



Email: plans@ashteadresidents.org.uk

11th February 2025

Mole Valley District Council
Pippbrook
Dorking
Surrey
RH14 1SJ

For the attention of Katrina Sullivan-Watkins

Dear Ms Sullivan-Watkins,

Outline Planning Application No: MO/2025/0033

Location: Land South of Ermyrn Way, Ashtead, KT22 8TX

I write on behalf of the Ashtead Residents' Association with regard to the above planning application, recording our comments which result in our objection to this application.

We recognise that the new Mole Valley Local Plan 2020-2039 includes this site as DS1 in Section 9 Development Site Allocations, and whilst there is an allocation of 270 houses this is also noted to be indicative. See MVDC Local Plan 2020-2039, page 120.

The Litchfields Planning Statement dated 30 December 2024 which has been submitted by the applicant sets out the MVDC Planning Policy in Section 5. This states the policy regarding the mix of units, 1 bed, 2 bed etc. and the requirement for 40% percent of the proposed total number of units to be affordable.

The Design and Access Statement also highlights this and is clear in its understanding of the definition of "indicative residential capacity" as set out by MVDC in the Local Plan.

Quoting the Design and Access Statement :

"Paragraph 4.4

Policy DS1 notes an ‘Indicative Capacity’ of 270 dwellings for the Site. The MVLP (para 9.5) explains ‘Indicative residential capacity’ as follows:

“The capacity is net and is based on either an extant permission or the Mole Valley Density Matrix which has been developed to provide a guide and which is set out below. The indicative capacities are estimates and the final developed capacities are highly likely not to be the exact number but they provide a robust and consistent estimate.” “

The application submitted is an “Outline planning application with all matters reserved except means of access for up to 270 dwellings (Use Class C3), community building (Use Class E and/ or F), gypsy and traveller pitches (up to 0.2 Ha), publicly-accessible open space, landscaping, surface water drainage and all associated infrastructure”.

Presumably, because this is an outline application the application does not attempt to use the MVDC Planning Policies H3 and H9 to determine the potential residential mix and also the number of car parking spaces i.e. vehicles likely to result from the development of UP TO 270 units.

We would suggest that the number of parking spaces generated by the mix of units would be relevant to inform the calculation of the number of “trips” that would need to be considered in the traffic impact assessment.

A further consideration of importance is that this is one of two immediately adjacent sites that MVDC has allocated for residential development on the South side of the A24. The other site DS2 in the MVDC Local Plan has an indicative allocation for UP TO 140 residential units. This site would also have to utilise the existing road, Ermyn Way as there is no other means of access/egress from the A24.

The junction of Ermyn Way to the A24 is currently managed by a signal controlled cross road junction. The current traffic situation is already extremely congested at peak morning and evening times.

There are 3 schools in close proximity and they already experience severe congestion in the immediate vicinity of the A24/Ermyn Way cross road. Local home owners express their concerns regarding congestion and safety issues at drop off and pick up times, with many vehicles coming from the local area as well as from the wider school catchment area.

Last week the ARA attended a meeting with the schools to discuss the problems given an accident involving a motorist in December 2024. This traffic problem has been under discussion for a number of years and despite the best efforts of Surrey County council Highways, the Schools themselves and the Police working with residents there has been no significant improvement. As the schools provide education across the full age range and the wide catchment area there is no way to easily reduce the number of parents arriving and collecting by car.

This local problem needs to be factored into the traffic assessment, that surveys need to be carried out during term times in order to reflect the busiest times.

We have substantial concerns with regard to the number of additional vehicles that will potentially be added to the traffic network. We do not feel the Transport studies and Traffic Assessment provided by the applicant presents a realistic assessment of people’s actual behaviour. The reports are based on

hypothetical, generalised comparisons and Mole Valley wide data rather than real and site specific data in assessing how many will drive, walk, take a bus or cycle.

The report includes a table that seeks to demonstrate that only 61% of residents of Mole Valley use a car to go to work. The table is duplicated below for ease of reference.

Table 4.1 Method of Travel to Work.

