



Future Mole Valley: Draft (Regulation 18) Local Plan Consultation Response Form

Consultation Period: 3 February to 23 March 2020

This response form will allow you to comment on each section of Future Mole Valley if you wish. To view the draft Local Plan and associated documents, please visit www.futuremolevalley.org. Alternatively the draft Local Plan and supporting evidence documents are available to view in hard copy at Mole Valley District Council (MVDC)'s offices in Dorking, the HelpShop in Leatherhead and libraries in the district. Consultation responses can also be submitted online by visiting the same website.

By submitting a representation to us, you consent to being notified of other upcoming Local Plan consultations. Please notify us if you wish to opt out of future correspondence.

Your personal information will be held confidentially by us, and will not be shared with third parties. More information about how your personal data will be held is contained in the Future Mole Valley privacy notice available on the Council's website. By submitting a consultation response using this form, you agree that we may process your information in accordance with these terms.

Fields marked with a * must be filled in for validation purposes. Fields not marked with a * are optional. Anonymous responses cannot be accepted.

| | |
|--|---------------------------------------|
| First Name* | Glynis |
| Last Name* | Peterkin |
| Organisation (if applicable) | Ashtead Residents' Association |
| Responding on behalf of (if applicable) | |
| Address | |
| City, Town or Village | |
| Postcode* | |
| Email address | |

Please submit your consultation response:

- To reception at the Council Offices, Pippbrook, Dorking, Surrey, RH4 1SJ.
- By email to planning.policy@molevalley.gov.uk
- By post to Planning Policy, Mole Valley District Council, Pippbrook, Dorking, Surrey, RH4 1SJ



Our approach

We have taken a 'brownfield first' approach, with the need for new development being met within built up areas or on previously developed land as far as possible. Do you agree with our 'brownfield first' approach?

Yes

Any other comments:

Whilst meeting demand from brownfield first, rather than destroy greenfield (Green Belt) sites in the north of the district that provide the Green Belt buffer and prevent urban sprawl cannot the opportunity be taken to enhance towns and villages in the south of the District where infrastructure is poor, local shops are struggling and closing and existing dwellers have to travel far afield for Medical and Dentistry services. Increasing town and village sizes would surely be a boost to their local economies.

We have sought to make more efficient use of brownfield land through:

- town centre redevelopment
- limited reallocation of employment land
- mixed-use redevelopment
- increasing densities in opportunity areas

Do you broadly agree with these approaches?

Yes

Any other comments:

However efficiently brownfield land is reused, there is still an unmet need for housing which can only be met on land that has not previously been built on. Do you agree with the use of a small amount of undeveloped greenfield land for this purpose?

Yes (qualified)

Any other comments:

Please also see comment in response to Question (1). More consideration should be given to enlarging the southern towns and villages to give them a better chance of survival, improve their infrastructure and prevent the northern areas becoming one large urban sprawl and exacerbating the already stretched road and health provisions.



Which part of the draft Local Plan do you wish to comment on?

Please use a separate sheet for each policy or site allocation.

Please clearly state which chapter, policy, site allocation, appendix or other document you are commenting on, giving a page number where appropriate:

Spatial Strategy Policy S1: Presumption in Favour of Sustainable Development - Page 14

Comment:

How is this to be achieved with little evidence that public transport can be improved and with narrow country-like lanes that prohibit the creation of foot & cycle paths?

The policy also states that: "*When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development in accordance with national planning policies that protect natural and heritage assets, the presumption will not apply to sites protected under* [a list of categories follows including:] *land designated as Green Belt*". Clearly this protection applies to some areas of Mole Valley's Green Belt but not all, given the number of Green Belt sites being proposed for development, in Ashted's case Sites SA01, SA04 and SA45.



Which part of the draft Local Plan do you wish to comment on?

Please use a separate sheet for each policy or site allocation.

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Spatial Strategy Policy S2: Scale and Location of Development - Page 15

Comment:

S2, clause 3

Further development will be encouraged within the built-up areas

We can see why it is attractive to build in the north where there is existing infrastructure, albeit at its limits and beyond them of provision to existing communities, but smaller communities are losing their facilities and how will their communities manage to be sustainable in the future if their children have to be driven or bussed to school and people have to drive elsewhere for leisure activities.

More development in the south would mitigate this issue, reduce the pressure on the north's already shaky infrastructure listed here:

GP surgeries

- ◆ GP surgeries in Ashted are at, or almost at, their list limits.
- ◆ GP surgeries across the District are having staff recruitment issues.
- ◆ Initial contact with the Surrey Downs CCG (soon, we know, to be merged with Surrey Heartlands CCG) has informed us that they have given no consideration to the draft Local Plan and the primary healthcare provision issues arising from it, given the additional number of residents development will bring into the District.
- ◆ The merged CCG must be required to produce a clear plan identifying how and where primary healthcare is to be provided to residents over the period of the Local Plan and beyond.

Schools

Based on SCC's report of 2019 school intake levels, there appears to be little or no capacity to accommodate an increase in demand.



- ◆ Primary Schools

In Ashted, primary school provision may well be met by the expansion of Barnett Wood Infants School into a full primary school (a plan to do this was shelved less than five years ago) and the building of a new 2-form entry primary school in the locality (although not, as currently proposed, on the Site SA45 in Barnett Wood Lane – see response on that site).

- ◆ Secondary Schools

The Infrastructure Delivery Plan does acknowledge the need in later years for an additional 4-form entry secondary school in the Leatherhead/Ashted area but there is no indication of where this will be provided. Surrey County Council's *Surrey School Organisational Plan 2018-2027* does not cover the full period of Mole Valley's Local Plan but SCC has nevertheless confirmed to us that no new school will be built to accommodate the identified need for additional secondary school places. If SCC is hoping that Therfield school will expand to provide the forms, it is unclear how SCC can make that happen given Therfield's Academy status. This is an unacceptable situation and SCC must be required to produce a clear plan for 2018-2033 to show how school places are to be provided to accompany the Regulation 19 draft of the Local Plan.

Traffic

- ◆ Existing traffic levels already causing serious congestion on our roads, extending journey times and creating safety issues.
- ◆ Current lack of funds leading to poorly maintained roads full of potholes.
- ◆ Emissions from the current congestion levels and no adherence to current views on air quality which have not yet been adopted by DEFRA.
- ◆ Limited public transport provision.

Is all this going to be addressed before any further development happens in the north - as stated in INF4/1?

At some point, surely MVDC must acknowledge that the north can take no more development. To show equal consideration for the lives and wellbeing of north Mole Valley residents as for south Mole Valley residents, how about an Urban Areas policy (as a balance to the Rural Areas policy)? An Urban Areas policy that protects all the existing residents living in the north who are gradually seeing the green environment and character of the area they opted to move into become one huge urban sprawl stretching from Ashted through to Bookham and hang



the Green Belt (unless, of course, it's Green Belt in the south, or countryside just beyond its boundaries)?



