

Draft Mole Valley Local Plan 2020-2037

Proposed Submission Version - Regulation 19 Consultation

Representations on behalf of Westcott Village Association (WVA)

James Leaver, Planning Representative, WVA [jamesandfrancesca@hotmail.co.uk](mailto:jamesandfrancesca@hotmail.co.uk) 07771 885989

3 November 2021

WVA made representations in March 2020 at Regulation 18 stage. WVA is now making Regulation 19 representations in respect of the soundness of the draft Local Plan relating to the:-

1. Spatial Strategy
2. Lack of a deliverable highway infrastructure solution to mitigate congestion on the A25 Westcott Road at its intersections with Vincent Lane, Station Road and West Street on the west side of Dorking. Described in the Reg 19 Infrastructure Plan as a “Priority hotspot”
3. Merging of the Westcott and Dorking settlements
4. Housing delivery assumptions for Westcott

## **1. Spatial Strategy**

Notwithstanding the fact that MVDC has reduced the proposed Green Belt take to 0.7%, we believe this is still too much. The spatial strategy on page 16 of the Plan does not sit well with MVDC’s 15 objectives on page 15 of the Plan.

MVDC consulted on 10 spatial strategy options in 2017, after which 3 options were dropped. Town centre redevelopment has quite rightly ranked highest followed by the re-allocation of commercial and retail land, mixed use redevelopment and targeted increases in suburban densities. We believe these options should have been pushed much harder in the Plan with greater allocation and massing on brownfield land to take pressure off the need to deliver on the less accessible and less sustainable green field options - extend built up areas (option 7) and expansions of rural (option 8) and existing villages (option 10).

Options 7, 8 and 10 are firmly at odds with a number of MVDC’s objectives. Most notably the Plan states that these options need to combine with:-

Objective 8 – to protect the integrity of the Green Belt

Objective 9 – to protect the Surrey Hills AONB and District’s landscape more widely

Objective 10 – to ensure that the District’s biodiversity is protected...

Objective 13 – to address the causes and impacts of climate change

Objective 15 – to provide necessary infrastructure for existing and future residents

Westcott has the Westcott Neighbourhood Development Plan 2017-2026 and WVA is proud to be the custodian of this Plan, where we encourage appropriate development, principally within the village boundary.

In this representation WVA is therefore specifically focussed on three proposed allocations, which are all on Green Belt land accessed from the A25 to the west of Dorking:-

DS24 Sondes Place Farm, Westcott Road (A25), Dorking – Green Belt with a “moderate” score for all Green Belt Review criteria – sprawl, merging, encroachment, setting/ character for the Dorking assessment

DS26 Land at Milton Court Lane, Dorking - Green Belt with a “moderate” score for all Green Belt Review criteria – sprawl, merging, encroachment, setting/ character for the Dorking assessment

DS63 Land at Mill Way House, Bramley House and Heathcrest, Westcott - Green Belt, AONB, AGLV and part Conservation Area with a “moderate” score for encroachment and “significant” for setting/ character against the Green Belt Review criteria for the Westcott assessment

We believe MVDC should be doing more to identify additional capacity on sustainable town and village centre sites which are within settlement boundaries, more accessible and better served for public transport and amenities.

Further specific comments in relation to highways infrastructure, merging of the Dorking and Westcott settlements and Westcott housing delivery assumptions are provided below.

## **2. Highway Congestion on Westcott Road (A25)**

Westcott residents are very familiar with the congestion issues to get into Dorking from the west and returning via the Westcott Road(A25)/ Vincent Lane/ Station Road/ West Street intersection. This can be particularly heavily congested at peak hours with significant queues tailing back on the Westcott Road (as far as Westcott village on occasions) and Vincent Lane in particular.

To validate what we already know WVA has taken time to review the following evidence documents on the Future Mole Valley website:-

### L1 - Infrastructure Needs Assessment (MVDC 2016)

Paragraph 1.18 on page 16 states:-

*“Traffic congestion was the third most popular topic with 11% of all responses. Most concerns in this category were directed at congestion in the Dorking town centre gyratory system, in particular the Vincent Lane/A25/West Street section and the approach from Westcott”.*

Paragraph 1.26 and 1.27 on page 17 state:-

*“In Dorking, by far the most significant local issue was traffic congestion in the one-way gyratory system around the town centre, and the High Street. Resurfacing works during the consultation period allied to problems with traffic light phasing may have exaggerated the response, but it is clear from the replies made that frustrations over delays caused by congestion in Dorking town centre are significant and have an effect on visitors’ behaviour”.*

*“Solutions to the congestion problem were many and varied, depending on individual respondents’ circumstances. Popular suggestions included replacement of traffic lights with mini-roundabouts or*

standard junctions, rephasing and coordination of traffic lights, and stricter controls around onstreet parking and deliveries. More involved solutions include making Vincent Lane two-way, and installing a slip-road from the A25/Vincent Lane junction to Station Road to ease congestion from the Westcott direction”.

