 2: Protection of Employment Land

- Plans across local authorities should complement each other in delivering net zero carbon objectives and optimising the local supply of employment opportunities

We support this policy, but it conflicts with Surrey's draft Waste Plan where industrial areas have been identified as having the potential for energy from waste facilities. Some of these same areas appear in this plan as areas for the protection of employment. Incinerators have a low employment rate, and will provide a disincentive to other businesses to set up nearby. They will also have a disincentive effect on potential employees. We agree that SMEs including other forms of waste management provide better opportunities for employment than incinerators in our towns. We would like joined-up planning from Surrey County Council and MVDC on the approach to providing employment opportunities in our industrial areas.

Environment 1: Green Belt

- The Plan has an inherent conflict: its aims to protect the Green Belt are welcome, but removing land from the Green Belt to build on it is inconsistent and wrong

The Plan proposes to de-designate substantial areas of land that are currently Green Belt. The maps provided do not show land that is currently Green Belt where development that runs counter to its purposes is proposed as it presupposes that it will be de-designated. This is misleading. This policy is worthless if it does not protect the Green Belt we currently have.

Section 9 (para 79) of the National Planning Policy Framework sets out the fundamental aim of Green Belt policy: "The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence".

The Green Belt is vitally important to protect the integrity of our towns and villages, to ensure that the beautiful Mole Valley landscape is looked after and the wildlife and wider environment are carefully conserved by the present generation. The quality of life in Mole Valley is high and the key contributing factors include the extent of accessible countryside,

broadleaf woodland and associated wildlife and the overall quality of the natural environment surrounding the towns and villages. Mole Valley is quite different in character from the urbanised areas north of the North Downs, which are now more or less indistinguishable from Greater London. We give up our important Green Belt areas at our peril and expose ourselves further to the effects of climate change (eg flooding) and food insecurity the more we build on agricultural land and green areas, and replace natural vegetation with bricks and mortar, destroying a vitally important carbon sink.

More than 1,000 new houses have been built on Surrey's Green Belt in the last five years. One in seven new builds in Surrey between 2015 and 2018 was built on the Green Belt. New houses in Surrey are five times more likely to be built on Green Belt land than anywhere else in England. This is unacceptable.

If any of the proposed developments do go ahead in the Green Belt, they should be to the highest environmental standards (Passivhaus) and support the special character of the area. They should provide a beacon for the rest of the community and include state of the art technologies for energy saving, generation of renewable energy, sustainable water use and drainage, incorporation of trees and other natural vegetation and respect for the ecological and landscape qualities of the site. This is in addition to the usual considerations of minimising impacts on the landscape, traffic etc. If developers say these requirements are too expensive their plans are not good enough to proceed.

Missing Policy on Trees

The Plan should have a general policy for trees. They are vital to mitigating the worst effects of climate change both at the global level (by sequestering carbon) and locally by taking up water to slow down run off, providing a cooler micro climate etc. We suggest MVDC takes an ambitious approach by safeguarding land for trees within the Plan and setting a target for tree planting with a substantial net gain. Equivalent canopy cover should be the measure for offsetting, rather than a tree for a tree. Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) must be refused (not qualified as it is in Policy EN9). We have some truly unique woodland such as the ancient yew groves at Norbury Park and Newlands Corner, which are amongst the oldest in the British Isles, and their cultural importance, as well as their contribution to biodiversity and climate mitigation, should be recognised in the Plan.

Environment 14 – responding to the Climate Emergency

- The Climate Emergency should frame the plan, making us think differently about how we plan for our local communities' needs

The Climate Emergency should frame the Plan, instead of being the last policy in a long list. It requires a change in how we live, not business as usual with houses being built on the Green Belt. It is far more than about how we build – it is about where we build, how much we build and how infrastructure is designed to be as carbon efficient as possible. The Climate Emergency means that developments which will lead to increased carbon emissions from transport should not be acceptable within the Plan. A new school on the edge of Dorking, rather than near to where most people live, will inevitably lead to a huge growth in traffic. The loss of agricultural land near to centres of population is not sustainable given the need to minimise the carbon footprint of food in the context of the National Farmers' Union target

of moving to net zero carbon by 2040. That is inconsistent with the Climate Emergency we face. These kind of considerations should be upfront and central to the Plan, rather than tagged on at the end.

