

Representations on the Draft Mole Valley Local Plan 2020-2037

by

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on behalf of

Bookham's Residents Association

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EXECUTIVE SUMMARY AND CONCLUSIONS

This representation is submitted on behalf of Bookhams Resident's Association (BRA) and focuses upon the Draft Mole Valley Local Plan (as published for Regulation 19 purposes) as it is proposed with particular regard to changes to Green Belt policy and the allocation of LAND NORTH WEST OF PRESTON FARM, BOOKHAM for mixed use development (Policy DS8) and Development Site DS11, LAND BEHIND HUNTER'S MOON for 5 dwellings

The BRA suggests the proposal fails four of the tests to demonstrate exceptional circumstances in that;

- The development would inherently be sprawl
- The development would further merge Bookham and Effingham
- The development will urbanise the area and encourage encroachment
- The development in part releases the pressure to develop in the urban area and particularly its town centres.

The BRA suggests the contribution made by windfall sites is underestimated and shows that in the past 12 months there has been a gain of 24 units in this locality. These approvals were made under the current policy framework. It follows if a new policy approach towards density were adopted this number could be greater. If Bookham is identified to achieve 469 units over 17 years (2020-2037) this can be averaged to 27 units per annum, only two units more than achieved last year. A new approach to density at 50dph must close that gap. If a more strident stance on compact development were established, that deficit would disappear. It thus follows that the housing need to release green belt land in Bookham is not proven. The BRA believes the Plan is unsound for the reasons below;

- exceptional circumstances do not exist as the housing analysis is incomplete and underestimates brownfield and underutilised land and opportunities arising from increased densities

- the plan underestimates the merging of settlements arising from extant consents and the proposed development of Preston Farm. The prevention of such coalescence is a fundamental cornerstone of Green Belt policy
- infrastructure demands arising from traffic, health requirements and schooling are insufficiently developed
- the site is not a sustainable location

Thus the Plan as submitted is not consistent with achieving sustainable development. The Plan currently has a flawed strategy which fails to take account of the reasonable alternatives as regard the re-use of urban land and opportunities arising from increased density. Finally, in promoting the merging of Effingham and Bookham, it is not consistent with national policy.

1. **Introduction**

2. This representation is submitted on behalf of Bookham's Residents Association (BRA) and focuses upon the Draft Mole Valley Local Plan (as published for Regulation 19 purposes) as it is proposed with particular regard to changes to Green Belt policy and the allocation of LAND NORTH WEST OF PRESTON FARM, BOOKHAM for mixed use development (Policy DS8) and Development Site DS11, LAND BEHIND HUNTER'S MOON for 5 dwellings

3. This representation will be structured thus:

- The previous history will be briefly rehearsed
- The site and its assets will be described
- National policy on release of the Green Belt will be discussed
- The proposed changes will be identified
- The representation will be lodged along with suggested changes
- Conclusions

4. This representation has been prepared in full consultation with the local community and follows guidance that examines the draft plan legal compliance in terms of:

- Has the Plan been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations (SI2012/767)?
- Does the Plan comply with the Duty to Cooperate set out in Paragraph 33A of the Planning and Compulsory Purchase Act 2004 as amended?

5. As regard soundness it will consider whether it has been:
- Positively prepared: Does the Plan provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development?
 - Justified: Is the Plan an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence?
 - Effective: Is the Plan deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters...
 - Consistent with national policy: Is the Plan enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, where relevant?
6. If we consider the Plan not to be legally compliant or sound, we set out the modifications we consider necessary to make the Plan legally compliant or sound.

7. History

8. The BRA has held extensive consultations using a range of media and has complete confidence that it represents the views of the community. The key issues identified by the community are Green Belt Release, Education, Healthcare, Roads and Drainage. Representations were made on these subject areas in 2020 at the regulation 18 stage. That representation is summarised below in paragraphs 9-19 of this statement..

9. The starting point for these representations was the Green Belt and that one of the key functions of the Green Belt is to prevent neighbouring towns merging into one another. The BRA asserted, and continues to assert, that the proposed local plan will have the effect of merging Bookham and Effingham having regard to other developments both in Mole Valley and Guildford. The draft plan at that time suggested that the Green Belt impact would be moderate to significant for Sprawl, Merging Encroachment and Setting. The BRA believed this conclusion to be unsound. The development of this land will cause significant environmental damage and habitat loss.

10. This land is currently well protected by the purposes of the Green Belt in National Planning Policy Framework sections 140 and 141 (July 2021 version) and MVDC EN1 and should not be developed.

11. The BRA fully appreciates that Bookham must be part of the solution to the housing problem. At the earlier consultation it suggested that MVDC has underestimated the volume of dwellings built over the past 20 years (350) in Bookham through infill and windfalls. A continuation of this rate would mean another 220 in the 13 years left for this Draft Plan period plus those already completed up to March 2020. Along with increased densities (50 dph) that will be permitted as recommended in that Draft Plan the BRA expected that this number of infills and windfalls to greatly exceed the 150 dwellings suggested in the Draft Local Plan document. Where infill occurs it is easier to absorb infrastructure changes whereas large green-field sites require infrastructure up front.

12. Green Belt development in the Draft Plan contradicts the national guidelines by encouraging urban sprawl. This will harm the distinct nature that currently exists between the villages of Bookham and Effingham. 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. Sprawl is effectively underway from Effingham towards Bookham with the Howard of Effingham (HoE) development.

13. These two sites plus the 295 new dwellings to be built on and close to the Howard of Effingham site will mean a new settlement of around 500 dwellings in a half mile radius of Preston Cross and a population of well over 1100 people. This equates to a new large village. This is an unacceptable situation and one which would only continue to extend the urbanisation of Bookham, Fetcham and Effingham through Leatherhead to the Ashted border.

