

MO/2020/0185 – Submission by Headley Parish Council (HPC)

Headley Court: Outline planning permission with all matters reserved except for access, for the consideration of the demolition of existing buildings and redevelopment to comprise up to 100 residential units (Use Class C3), landscaping, car parking, access routes and other associated works.

1 Summary

Headley Parish Council (HPC) objects to the above application for the reasons given below. We also wish to take up our right to speak when the item comes before the Development Management Committee.

This section summarises the Parish Council's recommendations. Evidence supporting each of these recommendations is provided in subsequent sections of this document.

Throughout this document we shall refer to the "Elements" of the Headley Court as defined in the Introduction to the applicant's Design & Access statement and to the 5 "zones" of development within the current application site as identified on pages 38-43 of the applicant's Design and Access statement.

1.1 Lack of approved Masterplan

We believe that a fair assessment of this application can only be made in conjunction with the plans for the rest of the Headley Court estate. We believe it should be withdrawn and replaced by an Outline planning application covering the proposed scale of development on both the current application site (Element 3) and Element 2 (the Mansion house area) – effectively a Masterplan for the elements of the estate owned by the applicant.

1.2 Principle of development

HPC does not oppose the principle of limited new housing forming part of the redevelopment of the full Headley Court estate. However we consider that the allocation of such development across the Headley Court estate should be determined by an agreed Masterplan rather than being agreed on a piecemeal basis for each Element within the estate.

1.3 Immediate Access to the public highway

HPC objects to the proposed Access for this number of houses on the grounds that it has not been demonstrated that the increased traffic and inadequate parking could be safely handled at the junction of Headley Road and The Drive. We further recommend that any such permission be withheld until a MasterPlan has been approved covering the proposed Access arrangements for Elements 2 & 3 of the Headley Court estate.

1.4 Highways & Traffic

HPC objects to the application for Access on the grounds that local roads are unable to safely accommodate the likely traffic that the proposed scale of development would generate. We have no confidence that the Transport Plan will lead to an appreciable reduction in the dependency of this development on cars as the primary mode of transport

1.5 Sustainability

The proposed development cannot be considered sustainable on any of the three aspects – environmental, social or economic. HPC therefore objects to the development as it fails to meet the requirements for sustainability in the National Planning Policy Framework (NPPF). We have no

confidence that the proposals in the Transport Plan and Sustainability Assessment will effectively tackle this issue.

1.6 Scale of development

HPC objects to the scale of development and number of houses proposed in this application. It notes that the application exceeds the permissible replacement of existing buildings in the Green Belt and that no Very Special Circumstances have been put forward to justify this inappropriate development.

1.7 Impact on the Green Belt

HPC objects to any housing development in Zones 4 or 5 which would constitute unacceptable loss of open-ness in the Green Belt. We believe new development in Zone 3 should be restricted to the area previously-designated as a Major Developed Site in the Green Belt (MDS) in order to retain the Open-ness of the Green Belt

1.8 Massing and housing density

We understand the Housing Density may be a Reserved Matter as it depends on the layout proposed for the site. **However even at this stage HPC objects to the massing and housing density described in the documents supporting the Application on the grounds that it conflicts with the character of the area.**

1.9 Urbanisation

HPC objects to any proposal which brings increased urbanisation which is out of character with the local area as described in the Landscape SPD. We are looking for a detailed application which minimises this. We believe that increasing adoption of urban highway design features is inappropriate as a means of trying to resolve Highways safety issues. Indeed we would prefer to see proposals which remove many of the urban features historically introduced to support the Defence Medical Rehabilitation Centre (DMRC) and restore this part of Headley to the rural character enjoyed by the rest of the village.

1.10 Affordable housing

HPC believes that the Affordable Housing obligation associated with development of the Headley Court site should be delivered in the first instance via a financial contribution to enable the delivery of a Rural Exception site on a more sustainable location in the village and that any surplus should be used to provide affordable housing in a more sustainable location elsewhere in Mole Valley.

1.11 Ecology

The Parish Council would prefer a housing development which minuses external lighting and would welcome the reinstatement of the wildlife corridor between Hambleton Wood and Tyrrells Wood.

2 Introductory comments

Whilst we recognise that a portion of this site lies outside our Parish boundary, for the purposes of this document we are treating the entire site as though it lies within our Parish.

2.1 Local engagement

The Parish Council has undertaken its own engagement with the local community to understand their views on the application and to encourage residents to submit their own comments on this.

- In September 2019, we invited the Development Management Manager of MVDC to explain the key planning policies affecting the site and how best residents could make their views known;
- We have helped publicise the applicant's own Open Days to ensure residents could be aware of the proposals and make comments at an early stage;
- In Autumn 2019 we organised a questionnaire for residents to tell us their views on Angle Property's proposals for the estate;
- Following the second of these Open Days, the Parish Council wrote to the applicant outlining our views on a number of issues raised;
- In February 2020 we delivered a newsletter to all properties in Headley informing residents about the application and our plans for consultation;
- On 26th February 2020 we organised a 5-hour drop-in session for residents to share their views on the application with Parish Councillors; these comments have informed this submission;
- On 9th March, we held a special Parish Council meeting at which members of the public were able to comment on our draft submission before it was agreed by the Council.

Our submission reflects the balance of views we received through this process.

2.2 Lack of approved Masterplan

Whilst the Local Planning Authority (LPA) is obliged to consider each application on its own merits, we believe that the lack of a formally agreed Masterplan for the development of the overall Headley Court site poses particular challenges in assessing the impact of this application.

We note that the applicant's Transport Assessment recognises this dependency by including traffic estimates from their currently proposed Element 2 development in their model. We are concerned that these proposals are currently informal.

The key to a sustainable redevelopment of the Headley Court estate is securing a viable future use of Element 2 which enables the maintenance of the heritage assets, ie the listed buildings and the important gardens. Without a definitive commitment to the scale of the development necessary on Element 2, it is impossible to assess the impact of the current application fairly. The scale of proposed development on Element 2 could affect:

- Whether the scale of a viable development on Element 2 would only be justified by using some of the building volume from buildings replaced from Element 3;
- Whether the traffic volumes generated by the overall site are acceptable;
- Whether the access points for Elements 2 & 3 are compatible.

Specifically we are concerned that, once approval has been granted for this application, the owner may discover that the viability of Element 2 demands a greater scale of development than their current plans indicate. They may then present the requirement for a viable plan as Very Special Circumstances that outweigh what would be an unacceptable impact on traffic or inappropriate development in the Green Belt.

We believe that a fair assessment of this application can only be made in conjunction with the plans for the rest of the Headley Court estate. We believe it should be withdrawn and replaced by an Outline planning application covering the proposed scale of development on both the current application site (Element 3) and the Element 2 – effectively a Masterplan for the elements of the estate owned by the applicant.

