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Ms G Betts
Principal Planning Officer
Tandridge District Council
8 Station Road East
Oxted, Surrey
RH8 0BT

By Email
19th August 2021

Dear Ms Betts

TA2021/1040 – Nutfield Green Park

The Parish Council has a wide range of concerns regarding this Outline Application. These are twofold; the principle of any development on the former Laporte Works and the two matters for which approval is being sought, namely “means of access” and “layout”.

Section 1 - Development of the former Laporte Works

Set out below are the Parish Council’s objections to this development proposal on the following local and national planning policy grounds.

Ground 1 – The location of this proposed development is outside an existing built-up area –
As such this proposal is not compliant with Tandridge DC’s planning policies.

Core Strategy Policy (CSP) 1 of Tandridge’s Core Strategy seeks to promote sustainable patterns of travel and in order to make the best use of previously developed land. Specifically, it states that development will take place within the existing built-up areas of the district and be located where there is a choice of modes of transport available and where the distance to travel to services is limited.

Paragraph 12.8 of Tandridge’s “Part 2: Detailed Policies 2014 – 2029” in relation to Detailed Policy (DP) 12 states that “*All other villages located in the Green Belt, including those previously defined as ‘Green Belt Settlements’ that are not listed, are not considered sustainable locations for even limited development. These villages will therefore no longer be suitable for infilling (or redevelopment) and general Green Belt policy will apply*”. Nutfield is not one of the listed settlements and as such this policy restriction applies.

This restriction is reinforced in the footnote to paragraph 12.11 (“Rural Exceptions”), which states that “*Those settlements no longer considered appropriate for infill development as a result of the ‘Green Belt Settlement Review’ are also no longer considered as appropriate locations for the provision of rural exception sites. As such, land adjoining or closely related to the villages of Domewood, Dormans Park,*

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Limpsfield Chart, Nutfield and Tandridge will not be released for the provision of limited affordable housing to meet local needs under Core Strategy policy CSP5’.

Ground 2 - Inappropriate development in the Green Belt - As the applicant’s own Planning Statement acknowledges its proposals are inappropriate development in the Green Belt (paragraph 8.2.2, planning portal document 24708965).

These proposals do not fall within one of the listed exceptions in paragraph 145 of the National Planning Policy Framework (NPPF) or paragraph 146 which states that certain other forms of development are also not inappropriate. This proposal is also contrary to policies DP10 and D13, both of which are in conformity with the NPPF.

In addition, paragraph 12.8 of DP12 states that “*All other villages located in the Green Belt, including those previously defined as ‘Green Belt Settlements’ that are not listed, are not considered sustainable locations for even limited development. These villages will therefore no longer be suitable for infilling (or redevelopment) and general Green Belt policy will apply*”. Nutfield is not one of the listed settlements and as such this policy restriction applies.

Under the NPPF there is a further exemption from these restrictions if “very special circumstances” exist. The Parish Council will address this matter in Ground 12 of this response.

Ground 3 - Openness - The proposed development is situated on land which is open countryside.

This proposed development would not only cause substantial harm to the openness of the Green Belt at this location by reason of its encroachment into open countryside, but consideration also needs to be given to its impact on the Surrey Hills Area of Outstanding Natural Beauty (AONB).

Although this location is currently outside this AONB, on 24 June 2021 Natural England announced that it will be giving consideration to the AONB’s request for its boundaries to be extended. In 2013 the AONB completed a comprehensive landscape character assessment to establish whether land currently designated as an Area of Great Landscape Value (AGLV) should be included within its boundaries. This identified a number of existing AGLVs which met the criteria for inclusion in an AONB.

Although the list of candidate areas for inclusion is not in the public domain, the Parish Council understands that Tandridge DC has access to this information. If either or both of the existing AGLVs that are close to this location are candidates for inclusion, then clearly this must be taken into account in assessing this outline application.

Ground 4 – Impact upon the character and appearance of the surrounding area - The proposals do not reflect nor respect the open rural character of the site and the surrounding area.

This location has a rural character with the homes in adjacent Nutfield having the character of a compact linear village when viewed from the A25. The housing and commercial buildings on the northern side of the A25 back onto woodland which effectively shields views of them from the northern escarpment of the Lower Greensand ridge upon which the village is situated. Merely building at this location would result in a significant change to this escarpment’s character and appearance.