14. Turning to Education, the BRA concluded that the Local Plan fails to accommodate the effect of the proposed developments in both Bookham and its borders, a more coherent and holistic approach is required. Each sector is considered below:

- Early years: Will not meet demand given existing resources and space available.
- Primary: Where will the capacity come from and has the impact of cross boundary demand on our schools been considered? We think not.
- Secondary: If no new school, a delayed school, and or a smaller new school; this will mean our existing Bookham children who can walk and/or cycle to school may be “bussed” elsewhere and, if not to Therfield, then possibly even up to 75 minutes further afield.

15. The current health facilities were identified as inadequate. In particular: Effingham has no GP surgery. Fetcham has the Molebridge practice which was established in 1974 and currently has about 2,750 patients. Eastwick Park, which was refurbished in 1999, has 8,200 patients. Fairfield, which was rebuilt in 1995, has 10,600 patients.

16. Both the Eastwick Park and Fairfield practices are already above the capacity required by national guidelines. The proposal was estimated to produce a further 719 homes. If we include the 295 homes for the Howard of

Effingham development, this amounts to another 1600 people who may wish to register with the above practices. It is of concern to the community that allocating land does not by itself produce health facilities and thus the LPA cannot guarantee that the increase in primary healthcare provision will actually occur.

17. There are two large Greenfield sites proposed to the west of the village in Little Bookham at Preston Farm which will increase traffic on the A246 and Lower Road. This site might generate over 500 cars and the latter more than 500 cars. The location of the site is unsustainable. The nearest shopping area is circa 1500 metres away, the railway station is a similar distance, bus services are restricted to one service 479 (Guildford–Leatherhead–Epsom).

18. The BRA raised concern about the capacity of the existing drainage system to take both surface and foul runoff from the proposed development.

19. The site

20. The site forms a green wedge and backdrop to the Little Bookham Conservation Area. The following aerial photograph shows this will leave the fields to west of the Vineries Garden Centre as the only green space; stopping Little Bookham and Effingham merging. This is already part compromised by extant consents for a new school and further housing. In effect the development of Preston Farm will merge the two settlements. The essence of the Plan case is that the Lower Road frontage is already developed and thus there would be little change to the general perception of setting and merging. However, it is a long standing principle that value of Green Belt land openness is not just limited to visual perception. Equal or greater weight should be given to preventing encroachment into the countryside. The site is rural, open countryside with very minimal non countryside features. 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.'



21. National policy on release of the Green Belt

22. The case proposed in the draft plan is that the release of Green Belt is founded upon the inability of the LPA to meet its housing targets and that consideration represents exceptional circumstances

23. The NPPF, Planning Practice Guidance (PPG) and case law have concluded that:

- *To move a Green Belt boundary it is necessary to identify exceptional circumstances. It is not sufficient to simply say that moving the boundaries is desirable in the planning balance.*

- *It is not necessary, at least when seeking to take sites out of the Green Belt, to show that the assumptions on which the Green Belt had been made at that location have since been falsified.*
- *The simple act of carrying out a local plan assessment/review of the Green Belt will not be sufficient to amount to exceptional circumstances. That would not accord with the point in the NPPF that Green Belt boundaries are meant to be permanent and endure beyond any individual plan period.*
- *The fact that a particular site in the Green Belt is suitable for housing (or other development) is unlikely on its own to amount to an exceptional circumstance, but would contribute to a finding of exceptional circumstances as part of a package of measures.*
- *Unmet objectively assessed need can contribute to a finding of exceptional circumstances but is unlikely on its own to justify a conclusion that exceptional circumstances have been identified*
- *Unmet objectively assessed need cannot require an authority to move the boundaries of the Green Belt (which would chime with the approach of paragraph 11 of the NPPF which requires objectively assessed needs to be met unless specific policies in the Framework, including Green Belt policies, indicate development should be restricted). However, if an authority has unmet objectively assessed need it is necessary to show through their sustainability appraisal and other assessments why it would not be appropriate to move the Green Belt boundaries in a particular case.*

24. The NPPF Considerations

25. The key paragraphs of the NPPF are:

140. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having

regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.

141. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

makes as much use as possible of suitable brownfield sites and underutilised land;

optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

142. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory

improvements to the environmental quality and accessibility of remaining Green Belt land.

143. When defining Green Belt boundaries, plans should:

ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;

not include land which it is unnecessary to keep permanently open;

where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;

make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;

be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

144. If it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.

145. Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, 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.

26. The BRA, in this representation, will show the policy fails to meet the tests of paragraphs 141 – 143.

27. The LPA assert in their Green Belt Exceptional Circumstances Topic Paper July 2021 in paragraphs 3.13 -3.17 that the tests of NPPF paragraph 141 have been passed because it has:

3.13. The Council has scrutinised the extent of brownfield and underutilised land on a detailed and ongoing basis. There was a brownfield-specific call for sites in 2016, informing the 2017 Issues and Options consultation. Brownfield capacity was updated again when preparing the 2020 Strategic Housing and Economic Land Availability Assessment and has been kept under review throughout the revised site selection process and preparation of the Regulation 19 Local Plan. Further details are in the 2020 SHELAA and a 2021 SHELAA Addendum.

Optimise the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport (NPPF para 141 b)

3.14. Analysis of suburban planning permissions between 2015 and 2019 in the District's five built up areas show an average density of around 16 dwellings per hectare. It is acknowledged that the policies within the Core Strategy have not been effective in improving the productiveness of land. Indeed the Core Strategy does not have a density target or minimum and deferred from implementing the target set out in the then South East Plan, which was 40 dwellings per hectare.

3.15. The Core Strategy defers to a Built-Up Area Character Assessment. These were delivered as a series of SPDs for the built-up areas in 2010 and for the six Larger Rural Villages in 2013. However, the focus is on character rather than boosting densities.

3.16. It is acknowledged that a shift in focus is necessary to optimise density to ensure that the Local Plan makes efficient use of suitable brownfield sites and underutilised land.

3.17. To this end, the Local Plan strategy is underpinned by a series of brownfield options which seek to optimise density in the most appropriate and sustainable locations. Policies and site allocations include opportunities for mixed use and higher density locations in the town centres and close to transport hubs in the built up areas. Limited reallocation of employment land is proposed and policies support recycling of existing employment land to meet evolving occupier requirements. A minimum density requirement is introduced in a series of Development Opportunity Areas, also focussed on the more sustainable locations, but including smaller centres and principal transport routes.