2.3 Replacement of buildings previously granted Personal permission

The applicant's calculations of allowable replacement buildings rely on the legal guidance they paid for which argues that buildings granted Personal permission solely to the Minister of Defence should be counted as permanent buildings which can be replaced without reducing the open-ness of the Green Belt.

We reject this argument for several reasons which are detailed in Appendix A; the key reasons are:

- We believe that this interpretation contradicts the intentions of the LPA Officers and Councillors in setting the unusual Personal permissions;
- HPC was told during the pre-closure period that the MoD would remove all such buildings (apart from the Help for Heroes gym) before it left the site;
- We maintain that the legal advice is unsound.

The correct interpretation of this issue directly affects the current application since the Mallard Building on Element 3 is subject to a personal permission. It also significantly reduces the replaceable building space on Element 2; so the applicant might need to rely on allocating some of the allowable space from Element 3 to support a viable proposal on Element 2.

In our view, it would be unsafe to approve the current application until this issue has been clearly determined.

2.4 Previous use of the site

In considering what constitutes appropriate development on this site, some consideration needs to be given to the very exceptional conditions under which many of the buildings currently on site were erected.

Initially many buildings were constructed by the Ministry of Defence (MoD) without needing planning permission from the LPA. Since the LPA has been involved, the nationally unique role of the Defence Medical Rehabilitation Centre (DMRC) provided uniquely Very Special Circumstances which were used to justify development that we believe would not have been approved for any other applicant. On one occasion this involved a special briefing which had to be kept confidential on grounds of national security. This explains the unusual granting of many permissions which were either temporary or Personal to the Minister of Defence.

For example:

- application MO/2010/0211 allowed an open courtyard to be infilled by a new block; this design and proximity of building would not have been acceptable other than under such Very Special Circumstances; we believe such a design would have been rejected for any other applicant;
- applications MO/2012/0075 & 1318 formalised the car-park at the Northern end of the site even though it was outside the boundaries of the MDS
- when applications MO/2011/1180 & 2012/0617 (on Element 2) were considered, the site was accepted as the only area on the estate where the essential new buildings could be erected without irreparable damage.

These Very Special, indeed nationally unique, Circumstances ceased to apply once the MoD stopped using Headley Court as a rehabilitation centre.

We believe that this factor should be borne in mind in any on-balance judgements about this application.

3 Evidence supporting HPC's recommendations

This section provides additional evidence to support the issues raised in the summary of our submission.

3.1 Principle of development

HPC acknowledges the MDS status of parts of the Headley Court site, before the NPPF removed the recognition of this designation. Following the cessation of its previous use, we accept that the Headley Court site needs to find a new purpose and **we do not oppose the principle of limited new housing forming part of that redevelopment. However we consider that the allocation of such development across the Headley Court estate should be determined by an agreed Masterplan rather than being agreed on a piecemeal basis for each Element within the estate.**

3.2 Access to the public highway

HPC has met with Surrey Highways to express our concerns about the impact of the proposed development on the immediate point of access to the public highway and the traffic it will generate on local highways. We hope that their report will reflect these discussions.

Since The Drive is a private road, the Highways Authority is primarily assessing the impact of access onto Headley Road at its junction with The Drive (the Northern mini-roundabout). This junction is therefore crucial to any permission regarding Access to the Application site. The next section will look at impact elsewhere on the highway network.

3.2.1 Validity of traffic modelling work

- We have identified a number of faulty assumptions in the applicant's Traffic Assessment (See Appendix B) which undermine the conclusion that the application will generate no increase in traffic over the use of the site as DMRC.
- We believe that the proposals across the Headley Court site will significantly increase local traffic.
- Without these errors being corrected there is no evidence that the proposed access can safely accommodate the likely traffic.

3.2.2 Existing issues at this junction

The main problem experienced at this junction historically has been a failure to respect the rights of way for traffic entering or leaving The Drive:

- When exiting The Drive, drivers have to look right (to give way to traffic heading Northbound on Headley Road), but also look left because traffic heading Southbound (ie coming from the A24) often fails to give priority, especially as their visibility is restricted by the hedges along both roads;
- When approaching from the A24, wishing to turn right into The Drive, extra caution is needed because many vehicles heading Northbound accelerate after the traffic calming humps and zebra crossing and are not prepared to give way.

The number of accidents at this junction has been pretty low because the users are mainly local people with knowledge of the area; this may well change with more visitors and delivery vehicles using The Drive to access 100 new houses.

3.2.3 Parking provision

We believe the provision of 2 parking spaces per house, plus 10 visitor spaces, is inadequate. 40% of the proposed houses are 4-bedroomed, for which Surrey's parking standards suggest **a minimum of 2** spaces. If only half of these actually have 3 cars then the proposed visitor spaces are used up twice over.

So, what will happen to this overspill parking? The Drive is a private road and we understand that the owners will not permit parking on it and will take active steps (in terms of clamping, etc.) to prevent this. So any overflow parking will be forced onto Headley Road where it will undoubtedly create a major safety hazard.

We also have concerns about the adequacy of the parking provision proposed for Element 2. If this also creates overflow, that too will end up on Headley Road. We note that the applicants are proposing the removal of two car-parks serving the site and not replacing those with sufficient on-street parking,

3.2.4 Safety of horse-riders

The Drive is designated as a bridleway, which continues across the Tyrrells Wood Golf Course to Mill Way and on to Stane Street. The only way to access this section of bridleway is from the mini-roundabout on Headley Road. We propose elsewhere that footpath 513 (South of Zone 2) be upgraded to a bridleway to provide a safer route for horse-riders to reach The Drive. Without this alleviation, the safety of horses and their riders will be put at risk by a significant increase in traffic using the junction.

3.2.5 Proximity to Ambulance Gate

We understand that the applicant intends for the main entrance to Element 2 to be at the "Ambulance Gate" a short distance North of this junction; taken together with the entrance from The Drive on Headley Road, this will create two significant junctions on Headley Road within 100 yards. This has not been included in any of the traffic modelling work we have seen.

We believe it would be unsafe to approve a significant increase in traffic accessing Headley Road without this additional junction being considered. This is another issue that could be resolved by the approval of the Masterplan for the whole site.

HPC objects to the proposed Access for this number of houses on the grounds that it has not been demonstrated that the increased traffic and inadequate parking could be safely handled at the junction of Headley Road and The Drive. We further recommend that any such permission be withheld until a MasterPlan has been approved covering the proposed Access arrangements for Elements 2 & 3 of the Headley Court estate.

