



**MOLE VALLEY DISTRICT COUNCIL
REGULATION 19 DRAFT LOCAL PLAN 2020-2037**

This representation is submitted by Ashtead Residents' Association (ARA) to the Draft Mole Valley Local Plan (as published for Regulation 19 purposes) and primarily addresses infrastructure issues and the demands arising from new housing.

NATIONAL PLANNING POLICY FRAMEWORK - JULY 2021

The NPPF is clear that plans should address the various infrastructure needs arising out of development. In particular, it states:

- 11 a)** *all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects*
- 20.** *Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:*
- a) housing (including affordable housing), employment, retail, leisure and other commercial development;*
 - b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
 - c) community facilities (such as health, education and cultural infrastructure); and*
 - d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.*

- 104.** *Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
- a) the potential impacts of development on transport networks can be addressed;*
 - b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
 - c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
 - d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
 - e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.*
- 105.** *The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.*
- 159.** *Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.*
- 160.** *Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.*

DRAFT MOLE VALLEY LOCAL PLAN

The key new policies affecting Ashtead are Policies S1, H1 and H2.

⇒ POLICY S1: SUSTAINABLE MOLE VALLEY

Sustainable Development

1. *The Council will expect the development proposals and use of land to contribute positively to the social, economic and environmental enhancement of Mole Valley. Planning applications that are consistent with the policies in the plan (and with relevant policies contained within other elements of the Mole Valley Development Plan) will be supported, unless material considerations indicate otherwise.*

Housing Growth

2. *The Council will enable the delivery of new homes to help meet the needs of Mole Valley and the wider south-east region by aiming to deliver at least 6,000 new homes over the plan period 2020-2037 (353 new homes per annum).*
3. *In order to achieve this target, the Council has adopted the following spatial strategy:*
 - a) *Allocated town centre sites in Leatherhead and Dorking for housing-led redevelopment;*
 - b) *Developed policy (Policy H2) and set indicative densities for site allocations to ensure brownfield land sites achieve their appropriate capacity*
 - c) *Allocated outdated office complexes in Ashtead and Dorking for housing-led regeneration;*
 - d) *Released sites which were modest contributors to the objectives of the Green Belt for housing around the built up areas of Ashtead, Bookham, Dorking and Leatherhead;*
 - e) *Released sites which were modest contributors to the objectives of the Green Belt for housing within and around Hookwood to complement the economic growth point of the Gatwick area;*
 - f) *Developed policy and amended Green Belt boundaries to permit appropriate development in the villages inset from the Green Belt, namely Beare Green, Brockham, Capel, Charlwood, and Westcott; and,*
 - g) *Developed policy and amended village boundaries to permit limited infilling development in the villages washed over by the Green Belt and in the Countryside Beyond the Green Belt.*
4. *As a result of these measures, the Council anticipates that that new housing will be delivered in the following locations in the following approximate proportions:*

Dorking area 24%
Leatherhead Area 30%
Ashtead Area 12%
Hookwood Area 15%
Bookham area 7%
Rest of district 12%

6. Infrastructure provision

To ensure a liveable District, the Council will work with:

- f) Developers to deliver new early years facilities in Ashtead, Bookham, Dorking, Hookwood and Leatherhead;*
- g) Surrey County Council and developers to ensure District-wide and individual transport improvements take place across the District;*
- h) Flood prevention schemes target areas of flood risk; and,*
- i) Statutory undertakers to ensure utility improvements meet existing and new demands, especially in Ashtead, Dorking, Leatherhead and Ockley*

Character Protection

7. *All development proposals will be expected to:*

- a) Conserve and enhance the Surrey Hills Area of Outstanding Natural Beauty and the District's Area of Great Landscape Value;*
- b) Minimise the impact on the integrity of the Green Belt;*
- c) Conserve and, where necessary, enhance the District's heritage and biodiversity assets; and,*
- d) Protect other elements, designated or non-designated, which contribute to local character*

8. *The Council will produce design codes for the District in due course.*

⇒ POLICY H1: HOUSING DELIVERY

- 1.** *The housing requirement for Mole Valley is to deliver at least 6,000 additional homes within the 2020-2037 plan period (353 homes each year).*
- 2.** *Mole Valley's housing requirement will be achieved by:*
 - a) Dwellings built since the start of the plan period (since 1 April 2020);*
 - b) Dwellings currently under construction;*
 - c) Dwellings with planning permission and approval, but where development has not yet commenced;*
 - d) Dwellings delivered through site allocations, as detailed in Chapter 8 and shown on the Policies Map;*
 - e) Dwellings delivered on unidentified small sites (unidentified sites delivering fewer than 10 dwellings);*
 - f) Dwellings delivered as a result of Policy H2 Development Opportunity Areas which increases densities in sustainable locations; and,*
 - g) Dwellings delivered through other windfall sites (unidentified sites delivering 10 or more dwellings).*
- 3.** *At least 10% of Mole Valley's housing requirement will be achieved through the development of sites no larger than one hectare. This will be achieved through the methods of delivery identified in Part 2.*

