

**Main Modifications Consultation Response from Westcott Village Association (WVA)**  
**Mole Valley Local Plan 2020-2037 (the Plan/Local Plan)**

To: Planning Policy, Mole Valley District Council, Pippbrook, Dorking, RH4 1SJ  
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Background

Westcott Village Association (WVA) has reviewed the further modifications with a primary focus on Policy ED74, the comparison in Policy ED71 and Sustainability Appraisal in Policy ED75.

Our main areas of concern relate to the soundness of the Plan in the context of MVDC's housing number assumptions and the capacity of the "Rest of the District" to deliver sustainable housing development. (Ref MM2).

Westcott is a village (rural settlement) with one pub, three shops, a church, a primary school and a doctor's surgery. It has a population of c.2,270 in c.1,000 households. Except during peak school run hours there is typically an hourly (at most) bus service in the directions of Dorking and Guildford. It is two miles to the west of Dorking without compelling walking and cycling alternatives. It is not a sustainable location for significant housing development without much needed infrastructure improvement.

The Regulation 19 Draft Local Plan set a target of 68 new dwellings for Westcott in the plan period (2020-2037). This was 4 dwellings per annum and broadly reflected historic levels of housing delivery in the Westcott neighbourhood area. The original modifications issued in February 2023 then changed the plan period from 2020-2038 and added one unit making 69 units which equates to just under 4 dwellings per annum.

We note all Green Belt sites have been kept in the draft Plan meaning that Westcott will take an allocation for 15 dwellings (apartments) at Policy DS63 Mill Way.

Sustainable Housing Delivery

We share our observations and significant concerns as follows:-

1. The proposed Plan Period is now 19 years from April 2020. MVDC's assumption is that Westcott will deliver 123 dwellings in the plan period. This is a straight-line trajectory of 6.47 dwellings per annum which means that Westcott should have delivered 26 units already.
2. This level of provision for Westcott is fundamentally at odds with MM32 Policy INF1 Criteria 1, 2 and 5 which focus on infrastructure led delivery. If the infrastructure is not present or existing road infrastructure becomes over-congested, the development is not sustainable. MM32 in relation to Policy INF 1 Criteria 1, 2 and 5 conflicts with:-
  - a. MM2 in relation to Policy S1 Criterion 4 proposes an increase in overall housing provision of 2% for the "rest of the district" as a result of a proposed 1% decrease in the housing allocations in Ashted and Dorking. This diverts significant housing provision away from sustainable urban locations which have the necessary sustainable travel infrastructure.

b. MM7 in relation to Policy H1 Criterion 4 would mean an 80% increase in housing provision in the rural settlements of Ockley and Westcott in the plan period. This diverts development to villages which do not have the required sustainable travel infrastructure, nor would the scale of development be able to fund it. It takes Westcott's housing trajectory from a historic average of 4 to 6.5 dwellings per annum.

3. It is understood that MVDC's own assessment of Westcott (table below) to justify 123 dwellings is based on the following updated MVDC assumptions of the current trajectory which we believe is incorrect: -

	Previous trajectory	Current trajectory
Allocated site	15	15
Completed since 2020	0	6
With a current permission	16	27
Small site windfall estimate	38	75
	<b>69</b>	<b>123</b>

4. WVA monitors its development pipeline. This differs to MVDC's assumptions. See table below. Since April 2020 only 4 (not 6) dwellings have been completed. There are consents for a further 26 (not 27) dwellings but only 4 of these are on site/ nearing completion. The remaining 22 consented dwellings have not yet started on site and delivery is therefore uncertain.

Completed Property	Postcode	Application	Net units	Registration	Consent date
Westlees Farm Surrey Barn	RH4 3JN	MO/2020/0336	1	19/02/2020	15/04/2020
Westlees Farm Gatehouse Barn	RH4 3JN	MO/2021/2361	1	05/01/2022	14/03/2022
Old Dairy 5 Garden Hill	RH4 3GJ	MO/2020/2315	1	01/02/2021	09/08/2021
Tumbledown	RH4 3NR	MO/2021/1620	1	26/08/2021	03/02/2022
<b>Total</b>			<b>4</b>		
Consented Property on site	Postcode	Application	Net units	Registration	Consent date
2 Milton Street	RH4 3PX	MO/2019/0159	1	24/11/2020	27/07/2021
Masters House	RH4 3NG	MO/2022/0394	3	16/03/2022	11/05/2022
<b>Total</b>			<b>4</b>		
Consented Property pre-construction					
The Old House	RH4 3NG	MO/2019/1345	3	30/07/2019	09/07/2021
Dene Farm	RH4 3LS	MO/2020/0674	8	24/06/2021	05/10/2022
The Vicarage	RH4 3QB	MO/2021/1744	4	13/09/2021	10/06/2022
Rookery Hill Farm - Milking Parlour	RH4 3LQ	MO/2022/1314	3	27/07/2022	21/09/2022
Barrington House	RH4 3NW	MO/2022/1168	1	11/08/2022	13/10/2023
Old Bury Hill Fisheries	RH4 3JU	MO/2021/0318	2	07/07/2021	23/07/2023
Westcott House Stables	RH4 3QD	MO/2023/1636	1	06/11/2023	29/12/2023