Method of Travel	Proportion of Trips
Driving a car or van	61%
Train	18%
On Foot	12%
Passenger in a car or van	3%
Bicycle	2%
Bus, minibus or coach	2%
Motorcycle, scooter or moped	1%
Other method of travel to work	1%
Total	100%

Source: QS701EW Census 2011 – MSOA Mole Valley 004 (rounding applied)

The survey is an “average” across the entire Mole Valley area, behaviour in this actual location in our opinion will be different. The issue we have with this is the site location being far from the village centre and local amenities and the considerable distance to the railway station. The DS1 site situation cannot be compared to the “normalised” Mole Valley survey, it is too simplistic to consider this to be truly representative.

We also firmly believe that in this location the 18% in the above table who apparently travel to work by train are more than likely to drive their car to or be driven to the railway station. So, how the survey question was phrased is relevant, if asked, do you travel to work by train you will get yes or no answer. If you ask, if you travel by train do you drive or were you driven to the station to take the train, the answer will in many cases be different.

If you go to Ashtead Station at morning and evening rush hour periods you will see a constant flow of people being dropped off/collected or parking their cars in the car park or in the side streets adjacent to the station.

Our belief is that this site is very far from the station and the arguments regarding the alternative modes of transport presented in the traffic report will not be reliable.

This will increase the trip generation during morning and afternoon/evening peak hour compared to the statistical assessments provided in the submitted reports.

Now moving on to the i Transport report assessment of local bus services.

The bus services referred to in the i Transport Framework Travel Plan Ref: MS/SG/ITB13592-025 Date: 20 December 2024, (duplicated below) does not give the full timetable information based on that available on the bus company websites.

2.3.2 The local bus services are summarised in Table 3.1.

Table 3.1: Local Bus Services

Service	Route	Frequency		
		Mon – Fri	Sat	Sun
21	Epsom – Leatherhead – Dorking - Crawley	Every 2 hours (06:51 – 17:15)	Every 2 hours (09:25 – 17:25)	No Service
408	Epsom – Leatherhead – Cobham/ Effingham	Every hour (06:30 – 17:45)	No Service	No Service

Source: Consultant

Referring to the actual bus company timetables there are hardly any buses available at the morning and evening peak hour times.

In this location given the distances to the local shops, the railway station and other amenities we are of no doubt that people will be people, and the large majority will use their cars.

408 Cobham Leatherhead Epsom	
Mondays to Fridays <small>except public holidays</small>	
Cobham Sainsbury's	0720 0729 0915 1015 1115 1215 1315 1415 1510 1510 1645 1845
Cobham High Street	0725 0734 0919 1019 1119 1219 1319 1419 1514 1514 1649 1849
Cobham & Stoke D'Abernon rail station	0732 0740 0925 1025 1125 1225 1325 1425 1520 1520 1654 1855
Oxshott Oakshade Road	0740 0745 0930 1030 1130 1230 1330 1430 1525 1525 1701 1900
Leatherhead Tesco	0747 0752 0935 1035 1135 1235 1335 1435 1530 1530 1706 1905
Leatherhead All Saints School	0748 0753 0936 1036 1136 1236 1336 1436 1534 1532 1708 1907
Leatherhead Levet Road	▼ ▼ 0940 1040 1140 1240 1340 1440 ▼ ▼ ▼ ▼
Leatherhead Lerey Way	0756 0801 0945 1045 1145 1245 1345 1445 1538 1535 1713 1910
Ashtead Grange Road	0802 0806 0948 1048 1148 1248 1348 1448 1544 1541 1716 1913
Ashtead The Street	0809 0813 0951 1051 1151 1251 1351 1451 1549 1546 1719 1916
Wells Estate The Greenway	0817 0819 0956 1056 1156 1256 1356 1456 1554 1551 1724 1921
Epsom Hospital Dorking Road	0824 0823 1000 1100 1200 1300 1400 1500 1558 1555 1728 1925
Epsom Clock Tower	0830 0828 1004 1104 1204 1304 1404 1504 1603 1600 1732 1929
Epsom rail station	0831 0829 1005 1105 1205 1305 1405 1505 ● 1601 1733 1930
Langley Vale Harding Road	1614
Nork Drift Bridge	1625
Banstead Marks & Spencer	1632
Woodmansterne post office	1636
Chipstead Valley Rectory Lane	1641

