CAPEL PARISH COUNCIL BEARE GREEN, CAPEL AND COLDHARBOUR

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By email: guy.davies@molevalley.gov.uk

Mr Guy Davies Head of Local Plan Mole Valley District Council Pippbrook DORKING RH4 1SJ

Dear Guy

Mole Valley Local Plan Review

Following the village proposals for Beare Green and Capel, the Parish Council undertook a comprehensive review of your suggested options.

Consistent with the recommendation of your council, the public response letters were sent to Capel Parish Council. These letters are submitted for your consideration. The Parish Council has identified from the approximately 70 letters and emails, the topics and issues including a report from an independent planning advisor commissioned by local residents.

The Parish Council is not seeking, through this submission, to undertake an analysis of the content of the responses; some are consistent re-occurring themes and some relate to the comprehensive public consultation and referendum which led to the adoption by MVDC of the Capel NDP in December 2017.

1) Introduction

The Capel Parish Council response, at this time, is broadly in line with both the adopted Capel NDP and the Draft NDP (July 2016). We understand this is not a formal (statutory) proposal and as such, our response will need to be modified when further stages of the Local Plan emerge.

Although the formal consultation has not yet started, we would like to draw your attention to the NPPF 2018 in which proposals affecting the Green Belt are very precise. Exceptions have regard to a very "limited" infilling in villages. The proposals set out in our response are entirely consistent with this statement.

Section 136 of the NPPF states that Green Belt boundaries should only be altered when exceptions are fully evidenced and justified. Accordingly, Mole Valley District Council must demonstrate a need which cannot be met within the urban framework of Mole Valley towns; (Dorking, Leatherhead and Ashtead). There is no justification for the building of dwellings other

than proposals which would ensure development is limited and responds to the sustainable needs of the villages.

In relation to development in urban areas, we have noted sites which have been granted planning permission and have not been developed at all or do not provide affordable or family housing. Further, the NPPF is clear that urban sites, brownfield sites and previously developed sites should all considered before building on the Green Belt.

NPPF (paragraphs 77 and 78) state that planning policies should be responsive to local circumstances. Housing should be located where it will sustain or enhance rural communities.

The lack of infrastructure including transport, school places and health provision is of particular concern in our area and even activities outside of the parish can have a detrimental impact on our villages. An example is the large development to the north of Horsham which has likely impacted traffic volumes. We believe a piecemeal approach is short sighted and that a strategic view is required regardless of how many homes are built.

In due course, when any site has been identified for inclusion into the draft MVLP, it will have to be demonstrated that infrastructure requirements will be met as a matter of policy and that sustainable objectives are met.

Our response has full regard to the policies of the Capel NDP particularly those pertaining to sustainability.

When the full draft plan is published the Parish Council will submit a formal response to proposals by the District Council. This formal submission will respond to wider policy issues, sites and designation including the Green Belt and infrastructure.

Notwithstanding our concerns about the bigger picture, we have provided a response to sites suggested by Mole Valley and other sites that the Parish Council suggests are included in the Draft Mole Valley Local Plan.

2) Sites

a. Sites introduced by Mole Valley

(i) 18-BG-001 – Land north of Breakspear Farm

- This site is supported in line with Capel draft NDP. The proposal should include improvement to hedgerows, must include a substantial car park, and should consider improvement to pavements to allow pedestrian access to the station as well as road safety.
- The northern part of the site (the recreation area) should form a part of the site but the northern area should remain in the Green Belt and not be included with the area for housing development.

(ii) 18-CP-001 - North Expansion

- Not supported
- Not in keeping with the linear nature of the village
- Significant encroachment into the Green Belt and detrimental impact on the character of the area
- There are significant highway issues pertaining to the alignment of the road which cannot be resolved without further impacting the character at this important village entrance

(iii) 18-CP-004 - Boxhill Caravans

- Supported in line with NDP
- Re-uses a previously developed site
- Provides employment provision

- Housing provision includes affordable and low-cost dwellings
- Any policy should have regard to access to the site being restricted from and to the A24 dual carriageway
- Walking distance of station and village amenities

(iv) 18-CP-006 - Capel House Farm

- Supported with recommendations
- Recommend inclusion with regard to the Green Belt boundary (building must not extend into the green belt)
- Maximum seven dwellings
- Should have regard to the existing new dwellings, this would trigger affordable housing provision if the site total is ten or more dwellings.

(v) 18-CP-007 Redlands.

