



Mr James Leaver

Melrose

Logmore Lane

Westcott

Dorking

Surrey, RH4 3JY

jamesandfrancesca@hotmail.co.uk

Planning Department

Mole Valley District Council

Pippbrook

Dorking

RH4 1SJ

27 September 2022

Dear Sirs

**MO/2022/1439 - Logmore Farm, Logmore Lane, Westcott, Dorking, Surrey, RH4 3JN**  
**Certificate of lawfulness for a proposed development in respect of a shepherd's hut**  
**for use as occasional family accommodation and occasional holiday lettings.**

I write in my capacity as planning lead for Westcott Village Association (WVA). WVA occasionally makes representations on behalf of the Westcott community.

WVA first highlighted this Shepherd's Hut without planning in a representation to MVDC dated 18 May 2021. This was in relation to MO/2021/0290 for the "change of use and extension of an existing storage building to a holiday let and artists studio". In this representation we continued to hold a "neutral" position on MO/2021/0290 having raised our "concerns" in an earlier letter to MVDC dated 5 May 2021. In the 18 May letter we encouraged the landowner and MVDC to regularise the planning status of the Shepherd's Hut which had been installed in 2020 and we noted it was advertised on Airbnb. It is the fourth holiday let at Logmore Farm and this in turn generates more car parking in open

countryside and access traffic along a c. 600 metre shared surface track/ bridleway (BW572 and BW254) from Logmore Lane.

We therefore welcome this application but feel it is a shame that the Certificate of Lawfulness application had to follow the threat of enforcement action by WVA, at the request of residents, earlier this year. 2022/0090/ENF refers.

We note from the application form that the applicant also confirms that the Shepherd's Hut was "acquired in 2020". This application is therefore less than the four years where it would be immune from enforcement action and we assume this should therefore be treated as a normal application.

WVA do not believe that very special circumstances have been demonstrated for further development at Logmore Farm. The Shepherd's Hut is "plumbed in" with a kitchen, shower and WC and is not "off-grid" as the application would suggest. This is therefore development. Any perceived benefits, which are not evidenced in this application, would not outweigh the harm to the Green Belt.

The policy concerns WVA raised in May 2021 in relation to MO/2021/0290 are now further amplified and we also wish to object to MO/2022/1439 on the following policy grounds:-

#### **POLICY ENV4 - LANDSCAPE CHARACTER**

The Council will seek to ensure that development proposals and forestry schemes in the countryside and rural settlements conserve and will not detract from the character of the local landscape. In determining planning applications account will be taken of the visual impact of the proposed development on the landscape, the extent to which the impact of new buildings has been softened and integrated into the landscape by careful consideration of siting, design, colour and associated planting and whether any existing landscape features such as trees and hedgerows should be retained.

Concern – we believe that, despite the quality of buildings erected, the quantum of development, together with the significant hard surface parking which has been provided to meet the needs of the holiday lets (shaded yellow in the aerial photograph below), has now started to detract from the character and open-ness of the local landscape.



### **Policy CS 13 Landscape Character**

1. All new development must respect and, where appropriate, enhance the character and distinctiveness of the landscape character area in which it is proposed. Landscape enhancement works may be required to avoid adverse impacts associated with new developments.
2. The Surrey Hills Area of Outstanding Natural Beauty (AONB) is of national significance, and as such, the conservation of the natural beauty of the landscape will be a priority in this area. The AONB will be protected in accordance with the objectives in Planning Policy Statement 7 (Sustainable Development in Rural Areas) and the Surrey Hills Management Plan, with particular focus on the impact of development on ridgelines, significant views, peace, tranquillity and levels of artificial light.
3. The AGLV (Area of Great Landscape Value) will be retained until such time as there has been a review of the AONB boundary. Development in the AGLV area will be required to be supported by evidence to demonstrate that it would not result in harm to the AONB, particularly views from and into the AONB and the key features identified in point 2 above.
4. Small scale development for the reasonable needs of the rural economy, outdoor recreation as well as that for the local community in the AONB or AGLV, will be supported subject to meeting other relevant criteria within the LDF.

Concern – same comments as for ENV4 above but we highlight that Logmore Farm is in the Green belt, AONB and AGLV and no very special circumstances made.

### **POLICY ENV23 - RESPECT FOR SETTING**

Development will normally be permitted where it respects its setting taking account of the following:

1. the scale, character, bulk, proportions and materials of the surrounding built environment. Developments will not be permitted where it is considered they would constitute over-development of the site by reason of scale, height or bulk or in relation to the boundaries of the site and/or surrounding developments;
2. public views warranting protection. Opportunities will be sought to create attractive new views or vistas;
3. townscape features such as street patterns, familiar landmark buildings, and the space about buildings;
4. the roofscape. Pitched roofs will normally be expected and any plant, machinery or lifts being incorporated within the roof structure;
5. the impact of the development within or conspicuous from the Green Belt on the rural amenities of the Green Belt by reason of its siting, materials or design;
6. the impact on the landscape of the proposed siting and appearance of new agricultural buildings or works or any other appropriate/exceptional development in the countryside.

Concern – We would suggest that the quantum of development at Logmore Farm, together with associated parking, has now exceeded the over-development threshold for the setting.

### **POLICY RUD17 - FARM DIVERSIFICATION**

The diversification of activities on agricultural units will be permitted provided that:

1. the scale and nature of the activity is commensurate with maintaining, and where possible improving, the character and appearance of the countryside;
2. new replacement activities should re-use existing buildings wherever possible but new building will be considered in exceptional circumstances;
3. the activities would not prejudice the protection of sites of ecological, historical or recreational value;
4. the character and setting of historic farm buildings is protected;
5. the amount of traffic likely to be generated by the proposal would not prejudice highway safety or cause significant harm to the environmental character of country roads.

Development for housing or industrial and commercial development will not normally be permitted unless acceptable under Policy RUD19.

Consent will be granted only for minimal advertising appropriate to a rural area.

Concern – same comments as for ENV23. Logmore Farm is a private dwelling with land. The application form states “for use as occasional family accommodation and very occasional holiday letting”. The 13 Airbnb reviews online for the Shepherd’s Hut between August 2020 and December 2021 suggests otherwise. The statement on the application form “The change of use of this small area of land is entirely consistent with the changes of use already granted to various buildings on the farm including The Barn, Stable Cottage and

the Hayloft" implies precedent for change of use for holiday lettings based on farm diversification. But this has now become commercialisation under the banner of tourism and the Shepherd's Hut is a new building.

In the context of our comments on the application MO/2022/1524 for a revised solar panel proposal at Logmore Farm and due the extensive planning history which has cumulatively led to overdevelopment of Logmore Farm, we urge MVDC to refuse permission for MO/2022/1439.

Given WVA's formal request it is our understanding that the application will come to the Development Management Committee for decision making if officers are minded recommend approval. As this has been the Council's previous approach, please confirm that this process will be followed and treating this submission from WVA as if it has come from a Parish Council.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'James Leaver', written in a cursive style.

James Leaver

Planning Lead, Westcott Village Association