



Future Mole Valley: Draft (Regulation 18) Local Plan Consultation Response Form

Consultation Period: 3 February to 23 March 2020

This response form will allow you to comment on each section of Future Mole Valley if you wish. To view the draft Local Plan and associated documents, please visit www.futuremolevalley.org. Alternatively the draft Local Plan and supporting evidence documents are available to view in hard copy at Mole Valley District Council (MVDC)'s offices in Dorking, the HelpShop in Leatherhead and libraries in the district. Consultation responses can also be submitted online by visiting the same website.

By submitting a representation to us, you consent to being notified of other upcoming Local Plan consultations. Please notify us if you wish to opt out of future correspondence.

Your personal information will be held confidentially by us, and will not be shared with third parties. More information about how your personal data will be held is contained in the Future Mole Valley privacy notice available on the Council's website. By submitting a consultation response using this form, you agree that we may process your information in accordance with these terms.

Fields marked with a * must be filled in for validation purposes. Fields not marked with a * are optional. Anonymous responses cannot be accepted.

First Name*	James
Last Name*	Leaver
Organisation (if applicable)	Planning Representative for Westcott Village Association (WVA)
Responding on behalf of (if applicable)	WVA for Westcott (Unparished)
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Please submit your consultation response:

- To reception at the Council Offices, Pippbrook, Dorking, Surrey, RH4 1SJ.
- By email to planning.policy@molevalley.gov.uk
- By post to Planning Policy, Mole Valley District Council, Pippbrook, Dorking, Surrey, RH4 1SJ



Our approach

We have taken a 'brownfield first' approach, with the need for new development being met within built up areas or on previously developed land as far as possible. Do you agree with our 'brownfield first' approach?

☒ Yes ☐ No

Any other comments:

WVA agrees with the Spatial Strategy in Policy S1 and, more specifically, the sequential approach to development underlined in the proposed Policy S2. We agree that previously developed land is a more sustainable location for redevelopment, intensification and new development. We agree that the built-up areas for extension and villages for expansion that MVDC has identified in Policy S2 are the most appropriate locations to make the greatest contribution to MVDC needs. These locations already have good social and community infrastructure and access to public transport provision.

We nevertheless accept that modest extensions to rural villages, in the Green Belt and beyond might still have a part to play in helping meet housing need and ensuring that rural communities are in a stronger position to sustain community infrastructure. In the case of Westcott we acknowledge that additional dwellings could help sustain village retail and employment, the school, pub and other amenities which are valued by the community.

We have sought to make more efficient use of brownfield land through:

- town centre redevelopment
- limited reallocation of employment land
- mixed-use redevelopment
- increasing densities in opportunity areas

Do you broadly agree with these approaches?

☒ Yes ☐ No

Any other comments:

As stated above WVA agrees with this approach.

However efficiently brownfield land is reused, there is still an unmet need for housing which can only be met on land that has not previously been built on. Do you agree with the use of a small amount of undeveloped greenfield land for this purpose?

☒ Yes ☐ No

Any other comments:

As stated above WVA agrees that modest extensions to rural villages, in the Green Belt and beyond might have a part to play in helping meet housing needs and sustaining all communities across Mole Valley.



WVA agrees with this principle with the following provisos:-

1. that the District wide approach, namely the re-use of brownfield land first, should also apply in the rural villages. In the long term the proposed Site Allocations SA66 and SA67 take land out of the Green Belt which we believe would be better preserved as Green Belt if brownfield land within the village envelope could come forward instead in the shorter term. We make this point because WVA is aware of a number of such sites within the village envelope which we anticipate coming forward for housing in the Plan period and are potentially capable of delivering 30-40 units.
2. sites which come forward in the shorter term and are suitable for housing in Westcott in the Plan period should count towards Westcott's "contribution" to housing numbers in the District. In other words they should not be treated as additional "windfall" sites by MVDC over and above the combined proposed contribution of the 44 units identified in Site Allocations SA66 (30 units) and SA67 (14 units) but instead of. Sites within the village envelope will be more sustainable.
3. Any sites which deliver housing in Westcott must meet the needs of the village. We particularly draw your attention to Policies WNDP1 (Housing) and WNDP2 (Infill and redevelopment) of the Westcott Neighbourhood Development Plan (WNDP) which clearly articulate the needs of Westcott.
4. Residents of Westcott have expressed concern about the deliverability of SA66 and SA67 generally on the grounds of viability and the challenge to provide safe vehicular access onto the A25.

Which part of the draft Local Plan do you wish to comment on?

Please use a separate sheet for each policy or site allocation.

Please clearly state which chapter, policy, site allocation, appendix or other document you are commenting on, giving a page number where appropriate:

Chapter 2 – Spatial Strategy

Comment:

We have already commented on proposed Policies S1 and S2 which we support.

We also support Policy S3 with respect to Leatherhead.

We note Policy S4 with respect to Dorking and we will continue to hold MVDC to account with respect to point 1b "To work with infrastructure providers to explore opportunities for mitigating road congestion and improving accessibility".