Paragraph 1.35 on page 18 states:-

*Abinger, Coldharbour and Wootton - congestion approaching Dorking was a concern...”*

Paragraph 1.43 on page 18 states:-

*“Westcott was most concerned about congestion entering Dorking, the need for more parking in Dorking town centre and mainline station, and the need for a more reliable bus service”.*

And the Annex 4 table of consultation responses further validates the above.

Annex 4 - Comparative analysis of local variation by percentage

Area	Road Maintenance	Parking	Traffic Congestion	Bus Services	Highway Safety	Broadband	Medical Services	Cycling	Retail Offer	Leisure Services	Traffic Calming	Street Cleaning	Refuse Services	Rail Services	Flooding	Community Services	Development	Public Realm	Noise	Education Services
Total	21	12	11	11	6	5	5	3	3	3	3	2	2	1	1	1	1	1	1	1
Dorking & south	16	11	13	6	4	4	2	3	3	2	3	1	2	2	0	1	1	0	0	1
Leatherhead & north	32	14	5	8	9	1	6	2	3	4	2	4	2	0	2	1	2	2	1	1
Abingers, Coldharbour & Wootton	29	6	19	6	2	4	0	10	0	2	6	0	6	2	0	2	0	0	0	0
Ashtead	31	11	5	7	14	2	3	3	2	4	1	3	3	3	2	1	1	1	1	1
Beare Green & Capel	22	13	9	7	10	3	3	0	2	7	14	2	0	2	0	0	0	0	2	1
Brockham, Betchworth & Buckland	19	12	9	12	10	5	5	2	1	2	6	1	0	2	2	3	2	0	1	1
Bookhams	36	19	5	6	9	1	5	3	1	0	1	2	0	0	6	0	4	1	1	1
Boxhill & Headley	29	10	0	14	7	2	3	15	0	0	5	2	2	0	0	5	0	0	0	0
Charlwood & Hookwood	35	17	0	20	4	4	0	0	0	0	9	2	6	0	0	0	0	0	0	0
Dorking	13	16	27	5	4	2	2	5	5	1	2	2	3	0	1	0	1	1	1	1
Fetcham	43	13	4	5	3	1	14	0	0	2	1	1	3	0	3	1	0	1	1	0
Holmwoods	27	9	20	9	7	9	7	4	0	0	0	0	0	4	0	0	0	0	4	0
Leatherhead	20	14	5	10	8	2	6	2	5	7	2	7	2	1	1	2	1	4	0	1
Mickleham & Westhumble	14	19	7	2	0	19	0	14	5	5	0	0	2	2	0	0	0	0	2	0
Newdigate & Leigh	29	8	5	12	3	8	5	6	0	0	14	0	2	0	5	3	0	0	0	0
Ockley, Forest Green & Walliswood	50	8	0	5	3	10	0	5	0	0	5	0	5	3	0	0	5	0	0	0
Westcott	14	12	39	9	3	3	0	5	5	0	0	0	2	0	0	2	0	0	2	0

## L2 – Reg 18 Infrastructure Delivery Plan (MVDC January 2020)

The Plan set out all of the infrastructure needed to support the development proposed in the Local Plan and the table at Appendix 1 identifies the A25 Westcott Road/ Vincent Lane junction. It is worth noting that all but two of the 29 road network schemes on the same table have a “TBC” estimated cost. All of them have an “unknown” funding gap and are “ongoing” for scheme phasing.

Settlement	Location	Scheme	Evidence Justification	Scheme Phasing	Lead Delivery Agency	Estimated Cost	Potential Funding Sources/Estimated funding available	Estimated Funding Gap	Delivery Constraints
Dorking	A25 Westcott Road with signalised junction of Vincent Lane	Potential opportunity for mitigation measures to be developed through further strategic highway assessment as the Local Plan progresses.	Mole Valley District Council Local Plan Strategic Highway Assessment 2019	Ongoing	Surrey County Council	TBC	CIL/Developer Contributions	unknown	

### L3 - Reg 19 Infrastructure Delivery Plan (MVDC August 2021)

Paragraph 1 of the Infrastructure Delivery Plan states “The NPPF places significant weight on the importance of infrastructure. In contributing to the achievement of sustainable development, the planning system is described as having a key role in coordinating development requirements, including the provision of infrastructure”.

Appendix 1 provides a schedule of 46 road network schemes. 15 of the 46 are a “Priority Hotspot”, including the A25/ Vincent Lane Junction and, even at Reg 19 stage, all of them still have “TBD” against Scheme Phasing, Estimated Costs and Estimated Funding Gap headings in the table.