28. The BRA disputes this analysis and shows that the take up of infill, windfall and future sites exceed the LPA estimate and thus the founding assumptions are unsound.
29. As detailed in the Statement of Cooperation August 2021, (which includes the Statements of Common Ground), unmet housing need exists or is likely to exist in several adjoining authorities, including those within the Housing Market Area. Waverley, Guildford and Reigate and Banstead have up-to-date plans but their adopted housing targets fall short of more recently calculated local housing need. Crawley's draft plan only plans to meet 44% of need, although it has agreements with Horsham and Mid Sussex to take at least part of its need. Horsham's proposed housing target in its emerging plan has yet to be published. The London Plan has handed down a significant increase in Kingston's target but the borough has not indicated how it would meet it. Epsom and Ewell and Elmbridge have out-of-date plans but their local housing need figures are considerably above their previous housing targets. This contributes to an acuteness of need across authorities with similar strategic policy links to the Metropolitan Green Belt. However, it is known that most south London Councils are substantially exceeding their housing targets (including that arising from the 2021 London Plan) thus suggesting this analysis may not be complete.
30. Even if exceptional circumstances may exist at a strategic level, that does not imply that all sites within the Green Belt will meet the threshold for

exceptional circumstances. This is because the final two tests set out in the Calverton case (Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin)), indicate that a site-by-site assessment is required. These are set out below and form the basis for a pro-forma devised by the Council for the assessment of specific Green Belt sites. The BRA considers this assessment flawed on grounds of merging settlements, landscape and damage to biodiversity and infrastructure requirements

31. In considering the nature and extent of the harm to the Green Belt, the Green Belt Review (GBR) 2020 is the Council's key source of evidence. The broad areas were scored across the first four purposes of the Green Belt as performing Minimally, Moderately or Significantly. The Green Belt purposes are as follows:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

32. The BRA suggests the proposal fails test 1-3 and 5 in that;

- The development would inherently be sprawl
- The development would further merge Bookham and Effingham
- The development will urbanise the area and encourage encroachment
- The development in part releases the pressure to develop in the urban area and particularly its town centres.

33. The LPA acknowledge the principle is reflected in the NPPF regarding mitigation. Paragraph 141 sets out that where it has been concluded that it is necessary to release Green Belt land for development, plans should set out ways in which the impact of removing land from the Green Belt can be offset

through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. The loss of the land as described on pages 4 & 5 (of this statement) which is natural is not compensated by development and a Country Park which inherently is more urbanised.

34. The LPA assertion in paragraph 3.54 of the Green Belt Exceptional Circumstances Topic Paper 2021 that "...in most instances the use of good design and an effective master planning process can help mitigate impacts on the openness of the Green Belt and its purposes, for example by reducing visual or perceptual coalescence, preventing a sense of urban sprawl or tying development into the landscape of the wider countryside and accommodating open space within the site." fails to appreciate the intrinsic character of the space.

35. The future Mole Valley local plan – policies

36. The key new policies underpinning the suggested Green Belt revisions are S1, H1, H2, EN1 and DS8. Relevant sections are detailed below.

37. Policy S1 states:

POLICY S1: SUSTAINABLE MOLE VALLEY

Sustainable Development

- a. The Council will expect the development proposals and use of land to contribute positively to the social, economic and environmental enhancement of Mole Valley. Planning applications that are consistent with the policies in the plan (and with relevant policies contained within other elements of the Mole Valley Development Plan) will be supported, unless material considerations indicate otherwise*

Housing Growth

- b. *The Council will enable the delivery of new homes to help meet the needs of Mole Valley and the wider south-east region by aiming to deliver at least 6,000 new homes over the plan period 2020-2037 (353 new homes per annum)*
- c. *In order to achieve this target, the Council has adopted the following spatial strategy:*

Allocated town centre sites in Leatherhead and Dorking for housing-led redevelopment;

Developed policy (Policy H2) and set indicative densities for site allocations to ensure brownfield land sites achieve their appropriate capacity

Allocated outdated office complexes in Ashted and Dorking for housing-led regeneration;

Released sites which were modest contributors to the objectives of the Green Belt for housing around the built up areas of Ashted, Bookham, Dorking and Leatherhead;

Released sites which were modest contributors to the objectives of the Green Belt for housing within and around Hookwood to complement the economic growth point of the Gatwick area;

Developed policy and amended Green Belt boundaries to permit appropriate development in the villages inset from the Green Belt, namely Beare Green, Brockham, Capel, Charlwood, and Westcott; and,

Developed policy and amended village boundaries to permit limited infilling development in the villages washed over by the Green Belt and in the Countryside Beyond the Green Belt.

- d. *As a result of these measures, the Council anticipates that that new housing will be delivered in the following locations in the following approximate proportions:*

- *Dorking area 24%*
- *Leatherhead Area 30%*
- *Ashted Area 12%*
- *Hookwood Area 15%*
- *Bookham area 7%*

- *Rest of district 12%*

Infrastructure provision

e. To ensure a liveable District, the Council will work with:

6f. Developers to deliver new early years facilities in Ashted, Bookham, Dorking, Hookwood and Leatherhead;

6g. Surrey County Council and developers to ensure District-wide and individual transport improvements take place across the District;

6h. Flood prevention schemes target areas of flood risk; and,

6i. Statutory undertakers to ensure utility improvements meet existing and new demands, especially in Ashted, Dorking, Leatherhead and Ockley

Character Protection

All development proposals will be expected to:

Conserve and enhance the Surrey Hills Area of Outstanding Natural Beauty and the District's Area of Great Landscape Value;

Minimise the impact on the integrity of the Green Belt;

Conserve and, where necessary, enhance the District's heritage and biodiversity assets; and,

Protect other elements, designated or non-designated, which contribute to local character

The Council will produce design codes for the District in due course.