Policy EN14 identifies a number of measures to mitigate the effects of climate change that will be supported including:

“... Reducing the need to travel and the promotion of more sustainable travel modes, including cycling, walking and public transport”.

If the Council is serious about responding to the Climate Change Emergency - we suggest this is reworded to: “Reducing the need to travel and the active promotion of sustainable travel modes, including cycling, walking and public transport.

Similarly on p80 in the narrative it states: “Carefully thought-out layouts of a development site can also encourage walking and cycling for short journeys rather than car use, helping to reduce greenhouse gas emissions. “

This would benefit from being reworded as:

“The layout of a development site needs to be carefully planned to ensure walking and cycling are the first choice for short journeys and public transport for longer journeys. “

Infrastructure 1: Sustainable Transport and parking

- Sites which are likely to encourage private car use should not be in the plan due to the Climate Emergency and transport being one of the main contributors to carbon emissions, poor local air quality in some places and widespread serious congestion

We support the policies on transport but they are inconsistent with some of the Site Allocations. The Plan should prioritise building near public transport hubs (as with the sites near Dorking Station) and discourage development more than 5 miles from areas of employment. Sites which depend on private car use and add to congestion/reduce air quality/add to carbon emissions are totally unsuitable and inconsistent with the Climate Emergency Declaration. Although cycle lanes might provide some mitigation, proper, segregated cycling options must be recognised as the norm. Distant, low density development plans with provision of 2 car parking spaces will result in continued reliance on private car use. Such locations should be removed from the Plan and a Plan adopted that truly enables the net zero carbon lifestyle that is needed in the next ten years.

We are concerned that even when the site allocations support sustainable transport (eg by wording like “Opportunities should be explored to enhance pedestrian and cyclist connectivity to and from the site, in order to facilitate safe, sustainable travel to local shops, schools and other services”) the intention is too weak for the current circumstances. Opportunities must be explored - it is not an option.

While we welcome 1. New development will be required to contribute to the delivery of an integrated, accessible and safe transport network...”

This should be followed with:

“2. Taking account of the scale and nature of the development, proposals will be required to:... “ (removing the weasel words of “where practical”)

Infrastructure 2

Managing Flood risk

The primary way to manage and reduce flood risk for existing homes is to plant trees in the water catchment. The Plan needs to include this with specific aims, locations and land safeguarded for this purpose. This is a significant omission in the Plan. When reviewing flood mitigation proposals from applicants, calculations must be based on all properties taking up the allowable 'permitted development' - i.e. the footprint of the building must be assumed to include the additional 1/3rd footprint increase allowable under permitted development rules.

Infrastructure 3

Space for allotments must be included for all developments over 30 homes.

Infrastructure 5

Safeguarding

This should include safeguarding land for trees alongside safeguarding land for roads and airports! The Plan needs to be rebalanced to recognise the Climate Emergency and take the bold steps needed to address it within the next 10 years.

The Committee on Climate Change has recently recommended (in its report on Land Use: policies for a net zero UK) that UK forestry cover increases from 13% to at least 17% by 2050 by planting 30,000 hectares or more of broadleaf and conifer woodland. Surrey is one of the most heavily wooded counties in England but that still has to increase - Mole Valley provides some of the best opportunities in the county to provide land for further woodland and land that could be allocated for this purpose should not be lost forever under development.

New building is not acceptable on land that is known to flood or is likely to become an important location with regard to flooding or its prevention, due to climate change.

Chapter 7 – Site Allocations

The approach to sites – particularly the ones on the Green Belt – has been partly developed. We do not support that approach. A community-led approach might have produced a different set of solutions to the very challenging problems we face. We support the brownfield-first approach and do not object to small developments on the Green Belt, where they are moderate extensions to existing towns and villages and meet local needs. Use of Community Land Trusts should be considered for this kind of development.