4. *The housing requirements for the designated Neighbourhood Areas within the District for the plan period (2020-2037) are as follows:*

Ashtead - 690 net new dwellings

Bookham - 469 net new dwellings

Capel Parish - 195 net new dwellings

Ockley Parish - 75 net new dwellings

Westcott - 68 net new dwellings

These housing requirements will be delivered through the allocated development sites in this plan and through windfall development.

⇒ **POLICY H2: DEVELOPMENT OPPORTUNITY AREAS**

Policy H2 seeks to capitalise on the housing potential of the urban area and notably has a target minimum density of 50dph. It states:

1. *Within the Mixed-Use Development Opportunity Areas, as shown on the Policies Map and set out above, the Council will support redevelopments, including changes of use, which make a more efficient use of the site. All development within Dorking and Leatherhead Town Centres will also be required to remain consistent with Policy EC3.*
2. *Within the Residential Development Opportunity Areas, as shown on the Policies Map and set out above, the Council will support the subdivision of existing large dwellings into flats or the redevelopment of those sites to form smaller dwellings.*
3. *All developments within the Development Opportunity Areas should:*
 - a) *Achieve minimum densities of 50 dwellings per hectare. A change in character may be supported provided that the proposed development has a positive impact on the appearance of the surrounding area;*
 - b) *Be predominantly 1- and 2-bedroom dwellings. An exception will be made for proposals involving a one-for-one replacement dwelling and is on a comparable footprint;*
 - c) *Not be taller than one storey above the prevailing storey height of the surrounding townscape; and,*
 - d) *Be of high architectural design quality and standards, supported by a full design justification.*
4. *In the Mixed-Use Development Opportunity Areas, the appropriateness of a taller building will be considered on a case-by-case basis.*
5. *In the Residential Development Opportunity Areas, new development will be expected to add no more than one additional storey to the existing building height.*
6. *On appropriately sized sites, development may be acceptable to the rear of the existing frontage property(ies) subject to other policy considerations, including design and amenity.*

7. *Where development proposals are located within or adjacent to Conservation Areas, or where they affect the setting of heritage assets, the proposals must conserve and, where possible, enhance the heritage assets.*

Comment

The key issue is thus whether 690 new dwellings in Ashtead is sustainable in terms of the existing infrastructure or whether such infrastructure can be provided in a timely way in advance of the demand, thus maintaining a sustainable community having regard to Paragraph 20 of the NPPF that requires sufficient provision of infrastructure.

THE REPRESENTATION

Ashtead has taken the brunt of much development in Mole Valley District in recent years and this stretches the infrastructure provision. Notably traffic, health, schools and drainage are already at capacity and new development should not progress until these issues are addressed. There is no confidence that waiting until development occurs will not exacerbate these problems.

Traffic

- During peak times and school runs, there is consistent congestion along the A24 to the Knoll Roundabout leading to drivers turning into Craddocks Avenue or Woodfield Lane and along Barnett Wood Lane down to the Plough Roundabout. Similar attempts to avoid the A24 lead to congestion along Ottways Lane which increases congestion around schools in the Grange Road area, which is further exacerbated by the traffic lights at the Grange Road/Ermyrn Way/A24 crossroads.
- Traffic issues at A24/Ermyrn Way/Grange Road crossroads were raised in our response to the Regulation 18 consultation. Paragraph 5.3.11 of the Strategic Highways Assessment states that operational changes to the Ermyrn Way junction were carried out in 2010 and *“would need revisiting as part of any developments in the vicinity. The congested nature of the local road network together with the existing sub-standard merge and diverge layouts are considered an existing issue and not one that is exacerbated significantly by Mole Valley’s proposed spatial strategy.”* However, given that the road layout and capacity is already a recognised problem area, there is no evidence that a timeline or plans exist to mitigate the issues.
- Traffic congestion throughout Ashtead is made much worse when there is a problem on the M25 – which can be at any time of day. M25 Junction 9 is on Highways England’s worklist and the Strategic Highways Assessment states that *“the existing layout is already unable to cope with the current flows”*. We

understand that work will not begin on Junction 9 until the work on Junction 10 has been completed – possibly 10 years away.