- Not supported in line with the NDP
- Site subject to previous failed appeal
- Village boundary extension to north west not consistent with linear nature of the village
- Settlement boundary normalisation does not include this site
- "Exceptional circumstances" not demonstrated

b) Suggested additions by the Parish Council

(i) Hurst, Vicarage Lane

- Supported in line with the NDP
- Previously developed site
- We agree it should be brought inside the village boundary to keep options open.

(ii) Brook Cottage

- Supported
- Development along Wolves Hill would provide natural infill towards Clark's Green Roundabout and the dwellings with frontage onto it, which are all part of the defining character of southern Capel
- · Recommend extension of village boundary to include part of this site
- 40% of housing to be affordable
- Mindful of the Gatwick noise contour 2018

Brook Cottage was recommended by the Parish Council as a housing allocation in its draft NDP. It sits within the historic framework of Capel village bounded by land designated as being "Within countryside beyond the Green Belt".

It forms a linear extension from the eastern end of Coles Lane up to Rusper Road and Clark's Green Roundabout. Development would provide up to 15 dwellings including the provision of 40% affordable housing.

With existing housing already extending from the roundabout north towards the village, the attached revised settlement boundary would respond to the character of the village. The planning application previously refused by Mole Valley District Council has the full support of the village, the Parish Council and local District Councillors.

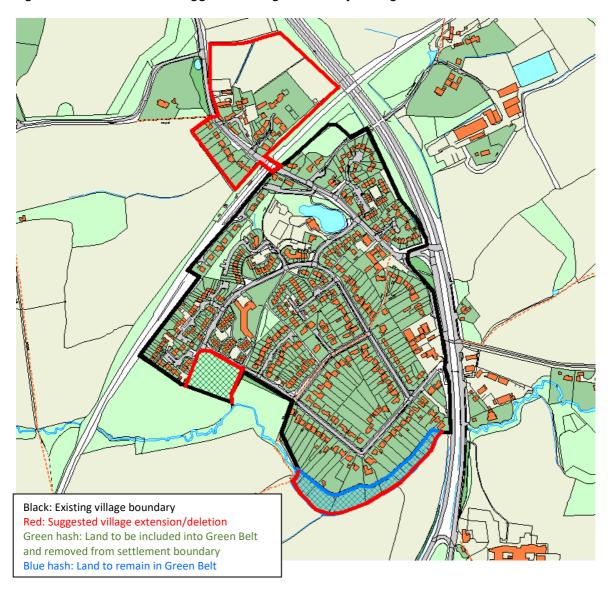
3) Revised Village Boundary

We are pleased to note that the Mole Valley proposals for Beare Green have had regard to the settlement boundary changes proposed by the Parish Council in its draft NDP. We support site 18-BG-001 for a limited number of residential homes, a recreation area and the provision of parking spaces which would significantly assist in overcoming the parking shortage at Holmwood Station. While we support the settlement boundary change which includes site 18BG-001 we believe this proposed allocation must include the open space to the north of the site. This area

is of high recreational and amenity value and we would seek to have this area designated through a charitable process. To the south of Beare Green, near Highland Rd and Springfield Rd, whilst we have no objection to the amendment to the settlement boundary in order to be more consistent we do not support the land between the current and proposed boundary being removed from the Green Belt as it provides, in landscape and amenity terms, essential protection to the character and setting of the area. So, the Green Belt boundary should remain unchanged.

Land at Great Turners has been allocated for recreation purposes and should be excluded from the settlement boundary.

Figure 1: Beare Green – suggested village boundary changes



Turning to the general principles of the settlement boundary for Capel village there is a distinction between land to the east and land to the west of The Street.

Regarding your plans for Vicarage Lane, we generally support the proposed changes but for reasons of consistency the two dwellings and land to the south west with access road should also be included (see diagram 2)

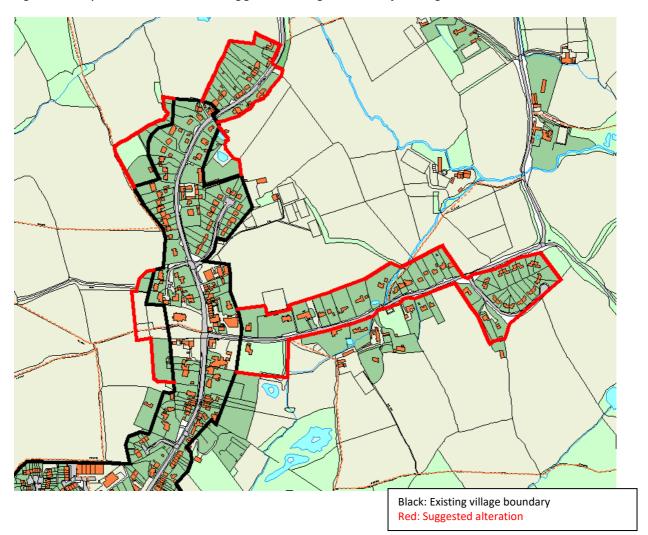
South of Vicarage Lane (and east of The Street) the character and nature of dwellings and settlement boundary is irregular due to undulating topographical characteristics of the landscape. We therefore consider it should be extended to include Brook Cottage.