East of Cormongers Lane through to the bridge over the M23 there are no buildings which are visible on this northern escarpment from the North Downs, Merstham, Mercers Country Park and those travelling on Cormongers Lane or Nutfield Marsh Road. Even Nutfield Cemetery is screened by woodland.

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By contrast and with the exception of “Church Meadow”, all of the built form is located at the top of this escarpment (Illustrative Layout planning portal document 24709718). So, not only would this development result in encroachment of built form onto open land, it would also would cause harm to the open landscape character of this escarpment.

In the Parish Council’s opinion this proposal would also introduce an urban form of development and layout which would be alien to the open and rural character of the site and surrounding area. These concerns are set out in Section 2 of this response.

As well as being contrary to policy DP7 since this proposal does not reinforce local distinctiveness and landscape character, the NPPF makes it clear that development should add to the overall quality of the area, be visually attractive, sympathetic to local character including the surrounding built environment and landscape setting...” which these proposals clearly do not.

Ground 5 – Adverse impact on the existing landscape - This proposal by reason of its scale and layout would result in an unacceptable encroachment of the built form into currently open and unmaintained countryside.

Although the northern escarpment does not have a national designation, in the Parish Council’s opinion it does have its own distinctive character and contributes positively to the AGLVs to the east of the site and directly opposite the western end of the site on the south side of the A25.

The proposed buildings accessed from the A25 and in particular the health facilities will be very prominent due to their bulk, and all or most of the entire development and would be very visible from the North Downs, to people looking southwards from Merstham, and to a somewhat lesser extent from the A25.

In conclusion these proposals would adversely affect the rural nature of this location and detract from its existing character, and as a consequence cause significant harm to the Green Belt contrary to policies CSP18, CSP21 and DP7 as well as the NPPF.

Ground 6 – Impact on the amenities of neighbouring residents - Aside from the lengthy construction period when there will clearly be significant adverse impacts for Nutfield residents, there will also be permanent adverse impacts upon those residents whose properties directly abut or overlook the boundaries of this site.

Nutfield residents already suffer noise, dust and air pollution from the HGVs using the A25 to access the Patterson Court Landfill site. During the construction period aside from the normal noise, dust and traffic movements, this proposal not only seeks to import inert materials from another site, but to also undertake “crushing and screening” of these materials. The Parish Council finds it unacceptable that residents should suffer at least 28 months of 94 movements per day (47 in and 47 out) of HGVs delivering these materials (paragraph 5.9.4 of the Planning Statement), and the impact of the onsite “crushing and screening” process.

The Parish Council also has two concerns regarding this aspect of the development proposal:

- The lack of clarity regarding the implications of importing inert materials on the biodiversity, ecology and topography of the land contrary to CSP18 which among other matters states that “Development must also have regard to the topography of the site....”

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- With regard to the “crushing and screening” of the imported materials the Parish Council is concerned about the nuisance and health implications for Nutfield residents in terms of noise and air pollution.

As the proposed layout is one of the two matters for approval in this application, the Parish Council concerns in relation to the permanent impact of this proposal on existing residents are set out in Section 2 of this response. Nevertheless, these should also be taken into account in assessing the overall principle of development at this location.

Ground 7 - Unsustainable location – Due to the need to travel to access key services and facilities and the limited public transport options, staff and visitors to the health and community facilities, including the Activity Park, and residents and their visitors would be primarily reliant on the use of private vehicles to meet the majority of their day-to-day requirements as set out below:

7.1 Health and community facilities and homes accessed from the A25

- Lack of day-to-day services within Nutfield village – With construction of the Wellbeing Centre not scheduled until 2024 – 2025 at the earliest (ES9.3 Construction Traffic Management Plan Framework, paragraph 4.4, planning portal document 24711036), it will be several years before either Nutfield’s existing, or new residents have access to the proposed new facilities and amenities. In addition, there is little information available on what services will be available within the proposed Community Shop and who will manage it.