- these buses run on school days only
- these buses run in school holidays only
- this bus runs via Ashley Road to Langley Vale
- no service on Saturdays, Sundays or public holidays

from 19 February 202

Talking bus
Mondays to Saturdays
from 31st August 2024



Mondays to Fridays

Code	SDO	NSD					
Crawley Bus Station, Stop H	0620	0620	0852	1015	1215	1445	1730
Ifield Royal Oak	0628	0628	0901	1024	1224	1455	1740
Ifield The Orchard	0630	0630	0903	1026	1226	1457	1742
Charlwood Ifield Road	0636	0636	0909	1032	1232	1503	1748
Parkgate Surrey Oaks	0643	0643	0916	1039	1239	1511	1755
Newdigate Winfield Grove	0647	0647	0920	1043	1243	1515	1759
Beare Green Merebank	0653	0653	0926	1049	1249	1521	1805
North Holmwood Cabin	0700	0700	0933	1056	1256	1529	1812
Dorking Townfield Court	0704	0704	0937	1100	1300	1537	1816
Dorking White Horse (arr)	0707	0707	0941	1105	1305	1547	1819
Guaranteed connection available; passengers do not need to change vehicles							
Dorking White Horse, Stop N (dep)	0708	0708	0942	1106	1306	1548	1820
London Road Dorking Station, Stop A	0711	0711	0945	1109	1309	1552	1823
Pixham Lane Chester Close	0715	0715	0948	1112	1312	1555	1826
Brockham Christ Church	↓	↓	↓	↓	↓	1601	↓
Strood Green Tynedale Road	↓	↓	↓	↓	↓	1604	↓
Brockham Brockham Lane	0718	0718	0951	1115	1315	1610	1829
Walton Oaks	0725	0725	↓	↓	↓	↓	↓
Box Hill NT East Car Park	0733	0733	1005	1130	1330	1623	1843
Walton Oaks	↓	↓	↓	↓	↓	1632	↓
Headley Church	0742	0742	1016	1141	1341	1637	1852
Headley Headley Court	0745	0744	1019	1143	1343	1639	1855
Leatherhead Seability	0751	0750	1026	1149	1349	1645	1900
Leatherhead The Crescent	0756	0753	1030	1153	1353	1648	1903
Leatherhead Station	↓	↓	↓	↓	↓	↓	1905
All Saints Church for Therfield School	0802	↓	↓	↓	↓	↓	...
Ashted The Street	0819	0759	1037	1159	1359	1657	...
Epsom Hospital	0826	0803	1042	1204	1404	1701	...
Epsom Clock Tower	0832	0807	1047	1208	1408	1707	...
Kiln Lane Sainsbury's	0837	0812	1052	1213	1413	1712	...

We are therefore not convinced that the Transport Assessment is reliable or reflective of human behaviour.

It is also interesting to consider **IF** 270 houses were permitted on site DS1 and **IF** 140 were permitted on site DS2 how many car parking spaces would need to be provided to meet the MVDC policy in Section 113 of the Local Plan.

We believe the following tables to be a correct interpretation of the policy for site DS1 and DS2.

Applying MVDC Local Plan Policy H3 to the **MAXIMUM** number of units noted in Policy DS1

SITE DS1	Policy H3 states 40% of all units to be affordable	
	Affordable	Market
MVDC local plan indicates a MAXIMUM of 270 units for site DS1	108	162

Applying MVDC Local Plan 2020-2039 (appendix 13) Policy H9 to determine the potential **MAXIMUM** number of cars according to MVDC parking provision requirements.

SITE DS1	1 bed dwellings and apartments	2 bed houses	3 bed houses	4+ bed dwellings		
Local plan Appendix 13 parking per dwelling	1	2	2	3		
	Also allow Visitors 1 space per 5 dwellings					
Policy H9 Housing mix Market Housing	25%	45%	20%	10%		
Market Number based on 162 total	41	73	32	16	162	
Total cars resulting from the above	41	146	64	48		299
Affordable	15%	45%	30%	10%		
Affordable Number based on 108 total	16	49	32	11	108	
	16	98	64	33		211
Cars due to 270 dwellings						510
Visitors cars 1 per 5 dwellings						54
Total number of new cars						564

Applying MVDC Local Plan Policy H3 to the **MAXIMUM** number of units noted in Policy DS2

SITE DS2	Affordable	Market
MVDC local plan indicates a MAXIMUM of 140 units for site DS2	56	84

Applying MVDC Local Plan 2020-2039 (appendix 13) Policy H9 to determine the potential **MAXIMUM** number of cars according to MVDC parking provision requirements.