38. The general objectives of the policy are supported but insufficient sustainability emphasis is given to the effects, locally and globally, of increased car movement arising out of green belt release.
39. Post COVID the office market is changing with companies and arms of Government reducing their space requirements which has the potential to increase housing provision in the urban areas or existing buildings, a matter considered in paragraphs 53-58.
40. Policy H1 states;

POLICY H1: HOUSING DELIVERY

a. *The housing requirement for Mole Valley is to deliver at least 6,000 additional homes within the 2020-2037 plan period (353 homes each year).*

b. *Mole Valley's housing requirement will be achieved by:*

Dwellings built since the start of the plan period (since 1 April 2020);

Dwellings currently under construction;

Dwellings with planning permission and approval, but where development has not yet commenced;

Dwellings delivered through site allocations, as detailed in Chapter 8 and shown on the Policies Map;

Dwellings delivered on unidentified small sites (unidentified sites delivering fewer than 10 dwellings);

Dwellings delivered as a result of Policy H2 Development Opportunity Areas which increases densities in sustainable locations; and,

Dwellings delivered through other windfall sites (unidentified sites delivering 10 or more dwellings)

c. *At least 10% of Mole Valley's housing requirement will be achieved through the development of sites no larger than one hectare. This will be achieved through the methods of delivery identified in Part 2.*

d. *The housing requirements for the designated Neighbourhood Areas within the District for the plan period (2020-2037) are as follows:*

Ashtead - 690 net new dwellings

Bookham - 469 net new dwellings

Capel Parish - 195 net new dwellings

Ockley Parish - 75 net new dwellings

Westcott - 68 net new dwellings

These housing requirements will be delivered through the allocated development sites in this plan and through windfall development

41. The BRA suggests the contribution made by windfall sites is underestimated, as shown in paragraph 51 and Appendix B. It shows that in the past 12 months was a gain of 24 units in this locality. Applications for a further 25

units were refused, some of which are at appeal. If 10% of these applications were granted permission (a figure half the national appeal success rate) then the 27 units would be met. These approvals were made under the current policy framework. It follows if a new policy approach towards density were adopted this number could be greater. If Bookham is identified to achieve 469 units over 17 years (2020-2037) this can be averaged to 27 units per annum, only two units more than achieved last year. A new approach to density at 50dph must close that gap. If a more strident stance on compact development was established that deficit would disappear. It thus follows that the housing need to release green belt land in Bookham is not proven.

42. The extent of urban re-use, infill and windfall is thus notably underestimated. The NPPF 2021 notes that 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 options include assessing brownfield and underutilised land and optimisation of the density of development, a theme repeated in promoting compact development. This has not thoroughly been carried out.

43. Policy H2 seeks to capitalise on the housing potential of the urban area and notably has a target minimum density of 50dph. It states:

POLICY H2: DEVELOPMENT OPPORTUNITY AREAS

Within the Mixed Use Development Opportunity Areas, as shown on the Policies Map and set out above, the Council will support redevelopments, including changes of use, which make a more efficient use of the site. All development within Dorking and Leatherhead Town Centres will also be required to remain consistent with Policy EC3.

Within the Residential Development Opportunity Areas, as shown on the Policies Map and set out above, the Council will support the subdivision of existing large dwellings into flats or the redevelopment of those sites to form smaller dwellings.

All developments within the Development Opportunity Areas should:

Achieve minimum densities of 50 dwellings per hectare. A change in character may be supported provided that the proposed development has a positive impact on the appearance of the surrounding area;

Be predominantly 1- and 2-bedroom dwellings. An exception will be made for proposals involving a one-for-one replacement dwelling and is on a comparable footprint;

Not be taller than one storey above the prevailing storey height of the surrounding townscape; and,

Be of high architectural design quality and standards, supported by a full design justification

In the Mixed Use Development Opportunity Areas, the appropriateness of a taller building will be considered on a case-by-case basis.

In the Residential Development Opportunity Areas, new development will be expected to add no more than one additional storey to the existing building height.

On appropriately sized sites, development may be acceptable to the rear of the existing frontage property(ies) subject to other policy considerations, including design and amenity.

Where development proposals are located within or adjacent to Conservation Areas, or where they affect the setting of heritage assets, the proposals must conserve and, where possible, enhance the heritage assets.

44. The Campaign for the Protection of Rural England in June 2018 in “Double the density, halve the land needed”, suggested increased densities in urban development could as much as halve the required release of green land. In the context of sustainable development density target should be closer to 100 dph. If achieved in Mole Valley the underlying assumptions of the need for green release are unsound. CPRE note:

- The higher the density, the more land is saved: space is used more efficiently.
- The higher the density, the bigger range of shops and services that can be supported.
- Of most significance is the cost of personal transport which diminishes rapidly as density increases. Better transport means better access to jobs,

amenities, leisure, etc. At high densities fast, frequent, reliable public transport systems become fully effective with dramatic reductions in energy & costs.

- As density increases the per capita cost of providing services such as water, gas, electricity and waste disposal reduces.
- The cost of transporting materials and goods also declines. As the costs go down so does the consumption of energy.
- As density increases, isolation and social exclusion is reduced for people without a car.
- Density can also impact on affordability as the cost of land is lower per dwelling, and space is not needed for parking cars, for instance.
- Higher density creates more vitality and diversity. *“Bigger concentrations of people stimulate and support the provision of more services and facilities making possible a wider choice of restaurants, theatres, cinemas and other recreational opportunities. They support specialist centres and services for minorities, which are not possible where such minorities are dispersed in low density sprawl. ...*
- *“All this stimulates interdependent economic development that creates new employment opportunities and greater choice of employment.*
- *“Above all, in higher density urban areas, all this diversity is within easy reach of where most people live. Ease of access is a key factor, which has critical implications for a sustainable quality of urban life.”*

45. Whilst policy EN1 (copied below) is protective for the future, it is notable that many of its aspirations or criteria are contradicted by the release of this site.

POLICY EN1: THE GREEN BELT

Land which is designated as Metropolitan Green Belt will be protected against inappropriate development, as defined by national policy.