In the meantime, the nearest shop selling fresh food is the Farm Shop at Priory Farm on Sandy Lane located 0.6 miles from the proposed roundabout and 0.5 miles from the beginning of the site’s proposed emergency access route in Park Wood. However, the issue for Nutfield residents is that there is no pavement or pedestrian refuge on Sandy Lane. Although it is only a 0.3 mile walk on this Lane, it is unsuitable for families or for carrying back shopping. While the Farm Shop opens for the normal hours, Holborn’s located in South Nutfield and some 0.8 miles from the proposed roundabout and the same distance from the proposed emergency access route in Park Wood, has longer opening hours, with the exception of the Post Office located within this shop. While there is a lit paved footpath from the junction with Sandy Lane the return journey to this development is quite steeply uphill making it a less attractive walking or cycling option.

- Key Stage 1-6 educational facilities - Nutfield Church Primary School is the only school in the Parish and has a one form entry with admissions to the Foundation Stage (Reception class) and Key Stage 1 (Years 1 and 2) limited to 30 pupils. This is a very popular school, and there is currently no guarantee that children living in the Parish will gain admission.
Given the number of homes proposed, it is unlikely there will be sufficient places available for children from this development to attend this school. From Year 7 all children in the Parish must travel to schools in Redhill, Reigate, Caterham or Oxted.
- Bus Services – Although three bus routes operate on the A25, one of these (Route 315) can be discounted. This route only operates on weekdays, and of its six timetabled services to Redhill, three only run on school days and these depart within 3 minutes of each other, and the last service of the day departs from Nutfield at 13:50. Of the six services returning from Redhill two only operate on school days and the last bus of the day is at 17:15.

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The services on the other two routes (400 and 410) do not provide adequate public transport options for 24/7 health services or meet the existing requirements of Nutfield's residents. Also, there is no evidence to support the applicant's expectation that either of the two bus companies currently operating these routes will divert into the proposed location.

- Route 400 (East Grinstead to Caterham) – This is an hourly service on weekdays and Saturdays, but two hourly on Sundays:
 - Weekday services from Redhill to Nutfield start at 05:52 with the last bus leaving at 18:57. On weekends the service is much reduced with an hourly service on a Saturday (first bus 7:06 and last 18:37), and a two hourly service on Sundays with the first bus at 10:06 and the last at 16:08.
 - Weekday services from Nutfield to Redhill start at 06:51 (school days only) or 07:01 (non-school days) and the last bus is at 19:59. On Saturdays the first bus departs Nutfield at 08:01 and the last at 19:34 and on Sunday 11:17 and 17:18 respectively.
- Route 410 (Redhill to Snow Hill Garden Centre) – This route has is a ½ hourly service on weekdays and hourly service on Saturdays and the currently two hourly service Sundays due to revert to an hourly service from 24 July.
 - Weekday services from Redhill to Nutfield start at 06:50 with the last bus leaving at 20:15. On weekends the service is much reduced with an hourly service on Saturdays and from Sunday 24 July with the first bus at 07:35 and 10:06 respectively and the last at 19:35 and 16:08 respectively.
 - Weekday services from Nutfield to Redhill start at 06:38 and the last bus is at 19:57. On Saturdays the first bus departs Nutfield at 07:47 and the last at 18:47. On Sunday the first bus departs at 10:47 and the last at 17:17.
- Rail services - There is a station (named Nutfield) located in South Nutfield on the Redhill to Tonbridge line which is 1 mile from both the proposed roundabout and the site's proposed emergency access route in Park Wood. There are no direct services from this station to destinations other than Redhill or the stations to Tonbridge. Outside of the peak hours there is only one train an hour in each direction, and there is very limited car parking available.

7.2 Homes located in Church Meadow - Due to its distance from Nutfield the residents living at this location are likely to look towards Merstham or Redhill to meet their day-to-day services. However, there is no pedestrian footpath or refuge on Nutfield Marsh Road from Church Meadow to Merstham for the first 0.7 miles. Also, the distance to public transport options, nearby schools, shops and community facilities is such that its residents will be entirely dependent upon the use of private vehicles for all day-to-day activities due to the following:

- Lack of day-to-day services - There is a Tesco Express within the Watercolour development (1 mile), a small parade of shops (1.2 miles) with a Co-op Food convenience store together with a pharmacy, Community Hub housing a library on Portland Road (1.5 miles).
- Educational facilities – In Merstham there are two primary schools - Lime Tree is 1.5 miles from Church Meadow and Merstham Primary School 1.6 miles. There is also a secondary school, Merstham Park School, which is 1.7 miles from this location.