3.3 Highways & Traffic

We have summarised our major concerns below. As mentioned above, these have been raised with Surrey Highways; until we see their Report we cannot know to what extent they address our concerns.

3.3.1 Validity of traffic modelling work

- The issues identified in the previous section apply also to this section.

3.3.2 Direction of peak flow

- When DMRC was operational the primary peak flow was inwards during the morning rush-hour, ie in the opposite direction to the main residential traffic heading towards the A24. As a residential site, the primary peak flow would be outwards in the morning rush-hour, in the same direction as the main traffic flow.
- The proposal (and other changes at Headley Court) will increase the volumes of out-going traffic during the morning rush-hour (especially at the A24 junction)

3.3.3 Impact of Headley Hoppa

- The application's Transport Plan depends critically on the proposed "Headley Hoppa" service. As this is only guaranteed for five years, any claims as to its effectiveness in reducing traffic are invalid in the medium term.
- We are not aware of such schemes in similar locations elsewhere which have significantly reduced traffic levels.
- The proposed route for the Headley Hoppa is very limited, so it is unlikely to provide an attractive service for residents wanting to travel to places other than Leatherhead. For example many residents may wish to go to the wider range of shops in Epsom town centre.
- Experience with the existing bus service suggests that once residents have accepted the need for two or more cars per typical household, they will tend to use those vehicles for their dependability and convenience rather than a public transport option. This is the Catch-22 which makes it expensive to provide public transport in such unsustainable locations.
- We conclude that the Headley Hoppa will at best reduce traffic by an insignificant amount;
- We also note that, if it should be successful, the Headley Hoppa service will increase the number of movements of larger vehicles on the narrow lanes.

3.3.4 Nature and capacity of local roads

- The "narrow lanes" in Headley are specifically recognised in the Landscape SPD as part of the character of the area. Most residents who have responded to our consultations would prefer to retain this character.
- All of the roads through Headley are designated as Unsuitable for Heavy Goods Vehicles. On each road there are significant pinch-points where vehicles have to slow down to pass. Car drivers frequently have to stop or slow to walking pace to pass an HGV or the bus and to slow down when they approach an oncoming van or a car pulling a trailer. In February 2020 one of

the local roads (Tot Hill) was blocked for over an hour when an HGV met the oncoming bus. Delays for 20-30 minutes are not uncommon in the village simply to unblock traffic going in opposite directions.

- The application will generate a significant number of van movements – for delivery vans and the Headley Hoppa - which increase the occurrence of vans meeting head-on, aggravating the problems associated with the narrow lanes.
- The village is on the “rat-run” created by Sat Nav systems whenever the M25 is blocked; to the extent that cars use the detour, this largely affects the capacity of the key junctions; however once HGVs use the detour, major jams can arise at pinch-points along the lanes.

3.3.5 Safety of other road users

- The narrowness of the roads around Headley and the lack of pavements force most pedestrians to use the network of footpaths and bridleways. However increased traffic, especially those unfamiliar with the area such as delivery drivers, will pose increased risks for any pedestrians that have to walk along the roads.
- The British Horse Society has identified the area as very heavily used by equestrians in view of the large number of horses stabled in Headley and the immediate surrounding area. As a result many horse-riders rely on the network of bridleways and, in various places, riders have to use the road to connect between bridleways. Specifically the stretch of Headley Road between the two mini-roundabouts is the only route to reach Bridleway 512 (The Drive).
- The roads are also widely used by cyclists especially many of those cycling for exercise who come to ride up the Box Hill Zig-zag and then use roads through Headley to descend (often at speed). Many of these do not know the local roads well and are at risk from traffic emerging from drives and road junctions. One of the worst recent cyclist accidents was caused by a car emerging from Lee Green Lane onto Tilley Lane and not seeing an approaching cyclist who had right of way.

3.3.6 A24 junction

- The greatest safety concerns relate to the A24 junction especially in the morning rush-hour when the bulk of vehicles using Headley Road wish to turn right towards Leatherhead and the M25 junctions. The Traffic Assessment acknowledges that this junction is already operating at capacity and it is clear that 164 dwellings on Elements 1 & 3 would substantially increase this traffic flow.
- Appendix C describes the specific problems associated with the junction and why the associated risks increase once capacity is reached.
- HPC believes that it is unsafe to introduce additional rush-hour traffic to this junction without a significant re-design of the junction.

3.3.7 Other junctions

- The junction at the top of Pebble Hill requires a similar risky manoeuvre to the A24 junction – see Appendix C for details. In this case the risks are increased by poorer visibility, especially of traffic coming up the hill and less available road space. Whilst it is further from the application site and likely to receive less additional traffic as a direct result of this application, HPC is concerned at the knock-on effect on this junction. HPC has campaigned for changes to improve safety at this junction.

- We note the applicant's proposal to relieve the pinch-point near the Lee Green Lane mini-roundabout; in principle we welcome this proposal but would need to see further details in order to assess the impact on the Heritage Asset and the nearby trees.
- The current layout of the Lee Green Lane mini-roundabout causes problems due in part to the slightly-staggered junction of the lane leading to the properties around Court Farm; this can lead to confusion over who has right of way. The removal of the pinch-point might improve things somewhat with better visibility of traffic approaching the junction from Headley Lane. However the doming of this mini-roundabout would introduce significant problems for longer vehicles, especially the bus, given the limited space around the junction.
- For the other junctions close to the application site, we agree with the Traffic Assessment's conclusion that junction capacity is not a major concern; however most of these junctions present safety issues relating to poor visibility
 - We note the applicant's offer to improve the sight-lines at the Clay Lane/Tilley Lane junction, although we note that the trees concerned are no longer owned by the Applicant.
 - We are particularly concerned at the Lee Green Lane/Tilley Lane junction which has notoriously poor visibility due to the curves and steep banks to the North of the junction and the slope of the hill to the South. We note that this was the location of the serious cyclist injury mentioned earlier.

3.3.8 Proposed road-widening

- Several residents have expressed concerns that widening the road between the two mini-roundabouts will encourage higher speeds on this section of road. The major width problem on this section at present is that the applicant has failed to trim the hedges on the Western side to the levels maintained by the MoD.

3.3.9 Increased domes on mini-roundabouts

- We do not support the proposal to increase the domes on the mini-roundabouts. Whilst we accept that this might reduce speeds for regular users, without substantial increases in the road space around these roundabouts it will cause major problems for larger vehicles, notably the bus. This is particularly of concern for the Lee Green Lane mini-roundabout where space is more limited.

3.3.10 Local footpaths

- The application proposes a number of "improvements" to paths in the immediate vicinity of the Headley Court site. Whilst these may improve mobility within the application site, they will do nothing to improve the connectivity (and hence sustainability) of the application site.
- We also note that no mention has been made of restoring the public right of way running between Elements 1 & 2 of the Headley Court estate; this right of way was suspended in light of possible security threats to DMRC as a potential military target. These risks no longer apply and re-opening the path and restoring it as a public right of way would contribute positively to the footpath/bridleway network within the village.

