

Producing a Local Plan is one of the key responsibilities of MVDC as a planning authority. It will play a major role in meeting the needs and aspirations of people who want to live, work, do business and spend their leisure time in the District.

A consultation on strategic issues and options was carried out over the summer. The consultation outlined the scale of the challenge in meeting development demands in the District, and invited views on different options for how that demand might be met. A summary of responses to the consultation is appended. The responses have informed the choice of preferred strategic options.

Selection of preferred options has followed a sequential approach, starting off with an assessment of brownfield options, then the potential for demand to be met outside the District, before finally considering greenfield options. The preferred options take account of other strategies and programmes that are emerging or have been adopted by MVDC, and which have land use implications.

CORPORATE PRIORITIES

ENVIRONMENT

A highly attractive area with housing that meets local need

- Protect and enhance the natural and built environment through land designations and policies
- In consultation with the community, develop plans for how land is used in Mole Valley, setting out proposals for residential, leisure, and commercial development, which balance residents' needs with protection of the Green Belt
- Pursue policies that encourage the creation of affordable housing
- Work with other agencies to protect the District from the effects of climate change and environmental pollution, paying particular attention to flooding and air quality.

PROSPERITY

A vibrant local economy with thriving towns and villages

- Continue to drive the transformation of Leatherhead Town Centre and support the market-town culture and economy of Dorking
- Support the rural strategy in helping rural areas thrive and become more sustainable
- Support the economic strategy in adopting a pro-business outlook across the District addressing infrastructure and other constraints on economic prosperity

COMMUNITY WELLBEING

Active communities and support for those who need it

- Plan for land use elements of a programme of inclusive sports and wellbeing activities, targeting those communities most in need
- Work with cycling and other leisure groups to encourage healthy lifestyles.

The Executive has authority to determine the recommendations

1.0 Background: Evidence and Consultation

- 1.1 In March 2016, MVDC approved a Local Development Scheme (LDS), which sets out the timetable for preparation of a new Local Plan over the period 2018-2033. An updated version of the LDS is proposed which takes account of changes in the intervening period (see separate report).
- 1.2 A series of evidence documents were prepared to identify the main issues facing the District in terms of accommodating new development. The evidence included forecasts of housing, commercial and retail demand over the plan period; and an assessment of the likely supply of development sites over the same period.
- 1.3 The objectively assessed housing need has been estimated at 5900 dwellings¹, while the likely supply is approximately 2900 dwellings², leaving an unmet housing demand of some 3000 dwellings. If the standard methodology that is currently being consulted upon by DCLG is introduced, then the housing need and unmet demand figures will rise by a further 750 dwellings over the plan period.
- 1.4 For commercial (industrial, office and warehouses) and retail uses the forecast demand is less. For offices and industry, there is estimated to be a modest surplus of 19,600sqm office floorspace and 13,100sqm industrial/warehouse floorspace over the plan period³, although this may be affected by the conversion of some premises to residential under permitted development rights. Retail demand is more complex, with modest surpluses of both convenience and comparison floorspace forecast up to the middle of the plan period, but modest demands of 800sqm and 5000sqm respectively forecast by the end of the plan period.
- 1.5 The evidence shows that there will be insufficient capacity to meet forecast demand using current plans and policies, particularly for housing, and that there are implications for commercial and retail uses.
- 1.6 Options for meeting unmet demand have been identified together with constraints on accommodating new development. A sequential approach was taken looking firstly at options for increasing capacity on brownfield land; then opportunities for meeting demand outside the District; and finally options for the release of greenfield land.
- 1.7 Consultation on these issues and options was carried out between 1 July and 1 September 2017. The purpose of the consultation was twofold: to explain the scale of the challenge that needed to be addressed; and to give an opportunity for the public to give their opinion on the options.
- 1.8 A summary of responses to the consultation is attached (annex 1). It includes quantitative and qualitative information that has been used to inform the

¹ Strategic Housing Market Assessment, 2016

² Brownfield Land Availability Assessment, 2017

³ Economic Development Needs Assessment, 2017

recommendations made in this report.

2.0 National Planning Policy Framework

2.1 National planning policy is contained in the National Planning Policy Framework (NPPF). The NPPF sets out core planning principles that direct how planning authorities should carry out their functions, including plan making. The key national policy for plan making⁴ is that:

- local planning authorities should positively seek opportunities to meet the development needs of their area
- local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the framework taken as a whole; or
 - specific policies in the framework indicate development should be restricted (for example, those policies relating to sites protected under the Birds and Habitats Directives and/or designated as sites of special scientific interest, land designated as Green Belt, local green space, areas of outstanding natural beauty, designated heritage assets and locations at risk of flooding).

2.2 For the Local Plan to be found sound, it has to conform with national policy, in particular the requirement to meet objectively assessed need unless there are justified reasons for not doing so.

3.0 Development Options

3.1 A sequential approach has been taken to looking at options, in the following order:

- Brownfield first – land within the existing built up areas or previously developed land outside them that has potential for development. Six brownfield options were consulted upon that would make a more effective use of land and which could increase housing supply. These are discussed in more detail below.
- Meeting demand outside the District – engage with neighbouring authorities to determine whether unmet demand can be met outside the District. For reasons explained in more detail below, this particular option is not expected to provide much if any significant capacity.
- Greenfield options – the release of land in the countryside that is currently protected from most forms of development. The potential for greenfield release is limited by a range of existing constraints. These include

⁴ National Planning Policy Framework, paragraph 14 and footnote 9.

physical constraints, accessibility, national designations and Green Belt policy. Three greenfield options were consulted upon that could result in significant additional housing capacity. These options, including advice on the principle of greenfield release, are discussed in more detail below.

- Modest extensions to existing villages - in addition to larger scale greenfield release, the potential for more modest small-scale development within existing villages was also consulted on as an option. This option was chosen not so much because of the additional housing supply to meet demand (although it would contribute towards that aim) but more for the social and community benefits that it might deliver. Further discussion is set out below.