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- Bus services – Although several bus routes pass through Merstham on the A23, circular routes 400 and 435 are the only feasible options provided a resident is prepared to walk approximately 0.8 miles to the Watercolour development.

Starting from Merstham both services operate the same route (Merstham, Redhill, Reigate, Woodhatch and East Surrey Hospital, Redhill, Merstham), but in opposite directions. Buses run ½ hourly on weekdays and Saturdays, and hourly on Sundays and Bank Holidays.

- Route 430 - Redhill to Watercolour – on weekdays the first bus is 06:49 and the last 22:47. On Saturdays the first bus is 06:56 and the last 22:47, and on Sundays and Bank Holidays 8:29 and 21:47.
 - Route 435 - Watercolour to Redhill - on weekdays the first bus is 06:17 and the last 22:38. On Saturdays the first bus is 06:13 and the last 22:38, and on Sundays and Bank Holidays 09:15 and 21:38.
- Rail services - Merstham rail station is 1.7 miles with direct services to London and all stations southbound on the Brighton and the south coast line via Horsham.

In conclusion while the Parish Council accepts that the proposal development would make an economic contribution and to a lesser extent a social one, the reliance upon private vehicles severely undermines any argument that this proposal would amount to sustainable development. As such, the proposed development would constitute unsustainable development contrary to the provisions of planning policies CSP1 and DP1.

Ground 8 Increased traffic on A25 - The applicant's assessment of the likely number of vehicular movements generated by this proposal is fatally flawed.

The Parish Council fully endorses the detailed reasons set out in Sections 4, 5 and 6 of the response submitted by Emily Gay, a Senior Transport Modeller (planning portal document – 24726971) As Surrey Highways is asking for additional time to respond to this application, Emily has kindly given the Parish Council permission to use her information in this response.

The applicant's assessment of the traffic impacts is flawed for the following reasons:

- This is clearly a car dependent location - Overall this proposal makes provision for 679 car parking spaces (135 for the rehabilitation and care home, 140 for the Wellbeing and Activity Park and 404 for the residential housing). The Parish Council shares Emily's concerns about how the applicant's consultants have undertaken the modelling of the likely additional traffic that that will be generated by this proposal.
- The under-recording of current traffic on the A25 - The applicant's traffic data surveys were undertaken in September 2020 which is obviously not representative of pre-Covid 19 traffic levels on this road as published government data clearly shows. Also given the uncertainty around likely traffic levels as life returns to a "new normal" in a post Covid 19 UK, any new surveys would also be inconclusive.
- Failure to consider the current congestion on the A25 – There are several pinch points as the A25 with the road narrowing to such an extent that HGVs are unable to pass each other at these locations. In addition, there are two road junctions (with Mid Street at the western end of the village and the junction with Coopers Hill Road and Church Hill at the eastern) which are particularly busy at morning and evening peak times. As a consequence, traffic normally has to travel well below the 30mph speed limit

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causing queues which are exacerbated whenever there are delays or worse still closures on either the M23 or M25.

Ground 9 Adverse impact on air quality - The applicant's assessment of this proposal on air quality is compromised.

Emily Gay has pointed out there are a number of shortcomings in the applicant's Traffic Air Quality Assessment, all of which the Parish Council endorses. In particular, they are concerned about the following:

- The applicant's air quality assessment significantly under-estimates the number of vehicular movements and the resulting increased congestion that this proposal will generate.
- Nutfield's residents already have concerns about NO₂ concentrations on the A25 (High Street) as it passes through the village. The Parish Council notes that there appears to be a significant discrepancy between the NO₂ Annual Mean Concentration readings collected by Tandridge DC and those used in the applicant's assessment (Table 2, paragraph 7.3 planning portal document 24729671).

As the pollutant concentrations within the Godstone and Redhill Air Quality Management Area already exceed guidelines, this proposal would seem to be contrary to Part H of Tandridge DC's Policy DP22, Minimising Contamination, Hazards & Pollution. Part H deals with Air Pollution and states that development will not be permitted if it would "1. Have an adverse impact on health, the natural or built environment or amenity of existing or proposed uses by virtue of odour, dust and/or other forms of air pollution".

Ground 10 Adverse impact on ecology - This proposal reduces the area of existing natural habitat by 25% and significantly increases both the level of and range of human activities, so adversely impacting on the biodiversity of this site.