- We also see no purpose in widening Leatherhead Footpath 55 to bridleway standards alongside Zones 3 and 4; it is not usable as a bridleway beyond this point so would not provide suitable connectivity to Stane Street. The photograph shows a section of footpath 55 between Headley Court and Stane Street which illustrates its unsuitability as a bridleway.
- On the other hand, we do see value in upgrading Headley Footpath 513 to a bridleway along the Southern edge of zone 2. Whilst this might create some security concerns for residents of new dwellings backing onto this footpath, it would provide a safer route for horse-riders to get to Bridleway 512 (The Drive) avoiding having to ride along Headley Road between the two mini-roundabouts



3.3.11 Transport Plan

- We acknowledge the Transport Plan created by the applicant and note its dependency on the Headley Hoppa, which as we have argued elsewhere does not provide a sustainable medium-term solution.
- The Travel Plan paints an unduly rosy picture of accessibility. For instance in referring to Rail Accessibility it lists Leatherhead, Epsom Downs and Tadworth as stations “in proximity of the site”. Their respective distances from the site are 3, 4.2 & 3.4 miles respectively. Tadworth in particular is accessible using a lengthy narrow lane to Walton-on-the-Hill. Likewise the Plan states that “The rural nature of the area and the pleasant environment associated with the historic buildings create a high propensity for pedestrian or cycle trips locally.” There is no evidence to support this.
- The baseline of car dependency for trips to work (Section 5.7seq of the Travel Plan) is based on a false assumption. The Traffic Assessment correctly recognises that the local Census data on journeys to work is now unrepresentative; it was taken when the DMRC was operational and so the main breadwinners in the 63 houses occupied on Element 1 walked to work. This distorts the figures for census area E00155683; the census figure of 49% driving to work is now outdated and we suggest a better figure would be the 80% produced by the rest of Headley. However the Transport Plan ignores this change. As a result, the best case is that the Transport Plan might cut the percentage of trips to work made by car to approx. 75%, rather than the 57% given in the plan.
- In Section 5.12 the Transport Plan states “for example, if walking levels are low despite high levels of local employment by residents, focus can be given to encouraging travel by this mode”. The concept of high levels of local employment is entirely incredible, given that the only significant employer within walking distance will be the planned Retirement Community and few of its employees will be able to afford housing on this development.

- We are unconvinced that the Transport Plan provides a credible way to significantly reduce the dependency on car transport as the primary means of access to the proposed development. We have seen no evidence of the success of schemes like the Headley Hoppa in a similar location when all households will need access to a car. Likewise we are unconvinced that a notice-board publicising travel options provides any incentive for residents to change their preferred travel patterns.

HPC objects to the application for Access on the grounds that local roads are unable to safely accommodate the likely traffic that the proposed scale of development would generate. We have no confidence that the Transport Plan will lead to an appreciable reduction in the dependency of this development on cars as the primary mode of transport

3.4 Sustainability

We believe that this application fails to meet the requirements for sustainability in the NPPF. We have read the Applicant's Sustainability Assessment and find it unconvincing.

3.4.1 Environmental sustainability:

- The existing public transport service is inadequate:
 - the service is infrequent (a 2-hourly service) and doesn't cover Sundays and evenings;
 - the local road network makes it inherently unreliable; for instance there are currently no buses stopping within a mile of the site for a 6-month period as roadworks are taking place elsewhere in Headley; also the length of the route, going from Epsom via Leatherhead and Dorking to Crawley makes it prone to delays at some stage of the journey
- The proposed "Headley Hoppa" service is not guaranteed into the future; the NPPF refers to a 15-year timescale to judge sustainability, but the "Headley Hoppa" is only guaranteed for 5 years; it is also unclear that a demand-responsive service will be as convenient as a regular schedule – especially for car-owning households. We are not aware of similar services elsewhere which have proved to significantly reduce car journeys.
- The previous use of the site provided an on-site shop; there is no longer any shop or social facility within walking distance; every day-to-day need, such as running out of milk, will necessitate a car trip.

As a result, residents will be highly dependent on cars as the primary mode of transport and the likely number of trips per household will be high.

Whilst we welcome the proposals in the Sustainability Assessment for energy efficient design, these do not go far enough to compensate for the carbon emissions and pollution caused by a large development which will be primarily dependent on cars for transport. We believe that any housing on this site needs to adopt the highest standards of sustainable building design to counter the inherent environmental unsustainability of the site.

3.4.2 Social sustainability:

- The village centre is a significant walk away and there are no footpaths linking the site to it;
- The narrow roads locally are unsafe for pedestrians; they have no footways and are unlit at night;

- No on-site services, other than some play equipment and a notice board, are proposed; the previous occupants had on-site social facilities (NAAFI) as well as shop.

This new development cannot integrate well with the existing community; any integration will be at the cost of more traffic and environmental damage.

3.4.3 Economic sustainability

- The current application provides no employment post-construction; (we note that employment on Element 2 could be considered in a Masterplan for the whole Headley Court site);
- We note that whereas the detached properties at Cunliffe Close sold quickly, the apparent failure to sell properties at Dale View shows that higher-density estate-style developments are economically unviable without connectivity to the village centre

The proposed development cannot be considered sustainable on any of the three aspects – environmental, social or economic. HPC therefore objects to the development as it fails to meet the requirements for sustainability in the NPPF. We have no confidence that the proposals in the Transport Plan and Sustainability Assessment will effectively tackle this issue.

3.5 Scale of development and number of houses proposed

3.5.1 Uncertainty of space demands for Element 2

- In the absence of an approved Masterplan, we believe that the likely scale of development to produce a viable scheme for the Element 2 of the overall site will exceed the size of the replaceable buildings there. We therefore believe that some of the allowance for replacement buildings from Element 3 should be reserved for the likely requirement for Element 2

3.5.2 Use of personal permissions

- We challenge the applicant's assertion that existing buildings with Personal permission to the Minister of Defence should be included in the calculations of the existing buildings to be replaced. (The technical grounds for this are explained in Appendix A).
- Specifically we ask what reasonable purpose the LPA had in placing these conditions other than for the buildings to be removed once the MoD ceased to use them and we draw attention to the uniquely Very Special Circumstances that applied when these permissions were granted.
- If buildings with Personal permissions are excluded, not only does this reduce the allowable space on this application, it also aggravates the problem identified in 3.5.1 above.