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Spatial Strategy Policy S5: Rural Areas – Page 22

Comment:

This policy seeks to make much of the rural areas of Mole Valley. Then build some more homes there and move more people in to create the vibrant communities and thriving economy that this policy envisages. Let the increase in residents keep the schools open, keep the pubs open, keep the shops open, build some recreational infrastructure so that people won't have to drive to reach it. That's sustainable! The north clings on to its green spaces and areas of biodiversity but they are gradually being eroded; examples of this are acceptance of many planning applications of backfill development and schools taking up more and more land. We must protect the environment for nature for the decades to come. We need to keep what we have got and look after it.



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Housing Policy 9: Gypsies, Travellers and Travelling Showpeople - Page 39

Comment:

General comments

This policy uses three terms without clarifying what each means or whether they are synonymous: "plot", "pitch" and "site". Without knowing if the terms are interchangeable it is difficult to interpret the extent of what is meant by each policy clause.

Is there a number above which the provision of plots and/or pitches becomes a site? Or when only a couple of plots are provided, does that make it a pitch or vice versa? Or do all three terms mean the same thing? (See H9.3 below.)

NB Dorking sites:

SA29 Land at Dorking Railway Station has no pitches in spite of its size.

SA 35 Land at Pixham Lane Depot and SA36 Conifer Park, Ranmore Road are solely for pitches (or plots, or sites?) How does this fit with policy statements about the provision of sites as "*part of the development of allocated housing sites*"?

H9, clause 2

This clause seeks to ensure that adequate protection is given to the Green Belt, and existing amenities and homes around existing sites, yet the Local Plan appears to negate this clause by proposing that a number of pitches be included in new developments on Green Belt, for example Site SA01 and Site SA45.

H9, clause 3

This clause seems to imply that once provision is made in the Plan, it **may**, in certain circumstances, be appropriate to increase the provision on sites not allocated within the Plan. Yet again, it's stated that, unless there are "*very special circumstances*", gypsy and traveller sites (note sites, not pitches or plots) are considered to be inappropriate development in the Green Belt and the countryside beyond? Why, then, are they are considered appropriate for new developments on Green Belt in the north of Mole Valley?



Provision for Travelling Showpeople

Page 40 of the Consultation Draft Local Plan states:

*“Alternatively, provision **may be acceptable** within one of the strategic housing sites, as an alternative to the provision of two to three gypsy and traveller pitches (see criterion 1), provided the site provides good access to the strategic highway network and is in a location that is a good fit with identified needs.”* (LDP p40). How can a

Development Plan provide such uncertainty and be expected to win local approval? The plan seems to want the ability to put a couple of plots in, e.g. Ermyn Way and then to decide that actually it would be a good idea to build a site there.



Which part of the draft Local Plan do you wish to comment on?

Please use a separate sheet for each policy or site allocation.

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Economy Policy EC1: Supporting the Economy - Page 42

Comment:

EC1, clause 2

Safeguarding sufficient employment sites and encouraging the recycling of land to meet the needs of the economy to support job creation, the needs of modern business and the attractiveness of Mole Valley as a business location.

How can this be achieved given permitted development rights for office to residential conversion? Is this covered under Policy EC2, clause 2 or do the permitted development rights stand alone as a means to shift from employment to residential use?

EC1, clause 6

Supporting and retaining employment opportunities in Mole Valley's villages and the rural areas, where consistent with other policies in the Plan.

How is this to be achieved given the low level of development in rural areas in the current draft Plan?



Which part of the draft Local Plan do you wish to comment on?

Please use a separate sheet for each policy or site allocation.

Please clearly state which chapter, policy, site allocation, appendix or other document you are commenting on, giving a page number where appropriate:

Economy Policy EC4: Rural Economy - Page 49

Comment:

EC4, clause 1c

*To maintain a successful, sustainable and diverse rural economy, the Council will:
1c. Resist the loss of village shops and employment floorspace in the rural areas.*

How is this to be achieved if significant further development is not to be allowed in rural areas that would increase demand from more residents. If businesses are operating at a loss because of lack of demand how they do they avoid closing down and what would the Council do to prevent that happening?



Which part of the draft Local Plan do you wish to comment on?

Please use a separate sheet for each policy or site allocation.

Please clearly state which chapter, policy, site allocation, appendix or other document you are commenting on, giving a page number where appropriate:

Environment Policy EN13: Promoting Environmental Quality - Page 77

Comment:

EN13, clause 1g

1g. Mitigate or avoid any other adverse site specific or environmental impact that arises as a consequence of the development.

What issues might arise that have not been considered in this draft Plan?



Which part of the draft Local Plan do you wish to comment on?

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Environment Policy EN14: Responding the the Climate Emergency – Page 79

Comment:

EN 14, clause 1e

Measures to mitigate the effects of, and adapt to, climate change will be supported. Such measures can include:

1e. Reducing the need to travel and the promotion of more sustainable travel modes, including cycling, walking and public transport.

Footpaths and cycle paths

How is it envisaged that footpaths and cycle routes can be delivered in the more rural lanes of Ashted, where currently no such facilities exist and there is no apparent space to create them without the loss of countryside banks or making the road too narrow for two-way traffic, which would force cars into taking a long detour to reach their destination?

In discussion with Surrey Highways, we learned that, since 2018, there have been a number of advice papers on this particular issue and it is probably making its way to policy.

Public transport

To repeat the comment made for Policy INF1, clause 2d: How can current providers of the public and community transport services and facilities be persuaded to improve them? Have calculations been made on the number of residences required to provide the level of demand necessary to increase public transport provision? Surely only a substantial increase in demand would persuade a commercial, or even a local authority, operator to increase transport provision. What evidence is there that this policy can be achieved?



Which part of the draft Local Plan do you wish to comment on?

Please use a separate sheet for each policy or site allocation.

Please clearly state which chapter, policy, site allocation, appendix or other document you are commenting on, giving a page number where appropriate:

Infrastructure Policy INF1: Promoting Sustainable Transport and Parking – Page 83

Comment:

Each clause and sub-clause of this policy describes highly desirable and essential infrastructure requirements but aren't these simply a wish list? What measures will be in place to ensure that all the provisions of this policy can be met, should the developer claim that contributing towards them would render the development non-viable

INF 1, clause 2d

Provide and improve public and community transport services and facilities

How can current providers of the public and community transport services and facilities be persuaded to improve them? Have calculations been made on the number of residences required to provide the level of demand necessary to increase public transport provision? Surely only a substantial increase in demand would persuade a commercial, or even a local authority, operator to increase transport provision. What evidence is there that this policy can be achieved?

INF1, clause 6

Development of new off-airport car parking facilities or extensions to existing sites related to Gatwick Airport will not be supported unless a specific need can be demonstrated, and all realistic alternatives have been examined.

Doesn't this clause go against the NPPF, which requires support to be given to the provision of national infrastructure?



Which part of the draft Local Plan do you wish to comment on?