Currently and historically since its restoration this land is and has been largely unmaintained with relatively limited footfall. The applicant's own ecological surveys identify its importance for a wide variety of species, including amphibians, grass snakes, breeding birds, bats and invertebrates.

The extensive and lengthy construction works over at least five years will clearly have an adverse impact upon the biodiversity of the area, particularly the groundworks which will remove much of the existing vegetation. While the applicant intends to undertake habitat replacement and enhancement, in the short to medium term there will clearly be adverse effects, and there can be no guarantee of biodiversity gains in the long term as claimed by the applicant.

Not only will the lengthy construction period have an adverse impact, but even more importantly this proposal will significantly increase the footfall across the site, introduce cycling and running routes and other activities across the entire site, all of which will encourage greater use of the reduced habitat for recreational purposes.

The Parish Council is also concerned that the applicant has failed to consider the adverse long-term impacts of vehicular traffic on this location's current biodiversity. The Parish Council is particularly concerned about the high level of predicted car ownership in the southern residential areas which is in excess of the average within Tandridge DC. As a result, this will increase the carbon dioxide, nitrogen oxides and particulate matter emissions, and consequently negatively impact on the location's biodiversity.

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In the Parish Council's opinion the applicant's ecology studies have failed to take sufficient account of the increased adverse impact of human activity at this location. As such the applicant has failed to demonstrate that the existing biodiversity will not be harmed by this development contrary to policies CSP17 and DP19.

Ground 11 – Increased flood risk - There is no robust assessment of the impact of severely reducing the significant areas of woodland and replacing these with large expanses of hard landscaping on the low-lying areas at the foot of the escarpment, namely Nutfield Marsh, Mercers Country Park, the residential development of Watercolour, and potentially homes in South Merstham.

As well as having environmental and social benefits woodland plays a role in flood risk alleviation and management. The Parish Council fully endorses the representations made by the Watercolour Residents Association and other respondents regarding the role that trees play in reducing surface water run-off. In addition, the Parish Council is concerned about the potential for soil erosion, the loss of nutrients which would otherwise be absorbed by the woodland, and the damage that this will cause to the watercourses on the northern escarpment and on the flood plain with its sensitive habitats.

Clearly it is critical in assessing this application that a thorough assessment of potential flood risk is available. The Parish Council notes that Surrey CC has criticised the validity of the applicant's "desk based hydrogeological and hydrological assessment".

Ground 12 - No "very special circumstances" exist – On balance the benefits arising from this proposal do not justify the loss of Green Belt land and the substantial harm arising from this proposal.

The Parish Council accepts that this proposal will deliver economic and social benefits not only to Tandridge DC, but also more widely to east Surrey. In particular, as Tandridge DC currently cannot demonstrate a five-year supply of housing land, the new homes would represent a significant contribution to its supply.

With regard to the proposed health and extra care facilities the Parish Council is concerned that there are no statements supporting the need for a new GP surgery, pharmacy and community diagnostic hub from the appropriate commissioning bodies or from Surrey CC regarding the appropriateness of constructing 100 extra care units at this location. Whether or not on balance these benefits outweigh the planning harms that this proposal will create is obviously a matter of judgement.

The Parish Council's view is that this proposal is unacceptable and contrary to local and national planning policies due to the loss of Green Belt land, the lack of appropriate additional social infrastructure for the proposed number of homes, the reliance on the use of private vehicles for residents, staff and visitors, the adverse impact on the amenities for existing Nutfield residents and the other identified harms to the open countryside, existing landscape, rural character, and the proposed extension to the Surrey Hills AONB. As such in its opinion the benefits fail to clearly outweigh the identified harms, even if the layout changes recommended by Surrey CC's Historic Buildings Officer are taken into account. Without a judgement that "very special circumstances" exist, this proposal is clearly contrary to local and national planning policies.

Section 2 - Matters for approval

This outline application seeks approval on two planning matters "Means of access" and "Layout". Set out below are the Parish Council's concerns in respect of both of these.

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2.1 Means of access - Two points of access are proposed, and the Parish Council has reviewed each separately.

2.1.1 From the A25 - The Parish Council has the following concerns:

- **Assessment of the impact of additional traffic on the A25** – The applicant’s assessment of the amount of vehicle movements to and from the proposed development and the resulting impact upon neighbouring properties is seriously flawed.