We have particular concerns about the loss of pasture land which is being proposed across a lot of the Green Belt sites:

- Land currently used as pasture has significant wildlife value.
- It is used by species such as Gulls, Starlings and Badgers for foraging and Skylark for nesting. Both Starling and Skylark are red listed species (2014 assessment) whose specialised habitat requirements can't be replaced by converting the pasture to back gardens.

- Pasture stores large amounts of carbon which is released when dug up for housing.

We have only commented where we have direct knowledge of the sites.

Dorking: subject to housing densities being optimised, affordability criteria being improved, zero carbon technical standards fully embracing a net zero carbon result and facilitation of walking, cycling and public transport to reduce dependence on private car use, we support SA28, SA29, SA33, SA34, SA35, SA36, SA38.

We strongly object to SA30, SA31, SA32, SA37.

SA37: Former Chalcraft Nurseries, Reigate Road (2.6 has/school)

This site makes a significant contribution to Green Belt purposes as it is preventing development from crossing Punchbowl Lane. It does have a fixed boundary (the railway line) to the east and north (the road) and west (also road) so further encroachment in those directions should not be a risk if it was developed. However, the southern boundary blends into the woodland making it vulnerable to further expansion into woodland of biodiversity importance. This site has AONB boundaries on two sides and its development, therefore, would have a significant impact on the AONB. The view from Box Hill which is within the AONB would also be impacted by the loss of green countryside and trees as the site is visible from the viewpoint on the south west elevation.

There are also serious concerns about the traffic access and impacts on this site which should not be underestimated. That in itself has an impact on the setting and character of Green Belt land. This is an unsuitable location for a school, being on the edge of town and not within easy walking distance of many properties. Adding to private car use and congestion would be inevitable and unwanted. The A25 at that point is very often congested already.

We note the landowner welcomes walkers on the land and we recommend that Surrey County Council negotiates with the landowner to install a pedestrian access point on the junction of Reigate Road and Punchbowl Lane, and to dedicate the land as access land so it is shown on maps as open to the public.

It has previously been suggested that this site would make a suitable extension to the Cemetery opposite. This might be reconsidered as a natural burial site, which would leave natural vegetation in place and promote biodiversity and green burials. This could also be consistent with public access.

SA32 Former Chennells nurseries, Ridgeway Road (55 houses on 2.6 has)

This site has been previously developed and is in close proximity to the surrounding houses. However the fact that the site is both Green Belt and AONB raises the bar in terms of the assessment and introduces criteria set out in national policy which do not appear to have been regarded. As long as other sites are available in Mole Valley (or even in a wider area) no AONB site should be developed for a major housing development (which this would be).

Its development would push the boundary of the developed area into the open countryside and would make it much more visible on the approaches to Dorking from the AONB.

There has been significant new development on the periphery of this site which is performing an important Green Belt role in preventing encroachment into the surrounding countryside and checking unrestricted growth of the urban area.

There is little infrastructure in the area to support an already expanded population and the inevitable increase in traffic would cause further impacts on quality of life and environmental quality. Access to the site is via the unadopted Ridgeway Road - adding 50-100 cars at a modest estimate into this area plus the need to access Flint Hill would just add to the congestion on the south side of Dorking.

The public right of way across the site provides an important access route out into the open countryside and to the rest of the AONB whose character would be totally changed by housing development as set out. The site is on the AONB fringe, providing an important Green Belt function by separating town from beautiful open country. Any plans for development here need to be tested against the nationally agreed criteria for AONB protection, which are not just about landscape impact.

SA31 Land at Miltoncourt Lane – 80 houses on 4.3 hectares

This is an extensive site and development here would have a major impact in terms of considerably adding to the footprint of Dorking. Development has already been pushed out to the West side of Dorking and there are no clear boundaries which would prevent it going further if housing was developed here. This Green Belt site has a significant role to play in preventing encroachment and stopping urban sprawl from reducing the gap between Dorking and Westcott.