3.5.3 Use of footprint rather than floorspace

- We believe the calculations of replacement buildings should be based on total floorspace rather than footprint. This would be reasonable as many of the buildings being replaced are single-storey.

3.5.4 Expectations set in Draft Local Plan

- In the Brownfield Sites Assessment drawn up as part of the Future Mole Valley initiative and in the Draft Local Plan currently out for consultation, MVDC indicates a reasonable potential of 90 new dwellings in total for the entire Headley Court site. This application alone exceeds this figure.

3.5.5 Excessive growth of Headley

- Combined with the indicative figure of 128 new dwellings on Element 2, this would represent a growth of 92% in the number of dwellings in Headley. This is excessive for a small village which is not even recognised as a Rural Village where development is permitted in the current Local Plan or in the Draft new Local Plan

3.5.6 Spatial extent of proposed development

- Achieving the proposed number of houses requires development over part of the site that was not previously recognised as the MDS

HPC objects to the scale of development and number of houses proposed in this application. It notes that the application exceeds the permissible replacement of existing buildings in the Green Belt and that no Very Special Circumstances have been put forward to justify this inappropriate development.

3.6 Impact on the Green Belt

In this section we refer to the 5 zones of development identified on pages 38-43 of the applicant's Design and Access statement,

We believe that transferring allowable building footprint from one zone to another inherently changes the Open-ness of the Green Belt and should be avoided where possible.

3.6.1 Zones 1 & 2 (Headley Road boundary & Land to South of The Drive)

Given the intensity of the existing institutional buildings in these zones, HPC accepts that development here would not per se significantly reduce the open-ness of the Green Belt.

The Western end of Zone 2 is currently largely laid out as a car park without built structures; it is immediately adjacent to Pignut Wood - an Ancient Woodland - and visible as open Green Belt from the properties near Headley Court Farm. It would be preferable for this section to retain its open character.

Also the visual appearance of the current structures gives a misleading impression of the massing now acceptable on these zones.

This area includes two buildings with temporary or personal permission, both of which have now lapsed:

- the building approved under MO/2007/1958 had temporary and personal permission
- the building approved under MO/20210/0211 (the Mallard Building) had personal permission; we note that the applicant claims that this building's footprint can be replaced elsewhere without reducing the open-ness of the Green Belt. As explained in Appendix A we challenge this interpretation of Personal Permissions.
- moreover, the Mallard Building's permission was granted on the argument that its location within a courtyard meant that its impact on the open-ness of the Green Belt was minimal; in this case its replacement by buildings that are not similarly enclosed would by definition reduce the open-ness of the Green Belt and constitute inappropriate development.

It is very important that the current lack of permission for both these buildings should be considered when establishing the degree to which the openness of the Green Belt is currently compromised.

3.6.2 Zone 3 (Northern side of The Drive)

- This zone extends beyond the area previously recognised as the MDS
- The existing buildings in this zone are exclusively single-storey and of no architectural merit;
- The slope of the land means that these buildings afford views from The Drive to the countryside (fields as well as trees) beyond the application site – see photograph;
- We also note that the Northern end of this zone contains a stretch of trees which provide a link between Hambleton Wood (to the North-East) to Tyrrells Wood (to the West); loss of these trees would reduce the semi-rural aspect of the site;
- We conclude that extensive two-storey buildings in Zone 3 will reduce the open-ness of the Green Belt.



3.6.3 Zone 4 (The Northern Corner)

- This zone extends into the undeveloped Green Belt beyond the natural boundary formed by a line of trees at the North of Zone 3. It is also outside the area previously recognised as the MDS.
- As the photograph shows it is surrounded on three sides by woods and fields.
- When the permission was granted for the development of the car park the Officer's Report decided that it was Inappropriate Development in the Green Belt – especially as it lay outside the area defined as MDS.
- The Very Special Circumstances used to justify the development included that it was “a very low-level addition” and that it “would not lead to significant lighting of the surrounding areas”
- We believe that any buildings on this zone will per se reduce the open-ness of the Green Belt and constitute inappropriate development. On the other hand, restoration of this area to grassland or woodland could enhance the local ecology.



3.6.4 Zone 5 (Open Space and Perimeter)

- The name the Applicant has chosen to give this zone says it all: this is open space in the Green Belt which lies outside the previously designated MDS and is undeveloped;

- We understand that the applicant justifies development in this area on the basis of the Affordable Housing it may permit; we consider the issue of Affordable Housing later in the document;
- We note that this is also the location of the only football pitch in Headley which was fairly well-used by local teams before the DMRC closed. We believe the loss of this sporting facility should be opposed.

HPC objects to any housing development in Zones 4 or 5 which would constitute unacceptable loss of open-ness in the Green Belt. We believe new development in Zone 3 should be restricted to the previously-designated MDS in order to retain the Open-ness of the Green Belt

3.7 Massing and housing density

We have been unable to find an estimate of housing density in the applicant's documents, but based on the applicant's plans, we have used an established technique to estimate the proposed Housing Density at 21-22 homes per hectare (8.5-8.9 per acre); this is based on the net area developed rather than the gross area of the full application site. This density is similar to recent housing development in nearby urban settings (eg Sycamore Gardens in Epsom) and is excessive for a semi-rural setting

The Landscape SPD describes Headley as follows:

Headley is a small village with a loose-knit pattern of development. The church, pub and shop (housed in the former village hall) form a focal point, from which pockets and ribbons of houses spread sporadically over a wide area, along the narrow lanes. The countryside setting is apparent throughout the village. Even in the village centre, buildings are grouped on one side of the road, facing a large expanse of open land. Streets are generally unlit, which contributes to the highly rural character of the village, although there is some night-time light pollution from the urban areas to the north.

The proposed development and housing density clearly conflicts with this description.

We would expect the density to be intermediate between the very spacious setting of The Drive and the denser setting of Dale View; by our estimation, the current application exceeds the current levels at Dale View. Within the application site, the current buildings exhibit greater massing in the Zones 1 & 2 South of The Drive, whereas Zone 3 comprises a low massing permitting easy views of the countryside beyond. We believe this would represent a better basis for redevelopment of the site.

We understand the Housing Density is a Reserved Matter as it depends on the layout proposed for the site. However even at this stage **HPC objects to the massing and housing density described in the documents supporting the Application.**

3.8 Urbanisation

We refer again to the Landscape SPD quoted in the previous section.

The area around the DMRC was allowed to diverge from this style of development because of the uniquely Very Special Circumstances that applied due to its previous use and the nature of disabilities that most patients suffered. For example a zebra crossing was constructed and special measures were taken to reduce speeds nearby because patients each had to cross at least four times daily to attend their rehabilitation sessions.