Health Care Provision

The following was stated about primary care provision in Ashtead in the 2015 Sustainability Appraisal that was carried out during the preparation of Ashtead's Neighbourhood Development Plan.

“There are two National Health surgeries in Ashtead, both of which are almost at full capacity.

The Gilbert House Surgery in Ashtead has 9,628 patients on its books of whom 9,147 (95%) reside in Ashtead. St Stephen's Surgery has 5,449 patients registered to the practice and of these 4,817 (88%) live in Ashtead. Between them, the two practices' lists cover all but 205 of Ashtead's total population as recorded in the 2011 census.

Both practices have extended their premises in recent years to accommodate demand but although not planning to close their lists they are getting close to a practical limit and in both cases their premises constrain further expansion.

Ashtead's large elderly population have complex health needs and a high percentage of elderly patients require home visits, including those in Ashtead's Care and Nursing homes, all adding to the pressure on the surgeries. The demand from this sector of the population will increase as more people live longer.”

Since 2015, Ashtead's population has increased and both surgeries are under even greater pressure than before and have no capacity to increase their service provision. The GP practices were not directly consulted about their capability to cater for an increase in Ashtead's population and there is no clear indication how this is to be provided.

Schools

Ashtead has 3 primary and 2 infants' schools and we are assured that there is capacity for more places - a planned expansion to turn Barnett Wood Infants School into a full primary was shelved a few years ago but can be reinstated if necessary.

Secondary schools may be a different issue. Given the overall level of development in North Mole Valley, we have concerns that the provision of secondary school places will not be sufficient to meet our needs locally and could result in our children being bussed out of the Ashtead and having to commute some distance in order to receive an education.

Flooding

In our Regulation 18 response, we raised the issue of flooding in The Murreys and along Barnett Wood Lane at its junction with Agates Lane.

The drainage issues in this very wet part of Ashtead were recognized in the original plans for The Murreys development in the early 1980s; those plans included the creation of two balancing ponds and a large network of soakaways and sewers to ensure that the flooding issues would be adequately addressed both for the new development and for neighbouring properties. In the event, 19 of the houses proposed to be built on the site were not constructed and the plans to address the acknowledged drainage needs were not fully implemented, including the omission of the second balancing pond.

There is a serious issue from surface water flooding in The Murreys due to runoff, not only from Murreys Court and the water that cascades down Agates Lane during heavy rainfall, but also from higher land in Ashtead. The persistency of heavy rainfall experienced in recent years has exacerbated the problem and residents have been taking measures to prevent water getting into their homes. A brook runs behind the houses on the eastern side, and towards the top of West Farm Avenue; during periods of heavy rainfall, the brook overflows, not only because of the rain but also from the water pouring into it from the balancing pond in Summerfield (off West Farm Avenue). The overflow from the brook cascades straight down into the Murreys and the homes there are caught between water overflowing both from the west and from the east: the drainage system simply cannot cope.

The drainage solution that was installed is not sufficient to address the surface water flooding issues, which will be exacerbated by, and also affect, any further development on the land in this area of Ashtead.

The effects of the poor drainage system are also evident in the flooding along Barnett Wood Lane and particularly at its junction with Agates Lane, on the eastern side of the proposed site. After heavy rainfall, Agates Lane becomes a watercourse, which not only puts houses towards the lower end of Agates Lane at risk but also creates a large flood pool at the junction with Barnett Wood Lane. Attempts have been made over the years to address this problem but without success and, with the heavy rainfall mentioned earlier, the problem simply grows in frequency and size.

Rainfall levels are forecast to increase in the coming years and will exacerbate surface water flooding in this area of Ashtead.

ARA believes that all of these infrastructure issues should be addressed by the relevant Authorities in advance of further development whereas the plan suggests resolution on an “as and when” basis. We suggest this is:

1. Unsound as it creates unacceptable impacts on the community and
2. Is not consistent with the NPPF.

CONCLUSIONS

ARA believes that the Plan is unsound for the reasons below:

- The plan underestimates infrastructure demands arising from traffic, health requirements, schooling and flooding.
- Insufficient attention is made to resolving existing problems. Funding and programming to address these problems are a prerequisite to development.

Thus, the plan as submitted is not consistent with achieving sustainable development and is not consistent with National Planning Policy.

Submitted on behalf of Ashtead Residents' Association
5th November 2021

Glynis Peterkin, ARA Chairman