The visual impact from the North Downs including from the North Downs Way national trail and the harm to the rural character of the Dorking fringe at the foot of the North Downs would be unacceptable. This is an important area for people to enjoy the countryside on the rights of way and is of cultural significance because of its associations with Vaughan Williams' Lark Ascending and Linden Lea. A major housing development would have a significant impact on quality of life. Instead, we would like to see the landowner supported to increase the biodiversity of the site, encouraging the return of Dorking's famous larks, and to enable public access.

The lower part of the site is also subject to flooding, which occurs frequently and which has previously seriously affected the adjacent industrial site. Further development would only exacerbate the problem and cause misery and cost to people who are led to buy properties on this site. The approaches to Dorking from the West side are already heavily congested at certain times and adding further pressure here would be unsustainable.

This should be a high priority to retain with the Green Belt due to the significant impact that development would cause.

This is also important agricultural land producing local food for the community. The farm has signed up to the National Farming Union's net zero carbon target by 2040. Taking land out of agriculture and building on it in no way delivers this target. It is vitally important, in light of the climate emergency, that land stays in agriculture and in the Green Belt, both delivering the net zero carbon target that MVDC and the Government has agreed is essential to stop runaway climate change. Local landowners should be supported and incentivised to do this.

There is also a cumulative impact point that should be made in relation to the other proposed development site nearby. Releasing these sites from the Green Belt would increase the pressure to release others as the argument could be made for consolidating development on one side of Dorking. This would so seriously erode the Green Belt on the West side of Dorking that the rural setting of Dorking and the beautiful countryside, for which it is justifiably visited and loved, would be lost forever.

SA30 Sondes Place Farm, south of Westcott Road (170 houses on 6 has)

This site has a significant role to play in delivering Green Belt objectives of preventing encroachment into the countryside and stopping unrestricted urban sprawl. It also makes a distinct contribution to determining the character of Dorking as the Western approach is a major access point to the town. Currently this is not particularly urbanised, with the Nower as the backdrop, the open fields and former Sondes Place farm which has been sympathetically renovated.

This is also one of the sites in the Sondes Place/Miltoncourt cluster that contribute not only to Green Belt purposes but also to food security as this is productive agricultural land. We now know that developing such sites not only impacts on our ability to live sustainably but can also exacerbate flooding, by removing natural vegetation and soil.

Developing the site would also be likely to pose an intolerable burden on local services, local roads and the infrastructure on the west side of Dorking. A development of this scale would add hundreds of private car movements onto the A25 which is already subject to excessive congestion at peak times, and sometimes during the day. This is a pinch point for which there is no alternative route and adding to the weight of traffic on it is unsustainable economically, due to delays, environmentally, due to pollution and would damage the character of Dorking irretrievably.

Beare Green

SA05 - Beare Green (480 dwelling/school on 32 has)

Impact on the landscape

The proposal to convert 79 acres of open, greenfield countryside which integrates closely with the surrounding landscape and the adjoining AONB flies in the face of national policy to “protect the natural environment” and “leave our environment in a better condition than we inherited it”.

Evidence (MVDC Policy EN8 refers)

- Site is up against AONB and clearly visible from it
- AONB has national importance -must protect it and its setting
- Mole Valley has statutory duty to protect the AONB
- Would spoil views from and into adjacent AONB
- Village contributes to openness of Green Belt
- Village is a “landscape sensitive” community
- Site is very good quality agricultural land that has never been developed, and should be preserved for farming
- Appearance and character of site unchanged for at least 100 years
- Footpaths across site are part of enjoying the AONB
- Site allocation plan doesn't require footpaths to be retained.

Threats to the natural environment

Inserting a commercial scale housing site into the cherished Surrey landscape will seriously impair biodiversity and reduce the recreational value of the rural area.

Evidence (MVDC Policies EN9 and EN10 refer)

- Low Weald landscape is “important for biodiversity” (Natural England)
- Site is village’s southern gateway to the countryside
- Countryside will start at A24/A29/railway, not via woods
- “Exceptional circumstances” driven entirely by numbers, not landscape
- Reduced recreational value of area to all Mole Valley residents
- Development might bring closure of railway crossings
- Light pollution
- Vulnerability of flooding

Habitats in danger

Site SA05 will destroy the natural habitat which currently joins up several areas of Ancient Woodland, threatening indigenous wildlife. Merely retaining existing trees and hedgerows will not provide the continuity of habitat that wildlife requires.