4.0 Brownfield Options

- 4.1 Six brownfield options for accommodating new homes were consulted upon. A number of these options also provide opportunities for meeting other development requirements, for example commercial and retail space. Further details are set out below.

Town Centre Redevelopment

- 4.2 This approach involves delivering high density development on sites in town centre locations. The greatest opportunity lies in Leatherhead town centre, where MVDC has already started exploring the potential for redevelopment of a number of sites in and on the edge of the town centre for a mix of retail, leisure and residential uses, as part of the Transform Leatherhead programme. There may also be more modest opportunities in Dorking town centre, depending on the capacity of the road network and other infrastructure. At the densities required to make a significant contribution to housing supply, smaller neighbourhood centres do not offer the same opportunities, although higher densities proportionate to their size may be an option to explore (see the increasing suburban densities option below).
- 4.3 There were approximately equal numbers in favour of town centre redevelopment as against it in the consultation. This contrasts to a degree with the higher level of support found in the Transform Leatherhead consultation. Where concern was expressed it was less with the principle of town centre redevelopment and more with the height and scale of buildings. Responses may have been indirectly affected by the Grenfell Tower disaster which took place during the consultation period.
- 4.4 As the most densely developed parts of the built up areas, and those parts with the best accessibility, town centres have the potential to accommodate high density development for housing and other uses. The type of housing most suited to town centres is smaller units, which is what the Strategic Housing Market Assessment (SHMA) indicates will be needed most in the housing stock as the population ages and household size continues to decline. A greater concentration of people in or close to town centres also provides greater footfall for town centre shops and services, and reduces reliance on the private car. There are limitations on town centre redevelopment, in particular the extent to

which highway congestion can be alleviated, and the desirability of conserving the historic character of both Leatherhead and Dorking.

- 4.4 While the consultation response needs to be acknowledged, the principle of town centre redevelopment remains a key opportunity for accommodating new development, not only for housing but also demand for other land uses that will need to be met as part of the Local Plan, such as retail and leisure uses. It is therefore recommended that this option be explored further for both Leatherhead (as part of the Transform Leatherhead programme) and also for Dorking.

Reallocation of Commercial and Retail Land

- 4.5 This approach looks at the potential for redeveloping a small proportion of existing employment sites in either commercial (office, industrial or warehousing) or retail use for housing. Mole Valley is well provided with employment land and is currently one of the few districts in Surrey to have net in-commuting despite its proximity to London. Forecasts of demand for future employment floorspace indicate that there would be a small surplus of commercial and retail land over the plan period, which could be used to provide additional housing. Reallocation of commercial and retail land was supported in responses to the consultation.
- 4.6 It is necessary to ensure that sufficient employment land is safeguarded to maintain the continued economic health of the District, and provide flexibility for changes in commercial and retail needs over the plan period. This has been made more difficult by the introduction of permitted development rights allowing the conversion of office and industrial space to residential use without the need for planning permission. While there may be localised shortages of suitable commercial space (for example, light industrial premises in Dorking), the Mole Valley Business Survey flagged other difficulties as more important to businesses including staff recruitment and retention, highway congestion and parking. The UK's planned exit from the European Union is an external factor that will increase uncertainty about economic activity throughout the plan period.
- 4.7 MVDC's approach to supporting the local economy will be set out in the Economic Prosperity Strategy. An emerging theme is the need to retain and grow existing businesses, and the Rural Community Strategy includes key actions aimed at supporting rural businesses and growing the visitor economy. It will therefore be important to frame emerging policies with these objectives in mind. Nevertheless, there is some scope for a modest reallocation of less suitably located employment land to meet housing demand, and it is recommended that this option be explored in more detail.

Mixed Use Redevelopment

- 4.8 This approach focuses on redeveloping underused sites to provide a mix of uses at a higher density in a more efficient manner. One example of this approach could apply to surface public car parks, where decking part of the site to provide the same or a greater number of spaces would release the remaining land for alternative use. The principle of mixed use redevelopment could extend to other underutilised sites, and is an integral part of other options such as town centre redevelopment. Mixed use redevelopment was strongly supported in the

consultation.

- 4.9 The difficulty with planning for mixed use development is the availability of sites, and the willingness of landowners to consider redevelopment, often in cases where there is an existing use operating on the site. These factors make it difficult to predict with accuracy what potential a site or sites has for accommodating housing and other uses, although clearly it would be amongst the most sustainable types of development and make better use of previously developed land. It is recommended that further work on this option is carried out to identify where mixed use development might be achieved.

Rural Employment Sites

- 4.10 One potential source of housing would be to allow redevelopment of rural employment sites such as equestrian sites, workshops in converted farm building and other rural businesses.
- 4.11 Consultation views about this option were mixed, with a small majority against the principle of such development. On the one hand, redevelopment of such sites would provide a new source of rural housing, albeit in the majority of cases isolated from existing villages and services. On the other hand, it would lead to the erosion of employment in the rural area, and reduce the stock of what are typically more affordable premises for small and start up businesses.
- 4.12 It remains the case that the conversion of rural buildings to residential use benefits from permitted development rights, and therefore a degree of change can take place now and in the future. However, demolition and redevelopment of sites would require permission, and based on the consultation responses, and the objectives of the Rural Community Strategy, which recognises the importance of rural businesses, it is recommended that this option is not progressed further as a means of significantly increasing housing supply.

Increase Suburban Densities

- 4.13 Mole Valley contains a number of areas of relatively low density suburban housing, particularly in the north of the District. Consisting of largely four or five bedroom detached housing, these areas are valued by their residents for their high level of residential amenity. Because of the low density, there are opportunities for small scale redevelopment or back garden land infill development. For the most part, these forms of development are required to respect the existing character of the area delivering similar sized dwellings, albeit typically on smaller plots. They are among the most controversial types of development in the District, often giving rise to significant objection from neighbouring properties. Nevertheless, this form of development provides an important contribution to new housing stock.
- 4.14 The consultation response showed mixed views on the option of increasing suburban densities, with a small majority in favour of such development. Given the level of opposition found when determining planning applications, that response is somewhat surprising although may be explained by the growing recognition amongst respondents that more housing is needed, and that where

possible brownfield options should be considered first.