Inappropriate development will not be permitted in the Green Belt, unless very special circumstances are demonstrated which are concluded to outweigh the potential harm, including harm to the openness of the Green Belt and the purposes of including land within it.

The following forms of development are exceptions to the definition of inappropriate development and will be permitted where they comply with other relevant policies in this Plan:

Extension or alteration of an existing dwelling or other building, including provision of ancillary buildings within the curtilage of an existing dwelling or other building, provided the proposed development does not result in disproportionate additions over and above the size of the original building;

Replacement of an existing dwelling or other building, provided the new building is in the same use and not materially larger than the one it replaces;

Buildings or other structures which it has been demonstrated are reasonably necessary to support agricultural, horticultural or forestry use of the site, in accordance with Policy EC6;

Appropriate buildings or facilities for outdoor sport, outdoor recreation, cemeteries, burial grounds and allotments, provided the proposed buildings and associated uses or activity would preserve the openness of the Green Belt and not conflict with the purposes of including land within it, by reason of their scale, design or siting. Where external lighting is proposed, or likely to be required, in connection with proposed outdoor uses, this should not result in light pollution adversely impacting on the amenities of neighbouring properties or the surrounding landscape, taking account of existing levels of artificial illumination in the surrounding area;

The re-use of existing buildings which are of permanent and substantial construction, provided the physical changes and associated uses and activity would preserve the openness of the Green Belt and not conflict with the purposes of including land within it.

Limited infilling in villages, in accordance with Policy EN3;

Limited infilling or redevelopment of previously developed land where the new development would not have a greater impact on the openness of the Green Belt than the existing development;

Reuse of previously developed land to meet an identified affordable housing need within Mole Valley, where the development would not cause substantial harm to the openness of the Green Belt;

Limited affordable housing for local community needs, in accordance with Policy H4 or,

Other forms of development specifically identified through national policy as exceptions to the definition of inappropriate development, including changes of use and engineering operations which preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.

46. The principal site-specific policy is DS 8 which is copied below:

POLICY DS8: LAND NORTH WEST OF PRESTON FARM, BOOKHAM

Allocated for: RESIDENTIAL, COMMUNITY (including Early Years Education) AND COUNTRY PARK

Site Area (ha): 27.4ha total, approx. 10ha developable

Indicative capacity: 200 dwellings, at least 3 gypsy and traveller pitches

Policy Map Designations: Former Green Belt (part), Green Belt (part), Built up area (part), Conservation Area (part), Area of Critical Drainage, Part within 5km, rest within 7km of Thames Basin Heaths Special Protection Area.

Relevant Planning History: None

In addition to meeting the policies in the plan, any developer of this site will be required to:

Locate built development within the eastern part of the site, which is excluded from the Green Belt, as shown on the Policies Map.

Create clearly defined boundaries between the edge of the residential development and the Green Belt using physical features which are recognisable, likely to be permanent and consistent with the character of the surrounding environment.

Conserve and where possible enhance the setting of heritage assets including Little Bookham Conservation Area and nearby listed buildings.

Retain the existing ponds and incorporate them into proposals for management and enhancement of biodiversity on site.

Maximise retention and safeguarding of existing mature trees and hedgerows, including areas identified as Priority Habitat (deciduous woodland), and incorporate them into a well-integrated landscape strategy.

Create a Country Park within the land lying to the west of the ponds, providing at least 10.3ha of Suitable Alternative Natural Greenspace (SANG),

incorporating walking routes, public car parking and measures for biodiversity enhancement, designed and implemented in accordance with Natural England guidelines.

Establish a legal mechanism for long term management of the Country Park, supporting both public access and an appropriate habitat management regime.

Incorporate any mitigation measures that may be required to address any adverse effects on the integrity of the Thames Basin Heaths Special Protection Area.

Incorporate sustainable drainage measures to mitigate the risk of surface water flooding in accordance with Policy INF3 and site specific guidance in the Level 2 Strategic Flood Risk Assessment.

Incorporate an area of approx. 0.2ha, with access to the highway and utilities connections, suitable for delivery of gypsy and traveller pitches in accordance with policy H5.

Provide a community building of at least 2000sqm, capable of accommodating early years education provision and other community uses responding to the needs of the locality.

In addition to the country park, provide publicly accessible open space and equipped play space in accordance with the standards in Policy EN10.

Provide suitable and safe vehicular access from Lower Road.

Demonstrate through traffic modelling that the proposed development would not have any significant impact on the transport network in terms of capacity or congestion, both individually and cumulatively with other nearby developments, or that any such impact can be mitigated to an acceptable degree.

Liaise with the relevant service provider to ensure the occupation of the development is phased to align with the delivery of necessary sewerage infrastructure.

Provide water efficiency measures such as water butts, rainwater harvesting, water-saving appliances and fittings, with the aim of exceeding the requirements of policy H10, to reduce increased pressure on water supply infrastructure.

Any developer of this site should, where possible:

Establish walking and cycling routes through the site, connected to surrounding roads and rights of way, at locations which support active travel to work, school and local services.

Incorporate measures to enhance pedestrian and cyclist safety along Lower Road, in order to facilitate safe sustainable travel to local shops, schools and other services.

Incorporate measures for flood risk betterment, aimed at reducing the surface water flow path through and beyond the site.

And having regard to the similar circumstances and affect upon the Green Belt

POLICY DS11: LAND TO THE REAR OF HUNTERS MOON, MADDOX PARK, BOOKHAM Allocated for: RESIDENTIAL – SELF BUILD

Site Area (ha): 0.5ha

Indicative capacity: 5 dwellings

Policy Map Designations: Former Green Belt, Built up Area, Area of Critical Drainage. Within 5km of Thames Basin Heaths Special Protection Area.