Evidence (Mole Valley Policy EN9N refers)

- Negative effects on pockets of Ancient Woodland
- Need wildlife corridors between Ancient Woodland
- Wildlife established for centuries here
- Impacts of additional pets on surrounding wildlife
- Wealth of wildlife around the Smallburgh pond

Why Beare Green?

Mole Valley’s “Exceptional circumstances” used to justify removal of Green Belt protection are wholly driven by a housing target which does not take account of Beare Green’s rural landscape. This pressure has resulted in a lack of due diligence by MVDC in itself assessing Green Belt disposability, as evidenced by factual errors in the “evidence” and an absence of impartial oversight of the process (oversight which was applied to the agreement NDP).

Evidence (NPPF Para 137 refers).

- Factual errors

-Village can’t be seen from AONB

-Pond included without landowner knowledge

-Number of footpaths and crossings is wrong

-Population figures include all outlying area-unfair representation

- No impartial input to Green Belt ratings

- Criteria been applied differently for different rural sites
- Judgements made without involving local people

Previous consultation on NDP ignored

There has been a complete dismissal of the Capel NDP which was produced by thorough democratic processes to record the sensitivities of the area and its villages. That such an in-depth local consultation has been ignored brings into question how seriously MVDC will take the DLP “consultation” process.

Evidence

- Capel Neighbourhood Plan has been ignored
- Capel Neighbourhood Plan had local backing
- Capel Neighbourhood Plan accepted moderate expansion (45 houses built since 2011)
- Proposals being insensitively imposed
- Future Mole Valley Local Plan consultation is no substitute for local democracy
- Big Business tramples over local people (surveyors already seen)

No Compensatory Improvements

The Future Mole Valley Local Plan provides no improvements to compensate existing villagers for the loss of land at sites SA05/SA06. MVDC has no authority to implement the cited “Opportunities” which could actually impair existing facilities by forcing changes on third parties such as the school (massive expansion) and Network Rail (increased use of crossings).

Evidence (NPFF Para 138 refers)

- No improvements in amenities or facilities
- Not even safeguarding surrounding green spaces and footpaths
- Development may well close railway crossings, restricting rather than enhancing the access to the AONB.
- No evidence of local economic improvement
- MVDC has no power to implement cited “opportunities”
- “Opportunities” all down to third parties. Who funds?

Housing (south site SA05) will be isolated from existing village

The physical barrier of Great Turner’s Wood and the belt of TPO-protected trees make it impossible to integrate the new housing development into the existing village; it will be disconnected, and what limited amenities there are in the village will be difficult to access. Walk-in times are excessive which will result in increased car use.

Evidence

- Site physically separated from village by woodland and stream
- Walking distance to village is too far

- There's no parking at the part-time station (no disabled access)
- Site not able to integrate with village life (barrier/distance)
- Poor local facilities will encourage car use
- Loss of fields will harm agricultural economy
- Effectively just a dormitory
- Small enclaves will be swallowed up

Disproportionate Expansion

Doubling the area and population of the village settlement is dramatic and disproportionate, and the local amenities are inadequate for such expansion.

Evidence (MVDC Policy INF3 refers)

- Population within village boundary will be doubled
- Area of village "settlement" will be doubled
- Local amenities inadequate for double population
- Will harm the rural character of the village
- MVDC Policy S2 is arbitrary and is singling out Beare Green
- There is limited scope to expand the existing amenities in line with the doubling of population

Not Sustainable

The sustainability of the SA05 development is questionable since most inhabitants will be dependent on cars due to the absence of fundamental services such as doctor, pharmacy, church and the limited accessibility of access to public transport and limited local facilities prevent the development being "inclusive" as required by MVDC's policy EN5.