- 4.15 Communities in Bookham and Ashted have recently addressed the issue of how to provide housing in their respective neighbourhood development plans. In both cases, it was recognised that there was a need for housing, in particular for smaller units, which are in short supply as part of the current housing mix. Both neighbourhood plans accepted the need for higher densities in certain locations in order to achieve a rebalancing of the housing mix: in the case of Bookham by concentrating smaller units around the neighbourhood centre; and in the case of Ashted on larger development sites.
- 4.16 The work undertaken by these communities, in particular the targeted approach to increased densities in certain locations, suggests that increasing suburban densities can be achieved without a loss of amenity of character if addressed in a sensitive way. It is recommended that this option be explored in more detail.

Reallocate Recreation Land

- 4.17 This approach involves building housing on some existing open spaces within the built up areas, and re-providing the open space on the edge of the built up area.
- 4.18 There was strong opposition to this approach in response to the consultation. Although this option could provide a reasonable amount of new housing, there are a range of drawbacks that would impact on other strategies of the Council. It would reduce accessibility to recreation land, particularly in those areas in which it is most scarce and currently has the greatest benefit in terms of health and wellbeing. It could also erode the amenity of built up areas and reduce the ecological value of a network of green spaces. There may be site specific cases where the relocation of open space is justified by other material considerations of public benefit, but in principle it is not an option that is recommended be taken forward.

Summary of Preferred Brownfield Options

- 4.19 If implemented, the brownfield options recommended above could deliver a significant additional amount of housing within the existing built up area. Using the estimated housing yields set out in the consultation, but with appropriate adjustments for a more restricted approach to the reallocation of surplus employment land and increasing suburban densities only in certain targeted locations, it is estimated that cumulatively these options could provide an additional 1200 dwellings⁵.

5.0 Meeting Demand Outside the District

- 5.1 As part of plan preparation, neighbouring authorities are required to co-operate with one another on cross-boundary issues of mutual importance. That co-operation also extends to authorities within the same housing market area.

⁵ Based on town centre redevelopment 350 extra homes (additional to brownfield land assumption), mixed use redevelopment 170 homes, limited reallocation of surplus employment land 475 homes, and targeted increases in suburban densities 200 homes

Unmet housing demand is one of the issues that MVDC has flagged as an issue for discussion with neighbouring authorities.

- 5.2 Neighbouring authorities were notified as part of the consultation and invited to comment. Responses were received from almost all of them (see consultation summary). There was a consensus amongst them that they would be highly unlikely to be able to meet any of Mole Valley's unmet housing demand. Four authorities have indicated that they wish to explore whether there is scope in Mole Valley for meeting any of their residual unmet housing demand.
- 5.3 The duty to co-operate does not extend to a duty to agree. A DCLG proposal currently being consulted upon to require planning authorities to agree statements of common ground is unlikely to change this position. It is the case that most neighbouring authorities are in a similar situation to Mole Valley, having to meet increased housing demand within land that is heavily constrained by the Green Belt or other designations.
- 5.4 The likelihood that neighbouring authorities can or will take some of Mole Valley's unmet housing demand remains small. Discussion will continue with them as plan making progresses, in particular once it has been agreed what unmet housing demand there is likely to be, but for the purposes of drafting the plan no reliance can be put on meeting any significant element of housing demand in neighbouring authorities.

6.0 Greenfield Options

- 6.1 The residual unmet housing demand, taking account of forecast demand and identified supply, is approximately 3000 dwellings⁶. If the four brownfield options recommended above are implemented they could deliver another 1200 dwellings⁷, reducing the unmet housing demand to approximately 1800 dwellings. If the standardised methodology for calculating housing demand is introduced as currently being consulted upon by DCLG⁸, the unmet demand figure would rise by a further 750 to 2,550 dwellings.
- 6.2 Accepting that these figures are estimates and that the method of calculation may change during the plan making process, there will remain an unmet housing demand of between approximately 1800-2550 dwellings, even after optimising the use of brownfield land.
- 6.3 Mole Valley is heavily constrained by nationally recognised designations, which preclude large-scale development taking place in those designations because of harm to features of recognised importance (such as the Surrey Hills Area of Outstanding Natural Beauty) or harm to potential future occupiers (such as risk of flooding). It does not mean that development cannot take place at all in those areas, but they are not locations suitable for significant housing development of the scale needed to meet the unmet housing demand.

⁶ Strategic Housing Market Assessment and Brownfield Land Availability Assessment

⁷ See paragraph 4.19

⁸ DCLG 'Planning for the right homes in the right places: consultation proposals', September 2017

The Green Belt

- 6.4 One other important national planning constraint is the Green Belt. The Green Belt is a policy which aims to prevent urban sprawl by keeping land permanently open. Once established national planning policy sets out that Green Belt boundaries should only be altered in exceptional circumstances, as part of the review of a local plan. The Government has recently proposed guidance⁹ on what might be considered 'exceptional circumstances'. The advice is that an authority should amend Green Belt boundaries where it has examined fully all other reasonable options for meeting its identified development requirements, including:
- making effective use of brownfield land and estate regeneration
 - making use of underused land, including surplus public sector land
 - optimising proposed density of development
 - exploring whether other authorities can help meet demand
- 6.5 The brownfield options outlined above seek to make the most effective use of brownfield land within the context of Mole Valley, including making use of underused land (for example surplus employment land) and optimising proposed density of development (for example increasing suburban densities). Engagement with neighbouring authorities indicates that they are unlikely to be able help meet demand. It follows that, with a residual unmet housing demand of between 1800-2550 dwellings, exceptional circumstances do exist and it will be necessary to investigate whether some or all of the unmet demand can be met through greenfield release including, if appropriate, amending Green Belt boundaries. The amount of land will depend on many factors, but is likely to be in the region of 90-130 hectares¹⁰, which equates to less than 1% of greenfield land in the District.

