

Draft Mole Valley Local Plan 2020-2037

ED28 - Inspector's Note 12: Updated Stage 3 Matters, Issues and Questions

Issue 16 Westcott – Policy DS63 Land at Mill Way House, Bramley House and Heathcrest

Representations on behalf of Westcott Village Association (WVA)

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WVA made representations in March 2020 at Regulation 18 stage and again in November 2021 at Regulation 19 stage in respect of the soundness of the draft Local Plan.

This submission specifically provides WVA's response to the Inspector's MIQs in relation to Issue 16 Westcott and Policy DS63.

1. What are the exceptional circumstances for the release of this land from the Green Belt?

WVA has not seen any evidence to suggest that exceptional circumstances for the release of 2.3 hectares of Green Belt land could be justified. Exceptional circumstances would not be needed for a 15 (apartment) dwellings conversion scheme through a regular planning application in any event.

Policy H1 states a neighbourhood requirement of 68 net new dwellings for Westcott in the plan period. A release of 2.3 hectares of Green Belt land would potentially exceed the H1 requirement for Westcott by a considerable margin.

68 net new dwellings equates to 4 dwellings per annum. WVA has no objection to delivering these proposed numbers and, as a community, our village has 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, meets our housing needs and helps us to sustain our small businesses and our community assets. As a proactive Residents Association we take responsibility for the Westcott Neighbourhood Development Plan and we prioritise the re-development of brownfield land and infill within the village boundary. Policy WNDP 2 of the Neighbourhood Plan states "Proposals for infill or limited redevelopment of large existing gardens, within the Village Core area....will be supported where they increase the stock of 1-3 bedroom housing..."

The current MVDC Local Plan period started on 1 April 2020.

6 dwellings have already been completed.

3 dwellings are under construction

24 dwellings consented (6 subject to S.106)

2 dwellings are currently in planning

17 dwellings are in identifiable pipeline (excluding DS63)

Total = 52

We conclude that Westcott's housing trajectory is therefore healthy, ahead of target and there is no need to allocate Green Belt land in Westcott in this Plan period. It demonstrates the fact that Westcott is very likely to meet its required dwelling numbers whether or not the 15 dwellings proposed in the DS63 come forward.

The dwelling numbers above should not be treated as windfall but Westcott's contribution to the 68 dwelling requirement in Policy H1.

2. Is the proposed Green Belt boundary justified and consistent with national policy as set out in NPPF 143?

The proposed site boundary mirrors the three land ownerships rather than features on the ground and has therefore had insufficient regard to national policy.

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

We concur with the Inspector's implication that the proposed DS63 allocation is not justified or consistent with national policy as set out in NPPF 143, particularly on grounds:-

(b) not include land which it is unnecessary to keep permanently open;

(f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

3. It is suggested that development could take place in the absence of Green Belt release. Is this a realistic option and would such development accord with national Green Belt policy?

WVA believe that 15 (apartment) dwellings could be successfully delivered through a regular planning application for a conversion scheme given the existing scale and massing of the buildings at Mill Way House, Bramley House and Heathcrest. This would not require an allocation of 2.3 hectares of Green Belt land within the three ownerships.

There is good precedent in Westcott for this type of scheme, most significantly Rokefield, RH4 3NZ, a former Jewish Care home, also in Green Belt. MO/99/1035. “Change of use from a nursing home

and convert main house to 9 flats, demolition of ancillary buildings and replace with 4 flats and 6 houses”.

4. How has the site’s location within the AONB and AGLV influenced the site boundary, capacity and policy criteria in Policy DS63?

The site boundary reflects the three land ownerships and WVA believes that the Green Belt, AONB and AGLV status of the land has been disregarded as referenced in question 2 relating to NPPF 143 above.

It should also be noted that Heathcrest falls within the Westcott Conservation Area.

5. Where would access be taken from and given local road conditions would this or any other factor be a barrier to delivery of this site?

The site has existing vehicular access from the A25 Guildford Road (Mill Way House and Heathcrest) and Westcott Street (Bramley House) but WVA can offer no guidance whether these access points have the capacity to provide safe access for the indicative 15 dwellings without significant modification.

We believe the cost of significant modification would, in the event of an allocation of DS63, be used by a developer to drive a viability argument requiring the delivery of considerably more than the indicative capacity of 15 dwellings. In other words, a self-perpetuating situation leading to the unnecessary loss of and damage to Green Belt, AONB and AGLV coupled with an over-provision in Westcott which is a Tier 3 rural village.