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Infrastructure Policy INF5: Safeguarding – Page 90

Comment:

INF5, clause 1

The development of new infrastructure will be supported where it is required. Land will be safeguarded from other forms of development that would prejudice delivery of infrastructure projects, where a demonstrable need is identified by service providers.

If, for example, a health centre were to be an identified need, this clause would mean that the land could not be used for residential purposes. Does this mean that sites so far rejected for inclusion in the Plan would be revisited and the rationale for rejecting them adjusted to fit into the Plan?

INF5, clause 2a

Land is safeguarded as follows:

2a. Land in Mole Valley adjacent to Gatwick Airport identified on the Policies Map is safeguarded for aerodrome uses, as identified by Gatwick Airport and supported by national policy.

This clause appears to contradict Policy INF1, clause 6



Which part of the draft Local Plan do you wish to comment on?

Please use a separate sheet for each policy or site allocation.

Please clearly state which chapter, policy, site allocation, appendix or other document you are commenting on, giving a page number where appropriate:

Site Allocation SA01: Land South of Ermyn Way, Ashtead – Page 93

Comment:

Green Belt

While we are supportive of Ashtead residents in the locality in their opposition to the loss of Green Belt land, we must acknowledge that this site was identified in Ashtead's 2013 Green Belt Boundary Review as a site that could be considered for a Green Belt boundary change.

We note also that, in its response to this consultation, the CPRE has made the same assessment of the site, particularly in light of only 10.5ha of the 55.5ha site being proposed for housing, with a further 8.3ha remaining as public open space and 3ha retained for protection of the ancient tree belt.

By far the greater concern regarding development of this site is its implications for exacerbating the traffic hotspot at Ermyn Way's junction with the A24.

Traffic

If this site remains in the Plan, we have serious concerns that development on this site will exacerbate the existing traffic problems associated with this part of Ashtead and this would be compounded if site SA02 were also to remain in the Plan.

Site Assessment 18-AS-011 states:

1. *"At peak times, traffic generated by residential development would generally be flowing in the opposite direction to existing traffic generated by schools and business in the area."*

It's not at all clear what this means. Traffic moves in both directions at peak times and residents leaving the Ermyn Way area get caught up in the school traffic leaving the area after parents have parked (parking in Ermyn Way adding to the congestion) and walked their children to school.



2. *“Access to the site would be from Ermyn Way, at the junction with Green Lane. It is proposed to realign Ermyn Way to provide a staggered crossroads to enable access to the site. The access plan confirms that access modifications can be achieved within land controlled by the developer and highway land.”*

Given that Surrey Highways has only conducted a strategic overview of proposed development across Mole Valley, how can this level of detail be claimed?

3. *“The impact on existing traffic congestion hotspots has been assessed at strategic level and does not appear severe.”*

The key words here are “strategic level”, which is a very top line overview looking at overall provision in Mole Valley and taking a view that more housing may not necessarily mean more traffic movement in the District as occupants of the new homes may well have moved within Mole Valley, perhaps from rented accommodation or shared living arrangements. And, of course, anything should be possible in order to ensure more free flowing traffic: more roads for example, were funds and land available.

4. *“Transport evidence indicates some impact on local roads but also highlights that development could bring funding forward for potential junction improvements, subject to further feasibility work.”*

This assumes that sufficient funding coming from developer contributions will create a large enough funding pot for any necessary highways work, always providing that Surrey County Council could also find funds to contribute to it. For this site, of course, developer contributions for highways infrastructure would also come from Site SA02 Ermyn House, Ermyn Way but, in discussion with Surrey Highways, we learned that combined developer contributions from these sites will not meet a level that could contribute significantly to any traffic mitigation measures needed for this area of the road network.

Traffic is already fairly constant in the Ermyn Way area because of journeys to and from the ExxonMobil and Premium Credit offices located on the site, which all contribute to traffic congestion at peak hours. The mornings are particularly difficult when employees and visitors arriving at the site combine with commuters travelling elsewhere in Mole Valley, or heading to and from the M25 at the same time as children are being delivered to the 3 schools in the immediate neighbourhood.

Parking along Ermyn Way adds to the congestion at school drop-off and pick-up times as parents park along the road and then walk their children to school; crossing the A24 is considered too dangerous to allow children to walk on their own. Highways acknowledge the fact that traffic congestion can lead to high stress levels and this can



have an impact on road safety as drivers' frustrations can lead to risk-taking on crowded roads.

The A24/Ermyrn Way/Grange Road junction that feeds into and off the Knoll roundabout and the route to M25, Junction 9 is a recognized traffic hotspot and Surrey County Council's document *Mole Valley Forward Programme 2019 and Completed Programmes* lists the following scheme in its table of *Strategic Road Network Schemes*:

Scheme SRN 1: M25 Junction 9/Knoll roundabout/A24 Grange Road Junction

Description of scheme:

- ◆ *Undertake feasibility work to determine necessary improvements to facilitate Local Plan growth.*
- ◆ *Provide improvements to congestion and safety.*

Scheme purpose:

- ◆ *Address congestion; improve journey time reliability;*
- ◆ *Improve safety for all users.*

We understand that some more detail on a strategy for addressing the traffic issues at this location, should this site remain as a preferred option, will be provided in the Regulation 19 stage of the Plan; the level of funding required to resolve the issue and the potential for developer contributions to contribute sufficiently towards the cost given the size of this development (and that of SA02), will also take place at this stage. Surrey Highways have said that it is difficult to see how a resolution to even the existing issues can be achieved without a major and very costly redesign of the road system, which is inhibited by the road bridge over the M25 in this section of the highway. As mentioned earlier, Surrey Highways said that developer contributions from the proposed sites would not begin to generate the necessary funding and add to that Surrey Highways own budget constraints that would prevent them making up the shortfall.

Air quality

Congestion brings with it the further issue of pollution. DEFRA's measurement standards of air quality have not kept pace with the latest findings on pollutants in fuel, particularly the micro-particulates, which are now identified as a serious component of petrol-engine emissions and a danger to health.

We understand from Surrey Highways that the issue of particulates is now recognized and there is a view that air quality measurement standards need to be revisited.

Sustainable transport modes

Regardless of a major resolution to Scheme SRN 1, the inclusion of, and improvement to, cycle paths connecting this development to transport & shopping facilities in Leatherhead / Ashted must be stated as a requirement if development goes ahead.



As must a resolution to the difficulties currently experienced by residents in simply walking from their homes to schools and local amenities. For example, the notion that children could walk to school from this part of Ashtead was met with derisive laughter when it was suggested to residents attending the public meeting held in Ashtead on February 6th, 2020. Sustainability of development through walking and cycling is clearly not an option for the current residents of this area of Ashtead; given that sustainability is a development requirement, it will not be achieved by adding to the traffic in this area, making it more dangerous for children to walk or cycle to school and commuters to walk or cycle to Ashtead or Leatherhead stations.

Traveller Pitches

Is it the intention to place the 2 traveller pitches proposed for this site next to each other?