Principle of Greenfield Release

- 6.6 The principle of greenfield release, in particular Green Belt, is a controversial issue for many people. Responses to the consultation included the view that development of greenfield land should not be allowed under any circumstances because, once developed, open land would be lost forever. However, there was also recognition by many respondents that greenfield land would have to form part of the solution to meeting housing demand.
- 6.7 Neighbouring authorities further ahead in their plan making activities have also had to address the principle of releasing greenfield land. In none of the districts has this been an easy decision to make. In some cases initial attempts to form a plan without releasing greenfield land despite unmet demand were rejected at examination (Waverley Borough Council) or pre-examination meeting (Reigate and Banstead Borough Council) by local plan inspectors. Both authorities have had to reassess their approach and revise their plans to include greenfield releases. Other neighbouring authorities are currently consulting on plans which include greenfield release (Guildford Borough Council and Tandridge District Council).

⁹ Housing White Paper: 'Fixing our broken housing market', February 2017

¹⁰ Assuming average of 30dph with 65% site efficiency

- 6.8 The proposed Government guidance indicates that where all other reasonable options have been considered, and there is still unmet demand, it will expect a local authority to have explored options for development on Green Belt land. Failure to do so is likely to risk the plan being found unsound at examination, with the consequent loss of control over planning decisions in the District, and/or delay to producing a plan that does meet national planning guidance.
- 6.9 The consultation sought views on three possible greenfield options. These would involve the release of greenfield (of which some or all may be designated as Green Belt) for large-scale housing development.

Urban Extensions

- 6.10 This option would involve significant expansion of one or more of the larger built up areas in Mole Valley – Dorking, Leatherhead, Bookham, Fetcham and Ashted. It would create one or more new residential neighbourhoods, together with the roads and other infrastructure necessary to support the new population. Depending on size and location, urban extensions may include other uses, such as a neighbourhood centre with local shops and services, and ancillary open space.
- 6.11 Of the three greenfield options consulted upon, urban extensions gained the most support when compared to the other two rural options. Concerns about infrastructure were raised, although it was also argued that this form of development had the potential to improve existing deficiencies in infrastructure, placed new housing closest to existing services, and was the most sustainable in that there were better opportunities for integrating with public transport. Concerns were also expressed about the coalescence of settlements and the scale of urban extension, a number of people preferring a number of smaller urban extensions to one or two large extensions.
- 6.12 In terms of accessibility, limiting impact on the Green Belt, and proximity to services, there is a strong argument in favour of urban extensions as an option for delivering large-scale housing. The views expressed in the consultation demonstrate the many factors that will need to be taken into account when investigating the potential of different sites around the built up areas. It is recommended that this option be taken forward for further investigation.

Expand a Rural Village

- 6.13 This option would involve the significant expansion of one or more villages in the rural area of Mole Valley. A village expansion of this nature would provide significant housing development but would inevitably substantially change the scale and character of the village. Services and transport links would be based on the original village centre, but would need to be significantly enhanced to support the new housing.
- 6.14 The consultation response in support of this and the other rural greenfield option for a new settlement were approximately the same, although not as high as for urban extensions. Comments were varied, ranging from strong concern about

- the impact on village character and the countryside, through to a view that the north of the District had historically taken the majority of development and that this option would help to address that imbalance. There was also concern about the ability of rural infrastructure to cope with large-scale housing development, and the lack of public transport leading to a growth of traffic on inadequate rural roads.
- 6.15 Expanding one or more rural villages would be a significant change in the planning approach taken in the District over the last few decades. It would give rise to a range of challenges including integration with an established community, impact on the countryside and provision of infrastructure.
- 6.16 While not underestimating these challenges, they are equally applicable to most large-scale housing development, including urban extensions. One of the biggest differences with an urban extension is that new residents would have to access higher order services by travelling to towns or larger urban areas. The need to maximise the sustainability of such a development is therefore a key factor and would limit locations to those villages with good road and rail links, or where such links could be provided as part of the development.
- 6.17 The scale of unmet housing demand and the potential need for more than one solution suggests that this option should also be explored in more detail.

New settlement

- 6.18 This option would involve the development of a completely new settlement. It would have to be large enough to fund the provision of new local services, for example a local shop, community buildings, health and education facilities. It would have to be located on good road and rail links, or be able to fund the provision of such transport links.
- 6.19 Consultation responses to this option were mixed. Some saw a new settlement as being a good compromise between providing large-scale housing while avoiding direct impact on existing urban areas or villages. Others saw it as the most harmful greenfield option in terms of its impact on the open countryside, and lack of sustainability.
- 6.20 Examples of new settlements are being considered by some of MVDC's neighbouring authorities, including Wisley in Guildford, Dunsfold in Waverley and a number of options in Tandridge, including Redhill Aerodrome. All of these examples are based on previously developed land (airfields); an equivalent site for which does not exist in Mole Valley. A new settlement would therefore have to develop open countryside, with a consequently high impact on landscape and the openness of the countryside.
- 6.21 The size of a new settlement would have to be sufficiently large to fund all the infrastructure required to support a new community, including transport infrastructure where not already available. This is likely to result in a housing requirement well in excess of MVDC's residual housing demand. It could be argued that such a development would provide housing beyond the plan period, and/or provide housing to meet other authorities' housing demand. However,

such a scale of development would have a significantly greater impact on the Green Belt and/or countryside than is required in order to meet MVDC's housing demand, and would therefore be harmful.

- 6.22 Land acquisition and planning a new settlement would have a considerable lead-in time before the delivery of new housing. Because it would not be able to make a contribution to short and medium term housing need, there would still be a need for other significant housing development in the District to address these needs.
- 6.23 Given the above factors, it is considered that this option is not one that would best meet the development requirements of the District, and it is recommended that it is not taken forward.