Relevant Planning History: None

In addition to meeting the policies in the plan, any developer of this site will be required to: 1. Ensure development fulfils the definition of Self Build and/or Custom Build homes. 2. Provide shared drainage, utilities and improved vehicle and pedestrian access prior to commencement of development of any individual dwelling. 3. Maximise retention and safeguarding of existing trees and hedgerows, including those on the southern and western boundaries, and incorporate them into a landscape strategy that also includes additional native planting on site boundaries. 4. Create clearly defined boundaries between the edge of the site and the Green Belt using physical features which are recognisable, likely to be permanent and consistent with the character of the surrounding environment. 5. Incorporate any mitigation measures that may be required to address any adverse effects on the integrity of the Thames Basin Heaths Special Protection Area. 6. Incorporate sustainable drainage measures in accordance with Policy INF3.

47. **The representation**

48. The thrust of policy S1 is sustainability yet the green belt revision proposes development in one of the least sustainable locations in that it is remote from day-to-day infrastructure, shops, employment, transport and community facilities. In the absence of these facilities there will be increased reliance upon the car which will either create congestion or pollution or both.

Sustainable development in the Planning system is defined in the NPPF as;

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- i. **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- ii. **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- iii. **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.(NPPF paragraph 8).*

2. Policy S1 promotes a development that;

- Is unnecessary as its objectives could be better achieved by promoting compact development as advocated by the NPPF and the National Design

Guide; Planning practice guidance for beautiful, enduring, and successful places October 2019. Such compact development would support urban facilities, be less energy intensive, more accessible, sustainable and safer

- Is damaging to biodiversity, promotes pollution and hinders climate change objectives

50. The text implies that the release of Green Belt is essential but the mere identification of housing need, or unmet housing need, cannot be assumed by itself to constitute an exceptional circumstance to justify an alteration in the boundary of the greenbelt. It is agreed that it does not follow that it is incapable of amounting to an exceptional circumstance. Whether it does so is a matter of judgement for the decision-maker, which depends in part on how much significance or weight the decision-maker attaches to that identified need. However, there is little evidence as to why the increased density approach of CPRE or the themes of compact development have not been proposed. The advice is that when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. The consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary is preferable to release of Green Belt or towards locations. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. Neither site subject of this representation has such assets. The tests applied by the Council are not holistic in that the locations are not sustainable.

51. The Chartered Institute of Highway and Transportation advocate in 'Planning for Walking' that walking neighbourhoods are typically characterised as having a range of facilities within 10 minutes' walking distance (around 800 metres). This site has no facilities save a public house (Ye Olde Windsor Castle). It is thus suggested policy S1 is unsound and should be re-visited with greater emphasis upon accessibility and location of sustainable development.

52. Policy H1 reinforces S1 in that allocations for housing flow from it. It is proposed that the allocations should be revisited in line with the themes of this representation. The research of BRA shows the numerical analysis of MVDC is out of date. They show in Appendix B the extent of windfalls under current policies is very close to required demand and could comfortably be exceeded if new more strident policies on density were promoted. This has been a consistent stance of BRA.
53. Policy H2 establishes the approach to density and it therefore follows is a determinant in establishing whether green belt release is a necessity. The CPRE study referred to above demonstrates how densities of up to 100dph can be achieved in low rise development with an emphasis upon family development. Such developments can be low impact and green in appearance 'a theme repeated in the National Design Guide that notes "Compact forms of development bring people together to support local public transport, facilities and local services. They make destinations easily accessible by walking or cycling wherever this is practical. This helps to reduce dependency upon the private car." It includes typologies shown as best practice drawn from both rural and suburban situations. At the most simple, Bookham is allocated to receive 469 net new dwellings of which 200 are located at Preston Farm. If the remaining 269 were built at double the density in the existing urban area the release of Green Belt in this location is no longer needed. It is important to note that the BRA has long advocated infill as the means to address housing need. It has community support and would avoid the demands on the Green Belt.
54. Beyond the above, the housing position has changed post COVID. A recently published survey from property agents Cushman & Wakefield analysed responses from more than 40,000 individuals globally about their work-from-home experiences during the Covid-19 pandemic. Survey respondents represent approximately 30 companies across nearly 20 industries. Three quarters of respondents agree or strongly agree that they are collaborating effectively with colleagues in the current environment – up 10% from data gathered during the pre-Covid-19 period – and 73% said they would like their companies to embrace long-term or permanent flexible working policies. This

has led KPMG to conclude Covid-19 has prompted businesses to look closely at their real estate, including office space usage.

55. On 21st July 2021 the Chairman of Nat West reported to the Guardian;

“The chair of NatWest, one of Britain’s biggest banks, has said office life in London is unlikely ever to return to how things were before the coronavirus pandemic.”

56. Howard Davies said he expected lasting cultural changes even after the danger from the virus receded. “The days when 2,500 people walked in through our office door on Bishopsgate at 8:30 and then walked out again at 6 o’clock, I think that is gone. I suspect there won’t be that many people who will be doing five long days in the office.” In a Bloomberg TV interview, Davies said that many of NatWest’s office-based employees would probably continue to work from home part-time after pandemic restrictions eased, in the latest sign of big business reassessing working practices. This view was shared by HSBC and JP Morgan. Moreover it was re-iterated in September following a report by the BBC and You Gov that concluded “A total of 70% of 1,684 people polled predicted that workers would “never return to offices at the same rate”. The majority of workers said that they would prefer to work from home either full-time or at least some of the time.”

57. A new JLL(Jones Lang LaSalle) report on the impact of Covid-19 on flexible space outlines the future of such space both now and after the pandemic subsides. The report indicates that flexible space will take a different form than it has in the past. This change will result in the de-densification of main office space and a move towards a ‘hubs and clubs’ model that provides office locations closer to where people live. These distributed locations, or ‘clubs,’ are likely to lean heavily on flexible space arrangements. The JLL report notes that they expect to see a fundamental shift in the way office space is consumed. A greater focus on spaces which emphasise collaboration is also likely to emerge as office space is redesigned and

repurposed. As tenants return to their offices, business continuity and operational resilience will be top priorities – and since flexible space is fast and easy to acquire, companies are likely to turn to flexible solutions to support portfolio reductions and cost-saving strategies during this time of economic uncertainty.