Gypsies, travellers and travelling showpeople are gregarious and will wish to be together; with that comes a life-style that tends towards large cars and other vehicles associated with the travelling community. Travellers' reputation with the wider public leads them to be viewed with some suspicion and apprehension and a degree of support will be needed to integrate them with others living in a residential development, especially as that reputation extends to one of untidiness. How will Mole Valley ensure integration with the non-traveller community and that the pitches will be well maintained and not be overcrowded by other settled travellers moving onto them?

Infrastructure Provision

Policy INF4, clause 1

New development must contribute towards the delivery of infrastructure facilities and services. The infrastructure necessary to support the new development should either be provided on-site, integral to the development, or be secured off-site through other mechanisms. For major development, phasing may be required and later phases may be dependent on infrastructure being in place.

The final sentence of this clause refers to phasing of major developments but it is not clear what size of development that includes. What consideration will be given to existing infrastructure issues that will be exacerbated by development in this area, which could be considered as a new phase to existing housing? This sentence needs to be invoked for this development, particularly in respect of traffic and drainage in the immediate neighbourhood as well as for school places and health provision. Planning conditions must be put in place stating that the necessary infrastructure to support this development, and also meet the needs of existing residents, must be completed prior to commencement of



construction.

Ancient Tree Belt

SA01, Requirement (1) states: "*The site layout shall maximise retention and safeguarding of existing mature trees, tree belts and areas of woodland and any species of botanical interest which are identified within the field margins, and incorporate those features in a coherent landscaping strategy for the site.*"

We of course support this but would urge that whatever landscaping plan is put in place includes a solution that ensures that the ancient tree belt is strongly protected from potential damage by visitors accessing the area post development.

Construction Plan

- ◆ Given all of the traffic issues, a clearly defined construction plan must be in place to ensure that peak hours are avoided by lorries driving to and from the site and that all vehicles associated with the development are parked on-site.
- ◆ Strong protection measures must be insisted upon to protect the ancient tree belt on the northern and western edges of the site during construction.
- ◆ All vehicles associated with the development during construction must be parked within the development site.



Which part of the draft Local Plan do you wish to comment on?

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Please clearly state which chapter, policy, site allocation, appendix or other document you are commenting on, giving a page number where appropriate:

Site Allocation SA02: Ermyn House, Ermyn Way, Ashtead – Page 95

Comment:

Traffic

If this site remains in the Plan, We have serious concerns that development on this site will exacerbate the existing traffic problems associated with this part of Ashtead and this would be compounded if site SA01 were also to remain in the Plan.

Site Assessment 18-AS-003 for this site makes no mention of the increase in traffic that will result from residential development and we think that the assessment does not reasonably reflect the traffic position. This is especially the case if considered alongside the development proposed on site SA01 Land South of Ermyn Way; the combination of 2 potential developments in the Ermyn Way area will clearly increase traffic levels at a junction that is already over capacity during peak hours and this should have been properly acknowledged and stated in the draft Local Plan.

The initial 1984 ExxonMobil planning approval included 800 car parking spaces, to include visitor spaces; over time an area of grass has also been concreted over to create a few extra spaces. At first sight, it would therefore appear that the building of 200 dwellings on this site would not necessarily exacerbate the existing traffic issues, were the site's use to change from commercial/employment to solely residential. However, it is intended that a workforce will remain on site and, as yet, we have no indication of how large that workforce will be in order to assess the level of traffic movement associated with it.

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We understand that some more detail on a strategy for addressing the traffic issues at this location will be provided in the Regulation 19 stage of the Plan. The level of funding required to resolve the issue and the potential for developer contributions to contribute sufficiently towards the cost, given the size of this development (and that of SA01), will also take place at this stage. It is difficult to see how a resolution to even the existing issues can be achieved without a major and very expensive redesign of the road system, which is inhibited by the road bridge over the M25 in this section of the highway. Surrey Highways further said that developer contributions from the proposed sites would not begin to generate the necessary funding and add to that Surrey Highways own budget constraints that would prevent them making up the shortfall.

Air quality

Congestion brings with it the further issue of pollution. DEFRA's measurement standards of air quality have not kept pace with the latest findings on pollutants in fuel, particularly the micro-particulates, which are now identified as a serious component of petrol-engine emissions that are a danger to health.

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Sustainable transport modes

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construction.

Archeological Interest

This is a Saxon & Bronze Age archeological site and a survey may be required before work begins if one has not been conducted prior to the development of the ExxonMobil offices, although, as the site assessment notes, the office block now covers most of the site.

Construction Plan

- ◆ Given all of the traffic issues, a clearly defined construction plan must be in place to ensure that peak hours are avoided by lorries driving to and from the site.
- ◆ All vehicles associated with the development during construction must be parked within the development site.



Which part of the draft Local Plan do you wish to comment on?

Please use a separate sheet for each policy or site allocation.

Please clearly state which chapter, policy, site allocation, appendix or other document you are commenting on, giving a page number where appropriate:

Site Allocation SA03: Murreys Court, Agates Lane, Ashtead – Page 96

Comment:

Character of the Area

Agates Lane lies within the Built-Up Character Area of **The Lanes**, an area that is characterised by its narrow winding lanes, which give it a rural feel and appearance, complete with its lack of footpaths. It is vital to retain the character of this area of Ashtead through the inclusion of proper screening requirements and buffer zones in any development of the Murreys Court site. Should this site remain in the Plan, the development's design must not overshadow the existing character of the lane through MVDC's failure to attach a planning condition requiring the retention of the current level of screening from neighbouring properties, including the retention of the wall fronting Agates Lane.

The planning condition should also state that buffer zones be put in place between the development and No 8 Agates Lane and that height restrictions are laid down to ensure the privacy of properties in Agates Lane and The Murreys.

Access

Site Assessment 18-AS-004 states that: "[Access to the site is currently from Agates Lane to the east. There is also an access point from The Murreys in the southwest corner of the site.](#)"

It should be pointed out that vehicular access is currently from Agates Lane and it does not extend beyond immediate access to the existing buildings.

Residents in both Agates Lane and The Murreys are concerned about the increase in traffic to the site, both during construction and thereafter for the proposed 30 new dwellings. Agates Lane is a narrow winding lane, without footpaths, which is already used as a cut-through for more traffic than is safe, particularly for pedestrians, including children walking to school. The roundabout in The Murreys sports an ancient oak tree, which already suffers damage from lorries as they negotiate the roundabout and confidence is not high that heavy construction traffic will be mindful of the need to take care. The twists and turns of the roads in The Murreys do not lend themselves to heavy



construction traffic or an increase in regular traffic post development as is also the case in the more rural Agates Lane

Imaginative solutions on access that involve close discussion and agreement with local residents should be found prior to commencement of any development such that neither Agates Lane nor The Murreys bears the full brunt of the increase in traffic, if any increase at all. Has a solution to access to the site from Barnett Wood Lane been investigated?