	1 bed dwellings and apartments	2 bed houses	3 bed houses	4+ bed dwellings		
SITE DS2						
Local plan Appendix 13 parking per dwelling	1	2	2	3		
	Also allow Visitors 1 space per 5 dwellings					
Policy H9 Housing mix Market Housing	25%	45%	20%	10%		
Market Number based on 84 total	21	38	17	8	84	
Total cars resulting from the above	21	76	34	25		155
Affordable	15%	45%	30%	10%		
Affordable Number based on 56 total	8	25	17	6	56	
	8	50	34	17		109
Cars due to 140 dwellings						265
Visitor cars 1 per 5 dwellings						28
Total number of new cars						293

Summing up the impact of the 2 sites DS1 And DS2 on the additional potential number of cars assuming each site is permitted to provide the MAXIMUM number of dwellings as per the MVDC local plan 2020-2039 857

It appears that Site DS1 Could add 564 new cars (excluding any provision for the Gypsy and traveller sites) and Site DS2 could add 293 new cars (excluding any provision for the Gypsy and traveller sites) a total of 857 cars.

Given the above comments on people behaviour and the distances to local amenities and transport links, the number of peak hour trips using Ermyrn Way would in our opinion create a significant impact.

We also note that the pre-app consultations, Surrey County Council Highways requested an alternative means of access for emergency vehicles.

The current proposal to this is to add a second site access off Green Lane. This hardly resolves the problem as this requires the emergency vehicles to still use the single point of access from the A24/Ermyrn Way signal controlled junction with the only route being via Ermyrn Way.

Unless this significant constraint can be overcome we would object to the proposals put forward in this outline application, and in any subsequent detailed application, on the basis of overdevelopment if indeed 270 units are proposed for Site DS1. The DS1 site has to be assessed taking the DS2 site into account as the cumulative effect of these two sites on this Highways constraint will be material to the traffic impact.

There could be two potential solutions:-

One solution would be to provide an alternative access/egress point. A very radical solution to consider could be achieved by bridging the M25, and taking vehicles onto the A24 South of the Knoll roundabout. Integrating a new road access with the existing Green Lane pedestrian bridge. This would resolve the SCC requirement for a proper secondary emergency vehicle access and reduce pressure on the A24/Ermyrn Way signal controlled junction and would then make UP TO 270 number dwellings more justifiable.

Being realistic, this solution whilst radical also seems to be unachievable as no doubt the cost would be considerable. The cost of this major infrastructure would need to be shared by the DS1 and DS2 sites which would be challenging as no application for DS2 has yet been submitted. We assume it also unlikely that SCC would fund this in the interim period.

The other alternative is to reduce the number of homes proposed for DS1 and DS2 sites to ensure that there is NO change i.e. NO increase in queuing and NO increase in waiting times, at any point on the nearby Highway network by making adjustments to the traffic signalling and local highways. The trip generation would need to be tested for the higher number of trips generated by the new residents without the idealised assumptions made by the applicant's team regarding use of buses, cycles and walking as the residents are unlikely to make use of these options in any great numbers.

In this scenario the changes to the Knoll roundabout and other road works would then also be avoided and the cost would be reduced. We assume some rephasing of the signalling at the A24/Ermyrn Way junction would still be required.

For the above reasons we believe the provision of up to 270 homes on the DS1 site should be limited to that which the local road network can absorb with no impact on queuing and waiting times at all local highway junctions.

To provide up to 270 homes would in our opinion represent overdevelopment although a justifiable lesser number may be acceptable. (Equally applicable to DS2 site when that is put forward).

The DS1 site would still need to provide at least 40% affordable homes including at least the minimum quantity of 1 bedroom accommodation set out in the MVDC Policy 9 as this will serve to assist with meeting the need for starter homes for young and potential downsizing homes for the older residents of Ashtead. It is accepted that these could be different in scale and character with differing price points but the 40% affordable provision is vital to this area.

The impact on local schools, healthcare and other amenities would also be a concern as these are already at capacity to serve the existing community.