58. The office has long provided a place for concentrated work and is increasingly becoming a place for collaboration, connection, innovation and social interaction. In a revived post-pandemic market where adaptability is high on the corporate agenda, the purpose of the 'hub' office is centred around collaboration and flexible space. The implications of these changes could release more office space or land for housing than was previously predicted. Given that once Green Belt land is lost it is lost forever it is suggested the policy is unsound until further research is carried out and new policies formulated.

59. The principal site-specific policy is DS 8. Beyond the housing consideration addressed above it produces demands whereby both the education uses and country park could potentially affect traffic flows and has the potential to further urbanise the locality. Whilst BRA opposes the allocation it is noted that;

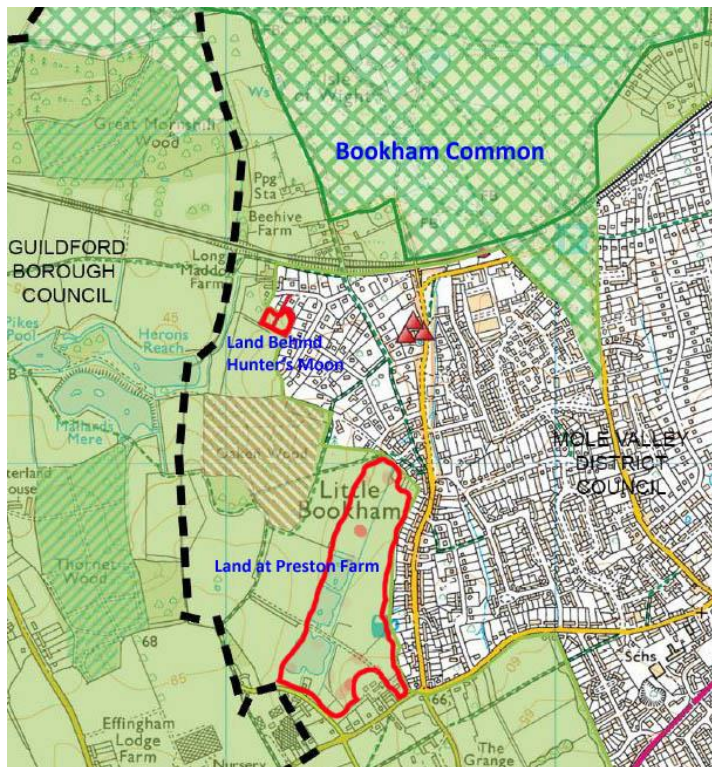
- No provision is made for retailing
- No provision is made for enhanced health provision
- Public transport improvements are not guaranteed and are vague.

60. Beyond these infrastructure shortcomings Education provision is inadequate. It is noteworthy that the policy makes no provision for increased demand or secondary places.

61. Turning to Hunters Moon, this site is a continuation of the open Green Belt land to the South West of Bookham, following after Oaken Wood to the west of the Preston Farm site (Map below).

62. It consists of a small field of 0.5ha to the South of the property known as Hunters Moon and 0.25ha of land associated with the houses Flowerdale

and Bryher to the West (see aerial photograph below). The area could be described as ungrazed grassland with plots of mature oak trees in parkland to the West. The land appears no different from the open countryside beyond, and is a quiet wildlife refuge forming part of the wildlife corridor from the ponds behind Preston Farm to Bookham Common to the North West.



63. Arguments against the soundness of the proposals in the Future Mole Valley Draft District Plan are made in detail in submissions by the Burnhams

Atwood and Maddox action group prepared by Leswest Planning and Richard Harwood OBE QC. Under Green Belt anomaly adjustment BK1, it is proposed to take all of the land out of the Green Belt. Under a separate assessment (18-BK-10) exceptional circumstances have been found to remove the field behind Hunter's Moon from the Green Belt; under policy DS11 it is proposed to build up to five self-build or custom build houses on the site. These proposals are considered unsound for the following reasons:

- The land described in BK1 has not been assessed for exceptional circumstances as required by NPPF para 140 (see NPPF discussion in section 23). Considered as a whole, the trees and grassland make a contribution to the openness of the green belt. MVDC argue in the Settlement Boundaries Topic Paper para 2.10 that an exceptional circumstances assessment is not necessary when adjusting inset boundaries. In para 3.8 this argument seems to have been applied to tidying up Green Belt anomalies. The land in BK1 does not qualify for adjustment since there have been no changes on the ground since 1967, and the boundaries have endured for 60 years. The anomaly adjustment also takes a significant amount of land out of the Green Belt and reduces its openness. The methodology is therefore incorrectly applied. This lack of assessment does not comply with the wording of the NPPF para 140 and is therefore unsound thus BK1 should be removed from the plan.
- In Assessment 18-BK-10, the field DS11 is said to be "somewhat enclosed" because of the surrounding trees in adjacent gardens, whereas in fact, the mature trees add to the openness of the countryside.
- Openness is not what you see. Openness is a landscape concept defined in case law:
"The openness of the Green Belt has a spatial aspect as well as a visual aspect". This is referenced in the Settlement boundaries topic paper para 2.11. (Lord Judge Sales in **Turner v SSCLG** (*Secretary of State for Local Government*)2016.
- In assessment 18-BK-10 Exceptional Circumstances have not been demonstrated.
It is claimed: "This site would be a very modest extension to Bookham and would provide a small amount of housing" where small = 3 to 5 houses for the loss of 0.75 hectares of Green Belt.

- It is also stated: “There are limited factors in this site’s favour, but its impact on openness and the purposes of the Green Belt would also be limited” It is argued above that the extent of loss of openness has been underestimated. This loss of openness is therefore not outweighed by other considerations i.e. an insignificant gain in housing delivery and does not therefore comply with NPPF para 148.
- On the grounds of failure to correctly assess the impact of development on the openness of the Green Belt and the failure to correctly assess the balance of harm and benefits, the site assessment is considered to be unsound and Policy DS11 should be removed from the plan.