The following specific facilities are present in this area that are not present elsewhere in the village:

- Street lighting
- Speed humps
- Zebra crossing
- Mini-roundabouts
- Metal fencing barriers

At our drop-in session no residents called for the urbanisation to be increased and two-thirds of respondents asked for it to be reduced.

We believe such a move would be an enhancement to the area bringing it more in line with the character assessment given in the Landscape SPD.

We also note that the zebra crossing no longer offers a link between 2 portions of the same establishment. Its sole purpose now will be to provide access to the Southbound bus-stop.

HPC objects to any proposal which brings increased urbanisation which is out of character with the local area as described in the Landscape SPD. We are looking for a detailed application which minimises this. We believe that increasing adoption of urban highway design features is inappropriate as a means of trying to resolve Highways safety issues. Indeed we would prefer to see proposals which remove many of the urban features historically introduced to support the Defence Medical Rehabilitation Centre (DMRC) and restore this part of Headley to the rural character enjoyed by the rest of the village.

3.9 Affordable housing

3.9.1 Background

- We recognise the importance of affordable housing to the wider community. Most of the previous affordable housing in Headley was purchased under Right-to-buy and has not been replaced. Headley is deemed too small a community to qualify as a matter of policy for Rural Exceptions.
- About 15 years ago a small development of 5 affordable homes was built on a Rural Exception basis at The Spinney near the village centre for households with a local connection to Headley. This has been very successful with only 2 vacancies occurring since the first occupation. Moreover the majority of the occupants have taken an active role in the life of the community.
- Since then HPC has been trying to establish a similar scheme and we went to considerable efforts to persuade planners at MVDC to accept the principle of a Rural Exception Site in Headley. We have sponsored two Housing Needs Surveys which have identified an on-going demand for a similar scheme.
- We undertook a sequential analysis of sites which identified 3 possible sites near the heart of the village; several possible sites were ruled out because they were not accessible by foot to the village centre.
- However we have been unable to secure an acceptable proposal from the owners of the preferred site due to financial viability.

3.9.2 Future affordable homes in Headley

- We believe it only makes sense to provide Affordable Housing in such an unsustainable location to households who know what living there would entail. We believe it is a recipe for anti-social behaviour to place a household whose financial position means that they need affordable housing somewhere where they would need 2 cars for a reasonable quality of life. (HPC has made this point in its submission to the Future Mole Valley consultation.)
- The Parish Council believes that future Affordable Housing in Headley should be developed on the same basis as Rural Exception Sites.
- We also believe that any sequential analysis would rule out the application site because of its isolation from village facilities.

The Parish Council believes that the Affordable Housing obligation associated with development of the Headley Court site should be delivered in the first instance via a financial contribution to enable the delivery of a Rural Exception site elsewhere in the village and that any surplus should be used to provide affordable housing in a more sustainable location elsewhere in Mole Valley.

3.10 Ecology

The application site borders Ancient Woodland at Hambleton Wood. It is also adjacent to the long-established woodland at Pignut Wood and Tyrrells Wood and close to the Surrey Wildlife Trust's education centre at Nower Wood.

We believe that the introduction of a large area of housing to Zones 3, 4 & 5 with street and footpath lighting would increase the night-time light pollution affecting wildlife in the nearby woods and fields.

On the other hand there are opportunities to enhance the local ecology; for example removal of the hard-standing of the car-park in Zone 4 would re-instate a wildlife corridor between Hambleton Wood and Tyrrells Wood

The Parish Council would prefer a housing development which minuses external lighting and would welcome the reinstatement of the wildlife corridor between Hambleton Wood and Tyrrells Wood

4 Conclusions

This application presents a number of problems, especially in the absence of an approved Masterplan for the whole Headley Court site.

Whilst accepting the principle of limited housing development on the parts of the site that were previously designated as a Major Developed Site in the Green Belt, the Parish Council objects to the current proposal on the grounds that:

- The development is unsustainable environmentally, socially and economically in conflict with the NPPF;
- The scale of the development is excessive after taking account of the permissible buildings that it would replace;
- The development would entail unacceptable loss of Open-ness of the Green Belt and no Very Special Circumstances have been offered to justify this;
- The massing and housing density is out of character with the semi-rural character of Headley and with the intensity of development in the immediate vicinity;

- The impact of traffic levels and highway safety is unacceptable;
- The increased urbanisation of the area conflicts with the character assessment in the Landscape SPD;
- The use of Green Belt land to provide Affordable Housing in an inappropriate, unsustainable location is unjustifiable; it does not address the proven local need for affordable homes for families with a local connection who would want to be connected to the existing community;
- The application fails to take opportunities to enhance the local ecology.

5 Appendix A: Personal planning permissions

HPC notes that the applicant is claiming that the various buildings that were authorised by a Personal Consent to the Minister of Defence should be included in the amount that can be replaced in the Green Belt by new buildings. This claim is supported by a document of Advice by Guy Williams which is included as an Appendix to the applicant's Planning Statement.

This appendix explains why we reject this interpretation.

Mr Williams' advice starts with two legal citations which stress the importance of interpreting a condition "as a reasonable reader would understand the words to mean". The second citation states "In summary, whatever the legal character of the document in question, the starting point – and usually the end point – is to find 'the natural and ordinary meaning' of the words there used, viewed in their particular context (statutory or otherwise) and in the light of common sense."

We will review the evidence as a reasonable reader would understand it in the particular context of the situation at Headley Court. We will then conclude by reviewing the legal argument proposed by Mr Williams.

5.1 The context at Headley Court

The context of Headley Court is perfectly well understood. As the MoD's Design and Access Statement for the Mallard Building (MO/2010/0211) states:

- "Headley Court is ... a unique, key national defence facility which performs a vital role in supporting injured service personnel."
- "Patient numbers have been steadily increasing ... as a result of military operations."
- "It is therefore of critical importance that we maintain the rehabilitation capabilities ... that DMRC uniquely provides."

It is also a location that is washed over by the Green Belt which the LPA is obliged to protect from inappropriate development.

In this context we would expect any responsible LPA to take unusual steps to support the critical demands of national importance that could not be supplied – at least in the short-term - at any other location. MVDC decided to do this by a combination of temporary permissions and permissions granted personally to the Secretary of State for Defence.

5.2 When did MVDC grant Temporary Permissions?

Between 2005 and 2012, we have identified 19 planning applications granted at Headley Court by MVDC; of these 8 were less substantive changes, such as internal changes, modifications to garden walls etc. Of the 11 substantive applications, **temporary permission was only ever given when the MoD had described the development as "temporary" in the application**. However almost all the substantive applications were granted permission Personal to the Minister of Defence.

So Mole Valley planning officers felt it was appropriate to put a specific time-limit (normally 3 years) only for those applications that the MoD itself had designated as temporary. However it placed Personal permissions on a wider range of applications to reflect the Very Special Circumstances surrounding the operations of the DMRC, including most of those granted temporary permission.