Evidence (MVDC Policy INF1 refers)

- Isolation means heavily dependent on cars
- No trains between 6.30pm Saturday and 6.00am on a Monday
- Limited bus service after 6.45 Saturday
- Cycling not a viable option into Dorking
- Walk to village amenities is too far and mostly unlit
- No foot/cycle paths along main roads
- Limited ways of encouraging cycling
- Increased light pollution - few street lamps in village
- Few chances for local employment
- Overall increase in carbon emissions
- No disabled access at station

- No health facilities

Beare Green SA06

Many of the factors relating to the Green Belt and AONB that impact on SA05 are shared by the site to the north of the village, SA06. Additionally, MVDC's proposals for SA06 should be considered against the following.

Village boundary:

The existing village boundary to the Green Belt is the London to Horsham railway line. At no point has MVDC consulted with residents on any potential movement/variation to this boundary. In 2019, as part of the National Planning Framework (NPPF), the Government required MVDC to consult with parish councils (in this instance, Capel Parish Council) about potential changes to Green Belt boundaries. One of the main requirements is that boundaries end at physical locations e.g. railway lines. Currently, all the houses to the north of the railway line are in Green Belt, with those on the left of the Old Horsham Road lying within the AONB.

MVDC's SA06 proposals require the movement of the boundary to the tip of the site which borders the A24. This would enable the additional 55 homes to be within the (expanded) village settlement. The consequential retention of the site within the Green Belt, while also moving it into the village settlement, appears to have no precedent elsewhere.

The movement of the AONB to within the village settlement also increases the likelihood of houses being built within the AONB at some future date. MVDC has stated it wants the AONB to be reviewed and potentially expanded. The Glover Report (currently being considered by the Government) has recommended streamlining the procedures for changing AONB boundaries. Releasing sites, such as SA06, adjacent to the AONB appears to pre-empt any recommendations which may emerge from the Glover Report.

Car park for rail commuters

MVDC's proposal for a 16 lot car park within SA06 is based on flawed and muddled thinking. MVDC cites the presence of Holmwood Station within the village as a factor in drawing new residents to the village and yet the additional 55 houses will each have parking for at least one vehicle, probably more. MVDC has produced no figures to demonstrate the level of train use by current Beare Green residents. It is a fact that the proportion of car journeys undertaken by current residents is higher than in neighbouring villages. In reality, Holmwood station is a commuter station and of no practical use for everyday requirements such as shopping or visiting the doctor etc.

MVDC's climate emergency declaration and turning Green Belt land into a car park are totally irreconcilable.

Westcott

SA66 Westcott House. This is a relatively small development, but appears to be on Green Belt land, so comments about Green Belt land apply. However this appears to be a slightly less egregious option, because of the size and as the site abuts a large area of housing and has access to the road. A concern might be flooding in the area near Pipp Brook, although the plan gives considerable attention to this issue.

SA67 Mill Way House. This is an area which already includes a certain amount of housing, and is inside the area which effectively defines the village. It may technically be in Green Belt land, but does not seem an unreasonable development.

However, our observations on housing density, proportion of affordable housing and additional congestion/traffic on the A25 apply.

Leatherhead

We support SA46, SA49 and SA50 in terms of site identification.

We strongly oppose these sites:

SA45 (Barnett Wood)

We oppose the loss of further Green Belt land in Barnett Wood Lane and the Poores Allotments. This site is stopping Ashted and Leatherhead from merging and will result in a significant loss of openness. This is an area which is also important for biodiversity, being part of a wildlife corridor, and an Asset of Community Value.

The ability to grow food locally to where people live is vitally important in a Climate Emergency and for reasons of sustainability and there are no suitable alternative allotment sites nearby.

There are no suitable plans for infrastructure at the site, nor provision of cycle and walking routes and suitable public transport (one mention of bus stops for a development of 550 dwellings and a school is totally inadequate in terms of assessment and mitigation of transport impacts). Increased traffic volumes on Barnett Wood Lane will exacerbate congestion which already backs up from the 'Circus Roundabout' during rush hour. There will be a significant increase in noise, low level air pollution and light pollution. The development is too close to M25 for a school and housing and poses a risk to the children who will live and attend school there.