7.0 Modest Expansion of Existing Villages

- 7.1 Separate to the three greenfield options for large-scale housing described above, consultation was also undertaken on the proposition of allowing modest additional housing development in villages throughout the rural area. The idea for allowing such small-scale housing development is not so much to meet wider housing demand, although it would contribute towards that aim, but more to support the social vitality of the villages. It is the case that many villages in Mole Valley have had little if any development for many decades. A small increase in population, particularly of younger people or families, could help community resilience in villages which are experiencing an ageing population and the loss of services.
- 7.2 The consultation response was supportive with a large majority in favour of the option in principle. The support was subject to questions about the scale of development and how that might differ depending on the village in question, a general wish for small and/or affordable houses rather than luxury homes, and locations and designs of buildings that would respect the character of individual villages. Selecting this option would also be necessary to meet objectives in the Rural Communities Strategy for rural housing.
- 7.3 This option would require reviewing existing village boundaries. It may include parts of villages where there are gaps between buildings or other small sites with potential for redevelopment, but would not involve any large expansion into open countryside. It would require close partnership working with parish councils and village associations.
- 7.4 Having regard to these factors, it is recommended that the option for modest expansion of existing villages is explored in more detail.

8.0 Next Steps

- 8.1 The timetable for progressing Future Mole Valley Local Plan is set out the revised Local Development Scheme (LDS) (see separate report). The chosen development options will be explored in more detail with the intention of forming a preferred options draft plan for consultation. Depending on which options are

selected, additional targeted engagement will be carried out, for example a greenfield call-for-sites if one or more greenfield options are selected; and discussion with parish councils if the modest additions to village option is selected.

- 8.2 The plan will include policies on other aspects of development, including affordable housing provision, development management policies, gypsy and traveller site provision, parking and technical standards, and a whole plan viability assessment. Additional evidence required to support these policies is set out in the annex to the LDS.
- 8.3 A review of the Community Infrastructure Levy charging schedule will be undertaken in parallel to the development of the Local Plan.

9.0 Financial Implications

- 9.1 Funding of the Local Plan review had been budgeted as part of the Planning Department's work, including additional one-off funding for consultant support made in the 2017/18 financial year. Further one-off funding will be required for the examination in 2018/19 and has been built into the medium term financial plan.

10.0 Legal Implications

- 10.1 The form and content of development plan documents and consultations on them are subject to the provisions of the Town and Country Planning (Local Planning) (England) Regulations 2012.

11.0 OPTIONS

- 11.1 The options are:
- To agree the recommended options for development and authorise detailed assessment of potential sites with a view to producing a preferred options draft plan (recommended)
 - To agree alternative options for development and authorise detailed assessment of potential sites with a view to producing a preferred options plan
 - Not to progress with developing a Local Plan

12.0 CORPORATE IMPLICATIONS

Monitoring Officer commentary – The Monitoring Officer is satisfied that all relevant legal implications have been taken into account.

S151 Officer commentary – The s151 Officer confirms that all relevant financial risks and implications have been taken into account.

Risk Implications – Failure to select suitable development options would risk a draft Local Plan that that may be found unsound. Failure to proceed with Local Plan preparation would risk failing to meet the development needs of the District, having less control over development, and in the worst case having the Government intervene to impose a plan.

Equalities Implications – Not required at this stage. An equalities impact assessment will be carried out as necessary on the future draft Plan.

Employment Issues – None for MVDC. Selecting strategic options for development will affect wider employment opportunities in the District over the life of the plan.

Consultation – Statutory requirements for consultation are set out in the Town and Country Planning (Local Planning)(England) Regulations 2012. Targeted consultation will take place during preparation of the preferred options plan, to inform development (for example a call for development sites, liaison with parish council on modest extensions to villages, liaison with relevant bodies on town centre redevelopment).

Communications – A summary of the Issues and Options consultation responses has been published on the MVDC website. A press release will be issued following the meeting setting out the decision on preferred strategic options.

12.0 BACKGROUND PAPERS

1. Future Mole Valley – Issues and Options: Consultation Summary, September 2017



Issues and Options:
Setting a strategic direction for development

Consultation Summary

October 2017

 See our video at www.futuremolevalley.org



Introduction

Between 1 July and 1 September 2017, Mole Valley District Council held a public consultation asking for views on strategic options for development over the fifteen year period of the next Local Plan, to be known as Future Mole Valley.

Our communications strategy for the consultation included a dedicated website, branding, a leaflet drop to residents, a social media campaign, focus groups and email notifications. The Planning Policy team hosted 16 events throughout the district and attended a further 13 meetings organised by parish councils, neighbourhood forums, residents' associations and other local groups. We spoke with a variety of Mole Valley residents to understand a broad range of opinions on future development within the district.

We received a significant amount of responses through different channels; respondents could make their views known via an online poll and survey, filling in a hard copy form, by emailing us or by sending a letter. In total, we received 519 detailed representations over the 9 week period, and 1390 individual respondents to the poll questions.

The responses from all avenues of submission have been collated and reviewed. This paper provides an overview of both the quantitative and qualitative responses and the key findings from the consultation.

Section 1: Website and respondent demographics

This section looks at the demographics of the Future Mole Valley respondents, including those who used the website, emailed, completed a survey form or sent a letter.

Section 2: Poll results

This section displays the poll results for six brownfield options for accommodating additional housing on previously developed land, as well as the responses to four greenfield options for how we could meet demand for new housing on undeveloped land.

Section 3: Summary of comments

This section summarises the more detailed comments made in response to the outlined options and development challenges facing Mole Valley over the Local Plan period. Each response has been read and analysed and the key points raised have been grouped into themes which are summarised in this section.



Section 1: Website and respondent demographics

The dedicated consultation website www.futuremolevalley.org hosted information on the consultation topic, our Issues & Options paper and all of the evidence documents. Use of the Google Analytics tool has enabled analysis of the demographics of people using the website, as well as the way in which they interacted with the content.

519 more detailed responses were received from the survey, and through letters and emails, provides further insight into the range of people who responded to the consultation. The following data refers to information that people chose to give, such as age range, gender and address information.

