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Ms Helen Clarke

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6 December 2021

Dear Ms Clarke

MO/2021/2158 – The Surgery, 4 Riverbank, Westcott - Change of use of existing Doctor's Surgery (Use Class E) to 1 No. residential dwelling (Use Class C3).

I refer to the proposal above and write in my capacity as the lead for planning matters for Westcott Village Association (WVA).

You may be aware that the WVA occasionally makes representations on behalf of the Westcott community and specifically with regard to compliance with the Westcott Neighbourhood Development Plan (WNDP).

The WVA has discussed this proposal and I am writing on behalf of our community.

The applicant, Dr Guilder, practised at the subject property from 1989 and he merged his practice with Dorking Medical Practice (DMP) in 2018 before retiring in 2019. DMP still has a lease of the property. I will save operational detail as DMP have written to MVDC separately explaining why Riverbank Surgery is such a critical part of their local operation.

From a WVA perspective we are concerned that **this application does not comply the objectives of Policy CS17(3)** which states:-

“The Council will resist the loss of key services and facilities (including community facilities), unless an appropriate alternative is provided or, evidence is presented that the facility is no longer required and suitable alternative uses have been considered. This will require the developer to provide evidence that they have consulted with an appropriate range of service providers and the community where relevant”.

This is further underlined by paragraph 93 of the NPPF which states that, to provide the services the community needs, planning policies and decisions should:-

“guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs”.

The facts are simple. Riverbank Surgery continues to be a valued community facility and since 2018 DMP has expanded the patient list at Riverbank Surgery from c. 2,000 to c. 2,200, the majority being Westcott residents. There is also a busy dispensary here.

WVA has seen no evidence in the supporting statement for this application to suggest that there has been proper consultation with DMP, its patients or any part of the village community.

Furthermore, we have not seen evidence that any targeted or open marketing has taken place for the existing community/ Class E use. Only by doing this could the applicant demonstrate that reasonable efforts have been made to secure a purchaser and lay out a clear audit trail. We are not persuaded that this community facility is no longer required. The fact that DMP believe it is necessary to object to the application themselves further confirms this view.

We are aware that DMP has been trying to secure alternative premises in Westcott but this has always been a long-term project. Until such time that this is achieved – which remains uncertain - and Riverbank Surgery is declared surplus by DMP, it should remain as a community facility.

We should add that the application site is within the Green Belt as it falls outside the Westcott village settlement boundary. The applicant’s planning consultant should be

aware that to argue a lack of 5 year housing supply is only relevant to land which is not in Green Belt. It is also within AONB and an Area of Great Landscape Value.

We have noted in paragraph 3.5 of the Supporting Statement there are comments in relation to providing parking “on the existing hardstanding to the front of the property”. This does not fall within the red line application plan supplied.

It is also worth noting Policy WNDP7 (Enhancement of Community Facilities) which reads:-

“Proposals for the provision and maintenance of flexible, accessible and modern community facilities will be supported, where they would help to maintain and extend the vibrant social, sporting, recreational, and educational activities in the Plan area”.

If approved in its current form, this application puts the continuity of provision of a key community facility at risk. WVA would only be able to support the change of use of Riverbank Surgery from community use where a “joined-up” solution delivers enhanced facilities at Riverbank or elsewhere in the village.

This application does not achieve either of these things so we urge MVDC to **refuse** planning permission.

Yours faithfully,



James Leaver

Planning Lead, Westcott Village Association

Cc DMP and Patient Participation Group