It is questionable, therefore, whether the Draft Plan is sound or consistent with National Policy.

Specifically, the table entry for A25 Westcott Road/ Vincent Lane is below.

Settlement	Location	Scheme	Evidence Justification	Scheme Phasing	Lead Delivery Agency	Estimated Cost	Potential Funding Sources/Estimated funding available	Estimated Funding Gap	Delivery Constraints
Dorking	(Junction) A25 Westcott Road with signalised junction of Vincent Lane	<u>Reg. 19 Priority Hotspot</u> : Potential opportunity for mitigation measures to be developed through further strategic highway assessment as the Local Plan progresses.	Reg. 19 Mole Valley District Council Local Plan Strategic Highway Assessment 2021	TBD	Surrey County Council	TBD	CIL/Developer Contributions	TBD	

### L14 – Existing Transport Trends and Constraints (prepared by SCC for MVDC March 2017)

This report recognises the “key corridors in the District” where there are delays and the A25 Westcott road features in both the AM and PM weekday peaks for data collected in 2014/15.

At paragraph 5.2.1 the same report states “A Transport Study of Dorking is being prepared with a brief currently being under development. The purpose of this study is to prepare a “bid-ready” package for Dorking for when Local Growth Deal 4 funding becomes available from the Department for Transport. This package would build on the existing 2014 sustainable transport project being delivered at the moment, but will focus on addressing highway congestion issues in the town. In particular it will consider locations such as Deepdene roundabout to address safety issues, Pump Corner, the junctions on the A25 with Vincent Lane and Station Road together with associated traffic queues, and the optimisation of traffic signals throughout the town. The package is expected to include a mixture of traffic management and larger schemes, and potentially a major scheme (£5million+).”

It is understood that this report was commissioned and failed to identify a workable engineering solution to alleviate the existing congestion on the historic street pattern in Dorking. This includes the Westcott Road/ Vincent Lane junction. It explains the second “Challenge” in the list in the Dorking town centre audit under Policy S4: Dorking Town Centre on page 28 of the Draft Local Plan which has been produced four years later and reads:-

“No engineering solution to the traffic congestion on the historic street pattern”

The associated “Opportunity” is “Utilise Surrey Highways’ new emphasis on prioritising sustainable transport solutions such as walking and cycling”

#### L16 – Strategic Highways Assessment Part 2 (SCC for MVDC 2019)

This piece of work provides useful base data which, we understand, was used by MVDC to determine which sites to allocate in the draft Local Plan. It models five scenarios; A -E.

Scenario A was the do nothing option taking all committed sites. Scenario B added all potential strategic sites. Scenarios C, D and E each removed 2 different sites. Notably, scenario D removed Sondes Place and Milton Court.

Table 2-11 on pages 57 and 58 of this report once again identifies the Westcott Road/ Vincent lane junction as a “Network Hotspot”

The report is jargon packed so the change in Level of Service (LOS) at specific junctions has been difficult to determine for each scenario.

What is clear to WVA from Figures 2-19 – 2-22 on pages 34-37 of the report is that there are two junctions on the Dorking one-way system, including the Westcott Road/ Vincent Lane junction, which already have a ratio of flow capacity (ROF) greater than 1. They are in Category D – *“Forced or breakdown of flow - every vehicle moves in lockstep with the vehicle in front of it, with frequent slowing required. Travel time cannot be predicted, with generally more demand than capacity”*. In plain English this means that the junctions are already operating at over-capacity.

It is against this background that WVA believes:-

1. Due to the absence of identified and costed infrastructure solutions for the 15 Priority Hotspots in the Reg 19 Infrastructure Delivery Plan, the draft Plan is not sound. It is not consistent with National Policy and cannot deliver sustainable development.

Paragraph 3.9 of Policy S1: Sustainable Mole Valley in the draft Local Plan does not provide sufficient evidence that the Council will be able to deliver

*“...the Council has revisited and revised its Infrastructure delivery Plan and incorporated the revised scale and location of housing growth. Consequently, the Council has endeavoured to ensure that the infrastructure will be delivered where it is needed”.*

Similarly, paragraph 8.4 of Policy D1: Infrastructure Delivery demonstrates a further lack of confidence

*"New connections and the reinforcement of infrastructure networks will be subject to appraisal. Where capacity is constrained, improvements may be required before development can proceed. Conditions or agreements may be secured that preclude development or use of land until adequate provision is made..."*

2. Specifically, in relation to the ROF Category D status of the Westcott Road/ Vincent Lane junction, without an identified engineering solution, over-reliance on “Surrey Highways’ new emphasis on prioritising sustainable transport solutions such as walking and cycling”, WVA believes no further development accessing the A25 to the west of Dorking is justified and DS24, DS26 and DS63 should not be allocated. The indicative capacity of these three

schemes is 229 units as well as the provision of facilities for coach and staff parking and a student drop off area for Priory School. This would draw further vehicle movements/ congestion to an over-capacity Category D junction as well as the associated pollution from stagnant traffic on the A25.