Flooding

The **Level 1 Strategic Flood Risk Assessment December 2017 (SFRA)** has been referenced throughout this response on flooding (and also on bio-diversity) and other reference documents stated when quoted.

Site Assessment 18-AS-004 states the following about flooding on this site:

"The site is in Flood Zone 1. Some of the eastern part of the site around existing buildings is liable to 1 in 30 and 1 in 100 year surface water flooding. In addition, parts of the centre of the site are liable to 1 in 1000 year surface water flooding."

Given the levels of persistent heavy rainfall we have been experiencing in recent years, we take issue with the apparent lack of concern about surface water flooding in this part of Ashted and the fact that there is no reference made to the surface water flooding issues experienced by residents living on the western side of the site in The Murreys. The entirety of **Policy INF 2 - Managing Flood Risk** should be applied to any development of Murreys Court.

SFRA Section 7 Guidance for planners and developers: Surface water runoff and drainage

7.1 What is meant by Surface Water Flooding?

"For the purposes of this SFRA, the definition of surface water flooding is that set out in the Defra SWMP guidance [Surface Water Management Plan Technical Guidance, DEFRA (2010)]. Surface water flooding describes flooding from sewers, drains, and ditches that occurs during heavy rainfall in urban areas.

Surface water flooding includes pluvial flooding [defined as]: flooding as a result of high intensity rainfall when water is ponding or flowing over the ground surface (overland surface runoff) before it either enters the underground drainage network or watercourse or cannot enter it because the network is full to capacity."

SFRA Section 4.6 Surface water flooding

4.6.1 General

“Flooding from surface water runoff (or ‘pluvial’ flooding) is usually caused by intense rainfall that may only last a few hours. Flooding usually occurs when rainfall fails to infiltrate to the ground or enter the drainage system. Ponding generally occurs at low points in the topography. The likelihood of flooding is dependent on not only the rate of runoff but also saturation of the receiving soils, the groundwater levels and the condition of the surface water drainage system (i.e. surface water sewers, highway authority drains and gullies, open channels, Ordinary Watercourses and SuDS).

Surface water flooding problems are inextricably linked to issues of poor drainage, or drainage blockage by debris, and sewer flooding.”

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.



The impact of climate change on rainfall

As stated earlier, rainfall levels will increase in the coming years and will exacerbate surface water flooding in this area of Ashted.

The headline findings of The Met Office document **UK Climate Change Projections 2018 (UKCP18)** state that:

Section 3.2 Future Precipitation Change

“3.2.4 Despite overall summer drying trends in the future, new data from UKCP Local (2.2km) suggests future increases in the intensity of heavy summer rainfall events. These increases in UKCP Local (2.2km) are typically greater than those in the Regional (12 km).For urban areas particularly, this will impact on the frequency and severity of surface water flooding.

3.2.5 Future climate change is projected to bring about a change in the seasonality of extremes.UKCP Local (2.2km) projects an extension of the convective season from summer into autumn, with significant increases in heavy hourly rainfall intensity in the autumn

3.2.6 UKCP Local (2.2km) suggests significant increases in hourly precipitation extremes in the future. For example, rainfall associated with an event that occurs typically once every 2 years increases by 25% (central estimate). This has several implications for how we manage water. It is worth noting that whilst the intensity of hourly rainfall is projected to increase in the future, overall summers are projected to become drier.”

UKCP18 also states:

- ◆ *“Consistent with earlier projections [on future UK precipitation], UKCP18 shows an increased chance of warmer, wetter winters in the UK*
- ◆ *But variability in rainfall is increasing: wet winters will get wetter, but we can still expect to see dry winters.*
- ◆ *This means that we will need to be resilient to wider range of conditions than we are used to.”*

And

| <i>For a location in central England</i> | | |
|--|-------------------------------|--------------------------------|
| | <i>Low emission scenario</i> | <i>High emission scenario</i> |
| <i>Summer rainfall</i> | <i>41% drier to 9% wetter</i> | <i>57% drier to 3 % wetter</i> |
| <i>Winter precipitation</i> | <i>3% drier to 22% wetter</i> | <i>2% drier to 33% wetter</i> |

The importance of a Sustainable Drainage System

SFRA Section 7.2

"It is essential that the consideration of sustainable drainage takes place at an early stage of the development process –ideally at the master planning stage. This will assist with the delivery of well designed, appropriate and effective SuDS. Proposals should also comply with the key SuDS principles regarding solutions that deliver multiple long-term benefits. These principles are:

- ◆ *Quantity:should be able to cope with the quantity of water generated by the development at the agreed rate with due consideration for climate change via a micro-catchment based approach*
- ◆ *Quality:should utilise SuDS features in a "treatment train" that will have the effect of treating the water before infiltration or passing it on to a subsequent water body*
- ◆ *Amenity/Biodiversity:should be incorporated within "open space" or "green corridors" within the site and designed with a view to performing a multifunctional purpose"*

SFRA Section 7.5

"Sustainable Drainage Systems (SuDS) are water management practices which aim to enable surface water to be drained in a way that mimics (as closely as possible) the runoff and drainage prior to site development."

Please note, that mimicking "the runoff and drainage prior to development" is exactly what is **NOT** needed in this case. We require a complete solution to the existing drainage issues that not only addresses all the surface water problems already being experienced by residents but also ensures that any new development is catered for; this infrastructure must be in place prior to commencement of new housing construction.

SFRA Section10 Development Management Recommendations

Two of the recommendations made in section 10.2, which are stated to be applicable to all Flood Zones, are:

- ◆ *"Developers should demonstrate through a Surface Water Drainage Strategy, that the proposed drainage scheme, and site layout and design, will prevent properties from flooding from surface water, allowing for climate change effects. They should also show that flood risk elsewhere will not be exacerbated by increased levels of surface runoff. Consideration must also be given to residual risk and maintenance of sustainable drainage and surface water systems*
- ◆ *Surface water runoff management should be undertaken, through the utilisation*



of appropriate SuDS techniques, prioritising the use of surface SuDS features which provide additional benefits (e.g. biodiversity, amenity space)”

It is possible that some of the flooding might be caused by Taylor Wimpey Homes' (TWH) inadequate maintenance of the existing balancing pond but no-one knows for sure whether or not this is an issue because TWH has been reluctant to investigate. TWH should be required to check that the pond is performing correctly and that there are no blockages in its out pipes causing water levels to rise and add to the surface water flooding problems.

It is vital that a Drainage Impact Assessment is carried out to ensure that a drainage infrastructure that can address the flooding issues described above is in place prior to development, especially now that 30 new dwellings are proposed to be built on the site – a significant and troubling increase over the additional 19 homes originally planned back in the 1980s.

It is also vital that a robust solution is found to the drainage problems and a that easy and clear recourse to a solution should flooding arise from a failure by the developer to provide such a solution is readily accessible by residents. This should be put in place as a planning condition should a planning application be approved .