The granting of a temporary permission simply reflected what the MoD had requested.

5.3 What was the intention behind Personal permissions?

Based on the recommendations of the planning officers, Councillors agreed to take the highly unusual step of granting permission personal to the Minister of Defence on a series of planning applications at Headley Court, irrespective of whether they had temporary permission or not.

All Councillors were very aware of the unique context of Headley Court, so we contend that they wanted to do everything possible to support the DMRC whilst respecting the Green Belt status of the location. So even when the permission they granted was already limited to 3 years in the case of the temporary conditions, they still decided that the permission should also be restricted to a single person.

The only sensible interpretation is that they only approved the buildings as long as they were being used to support the DMRC. By recommending both temporary and personal conditions on some applications, Planning Officers were stating that the permission would lapse at the earlier of the renewal date of the temporary permission or the point at which the MoD ceased using the building.

We conclude that the intention of the Personal permissions was to ensure that the buildings were removed once the MoD ceased using them; this would restore the open-ness of the Green Belt that had been given up temporarily to meet a critical national need.

5.4 Were the buildings regarded as temporary?

In early 2018, Headley Parish Council was advised informally that the Headley Court Charity – at the time the freehold owners of the Headley Court Estate - had agreed with MVDC that all buildings with temporary or personal permissions (apart from the Help-for Heroes gym/swimming pool complex) would be removed by the MoD once they had ceased operations.

This information was relayed at the Headley Annual Village Meeting held in May 2018 and welcomed by those present. There was therefore a clear understanding in the community that buildings without full permission would be demolished.

Although the removal was not eventually carried out, it shows a clear recognition by the then owners that the permissions for those buildings lapsed when the MoD ceased operations, even though their retention might have added value to the site they owned.

5.5 The Advice given to Angle Property by Guy Williams

The previous sections have used Guy Williams' cited approach of applying common-sense in the context of the situation when the Personal permissions were granted.

This section reviews the critical arguments made in his Advice, which seem to hinge on 3 key points:

- In his para 14, Mr Williams states "I am also instructed that there is nothing in the application documentation or officers' report suggesting that the application was for a temporary building."
- In his para 29, he argues that the benefit of the permission to the MoD was the right to construct the building, rather than the right to operate it.
- In his para 34, he argues that the buildings cannot be considered temporary and can therefore qualify to be replaced.

We examine each of these points in the following sections.

5.5.1 Are there suggestions that Mallard House was a temporary building?

Application MO/2010/0211 relates to the Mallard Building – the only building on the current application site with personal but not temporary permission. (As pointed out above, the only relevance of the absence of a temporary permission condition is that this was not what the MoD requested.)

The Design and Access Statement for the Mallard Building indicates that it is not intended for permanent use:

- Para 4 explains that the MoD had started “an Assessment Phase to replace and upgrade the existing facilities on site”. It pointed out that they “did not yet have a firm date for the completion of the project”
- Para 5 continues:

“As a sensible contingency measure in current circumstances, and to ensure that Headley Court continues to provide the excellent service that our armed forces deserve, in advance of the completion of the work outlined in the preceding paragraph, we are now planning to increase by up to 30 the number of ward beds through construction of a new facility that could provide these additional bed spaces so long as they are required.” (our emphasis)
- A “reasonable reader” would understand these words to mean that this facility would be removed when the bed spaces were no longer required.
- Obviously the closure of DMRC at Headley Court has constituted a point when these bed spaces are no longer required.

Moreover the Design & Access statement describes the structure as modular, suggesting that it could subsequently be dismantled.

Based on this evidence, our “reasonable reader” concludes that there were at least “suggestions” that the building was not intended to for permanent use.

5.5.2 What is the meaning of the personal permission granted?

In granting permission for the Mallard Building, the LPA granted permission to “enure solely for the benefit of the applicant, The Secretary of State for Defence”

The word “enure”, whilst perhaps not in everyday parlance, can be looked up in a dictionary and means “to come into use, to take or have effect, to become beneficial or advantageous”.

So the meaning of the Personal permission is that the building should be beneficial **solely** for the Secretary of State for Defence – and therefore not for any subsequent owner or user.

Moreover, it is obvious that the only benefit the MoD sought was the treatment of injured service personnel which they described as “of critical importance”; they weren’t looking to sell the building on at a profit or keep it as an investment, especially as they were leaseholders, not owners. The construction of the building would be a cost to the MoD, not a benefit.

In contrast, let us follow Mr Williams’ argument that the only benefit that enured as a result of the permission granted was the right to construct the building. What does this imply for the LPA’s reasons for granting a Personal Permission?

- There was a separate condition requiring the work to be started within three years.
- So under Mr Williams' interpretation the Personal Permission could only have effect for these three years, since it relates solely to the benefit of constructing the building.
- Therefore the only logical effect of the condition could be that, in the unlikely circumstances that the MoD left Headley Court within three years and without constructing this building, no new occupant would be permitted to construct it.
- We contend that this cannot be a common-sense interpretation of the condition for Personal permission, when the alternative explanation is that the LPA simply wanted to ensure that the new building was only to be **used** for the Very Special Circumstances associated with the operations of the DMRC.

By applying the criteria of what a “reasonable reader” would understand, we conclude that the Personal permission must relate to the use of the buildings as well as their construction.

5.5.3 Should be buildings be eligible to be replaced?

Following the argument above, the permission for the buildings lapsed when the MoD ceased operations at Headley Court. At that point a case could be made for enforcement action to be taken for their removal. Indeed HPC made enquiries as to whether this would be done. The response was that the LPA has a 10-year window to take such action and that it would be better to delay any such action for two reasons:

- That a future owner of the estate might find a useful purpose for the buildings and make a persuasive case that they be retained;
- If this was not the case, then it was unnecessary to precipitate an expensive enforcement action whose effect would merely be to force the new owner into the additional expense of demolishing these buildings before they may be ready to start the construction work to redevelop the site.

So no enforcement action was initiated to avoid unnecessary expense for the Council and the applicant.

We contend that the buildings' planning permission has lapsed and that they are eligible for an Enforcement Order. Until such an order has been determined it would be unsafe to include them as buildings that can be replaced in the Green Belt.

5.6 Summary

We have taken the approach as proposed by Mr Guy Williams. We have looked at the context and used common-sense to interpret what the words mean and what the reasonable intent of the LPA was in setting Personal permissions.

The only credible explanation is that they were granting permission in truly exceptional circumstances that would not have been granted for any other organisation. They were trying to protect the long-term openness of the Green Belt by ensuring that, by default, the buildings would be removed once the MoD was no longer benefiting from them.