64. CONCLUSIONS

65. The BRA believes the Plan is unsound for the reasons below;

- exceptional circumstances do not exist as the housing analysis is incomplete and underestimates brownfield and underutilised land and opportunities arising from increased densities.
- The plan underestimates the merging of settlements arising from extant consents and the proposed development of Preston Farm. The prevention of such coalescence is a fundamental cornerstone of Green Belt policy.
- infrastructure demands arising from traffic, health requirements and schooling are insufficiently developed.
- the sites are not sustainable locations.

66. Thus the Plan as submitted is not consistent with achieving sustainable development. The Plan currently has a flawed strategy which fails to take account of the reasonable alternatives as regard the re-use of urban land and opportunities arising from increased density. Finally, in promoting the merging of Effingham and Bookham, it is not consistent with national policy.

APPENDIX A – DS 8 (IN FULL)

BOOKHAM

**POLICY DS8:
LAND NORTH WEST OF PRESTON FARM, BOOKHAM**

**Allocated for: RESIDENTIAL, COMMUNITY (including Early Years Education)
AND COUNTRY PARK**

Site Area (ha): 27.4ha total, approx. 10ha developable
Indicative capacity: 200 dwellings, at least 3 gypsy and traveller pitches
Policy Map Designations: Former Green Belt (part), Green Belt (part), Built up area (part),
Conservation Area (part), Area of Critical Drainage, Part within 5km,
rest within 7km of Thames Basin Heaths Special Protection Area.
Relevant Planning History: None



In addition to meeting the policies in the plan, any developer of this site will be required to:

1. Locate built development within the eastern part of the site, which is excluded from the Green Belt, as shown on the Policies Map.
2. Create clearly defined boundaries between the edge of the residential development and the Green Belt using physical features which are recognisable, likely to be permanent and consistent with the character of the surrounding environment.
3. Conserve and where possible enhance the setting of heritage assets including Little Bookham Conservation Area and nearby listed buildings.
4. Retain the existing ponds and incorporate them into proposals for management and enhancement of biodiversity on site.
5. Maximise retention and safeguarding of existing mature trees and hedgerows, including areas identified as Priority Habitat (deciduous woodland), and incorporate them into a well-integrated landscape strategy.

6. Create a Country Park within the land lying to the west of the ponds, providing at least 10.3ha of Suitable Alternative Natural Greenspace (SANG), incorporating walking routes, public car parking and measures for biodiversity enhancement, designed and implemented in accordance with Natural England guidelines.
7. Establish a legal mechanism for long term management of the Country Park, supporting both public access and an appropriate habitat management regime.
8. Incorporate any mitigation measures that may be required to address any adverse effects on the integrity of the Thames Basin Heaths Special Protection Area.
9. Incorporate sustainable drainage measures to mitigate the risk of surface water flooding in accordance with Policy INF3 and site specific guidance in the Level 2 Strategic Flood Risk Assessment.
10. Incorporate an area of approx. 0.2ha, with access to the highway and utilities connections, suitable for delivery of gypsy and traveller pitches in accordance with policy H5.
11. Provide a community building of at least 2000sqm, capable of accommodating early years education provision and other community uses responding to the needs of the locality.
12. In addition to the country park, provide publicly accessible open space and equipped play space in accordance with the standards in Policy EN10.
13. Provide suitable and safe vehicular access from Lower Road.
14. Demonstrate through traffic modelling that the proposed development would not have any significant impact on the transport network in terms of capacity or congestion, both individually and cumulatively with other nearby developments, or that any such impact can be mitigated to an acceptable degree.
15. Liaise with the relevant service provider to ensure the occupation of the development is phased to align with the delivery of necessary sewerage infrastructure.
16. Provide water efficiency measures such as water butts, rainwater harvesting, water-saving appliances and fittings, with the aim of exceeding the requirements of policy H10, to reduce increased pressure on water supply infrastructure.

Any developer of this site should, where possible:

17. Establish walking and cycling routes through the site, connected to surrounding roads and rights of way, at locations which support active travel to work, school and local services.
18. Incorporate measures to enhance pedestrian and cyclist safety along Lower Road, in order to facilitate safe sustainable travel to local shops, schools and other services.
19. Incorporate measures for flood risk betterment, aimed at reducing the surface water flow path through and beyond the site.

APPENDIX A (ii) – DS 11 (IN FULL)

POLICY DS11:

LAND TO THE REAR OF HUNTERS MOON, MADDOX PARK, BOOKHAM

Allocated for: RESIDENTIAL – SELF BUILD

Site Area (ha): 0.5ha

Indicative capacity: 5 dwellings

Policy Map Designations: Former Green Belt, Built up Area, Area of Critical Drainage. Within 5km of Thames Basin Heaths Special Protection Area.

Relevant Planning History: None



In addition to meeting the policies in the plan, any developer of this site will be required to:

1. Ensure development fulfils the definition of Self Build and/or Custom Build homes.
2. Provide shared drainage, utilities and improved vehicle and pedestrian access prior to commencement of development of any individual dwelling.
3. Maximise retention and safeguarding of existing trees and hedgerows, including those on the southern and western boundaries, and incorporate them into a landscape strategy that also includes additional native planting on site boundaries.
4. Create clearly defined boundaries between the edge of the site and the Green Belt using physical features which are recognisable, likely to be permanent and consistent with the character of the surrounding environment.
5. Incorporate any mitigation measures that may be required to address any adverse effects on the integrity of the Thames Basin Heaths Special Protection Area.
6. Incorporate sustainable drainage measures in accordance with Policy INF3.

APPENDIX B – BRA INFILL ANALYSIS

Application No	Address	No. of additional dwellings	Status
20/1960	Unit B, Rayleigh House, 32, High Street	2	Approved
20/2135	Honeydew, 92, Woodlands Road	2	Approved
20/2150	Land south of Oaken Hill, Burnhams Road	1	Approved
20/2231	Oakleigh House, 65, Church Road	8	Approved
20/2260	Fileturn House, Church Road	2	Approved
20/2352	Chenies, Meadowside	1	Approved
21/0144	Chartland Lodge, Leatherhead Rd	4	Approved
21/0202	53 Dorking Rd	1	Approved
21/0481 & 21/1294	31 Crabtree Lane	3	Approved

TOTAL IN YEAR

24