Biodiversity

Site Assessment 18-AS-004 states that: *“This central site does not have any Nature Conservation or Biodiversity constraints.”*

We take issue with this statement. This site has not been disturbed for many, many, many years and it is most likely a wildlife haven and of biodiversity importance: we know already that the woodland on the site provides habitat for badgers, bats and birds. A detailed ecological survey that carries across all seasons must be carried out before development can be considered.

EN6

Where practical, taking account of the scale and nature of the development, proposals will be required to:

- a. Include proposals to achieve measurable net gains in biodiversity.*
- b. Increase the coherence of ecological networks through greater connectivity between wildlife sites.*
- c. Offer opportunities to improve health and wellbeing within the local community through direct contact with natural areas.*
- d. Provide educational opportunities to enable local people to improve their understanding of the natural environment.*

The work needed to address the drainage issues for this site and neighbouring



properties, will allow for the enhancement of the “*ecological and amenity value*” of the site. Sections of the SFRA refer:

SFRA, Section 6.7.3 Sustainable Drainage Systems

“The inclusion of SuDS within developments should be seen as an opportunity to enhance ecological and amenity value, and promote Green Infrastructure, incorporating above ground facilities into the development landscape strategy. SuDS must be considered at the outset, during preparation of the initial site conceptual layout to ensure that enough land is given to design spaces that will be an asset to the development rather than an after-thought. Advice on best practice is available from the Environment Agency and the Construction Industry Research and Information Association (CIRIA).”

SFRA Section 7.5

“The inclusion of SuDS within developments should also be seen as an opportunity to enhance ecological and amenity value as well as promote Green Infrastructure by incorporating above ground facilities into the landscape development strategy. Appropriately located SuDS measures also offer an opportunity to contribute to the priority habitat restoration and creation targets for the county outlined in The Surrey Nature Partnership's "Biodiversity Opportunity Areas" document [Biodiversity Opportunity Areas: the basis for realising Surrey's ecological network, Surrey Nature Partnership (2015). Accessed online at: https://surreynaturepartnership.files.wordpress.com/2014/11/biodiversity-opportunity-areas_surrey-nature-partnership_20151.pdf].”

Construction Traffic

- ◆ A very clear construction plan must be in place to ensure that residents in Agates Lane and The Murreys are not adversely affected by construction traffic accessing the site.
- ◆ Should any access be through The Murreys, advice from an arborist must be sought regarding protection of the ancient oak from high-sided vehicles.
- ◆ All vehicles associated with the development during construction are parked within the development site.
- ◆ Restoration of the wall fronting Agates Lane must be carried out if damage occurs during construction.



Which part of the draft Local Plan do you wish to comment on?

Please use a separate sheet for each policy or site allocation.

Please clearly state which chapter, policy, site allocation, appendix or other document you are commenting on, giving a page number where appropriate:

Site Allocation SA04: Marsden Nurseries, Pleasure Pit Road, Ashted - Page 97

Comment:

Green Belt

We support the views of Ashted residents in their opposition to the loss of Green Belt land, even though this site is considered under the NPPF definition as previously developed land. The site has been gradually built upon over the years such that it is hardly recognisable as Green Belt in terms that we usually understand it of open, undeveloped land. Our concern is the precedent that this site sets for greater loss of Green Belt along the stretch of land that prevents merging between Ashted and Epsom, should an extension to residential development be proposed.

Site Assessment 18-AS-001 mentions that there is: "[Extensive history linked to the site's use as a garden centre. The authorised use is limited by conditions and the site does not benefit from an unrestricted A1 use.](#)" To add some detail to this: In 2006, Planning Application MO/2006/0524 sought approval to build just one dwelling on this site; the application was refused by Mole Valley and dismissed on Appeal (Ref APP/C3620/A/06/2020019). With reference to the Green Belt, the Appeal decision gave detailed reasons for the dismissal; points (3) and (10) are reproduced below but there is a wealth of explanation supporting the conclusion in points (4) to (9) of the Appeal decision document:

- (3) *The site, together with undeveloped land to the north and east, lies within the Metropolitan Green Belt. Government policy for controlling development in the Green Belt is set out in Planning Policy Guidance 2 (PPG2), which confirms that there is a general presumption against inappropriate development in the Green Belt, and that such development should not be approved except in very special circumstances. This policy of severe restraint has been carried forward in the adopted Surrey Structure Plan (policy LO4), and the adopted Mole Valley Local Plan (policy ENV2). More detailed policies concerning general development control issues and the impact of development on*



the Green Belt are contained in Local Plan policies ENV22 and ENV23.

- (10) In conclusion I can find no very special circumstances to justify consent for what is recognised as inappropriate development in the Green Belt; that the proposed development would cause harm to the openness of the Green Belt; that any environmental benefits arising from the proposal would be slight and insufficient to overcome fundamental objections to the scheme; and that the contemporary design of the proposed dwelling would not mitigate against its intrusion into the local landscape or its inappropriateness as a form of development. I therefore conclude that the appeal should be dismissed.*

We do however acknowledge that this site was identified in Ashtead's 2013 Green Belt Boundary Review as a site that could be considered for a Green Belt boundary change and that this view is also held by the CPRE in its response to this consultation.

EN1, clause 1

Land which is designated as Metropolitan Green Belt will be protected against inappropriate development, as defined by national policy.

Has national Green Belt policy been amended to the extent that the proposed 20 dwellings on this site would not be inappropriate development when just one dwelling in 2006 was deemed to be so?

Sustainable alternative transport modes

INF1, clause 1

New development will be required to contribute to the delivery of an integrated, accessible and safe transport network, and maximise the use of sustainable transport modes; including walking, cycling and public transport.

And

INF1, clause 2a

Where practical, taking account of the scale and nature of the development, proposals will be required to:

- a. Provide high-quality, safe and direct walking and cycling routes, with priority over other traffic.***

The question arises as to how these policy clauses are going to be carried out in respect of the provision of safe cycling and walking facilities.



While the majority of current visitors to the site invariably use their cars to access it, a move to residential use, with the assumed associated move to more sustainable means of transport, means that the creation of footpaths and cycle paths will become a very necessary addition to the surrounding roads, particularly if children are to be expected to adhere to school travel plans and walk or cycle to school.

We note that this point has been mentioned in MVDC's site assessment but it is difficult to envisage how the introduction of footpaths can be achieved without considerably altering the current character of the area by reconfiguring road layouts and narrowing the highway. As we have stated in our response to Policy EN14, clause 1e: In discussion with Surrey Highways, we have learned that, since 2018, there have been a number of advice papers on this particular issue and it is probably making its way to policy. It is to be hoped that this will be given very serious consideration in the Regulation 19 stage of the preparation of the Plan when preferred development options are decided upon.

Economy / Community

Policy EC1, clause 4

Safeguarding local shopping centres as well as smaller parades and individual shops that support the local needs of communities.

The potential loss of this garden centre and restaurant, a valued community hub, presents the loss of an employment opportunity in Ashted and goes against Policy EC1, clause 4. What has caused the Council to override its own policy?

