

Westcott Neighbourhood Development Plan Regulation 16 LATE Representation

Representor index

The representor index lists every representor to the NDP. Each representor has a unique “R” number. The representors are set out in numerical R number order in the representor index.

Bodies, associations and businesses are listed by their name – not the name of their spokesperson, chair or managing director.

Where a landowner or developer has used an agent, the agent is named in brackets.

To search for a representor, place the cursor at the top of the index and use the search function “Ctrl + F”

Representation schedule

The representation schedule lists every comment made on the NDP. Each comment has a unique “C” number. Reading across, this is followed by the representor number, the representor’s name, the section of the NDP to which comment refers, the type of comment (Support, Comment, Object, with the type of objection) and then the comment itself.

To search for groups of comments:

Use the search function “Ctrl + F”

... and type in a representor’s number to find all that representor’s comments

... and type chapter title of the NDP to find all comments against that chapter

Representor index

Representor No	Name
R18	Stakeholder TG (Nova Latchmere)

Representation schedule

Comment Number	Representor Number	Respresentor	Representation
C1	R18	Stakeholder TG (Nova Latchmere)	<p>My client, TG, is the freehold owner of Riverbank Surgery, which is held within a pension structure. The building is currently occupied by Dorking Medical Practice.</p> <p>By way of factual background:</p> <ul style="list-style-type: none"> • The previous lease expired in February 2021, and no formal lease has been put in place since. • The current occupation is therefore unsecured. • The rent (£1,958.33 per month) has not been formally reviewed since 2018 and has not been agreed through NHS England or the District Valuer. • The NHS has never contacted the owner directly regarding the property. • The owner has never been contacted by the Village Forum, the Council, or their agents in relation to the Neighbourhood Plan, nor received any formal consultation documents, nor been asked for his views or consent. • The owner first became aware of the proposed designation on 2 April 2026. <p>The owner is himself a former GP of 42 years, including 32 years practising from this building, which he originally converted from a residential dwelling.</p> <p>Against that background, I wish to be clear that my client fully recognises the importance of local healthcare provision and does not object in principle to the appropriate safeguarding of valued facilities.</p> <p>However, the treatment of Riverbank Surgery within the Plan gives rise to serious concerns in respect of fairness, proportionality, and the robustness of the underlying evidence.</p> <p><u>1. Dual designation under WNDP6 and WNDP7</u> Riverbank Surgery appears to be the only property within the Plan area subject to safeguarding under both WNDP6 and WNDP7.</p>

		<p>In combination, these policies create an exceptional and disproportionate restriction on a single private asset, going materially beyond the approach applied to comparable facilities.</p> <p>There is no clear or compelling evidence base to justify this dual designation.</p> <p><u>2. Absence of landowner engagement</u> The owner has had no engagement whatsoever in the preparation of these policies which is surprising given they relate to his property.</p> <p>In circumstances where a private asset is being subjected to unusually onerous and potentially value-suppressing policy constraints, the absence of any direct consultation or engagement with the landowner is, to my mind, a significant procedural failing.</p> <p><u>3. Lack of secured and deliverable use</u> The current use is not secured by any lease or legal mechanism and has not been since February 2021.</p> <p>National policy requires that planning designations are realistic and deliverable. In this instance, the Plan seeks to safeguard a use that is not secured and may not be capable of being secured on reasonable commercial terms.</p> <p><u>4. Influence of third-party interests</u> It is apparent that the inclusion and positioning of the surgery within these policies has been influenced by the current occupier and associated development interests, who have a clear commercial interest in both the existing site and potential alternative provision elsewhere.</p> <p>It is not appropriate for the Development Plan to place significant and enduring constraints on a privately owned asset in circumstances where the policy approach has been driven by parties with a vested interest and without engagement with the landowner.</p> <p><u>5. Reliance on speculative future provision</u> Reference has been made to the potential relocation of the surgery linked to enabling development.</p>
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		<p>However, no planning permission has been granted, no funding secured and no delivery timetable established. The owner has not been approached or involved in any such proposal.</p> <p>It is not reasonable for the Plan to constrain an existing asset based on a speculative future scheme.</p> <p><u>6. Disproportionate impact on value</u></p> <p>The practical effect of the proposed policy framework is to materially suppress the value of the property.</p> <p>The building has been valued as a dwelling in the region of £750,000–£800,000, whereas offers linked to its continued use as a surgery, from the current occupier I might add, have been significantly lower (at circa £330,000).</p> <p>This stark differential illustrates the extent to which the policy approach risks placing an undue and disproportionate burden on a single private landowner.</p> <p><u>Requested modifications</u></p> <p>In light of the above, I respectfully request that the Examiner considers the following modifications:</p> <ol style="list-style-type: none">1. That Riverbank Surgery is not subject to safeguarding under both WNDP6 and WNDP7;2. That any safeguarding policy is applied in a proportionate and consistent manner with comparable uses;3. That explicit recognition is given to circumstances where the continued use of a facility is not secured by a lease or other legal mechanism;4. That the policy is amended to avoid reliance on speculative future provision in assessing the acceptability of change. <p>I trust these comments are helpful and would be pleased to provide any further information if required.</p>
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