Total visits:

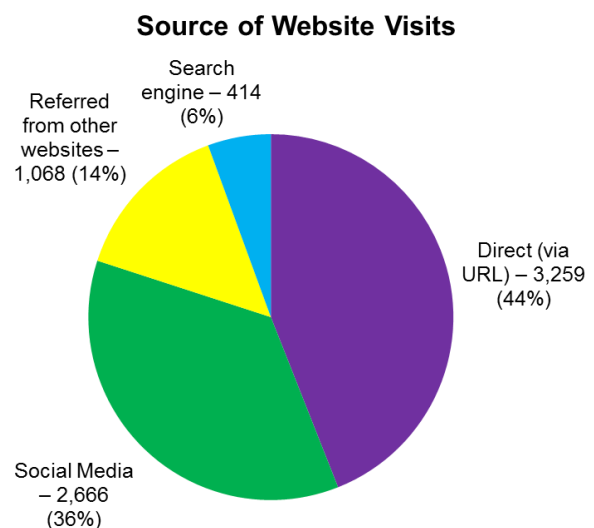
The table below shows the number of visits to the consultation website, whilst also displaying this number as a percentage of the adult population.

Future Mole Valley Issues & Options		
	Visits	As a % of Population (18+)
Total	7,407	11%
Unique	5,472	8%

District Population 18+ (2016 Mid-Year Estimates) - 68,596

Source of website visits:

The data shows how respondents reached the website: via social media (36%), a search engine (6%), clicking on a link from a different website (14%) or by directly typing our address into the URL bar, or clicking on it from an email or document (44%).





Video views:

We created a video to engage residents and to demonstrate both the purpose and importance of Future Mole Valley. The chart to the right indicates where the video was most frequently watched. Social media refers to Facebook, Twitter and LinkedIn. The consultation was regularly promoted on these platforms by MVDC’s Communications Team, throughout the nine week consultation period.

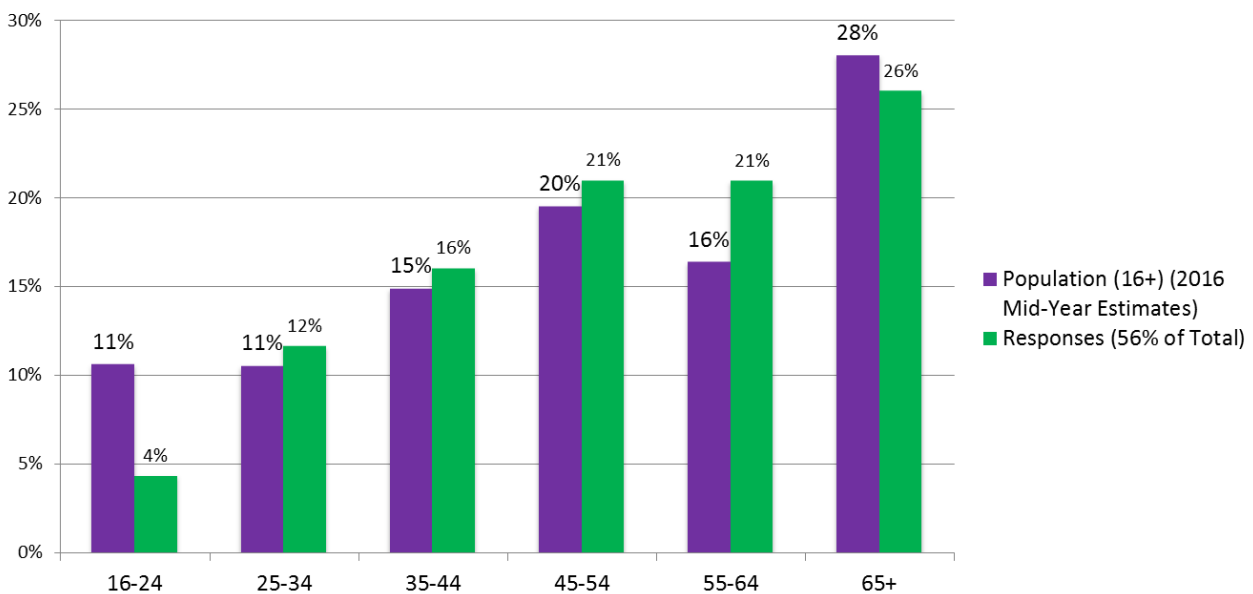
Source	Views
Future Mole Valley website	4,146
Social Media	3,192
YouTube	261
Total	7,599

Age:

It was possible to combine Google Analytics data with information provided in survey responses to record the age group of 56% of total website users and respondents. The chart below shows these ages compared to population by age group, which better indicates the success in reaching each age group across the district. For example, for the age group 25-34, in Mole Valley this equates to 11% of the 16+ population whereas 12% of website visitors were of this age.

Age Group	Total Respondents and Website Users
18-24	145
25-34	388
35-44	534
45-54	699
55-64	698
65+	867

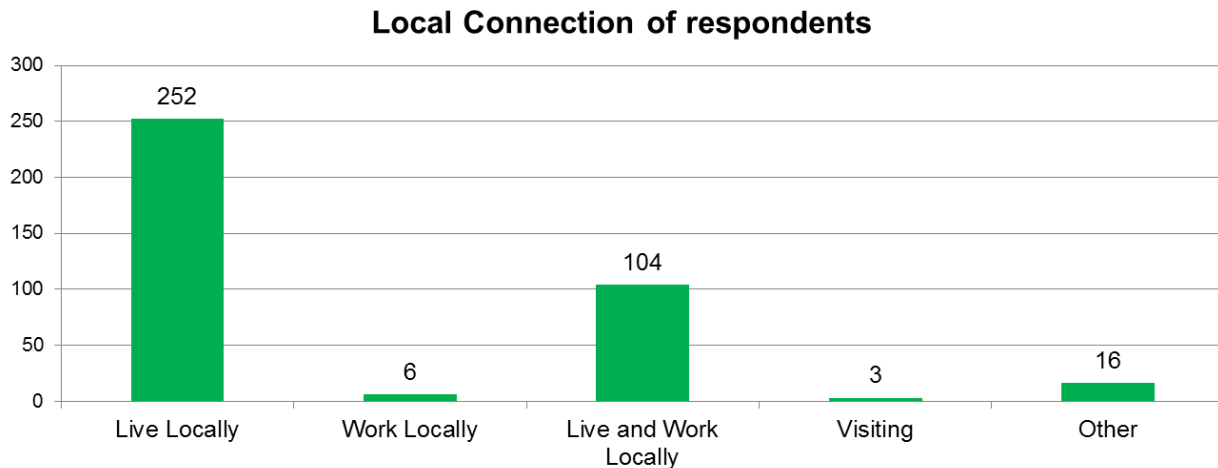
Consultation Responses compared to Population by Age Group