Construction Plan

- ◆ Construction traffic should only access the site from Wilmerhatch Lane (using the "Derby route") and be specifically prohibited from driving through the narrow Ashted lanes of Pleasure Pit Road and Farm Lane.
- ◆ All vehicles associated with the development during construction must be parked within the development site.



Which part of the draft Local Plan do you wish to comment on?

Please use a separate sheet for each policy or site allocation.

Please clearly state which chapter, policy, site allocation, appendix or other document you are commenting on, giving a page number where appropriate:

Site Allocation SA45: Land to the North and South of Barnett Wood Lane, Leatherhead – Page 148

Comment:

Green Belt

We strongly object to the loss of Green Belt to development of this site, a view shared by CPRE in its response to this consultation. The Green Belt here prevents the merging of Ashted and Leatherhead and, should it be lost, there is nothing to stop the two conurbations becoming one urban sprawl that extends out to encompass Fetcham and Bookham.

18-LH-021 suggests that: "*A 'green corridor' along Barnett Wood Lane could also be included to provide a degree of space and landscaping between Leatherhead and Ashted.*" This comment indicates that there should be some measure that creates an identifiable degree of green-space separation between Leatherhead and Ashted – a function currently carried out by the Green Belt land on this site, which, as stated in the site assessment, is performing its assigned function of preventing merging at a significant level.

The Green Belt here, as another two of its functions, also checks sprawl and encroachment at a moderate level, although enhancement has been reduced to minimal in the site assessment because the site has a "*less rural feel than other parts of the broader area*".

If we accept the point about enhancement, we would challenge the Council's decision to propose development on this site and override the significant and moderate contributions that the Green Belt makes in this location. To local residents it is part of the green landscape as you enter Ashted – even if it is on the Leatherhead side of the road bridge.

Traffic

18-LH-021 – Site is: "*Adjacent to identified congestion hotspot (M25 Junction 9a roundabout – A243 with A245 and M25).*"



Although the hotspot noted above has been flagged, there is no mention in the site assessment of the traffic congestion along Barnett Wood Lane. At peak times, particularly in the morning when commuter traffic joins the school run traffic, the congestion stretches along Craddocks Avenue, Ashtead, from its junction with the A24, and continues along the length of Barnett Wood Lane to the Plough Roundabout, Leatherhead. Traffic builds up in all the side roads along this route as it waits to feed into the traffic queue and it can take 30 to 40 minutes to reach the Plough roundabout, depending on the level of traffic queuing for the M25 or heading into Leatherhead from the roundabout. On mornings when there are problems on the M25, traffic in Ashtead is gridlocked.

Surrey Highways' forward programme does not include any plans that would address the current traffic issues along this route, although it does include a plan to address accessibility improvements to and from Ashtead Station (cycling, walking, car parks). But the problem is the traffic that uses this route to avoid the congestion on the A24 and Surrey Highways should already have identified the route as a traffic hotspot – even before this proposal to build 550 homes and a primary school on site SA45.

In discussion with Surrey Highways, we learned that a development this close to the M25 junction will fuel greater use of the motorway and this site has therefore been flagged to Highways England. Surrey Highways concern is also that increased congestion around the already identified hotspot in site assessment 18-LH-021 might mean that traffic that would normally have used M25 Junction 9a would opt for an alternative route to the M25 and move the congestion elsewhere.

Access

If this site is included in the Plan, to avoid adding to the congestion on Barnett Wood Lane, vehicular access should be onto the A245 Leatherhead Bypass. There should be pedestrian and bicycle access only on Barnett Wood Lane.

Air quality

EN4, clause 3h (first sentence)

There should be a clear definition between public and private space that provides opportunities for recreation, social interaction as well as supporting healthy lifestyles.

And

EN13, clause 1d

Development should minimise exposure to, and the emission of, pollutants including noise, odour, air and light pollution. Proposals should ensure that they:



d. Avoid increasing exposure to poor air quality, including odour, particularly where vulnerable people (such as older people, care homes or schools) may be exposed to areas of poor air quality.

How are the policy clauses quoted above to be met by building on land adjacent to major roads (A243 & M25) with vehicle emissions that fill the air with harmful particulates? Add to that the pollution from the congestion on Barnett Wood Lane described earlier.

Particulates are already attaching themselves to the buildings in Barnett Wood Lane and entering people's lungs where they will settle and remain. DEFRA air quality measurements have been used as the standard when assessing a site's suitability for development but those measurements pre-date 2016 and since then a great deal of work has been done to identify the harmful content of vehicle emissions. We understand from Surrey Highways that the issue of particulates is now recognized and there is a view that air quality measurement standards need to be revisited.

Particulates, particularly micro-particulates from petrol engines, have come to the fore as a very serious contaminant which causes serious health issues and exacerbates them in people with existing bronchial conditions. The proposal to build 550 homes alongside the A243 and M25 is so very irresponsible as is the proposal to include a primary school on the site with the accompanying exposure of young and developing lungs to the contaminant. This issue must also be taken into consideration before invoking **Policy EN11, clause 3c**, which requires that in "**developments of 500 or more net dwellings, a Multi-Use Games Area is required**".

Contamination and Safeguarding Soil Quality

Site Assessment 18-LH-021 states: "*Non-agricultural land. Small patch of low risk contaminated land located centrally on that part of the site to the north of Barnett Wood Lane plus a strip of medium risk contaminated land adjacent to railway line to the north which could be reduced through development.*"

Given the issues of micro-particulates referred to earlier, we consider that there is a very strong possibility that there is serious soil contamination on this site that has not been recognized or even considered and which would preclude development of the land for housing, let alone for a school or for growing food in gardens. The particulates causing the contamination will continue to be present even if the existing contamination could be addressed because the traffic won't stop and neither will the direction of airflow that carries the particulates onto the soil.



Flooding

Although some areas of green space are to be left, inevitably the remainder of this area will become largely covered in properties, concrete and tarmac with the existing soakaway acreage lost. The Rye Brook takes the output from many local culverts in Ashtead and recent experience of Storm Ciara and Storm Dennis has shown the brook will flood in extreme conditions. If the surface water from this development accelerates the flow of water into the brook it could have a severe effect on areas upstream of the area. We would wish the Environment Agency to be involved if any surface water from this area is to be routed towards the Rye Brook.

Sewers

The existing main trunk sewer from Epsom runs across Ashtead Common, Rye Meadows and then north of this site. At peak times and during times of heavy rainfall this main sewer reaches capacity and when the existing sewerage can't cope, pressure is relieved by the contents being forced up side sewers and blowing off heavy cast iron manhole covers. We have photographic evidence of this happening. Adding another 550 homes on to this system will have a dramatic effect on existing properties and side street sewer systems. In this case it is of no use saying the infrastructure will be suitably amended after the event. Any flooding is very unpleasant and distressing; sewage flooding is considerably worse and hazardous to health.

Traveller Pitches

Is it the intention to place the 3 traveller pitches proposed for this site next to each other?