Total			22	
<b>TOTAL on 22/4/2024</b>				
			30	

5. By the end of 2024 (4.5 years into the Local Plan) Westcott will likely have delivered 8 new dwellings which is a trajectory of 1.75 dwellings per annum, well below its historic trajectory of c. 4 dwellings per annum. All of these delivered and consented schemes are on infill sites and have come forward on “windfall” basis.
6. There are no allocated housing sites in Westcott in either the current Local Plan or Westcott Neighbourhood Development Plan 2017-2026.
7. Turning to the emerging MVDC local plan, site DS63 is classified in the Housing Trajectory ED71A as a “developable site” for delivery in 2031/32 as opposed to a “deliverable site”. It is in three separate land ownerships and has significant highways access challenges which need to be resolved to ensure safe access from the A25 Guildford Road. Delivery of this site is far from certain in the 2020-2039 Plan period.
8. In summary:-
  - a. the proposed dwelling numbers of 123 less 8 delivered/ under construction and 15 (DS63) is 100 units. With 15 years to run to 2039, this would require a trajectory of consented and windfall sites of 6.7 dwellings per annum (or 7.7 dwellings per annum if DS63 does not come forward)
  - b. MVDC’s windfall figure of 75 dwellings from small windfall sites is excessive for Westcott. Taking the indicative residential capacities at MM39 - in particular 20dph for brownfield and greenfield villages – this density suggests that Westcott would need to identify 5 to 6 hectares of developable land in the period from 2020-2039.
  - c. although Westcott Ward is c.123 hectares in size, the assumption that Westcott could deliver 5-6 hectares of developable housing land is wholly unrealistic. The village core settlement boundary encompasses c.44 hectares and this has not changed since the last Green Belt Review. The whole Ward is in an Historic National Landscape and the core is surrounded on all sides by Green Belt and an Area of Great Landscape Value.
  - d. the significant proportional increase in dwelling numbers for “the Rest of the District” between the original modifications and current modifications render the findings of the Sustainability Appraisal ED75 dated February 2023 out of date in the context of S1 and H1. The March 2024 updated sustainability appraisal in ED80 does not address this issue. **We believe the Local Plan is unsound as drafted.**

The new Westcott Neighbourhood Development Plan (W NDP)

1. We have started work on our new NDP which would run from 2026. W NDP1 and W NDP2 of our current NDP positively encourages infill housing development and has continued to meet identified housing needs.
2. We are concerned that MM2 and MM7 set unrealistic housing delivery targets for Westcott which is a small village and not a sustainable location for large scale development. If a new neighbourhood plan will need to make up any housing under

delivery to be found sound, this would be in a hinderance to us successfully guiding neighbourhood planning and development in Westcott.

3. We also need to consider policy which addresses the quantum of vacant business premises and significant parking pressures in Westcott. We would not wish housing under delivery to frustrate efforts to adopt a new positively prepared WNDP in 2026.

#### Sustainable Infrastructure First

1. We support the proposed modifications in MM32 in relation to Policy INF1 Criteria 1, 2 and 5.
2. WVA has made a number of representations highlighting community concerns about the detrimental impact that further development between Westcott and Dorking would have on increasing congestion on the A25 into Dorking and on the one-way system. This road network already operates over-capacity. Improved infrastructure needs to be delivered before the DS24 (Sondes Place Farm) and DS26 (Milton Court Lane) developments and new housing in Westcott comes forward for development.
3. Specifically in relation to delivery of housing in Westcott we have already stated concerns in relation to delivering infrastructure first elsewhere in this submission Policy INF1 Criteria 5 states that MVDC will work with SCC to “*produce a Cycling and Walking Infrastructure Plan, which will identify and deliver an increase in the extent of the walking and cycling network, plug gaps in the networks and/or integrate new development into the networks*”. Sustainable housing development in Westcott is only possible when known “gaps” are addressed and realistic alternatives to private car use are provided.
4. In relation to DS26 WVA suggest that MM53 includes a commitment on the developer against Criterion 4 “*to fully investigate a safer vehicular, cycling and pedestrian access alternative via Curtis Road over MVDC land as opposed to Milton Court Lane which is shared with Cycle Route 22 and Bridleway 110 and leads onto the already heavily congested A25*”.

#### Rural Economy

1. MM18 – Policy EC4 – Criterion 1. Point c states that MVDC will “Resist the loss of village shops and employment floorspace in the rural areas”. Adopting similar principles as MM17 for Policy EC3 we suggest that the following addition is made:-  
*“Applications resulting in the loss of:*
  - a. Commercial, Business or Service use (Class E) in a village will only be supported where it can be demonstrated that:*
    - i. There is no reasonable prospect of the site remaining in a Class E use;*
    - ii. Opportunities to reconfigure or reuse the site to retain its current use or another Class E use have been exhausted;*
    - iii. The site has been actively but unsuccessfully marketed for 12-month period at a reasonable market value with a recognised agent; and where this complies with other policies in the relevant Neighbourhood Development Plan”.*
2. The reason for this suggestion is that Westcott has a number of Class E buildings/ premises which have fallen vacant. These have been vacant for a considerable period of time because a change of use is not possible under current WNDP policy, which we believe will need to change, and would not be possible under Policy EC3 as currently drafted. Some of these

buildings are a blight in the heart of our village Conservation Area and we need to find sustainable alternatives uses for them.

Proposed New Locally Listed Listings

We have reviewed the list of properties for Westcott at MM86 and have no comments to make.

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Planning Lead for Westcott Village Association

Endorsed for submission by Westcott Village Association 23 April 2024