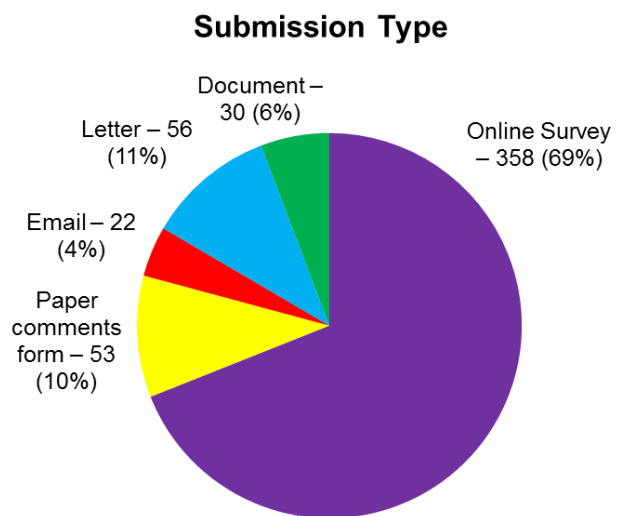
Local Connection:

381 respondents (73%) provided information about their connection to Mole Valley, as shown in the chart below:



Submission type:

We were able to distinguish the most popular method of response to the consultation by analysing the channel of each response. The chart to the right clearly indicates the popularity of online communication and how important it is for engaging with residents. Letters, emails and documents were typically submitted by those who fell into the Landowner / Agent category, or organisations and interest groups who wished to submit a detailed response with supporting evidence. Residents, however, were also able to respond via letter or any other form of written communication.



Responses on behalf of an organisation:

Of the 519 total detailed responses, 128 (25%) of them were on behalf of an organisation, such as a Parish Council or Residents’ Association. Of those 128, 32 (25%) were on behalf of a statutory consultee. 67 responses (52%) were from landowners or planning agents, the majority of which were in relation to specific site(s) they wished to see considered as Future Mole Valley progresses.



Section 2: Poll results

We used a poll as part of our consultation to gain insight into which of the proposed development options were favoured, and which did not appeal. There were six brownfield options proposed as a potential source of additional housing on previously developed land, and three main options for greenfield sites. One further, less substantial option for greenfield development was also proposed (modest extensions to rural villages), but this was presented separately from the three main options as it has less of a potential impact on future housing supply.

Brownfield options:

The consultation explained that our starting point would be to look at how and whether additional housing can be accommodated on previously developed land. Estimates of potential additional housing contribution as well as a brief explanation are shown below for each option that we asked for views on, with respondents able to select *Yes* or *No* for each:

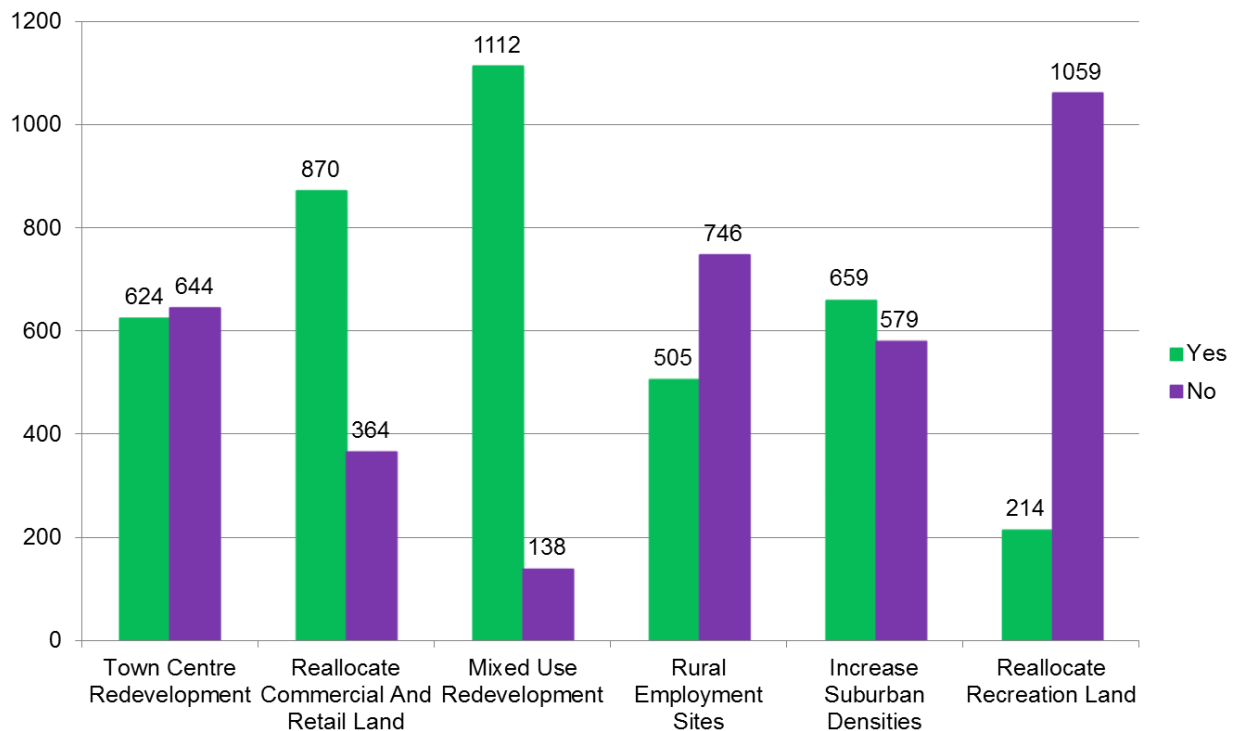
- 1) **Town centre redevelopment** (350 additional dwellings): building more intensively with taller buildings and more compact homes in town centres.
- 2) **Reallocate commercial and retail land** (950 additional dwellings): redevelopment of a proportion of existing employment sites which are currently protected.
- 3) **Mixed use redevelopment** (170 additional dwellings): retaining existing uses and re-providing them in a more efficient manner to release land for residential use – i.e. flats above car parks.
- 4) **Rural employment sites** (100 additional dwellings): redeveloping sites operating within the rural economy such as equestrian sites, workshops and other rural businesses to provide homes.
- 5) **Increase suburban densities** (800 additional dwellings): increasing the number of homes built on sites that come forward within suburban areas.
- 6) **Reallocate recreation land and open space** (200 additional dwellings): building homes on some existing open spaces and re-providing the spaces on the edge of the built area.