This assessment is based upon the assumption that this proposal is “sustainable development” due to its good link to public transport, shops, community facilities and employment opportunities (page 10, Non Technical Summary, planning portal document 24708958). As set out in Ground 7 of this letter, this is clearly not the case.

The Parish Council’s view is that a range of scenarios need to be developed to properly assess the vehicle movement likely to be generated by this proposal. These scenarios should be based upon the fact that it is almost wholly private vehicle reliant. These scenarios should also take account of the impact of 24/7 working in the two community health facilities where journeys will be made outside of peak times, and the estimated number of visitors to the health facilities and the Activity Park, many of which will also be outside peak hours.

- **Increased traffic noise for occupiers of homes located both west and east of the proposed new roundabout** – In addition to increased traffic noise generally due to the number of vehicle movements arising from this development, those living in Parkwood Road whose rear gardens face west and those homes west and east of the roundabout facing onto the A25 will be particularly affected.

The proposed roundabout will mean that vehicles travelling on the A25 will either need to slow down or brake and accelerate on exiting the roundabout with HGVs being particularly noisy when doing both. The level of noise will be exacerbated for vehicles travelling east (towards Bletchingley) as on exiting the roundabout they will need to accelerate as they travel uphill into Nutfield.

2.1.2 From Nutfield Marsh Road – The Parish Council has been unable to locate any evidence that this access has been discussed with Surrey Highways ahead of submitting this application.

Based upon document PS4.4 labelled “Preliminary” (planning portal document 24708996) the Parish Council has the following concerns:

- Its closeness to the junction currently serving the “Inn on the Pond” and its neighbouring properties.
- The sightlines for traffic exiting to see vehicles travelling towards Merstham due to its closeness to the exit from a long-left hand bend on this road;
- The reliance on the Highways Authority cutting back hedging on a regular basis to maintain sightlines; and
- A spur on the access road shown on the illustrative masterplan as highlighted below - The Parish Council is concerned that at some future date the land hatched in yellow surrounding Church Meadow will be the subject of a planning application using this access road for additional housing.

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- Access for construction traffic - Appendix E of the Construction Traffic Management Plan Framework (planning portal document 24711036) assumes that Church Hill and Nutfield Marsh Road will be used by construction traffic to access this site. In the Parish Council's opinion due to the narrowness of Church Hill at its junction with the A25, the lack of splays at this intersection and residents parking on this road, this route is not suitable for such traffic. In particular, HGV construction traffic will be unable to turn left into this road when travelling eastwards along the A25 without pulling out into the westwards carriageway.

Due to the width restriction on Nutfield Road the only other possible access road is Cormongers Lane, but this unsuitable for HGVs after the entrance to the Patterson Court Infill Site.

In respect of this matter the Parish Council believes that permission should not be granted for either of the two access roads. In the case of Church Meadow approval should be refused as building at this location would be unsustainable and also cause substantial harm to the hamlet of Nutfield Marsh. In respect of the access from the A25 permission should be refused, as no proper assessment has been made of the impact of increased private vehicle movements into and from this location or the commercial vehicles supplying and supporting the operation of the health and community facilities.

2.2 Layout

The Parish Council is surprised that this outline application seeks approval for the layout of the proposed development given the very limited information available, as the key document is labelled an "Illustrative Masterplan". In the Parish Council's opinion there is insufficient information to adequately assess the full implications of the proposed layout, particularly around its likely impacts for the existing residents of Nutfield and Nutfield Marsh.

Nevertheless, based upon this limited information the Parish Council's view is that the proposed layout would effectively introduce an urban form of development alien to the open and rural character of the site, its surrounding area and the village of Nutfield contrary to policy DP7. Furthermore, the proposed layout does not integrate effectively with the location's surroundings, reinforce local distinctiveness and local

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landscape character or with the existing village of Nutfield.

In reviewing the layout, the Parish Council has considered the proposed Church Meadow homes separately from those adjoining the existing village of Nutfield.

2.2.1 Church Meadow, Nutfield Marsh - Building any homes at this location would fundamentally change the Marsh's character which the proposed layout fails to recognise, and consequently would have the following adverse impacts:

- The loss of its distinctive and very special character - Described by Sir Nikolas Pevsner (acknowledged as one of the most learned and eminent architectural historians) as "a genuine hamlet" (the Buildings of England, Surrey), it has remained almost unchanged since the 17th century.