The nearest 3 schools to the site include 1 independent day school Downsend, ages 7-16, a Roman Catholic Comprehensive School St Andrew's, ages 11-18 and St Peter's Catholic Primary School, ages 5-11. Whilst these are the nearest to the DS1 site they would only provide education to a certain demographic and to find alternatives the residents would need to look further afield.

In Ashtead Village and Lower Ashtead there are 3 state primary schools, West Ashtead, The Greville and Barnett Wood Schools. The DS1 site is a considerable distance from these and it is our understanding that these are working at capacity. Given the ages of the children attending these schools and the distance from the DS1 site we are convinced that many would be taken to and collected from school by car. The secondary school at Therfield, is also some distance away from the DS1 site. Other secondary school options in the area are the independent schools, St John's Leatherhead and City of London Freeman's School in Ashtead Park. Again, these schools would only appeal to a certain demographic and may not be an option for many parents.

This situation will become more challenging and would also be improved by reducing the total number of new dwellings on the DS1 site (and therefore also the DS2 site).

Doctors surgeries in the area are also limited in number. The local Ashtead surgeries at Gilbert House and St Stephens House are a considerable distance from the DS1 site and again we understand are working at capacity.

We therefore request a comprehensive study by our Councillors and the MVDC planning department in the detailed evaluation of the impacts of these substantial residential developments.

If this development should be approved in any form it should also provide funding towards increased capacity at the local doctors surgeries.

The 3 local schools in the immediate vicinity are also currently considering whether a new minibus service could be provided to enable children to be collected and dropped off from Leatherhead Leisure Centre and from Ashtead Peace Memorial Hall or Grange Road car parks. An additional CIL contribution paid over many years would therefore be helpful in reducing the number of vehicles in the area associated with parents driving children to and from the schools. Equally the limited number of available school places needs further research, consideration and funding.

We would also request MVDC to impose a condition that substantial CIL contributions are provided by the developers. These would be required to fund investment in the provision of significant improvements in the items mentioned above. In addition, contributing to the funding of a new the local bus/mini bus services, potentially over a period of many years, to provide a new service from within the development to the village and to the station throughout the day.

Turning now to the impact on the Character of the area. With reference to Mole Valley Local Plan Policy S1 sub clause 7 Character Protection, this development would have a significant impact on the very character and identity of Ermyn Way and Green Lane. The scale of this project is completely out of proportion with the surrounding area, and it will irreparably alter the street scene in Ermyn Way and Green Lane as well as the surrounding landscape. The natural beauty and rural charm of this area enjoys a quietness, and with views out to open countryside which make it a desirable place to live. Introducing a sprawling housing development will destroy the essence of what makes living in this location so unique.

The development of UP TO 270 houses as per the Outline Planning Application would conflict with Ashtead Neighbourhood development Plan Policy AS-H5: Maintaining Built Character which states "In accordance with Mole Valley Policies CS13 & CS14, developments must be visually integrated with their surroundings and designed to have regard to the character of the local area and street scene (see also policy AS-En3)".

As stated above this substantial intervention in this location will significantly change the existing character of Ermyn Way and Green Lane causing a significant impact on the very feel and setting of the existing homes. It is sad to say but the design style and choice of materials used in modern housing estates that are springing up across the whole country are often boring and lack imagination. Most are built to formulaic “standard” house typologies that developers roll out across their portfolio on a cost driven model. These modern estates rarely create a sense of place or something that will stand the test of time and rarely age well to become places with real character. If this development goes ahead in any form the design and appearance of the new dwellings should be creative and varied to provide the greatest opportunity to stand the test of time and develop a character that so many lack.

It is acknowledged that there is a community building element proposed but this is likely to be nothing more than a sop to fulfil the obligatory addition of the minimum to satisfy the planning policy. It is unlikely to make a significant impact towards achieving a sense of place and character.

Reducing the number of dwellings within the DS1 site (and DS2 site) would also reduce the environmental impact enabling more of the green belt land separating Ashtead from Leatherhead to be preserved.

Should this Outline Planning Application be considered for approval by MVDC Planners, the Ashtead Residents Association would seek to reduce the impact on local infrastructure and amenities to the absolute minimum possible by calling for a significant reduction in the number of houses and dwellings proposed for the reasons stated above.

We will raise these issues again at the detailed application stage should this Outline Application be approved and these developments are taken forward to and beyond the detailed application stage.

Yours faithfully



ARA Planning Officer