

From: Councillor Hunt

Sent: 06 November 2021 00:23

To: Planning Policy <Planning.Policy@molevalley.gov.uk>

Cc: Councillor Hawksworth <Councillor.Hawksworth@molevalley.gov.uk>; Councillor Wiltshire

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Councillor Reilly <Councillor.Reilly@molevalley.gov.uk>

Subject: Proposed New Local Plan for Mole Valley District Council - Response to the Regulation 19 consultation

Dear Planning Inspector

I am sending this email to the Planning Policy team in the hope that it will be set before you as part of your independent examination of the proposals of the Council. The Executive Member for Planning has encouraged all councillors and residents to make representations to you, and I am doing so in such a spirit of engagement.

Clearly National events have over-taken the frequently delayed process of drafting, amending and consulting on the proposed plan. In this regard I welcome your appointment to now draw this process to a conclusion, involving your rigorous public examination of the key issues and proposals. Thank you for taking on this challenge.

As a Councillor I was invited to attend meetings of the Planning Policy working group over several years and under several different chairmen. Such meetings have seen sections of the plan reported upon and with hindsight develop and be amended (albeit over lengthy timescales and usually without tracked changes), albeit without formal votes to actually test and record as to which policies and ideas are acceptable to attendees. The Full Council has voted on the consultation process rather than the content of the plan as such, so I anticipate that you may be receiving a number of representations from councillors on the content - which may at first sight appear unusual given the time over which this proposed plan has developed - but I hope this explains the reason behind such representations. Hopefully when the plan is reviewed by you and thereafter actually voted upon by councillors as to formal adoption, it will then gain some democratic accountability as well.

The section 19 version is somewhat changed from the section 18 version, and the process of such changes will no doubt be considered by yourself. The outcome of your review of how those changes were made and how decisions were made will be interesting reading for many.

Given this background, I would be grateful if you could please consider the following representations which I make as an individual resident :

1. Given the changed tone which has come from Central Government regarding national planning policies and the change in emphasis regarding accommodating all homes calculated as needed in the existing higher density areas of the South East, the

underlying basis of the target which runs through the plan and where new housing should be located on a national scale has been dramatically changed. Luckily this change was announced before the local inquiry, so can you please take it into account.

2. Likewise the Government review of General Permitted Development rights - the consultation for which was held months ago with a promise to publish a response in the Autumn - has been held up...presumably in recognition of the changes in (1) above. I am aware that there have been thousands of representations sent to the Government on the subject. Given that PD rights could, in theory, be loosened to allow for easier subdivision of existing units which could allow for more of any demand to be met from the existing housing stock or, conversely, be tightened up to prevent extensions which may make denser development harder to achieve and so impact property demand, the ability to predict some of the 'inherent gain' may be hard to justify. So can you please set out what assumption you are making in terms of such 're-use' of existing units.
3. The proposed policy for supporting higher density development along defined roads was one that stems from a suggestion I made some time ago, but my suggestion was for such a policy to apply to main roads. The idea behind that original suggestion was that such main roads have in some places (such as Epsom Road in Leatherhead) already seen such higher density developments. By being on a main road, the prevailing noise level and pollution is higher and these can then be blocked by such larger buildings, thereby benefitting the wider area. The suggestion in such a form appeared on a list of ideas for a long while but when the idea was more recently turned into a proposed policy however the proposed policy has been suddenly widened to include not only the main roads but also local distributor roads such as Woodfield Lane in Ashted. That is not a main road, and the inclusion of such inherently quieter roads will mean that any planning benefits over the wider area (ie the main road noise and pollution reduction) will not be provided. As noted earlier, the lack of ability to vote on the proposed policy has meant that this proposed policy has reached you without the ability for cross-party voting on such proposals. Can you please redefine the roads it applies to back to the whole idea the higher density policy was proposed for - along main roads only.
4. Allied to (3) above, I am very concerned that the text of this proposed policy has been further expanded to specifically mean that where properties are in Conservation Areas along these defined roads, the Council will be committed to agreeing to intensification in such Conservation Areas. While the fine detail would presumably still be capable of being taken into account, I am concerned that by using the wording as proposed, the starting point will be to increase density in such protected areas. The capacity of the individual buildings or the impact of an extension will not in themselves be the criteria. The starting point will be that intensification is the policy. This appears to me to be the wrong starting point for the protection and improvement of a Conservation Area. To have a policy which allowed for the possibility of increasing density in a Conservation Area would be more reasonable and pragmatic than a policy that pre-determines that an increase will be approved. I object to such an approach and would therefore request that you look at the proposed wording and hopefully remove such a pre-determined approach.

5. I support the protection of the Green Belt between Leatherhead and Ashtead. They are two separate communities and it was shocking that the Council was proposing to build on the strategic gap between these two communities. While the Council has dropped its proposal to build next to the M25 on the Green Belt in this location in the draft plan, it is public knowledge that it has at the same time still recently renewed the financial contract between the Council and a builder - so I assume that the builder will still be seeking to pursue the designation of the land. In fairness to them, they must be shocked at the situation - with one hand the Council Executive has renewed the sale agreement but with the other, and with more publicity, they have removed the land from the official promoted list of sites. I am confident that you will uphold the principle that planning does not take account of land ownership details or contracts, and that the fundamental purpose of Green Belt in stopping merging will therefore be maintained. Thank you. The alternative, of promoting hundreds of people to live under the shadow of the busiest section of the busiest Motorway in the United Kingdom, will condemn those residents to noise and pollution. Their homes would have air pumps and filtration systems - hardly environmentally friendly let alone still having pollution-filled gardens even if the windows are sealed shut. If you accept the need for hundreds of new homes to be built on open land, it surely makes for a safer environment to allocate land beyond the Green Belt in locations, where property prices are lower and so allow for safer, lower cost homes to be provided.
6. I would also ask you to ensure that, should you support the designation of land off Ermyn Way for hundreds of homes on Green Belt there, that the access issues and school impacts are pre-planned and committed to be solved. The junction of the A24 / Grange Road and Ermyn Way is already heavily congested at rush hour and, with four schools off Grange Road the prospects of those schools being further expanded will be a double whammy for the cross roads. Are you able to pause and reflect on the idea of adding hundreds of houses accessed off of such a crossroads? As with point (5) above, if you were to designate land beyond the Green Belt for housing it would protect both Green Belt land (and the national designation, role and support of Green Belt land should attract much weight), and lead to lower cost housing being created in a location which is closer to the employment honeypot of Gatwick and Crawley. Gatwick, of course, is seeking to expand via the more regular use of its existing northern runway. The expansion of the Horsham area reflects what our adjoining local planning authority has decided as being the practical response to the need for more housing and it would be consistent to adopt a similar approach.

I would be pleased to speak to my thoughts at your Inquiry should you wish, and to answer any questions you may have at that time.

Thank you for considering my representations.

Chris Hunt

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Councillor for Ashted Village Ward, Mole Valley District Council