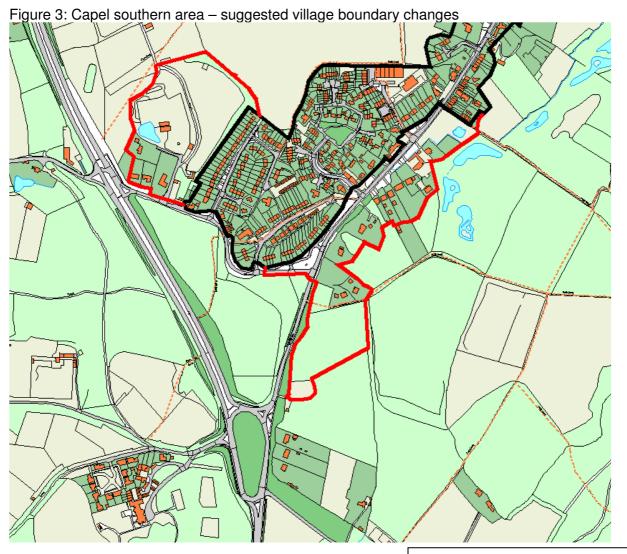
To the west of The Street and north of Coles Lane we do not support the proposed amendments to the settlement boundary; particularly sites 18-CP-001 and 18-CAP-007. To clarify, there was a consistency with 18-CP-006 to provide limited opportunity for residential development, whereas sites 18-CP-001 and 18-CP-007 would form an unacceptable encroachment into the Green Belt. Capel village (in particular to the north beyond Vicarage Lane) is linear in character. Site CP-001 is wholly set in an area of visual sensitivity. We refer to the report of independent landscape consultants CSA in their landscape analysis. Furthermore, you will notice that this site has produced a large number of strong local objections. In landscape terms the site is designated "moderate to high" landscape value and forms a natural end to the inhabited area of the village. With any development likely to have a significant and detrimental impact on the character of the village and the AONB. The current plan has no provision for employment, access is dangerous and the distance from this site to the village amenities makes this site unsustainable. We have recommended a modified boundary alteration to regularise the village boundary, which provides consistency with the linear nature of the village but precludes encroachment into the Green Belt.

By comparison, site 18-CP-004 offers low-cost market housing, which could include affordable provision, five starter business units and recreation space. In the event that this site is not developed for housing, this would provide greater emphasis for the need to provide housing at Brook Cottage.

Whilst we support the amendment to the settlement boundary adjacent to site 18-CP-006 to be more consistent, we do not support the land between the current and proposed boundary being removed from the Green Belt as it provides in landscape and amenity terms essential protection to the character and setting of the area. So, the Green Belt boundary should prevail.

Figure 2: Capel northern area – suggested village boundary changes





Black: Existing village boundary Red: Suggested alteration

4) Responses and topics raised by local residents

We attach copies of all correspondence received

5) Other Points

Through the process, we have worked closely with and consulted with the District Councillors for Beare Green and Capel. We believe it is vital for Mole Valley District Council to provide clear and regular information regarding the progress leading to every stage of the Local Plan review. There is considerable concern about the impact of both the actual future development and the threat of possible development on the lives of residents.

Conclusion

Whilst we welcome the early involvement of the Parish Council and residents, we would like to draw attention to the significant local opposition to some of the sites mentioned and strong support for others. Indicating that the villages of Beare Green and Capel recognise the need for limited and modest extensions or infill but would strongly resist changes which have a more significant impact to the valuable character of the Parish.

We ask that full consideration is given to the actual need for housing and that development should only take place where it is needed and where it has local support. Anything more than very modest extensions would fundamentally change the rural nature of our area and any development must not proceed without a review of public services and the infrastructure required to support it.

Yours sincerely

Chris Ball Chair, Capel Parish Council

Paul Garber Chair Capel Parish Council Planning Committee