SA48 Land to the rear of 5-33 Randalls Road

This site provides the only access to green space within walking distance for many people in North Leatherhead. It fulfils the functions of other areas of the Green Belt that are proposed for development: checking urban sprawl; preserving openness; preserving the character and setting of the historic town of Leatherhead. It is one of the last bastions of open space accessible to the town which provide for climate mitigation and biodiversity, as well as public enjoyment. Randalls Road cannot cope with current traffic so potentially 400 more cars coming out of Randalls Way is unacceptable.

Hookwood

Mole Valley's "Exceptional circumstances" used to justify removal of Green Belt protection are wholly driven by a housing target which does not take account of recent and planned extensive house building in the local proximity. The 2,500 property development of Westvale Park, 2 miles away, is still under development and proposed 10,000 home 'West of Ifield' new town within 3 miles. This pressure has resulted in a lack of due diligence by MVDC in itself assessing Green Belt disposability, as evidenced by factual errors in the "evidence" and an absence of impartial oversight of the process. Inconsistent with H3, a strategic housing assessment must be carried out prior to further investigation of this location. There appears to be very limited demand for new homes in the vicinity, with a number of properties, both old and new builds, being on the market for in excess of 1 year. The plan fails to consider nearby brownfield sites (for example Hookwood: Bluebird House and Fairalls builders merchant, Charlwood: The Limes and the Coal Yard)

Site SA42: land west of Reigate Road, Hookwood, object most strongly

The Green Belt boundary must not be moved in order to ease house building. All house building must take place on brownfield sites, not on Green Belt land with frequently used public footpaths. No building on this land can be considered sustainable. There is no clear boundary on three sides, therefore there would be a significant risk of creep. The presence of a secure hospital immediately adjacent means public safety and crime reduction studies need to be carried out prior to further feasibility. The nearest frequent public transport (bus) is a mile from the location and train 4 miles away and exiting onto Reigate Road could only be made safe by the introduction of traffic lights. There is very limited employment opportunity in the close locality, meaning residents are likely to need to use a car to reach employment (20 or 30 miles round trip to the employment centres of Dorking and Leatherhead).

The site consists of land used for grazing of horses, which routinely floods - there even being a 15 metre long bridge on one of the footpaths due to its frequently being otherwise impassable. Likely habitat for nesting and foraging of several bat species and Great Crested Newts, of which there are known colonies nearby. The plot is within close proximity to Gatwick Airport (non compliant with EN9) and the Plan states the development will incorporate measures to protect future residents from noise and other disturbance from the local business park. However, it is not clear how residents could be effectively protected from noise and air pollution from the Airport nor from the nearby Horse Hill oil extraction site which has Environment Agency permission to flare up to 15 tonnes of gas per day and therefore not compliant with EN13. It is out of keeping with EN4 as the amenity of existing residents will be damaged by overbearing development and loss of open space. Allotments and playgrounds would need to be provided. Neighbouring homes are already seeing flooding and building on green fields and these effects will only be compounded in light of climate change. Woodland and orchards are highly biodiverse, so this would be a significant loss to the local area.

The proposed 450 new houses cannot be considered as modest development and therefore are unacceptable under EN3, being hugely out of proportion to the village and resulting in a doubling of its size. Such urbanisation would completely change the village character. The local water treatment works are currently close to capacity and cannot deal with further increases. The plan is non compliant with NRM4 as flood zone 2 and 3 and with the aim of CS19 to reduce flooding. The 'permitted development' rights of the new properties would also need to be considered when planning flood mitigations. The location is in an earthquake zone. There are no available local services (school, GPs or other services). Existing trees and hedgerows would be damaged by any development. Significant local flooding would also be perpetuated by building on this land.

Site SA43: Land south of Kennel Lane, Hookwood, object. In addition to the above arguments (SA42) There is no vehicular access to the site.

Site SA44: Land adjacent to Three Acres, Hookwood, object. In addition to the above arguments (SA42), access from the proposed site onto the public highway is <10 metres from a large roundabout. This access is not suitable for the significant number of vehicles this development would bring. There is no defined boundary on 2 sides, which leaves the location vulnerable to urban creep.