This assessment has been endorsed by Surrey CC's Historic Buildings Officer. In his response to this application (planning portal 24726629) he concludes that the proposed development at Church Meadow would lead to the "Loss of key characteristics which make up the hamlet including views of the countryside, tranquillity and the rural approaches".

- Impact on its historic homes - Pevsner specifically comments on two buildings: Leather Bottle Cottage (Grade II Listed) described as a "good, unrestored 17th century house"; which has subsequently been dendrodated to 1549/50 and Peyton's Cottages built circa 19th century with its "stepped roof-line" described as "a first-rate piece of architectural subtlety".

Surrey CC's Historic Buildings Officer focuses on the three medieval buildings in close proximity to this proposed development: Leather Bottle Cottage, located on the eastern side of Nutfield Marsh Road almost directly opposite the proposed access to Church Meadow; Charnan Cottage (Grade II listed) dendrodated to 1556/59 and "The Inn on the Pond" (Listed Grade II) built in the early 17th century. In addition to these there is an unlisted property Canal Cottage built in 1713 in close proximity to this proposed development.

The Parish Council fully endorses the response from and shares the view of Surrey CC's Historic Buildings Officer that "...I do not see how the scope of development at Church Meadow can be carried out without fundamentally harming the character of the Nutfield Marsh hamlet and as a result the setting of the [above] three listed buildings. My preference would be to see this element removed from the development entirely".

- The layout supports a scale of development at this location which is inappropriate given the lack of access to amenities and facilities required for day to day living.

2.2.2 Homes adjacent to existing properties in Nutfield village - The Parish Council has the following concerns regarding the proposed layout.

- It supports a scale of development that is excessive and inappropriate for this location - This proposal represents a 116% increase in the amount of accommodation and businesses in the Nutfield village and Nutfield Marsh (estimated to be circa 350) with very limited additional community infrastructure.
- It allows for a housing density which is inappropriate for this location – While there is a range of densities across the site clearly a density of 51 persons per hectare in "Streeters Meadow" is inappropriate in a rural community, and to lesser extent 38 persons per hectare in "Downs View" (PS4.1, planning portal

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document 24708988).

- It does not reflect Nutfield village's local character - With the majority of the proposed homes seemingly located off a single road (Nutfield Park Avenue) in three cul-de-sacs, this proposal is significantly different from the linear character of the existing village. This contrasts significantly from the approach taken when an extension to South Nutfield was built on a former industrial site in the 1980s. This settlement has a similar linear character, so the approach taken was to build the vast majority of houses fronting the single access road (Kings Mead) with an occasional cu-de-sac. Each of these cul-de-sacs contain very few homes.
- There is no evidence that the proposed layout meets any of the relevant national standards, such as the "National Model Design Guide" (January 2021). In particular, the Parish Council is particularly concerned that Nutfield Park Avenue does not appear to be overlooked from the frontage by the homes with the possible exception of Streeters Meadow. In the Parish Council's view, it will make this an unattractive road for pedestrians and cyclists to walk or ride along at any time and in particular, during the hours of darkness given the significant areas of open land between the three cul-de-sacs.
- It fails to take any account of the impact upon existing residents - Both the exit road from the A25 and the road giving access to the residential areas are located in close proximity to the rear gardens of existing homes where there is no screening:
 - The exit road from the A25 appears to be just over 50 metres from the rear boundary of the homes in Park Wood Road whose gardens face west.
 - The single road (Nutfield Park Avenue) giving access to the housing is also less than 50 metres from the north facing rear gardens of the homes in Blacklands Meadow.
- The gardens of the homes within the western area of "Streeters Meadow" appear to directly abut those of Blacklands Meadow and Park Wood leaving no separation.
- The Parish Council also endorses the views of Surrey CC's Historic Buildings Officer regarding the adverse impact upon St Peter and St Paul Church (Listed Grade II*) of the Church Hill Green cul-de-sac that "*Ultimately the residential appearance of the site will detract from the rural setting of the church*".