Gypsies, travellers and travelling showpeople are gregarious and will wish to be together; with that comes a life-style that tends towards large cars and other vehicles associated with the travelling community. Travellers' reputation with the wider public leads them to be viewed with some suspicion and apprehension and a degree of support will be needed to integrate them with others living in a residential development, especially as that reputation extends to one of untidiness. How will Mole Valley ensure integration with the non-traveller community and that the pitches will be well maintained and not be overcrowded by other settled travellers moving onto them?

Infrastructure Provision

Policy INF4, clause 1

New development must contribute towards the delivery of infrastructure facilities and services. The infrastructure necessary to support the new development should either be provided on-site, integral to the development, or be secured off-site through other mechanisms. For major development,



phasing may be required and later phases may be dependent on infrastructure being in place.

The final sentence of this clause refers to phasing of major developments but it is not clear what size of development that includes. What consideration will be given to existing infrastructure issues that will be exacerbated by development in this area? This sentence needs to be invoked for this development, particularly in respect of traffic and drainage in the immediate neighbourhood as well as for school places and health provision. Planning conditions must be put in place stating that the necessary infrastructure to support this development, and also meet the needs of existing residents, must be completed prior to commencement of construction.

Allotments

EN14, clause 1i

1i. Incorporating spaces within new developments to enable local growing of food, including by householders without their own private garden.

And yet, despite this policy clause, the proposal is to remove the allotments from this site, from land that has been in use as garden allotments for some 150 years, albeit to provide land for them elsewhere.

We understand that the move might be to Green Belt land in Ashted but the current allotment holders have continued the work of their predecessors and spent many years nurturing the existing allotments so that the soil is in prime condition to grow the very food that the policy clause is suggesting. A move to a new area of land would not only mean loss of Green Belt in Ashted but we understand from the allotment holders that the soil there is poor and an initial soil analysis conducted on their behalf shows that the land on the north of Barnett Wood Lane either side of the M25 road bridge is contaminated with heavy toxic metals and sodium.

We are aware that the designation of *Asset of Community Value* would not delay development on this land beyond six months but the allotment holders sought that designation with the strong support of the local community and it actually means something to them all, to us all. Quite what is the point of creating a mere paper designation that identifies a valued community facility only to ride roughshod over local wishes whenever it suits?



Construction Plan

- ◆ Construction traffic will inevitably add to the traffic issues on Barnett Wood Lane and timings will need to be precise and strictly adhered to in order to avoid the morning peak time.
- ◆ All vehicles associated with the development during construction are parked within the development site.



Which part of the draft Local Plan do you wish to comment on?

Please use a separate sheet for each policy or site allocation.

Please clearly state which chapter, policy, site allocation, appendix or other document you are commenting on, giving a page number where appropriate:

Final Overall Comments

Comment:

Thank you for the hard work that has gone into producing this draft Local Plan and the supporting documents.

ARA fully understands the need for housing development in Mole Valley and is not unsupportive of that but we do have very great concerns about the infrastructure needs associated with the proposed level of development, especially given that our infrastructure is already close to, or at, capacity for existing residents and businesses.

We do know that Mole Valley needs to encourage younger families to move into District to balance the age demographic; we also know that many of our residents are keen to see more development in the District in the hope that the availability of more affordable homes will mean that their own children can remain in Mole Valley and close to family support as they bring up their own children.

Green Belt

We do, however, think that it is very wrong to propose the level of development on Green Belt in the north of the District that is included in the Draft Local Plan. A number of brownfield sites have been discounted for inclusion in the plan for the reason of their impact on the Green Belt, yet actual Green Belt sites have been included that wipe out the Green Belt altogether, particularly in the urban north where we fear the creeping loss of our remaining green space with its associated loss of biodiversity and wildlife corridors.

Other brownfield sites do not accord with the spatial strategy and we contend that it is the spatial strategy that needs to be revisited to protect the valued green space in the urban north and prevent urban sprawl and the merging of Ashted, Leatherhead, Fetcham and Bookham

North/South Development

The north of the District is bearing the brunt of the development proposals and it may be that taking another look at the discounted brownfield sites would not change that



very much, but it might save our Green Belt from development (even if it does mean some building up, albeit without destroying an area's character) and allocate some more land in the south. One of the brownfield sites in the south was discounted because of its impact on the Green Belt, while another in the same location was discounted because it presented a loss of a rural economy site; why not build more residential property in that location and support the rural economy that way? Could there not be some redress of the balance of the development proposals so that the south can have the opportunity of maintaining its community life and revitalizing its villages?

Infrastructure

Our responses to the Consultation Draft Local Plan include details of the infrastructure issues that already exist for each of the development sites both in and bordering Ashted and it is imperative that solutions to the infrastructure provision are put in place to resolve those existing issues before any further development should be considered that would exacerbate them. Additional to the hard infrastructure of roads and drainage, we do not see where in the Plan, or the supporting evidence documents, there are clearly laid out solutions with regards to increasing the provision of primary healthcare and school places that are already at or over capacity for meeting the needs of existing residents and which will not be sufficient to provide for a further 1,050 homes in and adjacent to Ashted.

It is unreasonable to ask residents to respond on additional development options without giving clear resolutions to the infrastructure issues that are the first points that are invariably raised when they are asked to comment on those options; all that they see is that more development will make their own lives that much worse as traffic increases on roads already at and over capacity, doctors lists that are full or close to it, schools that are full with their children already being bussed to Dorking and inadequate drainage leading to flooding that makes their lives very difficult during the increasing frequency of heavy rainfall. We trust that MVDC will adhere to the following statement on the "infrastructure-first" approach in the recently issued government White Paper on planning:

Government White Paper, March 2020: Planning for the Future

"Item 12

Deliver on our commitment to infrastructure first. We will provide local authorities with greater funding for the infrastructure, ensuring that those who strive to build enough homes for their communities and make the most of brownfield land and urban areas are able to access sufficient resources. This includes:

Investing another £1.1 billion in local infrastructure to unlock almost 70,000 new homes – our infrastructure-first approach to building new homes means putting in the transport, utilities, digital connectivity and community services like schools and hospitals



early, so that new developments do not put strain on local services. The Budget set that over £1,1 billion will be provided to fund key infrastructure schemes from Surrey to Sunderland, including new roads, transport links, flood defences, leisure and healthcare facilities, digital and power networks and schools. To date we have allocated over £4 billion through the Housing Infrastructure Fund to unlock up to 340,000 new homes.”

We trust that, if infrastructure solutions prove to be unaffordable, or for other reasons are impossible to implement (such as having no room for a new road), then any proposed development site that will exacerbate existing infrastructure problems will be discounted from the Plan. This will hopefully become clearer as work begins on preparation of the Regulation 19 draft Local Plan.

ARA has worked closely with RA colleagues in Bookham and Fetcham as we have drilled down into some of the detail of the draft Local Plan and we are particularly grateful to Bookham RA for arranging meetings with infrastructure providers that having given us insight into their thinking on roads and schools.