### **3. Merging of Westcott with Dorking Settlements**

WVA believes that the Green Belt performs an essential function between Westcott and Dorking.

WVA undertook a consultation in Westcott and prepared the draft assessment of criteria for MVDC's Green Belt Review January 2020.

The assessment of Milton Street which is on the eastern edge of Westcott acknowledges that the distance between the eastern side of Milton Street in Westcott and the western edge of Dorking is only 700 metres.

The Green Belt assessment for Milton Street (WD), which is also in AONB, AGLV and is a Conservation Area is:-

Sprawl - minimal

Merging - moderate

Encroachment - moderate

Setting/ Character - significant

The corresponding assessment for North West Dorking (DI) which relates specifically to Sondes Place Farm (DS24) and Milton Court (DS 26) land is:-

Sprawl - moderate

Merging - moderate

Encroachment - moderate

Setting/ Character - moderate

We have noted the Reg 19 representations made by the West Dorking Resident's Group (WDRG) who have made a forceful case for these sites not to be removed from the Green Belt and allocated for residential development. With particular reference to Sondes Place Farm we agree with WDRG that an exceptional circumstances case has not been made. The openness of this landscape and the biodiversity of these sites make a highly valuable, arguably essential, contribution to the "green buffer" which separates the settlements of Dorking and Westcott. The current separation of 700 metres would be reduced by about a third if Sondes Place Farm is developed.

Couple these factors with the prospect of adding further congestion to the A25 immediately to the west of Dorking, the potential development at Sondes Place farm and Milton Court represents a highly unsustainable and environmentally damaging development proposition.

#### **4. Housing delivery Assumptions for Westcott**

Policy H1 states that the neighbourhood requirement for Westcott is 68 net new dwellings in the plan period. This equates to 4 dwellings per annum. WVA has no objection to delivering the proposed numbers and we have a demonstrable track record of delivering at least 4-5 dwellings per annum, mostly within the village boundary, in recent years. We think controlled housing growth is good for our village, provided it meets our housing needs, and it helps us to sustain our small businesses and our community assets.

This sits true to the findings of Westcott Neighbourhood Forum (now disbanded) who drafted the Westcott Neighbourhood Development Plan off the back of a questionnaire which was completed by 75% of the village. The Plan was adopted following a referendum in which 91% of residents approved it.

WVA has now taken over responsibility for delivering the priorities and needs of the village which are reflected in the 7 Policies in the Plan. We actively prioritise the re-development of brownfield land and infill within the village boundary to achieve these priorities.

The clock started ticking for the current Plan period on 1 April 2020 and there are 21 dwellings which contribute to our consented numbers already. 10 of these dwellings are currently under construction. There are another 11 dwellings currently in planning. We are also aware of planning pipeline on sites within the village boundary which could yield a further c.20 dwellings in the next 5 years or so. We conclude that Westcott's housing trajectory is therefore healthy, ahead of target and potentially without the need to take Green Belt in this Plan period. These numbers should not be treated as windfall but Westcott's contribution to the 68 dwelling requirement.

In our Regulation 18 response we raised concern about the appropriateness of allocating 2.3 hectares at DS63 - Mill Way, Bramley House and Heathcrest for 15 dwellings (apartments) and we continue to do so today. It sits in the Green Belt, AONB, AGLV and partly in the Westcott Conservation Area. When WVA undertook a consultation in Westcott and prepared the draft assessment of criteria for MVDC's Green Belt Review January 2020 we assessed the edge of the settlement (Deerleap Road (WC)) as follows:-

Sprawl - minimal

Merging - minimal

Encroachment - moderate

Setting/ Character – significant – “This segment of the village rises from the valley floor on the north side of the village and is set among mixed species of largely deciduous trees, giving the impression from a distance of natural woodland. The plots are spacious, with large gardens, the housing is varied and having the appearance of being built among the trees. The mature tree cover is an important component in the setting...”

It is against this backdrop that we believe that the release of 2.3 hectares from the greenbelt in this location is neither necessary or proportionate. We note that the existing buildings at Mill Way, Bramley House and Heathcrest are of sufficient massing that they could be converted or replaced to create 15 dwellings by development within the same mass, meeting the NPPF policies for redevelopment in the greenbelt and without releasing the remaining and surrounding land.

Given the physical aspects of the frontage of this site on the A25, we also have significant concerns about the ability to deliver safe vehicular access and egress to the scheme and we are aware that others have made specific representations in this regard.