Brockham

SA14 Kiln Lane. The land is within the Green Belt and adjacent to a conservation area. Permission has been turned down repeatedly because a) it is a very prominent site and b) it is a very important wildlife corridor connecting Box Hill with the River Mole. The species

using this corridor include many different varieties of bat, particularly in the late summer when the juveniles are brought across from the old lime kilns and other Box Hill locations. Other species include adders, grass snakes, badgers and many different small mammals which provide food for owls and other birds of prey. A red kite was seen hunting over this small field last summer. Apart from the rich biodiversity, there are springs at the top of the hill, behind The Bungalow, which add to the vast quantities of storm water coming off this land onto Mill Hill Lane, Kiln Lane and The Big Field. This is not a suitable site for the housing proposed.

SA15 Tanners Meadow Strood Green. This land is not in the Green Belt but building there is folly as it is prone to flooding. Permission has already been granted subject to certain conditions regarding flooding. Basically this land floods annually. There is no realistic prospect of sufficient water being retained on-site to prevent on-site flooding AND, more importantly, further flooding of existing housing downstream alongside Tanners Brook. Many houses in Old School Lane were flooded in 2013 when Tanners Brook burst its banks and residents were evacuated for many months. Since then, nothing much has changed.

SA16 West of Wheelers Lane. Although this field is within the Green Belt, planning permission has been granted for Poland Trust to build affordable housing on the opposite corner of this field as a rural exception site. Several residents suggested that the proposed site in the northeast corner opposite the old Noys Yard would be a much better location for the affordable housing. However, Poland Trust stated at the public exhibitions that there was a flooding issue to build there. In addition, the existing housing on the south side of this field has been enlarged significantly as "permitted development". If the current plans for the rural exception site proceed then this site must be refused otherwise there is severe risk of losing the whole of this good quality agricultural field as part of the Green Belt. This deliberate enclosure of Green Belt land must be stopped.

SA17 Former sewage works. Nature has been reclaiming the site and this was boding well being opposite Betchworth Castle. Sadly, the owner seems to have obtained permission to build a very large house on this site. The land is still liable to flooding however and this development has made it even more difficult to build anything else there. Access from Hillside Close is not practical.

SA18 31 Wheelers Lane. If any permission is granted it must be exclusively for affordable housing, and for rent only, and subject to rural exception site rules. There would also have to be some very well defined restrictions for the development to blend in with the environment.

Buckland

SA19 Bromley Barns Field. Whilst this is in the Green Belt, this land can be shielded; is on the A25 and close to the currently underway redevelopment of the petrol station to incorporate much expanded shopping facilities. Thus it seems suitable for a much higher density development than proposed. Buckland desperately needs more smaller houses at low price points and this would be a good location. However, care is required to ensure the structures blend in.

SA21 Buckland Court Drive. Again on the A25 and within a commercial area. To the west is a showground for conservatories, garden sheds and similar timber outbuildings. To the east and north is a light industrial area comprising a motor vehicle workshop and other smaller but similar premises. Two small cottages are in the middle of this and front onto the A25, but this is not as inappropriate as it sounds. There are other houses, some of similar size and other significantly larger likewise located within the immediate vicinity. Any development should have a net gain of houses.

SA20. This is Green Belt land in Dungates Lane, which has recently seen some inappropriate development that could have been less ostentatious and at higher density. Just 4 dwellings on this site seems far too few. Nevertheless, the site is adjacent to the open Green Belt and whatever is done with it (including doing nothing) should be carefully considered.

SA22. Also in Dungates Road and close to SA20. Yewdells Close is immediately behind this site (to the west) and contains 4 dwellings in an area not significantly larger than this site. This proposal for only one dwelling does not optimise the space, but otherwise should not present a problem.

Betchworth

SA07. This is in the Green Belt and it should be noted that the "workings" to the west are temporary and conditioned to be restored as open farmland when quarrying is complete. Nevertheless this is classic central village infill and the opportunity should be taken to maximise the number of dwellings. It would be a good location for housing of young families, but care must be taken to blend the development in with the surroundings.

SA08. A very prominent site on the A25 that is visible from almost any high ground for several miles around. Any changes to this site require very careful thought before granting permission.