2.2.3 Health and Community Facilities

The Parish Council has a general concern regarding the positioning of these facilities. It has been unable to find any substantive information to enable it to assess the possible adverse impacts on the existing or proposed new homes, arising either from the 24/7 operation of the rehabilitation and respite care facility (The Grange) or the extra care apartments (Brookmead Place) and the equipment or plant required in these two buildings.

It also has the following specific concerns:

- Loss of woodland to the east of Pimlico Cottages - It appears from the illustrative masterplan (planning portal document 24709718) that a significant portion of this woodland will be felled to accommodate the car parking for the proposed Wellbeing Centre, possibly the Centre itself and children's play area together with a lesser area for the construction of The Grange, its car parking and staff accommodation.
- Noise, overlooking and other nuisance for the occupiers of Pimlico Cottages - It is difficult to assess the

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full impact of the proposed development of both The Grange and the Wellbeing Centre on these residents. However, with the staff accommodation for The Grange and the car parking for this facility being less than 100m from the eastern boundary of 4 Pimlico Cottages, the car parking for the Wellbeing Centre just over 125m from its rear garden, and the proposed location of a Children's Play Area approximately 225m, there will inevitably be an increase in noise, the likelihood of some degree of overlooking and possibly light pollution affecting these four properties.

- The uncertainty around whether there are any adverse impacts for either the existing homes located on Parkwood Road whose west facing windows and gardens will overlook The Grange or the new homes being built adjacent and opposite to the extra care apartments (Brookmead Place).
- The adverse implications for Nutfield Cemetery of this proposed layout – As the Parish Council is the owner of this facility, it has sent a separate letter detailing its concerns. The relevant section of this letter is set out below:
 - Loss of woodland on its eastern boundary – As set out above, at present there is a well-established bluebell wood adjacent to Pimlico Cottages which extends almost to the Cemetery's northern boundary, as shown below in an extract from the 1971 aerial photograph of the site (planning portal document 24708968).



This woodland enhances the additional tree and shrub planting that has taken place in the Cemetery since the 1970s, and very much contributes to the Cemetery's rural setting.

- Adverse impact upon the Cemetery's tranquillity and peaceful environment - The loss of this woodland buffer and its replacement with buildings and associated infrastructure operating either on a 24/7 basis or 7 days a week will inevitably increase the levels of noise and disturbance within the Cemetery due to their closeness to the Cemetery's eastern boundary. The distance between this infrastructure and the eastern boundary is approximately 75m at the nearest point and little more than 100m at the furthest.

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- No consideration of its current environment or surroundings – This application fails to make any attempt to preserve or harmonise its proposals with the Cemetery’s current setting. As such, it does not show any respect for those buried there or the relatives and friends visiting their graves or memorials.

In respect of this matter the Parish Council has been unable to ascertain whether the proposed layout meets the requirement set out in criteria 6 – 8 of policy DP7 aimed at safeguarding the amenity of neighbouring properties, namely:

“6. Amenity: The proposal does not significantly harm the amenity of neighbouring properties by reason of pollution (noise, air or light), traffic, or other general disturbance;

7. Privacy: The proposal does not significantly harm the amenities and privacy of occupiers of neighbouring properties (including their private amenity space) by reason of overlooking or its overshadowing or overbearing effect. In most circumstances, where habitable rooms of properties would be in direct alignment, a minimum privacy distance of 22 metres will be required. This distance may need to be increased to protect those parts of gardens which immediately adjoin dwellings or where sites are sloping. In most circumstances, a minimum distance of 14 metres will be required between principal windows of existing dwellings and the walls of new buildings without windows;

8. Environment: The proposals provide a satisfactory environment for the occupiers of both the existing and new development”.

In conclusion CSP18 requires that new development within the countryside is of a high standard of design that must reflect and respect the character, setting and local context, including those features that contribute to local distinctiveness. Development must also have regard to the topography of the site, important trees or groups of trees and other important features that need to be retained. Development must not significantly harm the amenities of the occupiers of neighbouring properties by reason of noise, visual intrusion or other adverse effects.

Due to the lack of specific information regarding the detail of the proposed layout of the homes adjacent to the existing village of Nutfield, the Parish Council believes that approval of this matter should not be given as the applicant has failed to demonstrate compliance with the above policy.

Yours sincerely

A handwritten signature in cursive script, appearing to read 'Nicky Chiswick'.

Nicky Chiswick
Clerk and RFO to Nutfield Parish Council