Congestion represents one of the most significant challenges to the residents of Westcott who frequently encounter long queues on Westcott Road (A25) entering Dorking and on the clockwise one-way system around Dorking, particularly during peak hours.

We do not believe that “exploring opportunities for mitigating” is strong enough in the context of the planned housing growth contained in the Draft Local Plan and this should read “to deliver mitigation measures....before further development is delivered to the west of Dorking”.

We support Policy S5 with respect to rural areas.

Which part of the draft Local Plan do you wish to comment on?

Please use a separate sheet for each policy or site allocation.

Please clearly state which chapter, policy, site allocation, appendix or other document you are commenting on, giving a page number where appropriate:

Chapter 5 - Environment

Comment:

WVA fully supports MVDC's proposed policies with respect to the environment and the definition of Westcott as a "Rural Village" in Policy EN3 is welcomed, particularly with reference to development and the proposed housing policies.

We note that, whilst there is reference to sustainable transport in the draft plan, there are no specific policies relating to car parking. Access to public transport for the residents of Westcott is not good and there are high levels of car ownership in this rural village which means a shortage of car parking. This is why the Westcott Neighbourhood Development Plan has Policy WNDP 4 (Parking Provision) which stipulates a minimum off-street standard of 1 car parking space for a 1 bedroom property and 2 for 2 bedroom properties (and larger). It is important that the planning process continues to secure this level of provision in Westcott.

Which part of the draft Local Plan do you wish to comment on?

Please use a separate sheet for each policy or site allocation.

Please clearly state which chapter, policy, site allocation, appendix or other document you are commenting on, giving a page number where appropriate:

Chapter 3 - Housing Policies



Comment:

WVA believes that MVDC's proposed housing policies are sensible.

We note that the proposed Policy H1 aims to provide 6,735 additional homes in the Plan period 2018 -2033 and then explains how this number will be achieved.

This includes:-

- dwellings built since 1 April 2018
- dwellings under construction
- dwellings with planning but not yet commenced
- dwellings in the allocation areas
- windfall dwellings in Opportunity Areas (as defined in Policy H4)

WVA wish to remind MVDC that Westcott has already delivered the following:-

- 7 dwellings built since 1 April 2018
- 3 dwellings under construction
- 7 dwellings with planning but not yet commenced
- **17 dwellings in total**

MVDC proposes Westcott contributes 44 additional dwellings in Site Allocations SA66 (30 units) and SA67 (14 units) on Green Belt land.

WVA believes that brownfield/ previously developed sites which come forward and are suitable for housing in Westcott in the Plan period should count towards Westcott's "contribution" to housing numbers in the District. In other words these sites should not be treated as additional "windfall" sites by MVDC over and above the combined proposed contribution of the 44 units but instead of. This reflects MVDC's sequential approach we have observed in Policy S2. Windfall sites in Westcott are not in an Opportunity Area (as defined in Policy H4).

WVA fully supports MVDC's proposals under Policy H2 for affordable housing provision and Policy H3 with respect to housing mix, Policy H5 for technical standards and H6 for older people and people with disabilities. We welcome the emphasis on two, three and four bedroom dwellings in Policy H3 which reflects Policies WNDP1 and WNDP2 of the Westcott neighbourhood Development Plan.

Which part of the draft Local Plan do you wish to comment on?

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Policy INF 3 – Community – page 87



Comment:

WVA welcomes the proposed drafting of this Policy as a replacement to Policy CS13 in the current local Plan. Community needs have changed considerably in recent years and we believe this proposed Policy will enable the renewal/ delivery of better quality and sustainable community assets for Westcott residents whilst potentially delivering additional brownfield housing sites. The Westcott Neighbourhood Development Plan Policy WNDP7 (Enhancement of Community Facilities) sets the objective.

Which part of the draft Local Plan do you wish to comment on?

Please use a separate sheet for each policy or site allocation.

Please clearly state which chapter, policy, site allocation, appendix or other document you are commenting on, giving a page number where appropriate:

Site Allocations to the west of Dorking – SA 30 (170 units) page 127 and SA 31 (80 units) page 129.

Comment:

Residents of Westcott have expressed concern about the scale of these two allocations because:-

1. they erode the very important green belt buffer which separates Dorking from Westcott. In the second paragraph of the Westcott Neighbourhood Development Plan the Vision states *"The village of Westcott will remain physically distinct and separate from Dorking and surrounding parishes using Green belt to resist the merging of communities and encroachment into the unique character and setting of the surrounding countryside. This is the most important issue emerging from the survey of the villagers of Westcott"*.
2. We have already mentioned in respect of point 1b of Policy S4 above that Westcott Road (A25) gets very congested, particularly during peak hours, where eastbound traffic frequently queues back as far as Westcott trying to feed into the congested Dorking one-way system. These 250 additional units will only add to this congestion. MVDC must work with Surrey County Council to deliver a solution to this congestion before these sites come forward for development.