By contrast, the three key points in Mr Williams' argument defy common-sense and, using the criteria he chooses to cite, cannot be sustainable.

6 Appendix B: Validity of traffic modelling

We have submitted more detailed reports to Surrey Highways explaining why we reject the conclusions reached in the applicant's Traffic Assessment.

These cover a number of areas:

6.1 Impact of changes to Element 1

When previous surveys were undertaken to establish the baseline level of traffic, the 64 properties on Element 1 (Dale View and Cunliffe Close) were partially occupied exclusively by military households. The change of use of these households was recognised in MO/2018/1890, but the impact of this change could not be reflected in any traffic surveys because the properties have been largely unoccupied.

- Historically the main breadwinner walked to work and the households had low car ownership; it is recognised by the Transport Assessment that this contributed to the lower level of car ownership reported in this census area than in neighbouring areas;
- Under civilian occupation, car ownership will increase and rush-hour travel to work will increase;
- Other trip levels will increase as the households no longer have access to a local shop and social facilities (NAAFI) on-site.

6.2 Traffic generated by Element 2

The Traffic Assessment recognises that their plans for Element 2 will generate traffic. However there are fundamental flaws in their assumptions about this:

- The traffic modelling assume that Element 2 is developed as indicated by the applicant. Without an approved Masterplan, there is no confidence that this is realistic.
- This type of "retirement community" is relatively new in the UK and there is no third-party evidence of likely car ownership or usage; for instance Surrey has not set any standard parking requirement for this type of community so classifies it as a "retirement home" which would clearly require fewer residents' vehicles
- As the business model of the retirement community is to attract households who are still active, many residents would wish to participate in external activities including leisure;
- The comparative site chosen (Cooper's Hill – at Englefield Green) is different in many aspects to Headley Court
 - There is a regular bus service for staff and visitors to use;
 - The neighbouring village is within walking distance with flat surfaced footways which could accommodate less mobile pedestrians and wheel-chair users; Headley Court has no footpath connection to the village centre; the area is hilly and all local footpaths away from the site are unsurfaced;
 - The local village (population 10,000) has any more facilities than Headley (pop 650)

Taken together these factors will mean many journeys made by staff and residents at Cooper's Hill would require a vehicle at Headley Court. Also many resident might be comfortable not having a car at Cooper's Hill but would be isolated without a car at Headley Court.

6.3 Validity of MoD survey

The Traffic Assessment relies upon survey data undertaken by DMRC; it is not clear whether this survey was undertaken by professional highways engineers, so it is unclear how much weight can be attached

to it. The timing of the survey, when DMRC was operating at a short-term peak, is also likely to over-estimate the volume of traffic generated by the activities of DMRC.

6.4 Levels of car usage by DMRC

Various references are made to the photographs showing high usage of the car park in Zone 4. Experience of nearby residents who walked regularly along the adjoining footpath suggest that it was only used extensively for a fairly short period when Headley Court was at maximum capacity. Moreover the designation of this car park for “Patients and visitors” indicates that many of the vehicles would have been parked there for most of a typical patient’s week-long course at Headley Court.

6.5 Likely levels of car ownership

The Transport Assessment acknowledges that the census data on car ownership is now unrepresentative because it was based on the previous low car ownership on Element 1. However the Transport Plan still uses the census data on modes of transport to work and assumes a base level of 64% of work journeys by car (which it plans to reduce to 59%). We believe a more realistic base-level is over 95%; in this case the Transport Plan would only reduce this to about 90%.

7 Appendix C: Critical junctions

There are three key routes away from the Headley Court site:

- Towards the A24 for Leatherhead, Dorking and the M25
- Towards Ashted and Epsom
- Towards Pebble Hill, for Reigate and Gatwick

Two of these have particularly dangerous junctions especially for traffic turning right.

7.1 The A24 junction

The junction of Headley Road onto the A24 poses the greatest safety concerns - especially in the morning rush-hour.

Traffic from Headley comes in from the right. Priority is for traffic going along the A24 which is subject to 50 mph limits and is often free-flowing during the rush-hour. At busy times it can be queued back Southbound from the Beaverbook roundabout some 300 metres away or Northbound from the Knoll roundabout 500 metres away.

Note that traffic can also enter and exit along Headley Road westbound (towards Leatherhead on the left of the diagram). There is also a slip-road for traffic heading Southbound off the A24 but leaving towards Headley.



The manoeuvre of most concern is traffic entering from Headley and wishing to turn right (Northbound) onto the A24. Although this entry lane is only marked for a single line entering the A24 and a single line existing, in practice there is space for 2 lines to queue up to enter the A24. At peak times this is the normal behaviour. Each line can handle about 3 vehicles.

In the diagram Car A (wishing to turn right) has drawn up alongside Car B (wishing to turn left). Car B is waiting for a gap in the Southbound traffic on the A24. Its only problem is that Car A may now be obscuring the view of the oncoming traffic.

Car A will make a 2-stage manoeuvre: first to where Car C is currently marked on the shaded area between the Northbound and Southbound lanes on the A24; then it will wait for a gap in the Northbound traffic. For the first stage of the manoeuvre it has wait until there is no car wishing to turn right from the Northbound A24 towards Headley (ie where the black vehicle is now), then find a gap in the Southbound traffic and check there is no Northbound right-turning vehicle (where its view is partially obscured by



Car B). At this point it can proceed to where Car C is. Now it must wait for a gap in the Northbound A24 traffic and negotiate priority with any Southbound A24 vehicle wishing to turn right to the Westbound Headley Road.

This is not a manoeuvre for the faint-hearted and some drivers prefer to turn left and go 360 degrees around the Beaverbrook roundabout.

As traffic gets heavier drivers making this manoeuvre can be seen to get impatient and take greater risks using smaller gaps in the A24 traffic. This also happens when drivers have to wait longer in the queue to leave Headley Road.

7.2 Pebble Hill junction

Whilst this junction is further from Headley Court, it poses major safety issues and is likely to see increased traffic from residents travelling to Reigate and towards Gatwick.

The key problems are faced by cars coming from Headley or Box Hill and turning to go down Pebble Hill (Green cars). The red cars represent fast-moving traffic on the B2032 continuing down Pebble Hill; Blue cars are turning right and left into the B2033.

The problem is that the slope of the road limits visibility for the Green cars to see traffic coming up Pebble Hill; meanwhile they are having to look back over the left shoulder to spot the fast-moving red car obscured by the blue cars waiting to turn onto the B2033 (towards Headley).



The only feasible manoeuvre is similar to the A24 junction – to try to reach the gap between the fast-moving traffic going down the B2032 and the vehicles coming up the hills. The available space here is much less than at the A24 junction.