Respondents were then given the chance to make any additional comments about each of the brownfield options and these more detailed responses are summarised in section 3 of this document.

The chart on the following page shows the results of both the online poll and paper forms combined for each brownfield option.



Brownfield Options – Poll Results



From the above chart, it can be seen which options were supported, which were opposed and also which were neither strongly favoured nor dismissed. These results give a good indication as to which sources of additional housing on previously developed land residents would like to proceed, and which should not be considered.

Greenfield options:

The consultation outlined that it is likely we will not be able to meet housing demand solely on previously developed land. We stated that we will investigate whether demand can be met outside of the district, but that if this is not possible, it will be necessary to consider the release of greenfield land. We therefore asked respondents to indicate their preference(s) for which of three alternative greenfield options should be explored, if greenfield releases are necessary.

The three options are shown below:

- 1) **Urban extensions:** expand the largest built up areas through one or more planned extensions to build new homes, with extra infrastructure and local services where needed.
- 2) **Expand an existing rural village:** significantly increase the size of one or more villages, to build new homes, with extra infrastructure and local services where needed.

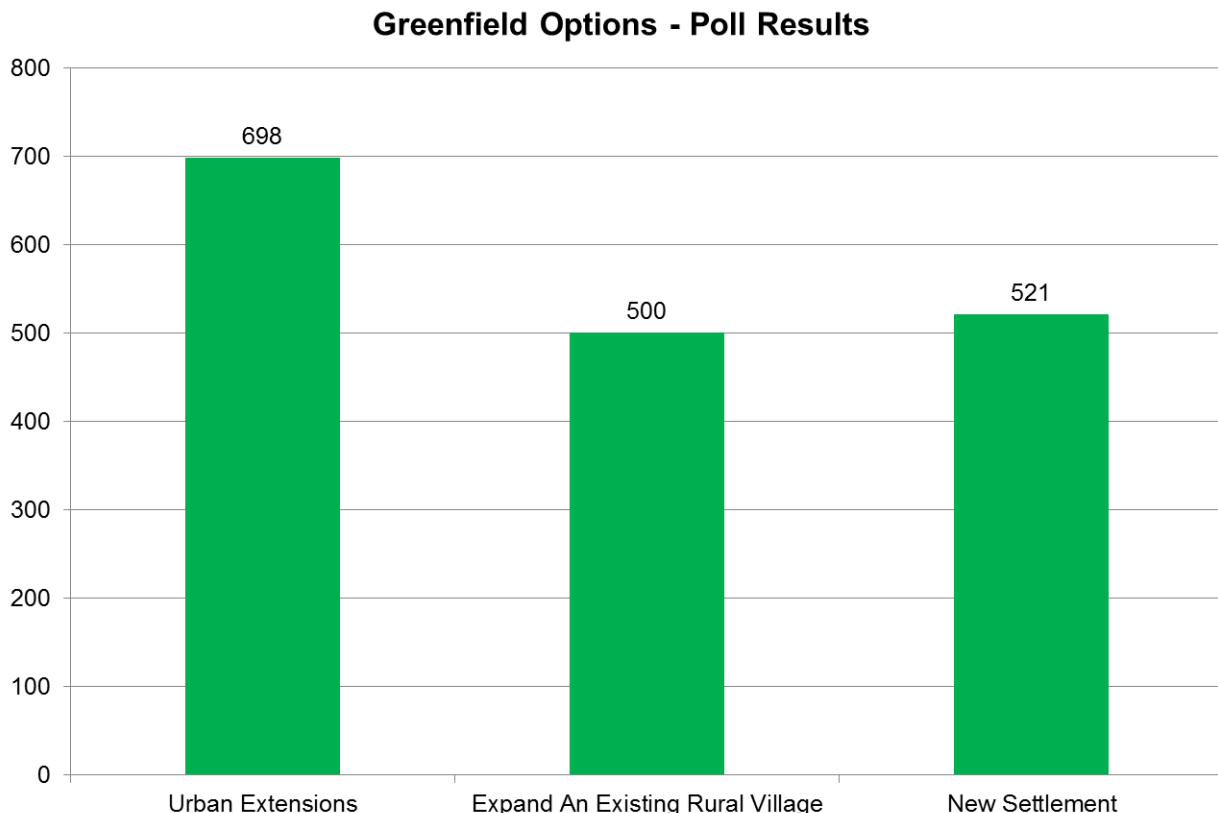


- 3) **Create a new standalone settlement:** design a completely new town or village with new infrastructure and its own local services.

Respondents were allowed to choose in favour of more than one option should they wish and comparison of the number of preferences expressed with the number of responses to the brownfield options suggests that at least some people opted for more than one option.

The consultation did not offer an explicit option for “no greenfield releases”. This is because it may have raised an unrealistic expectation that it would be possible for Mole Valley to address its housing need without releasing any greenfield land. The consultation sought to focus responses on those strategic options which are achievable and credible. A number of people did provide a more detailed response, expressing their opposition to release of greenfield land as a matter of principle or giving reasons why they did not favour one or more of the options. These views are summarised in section 3 of this report. It was also possible to omit this part of the consultation, if respondents did not wish to express a preference between the three greenfield options.

The poll results are shown below:



Urban extensions proved to be the most popular of the greenfield release options with 698 preferences. The other two options both scored almost equally.

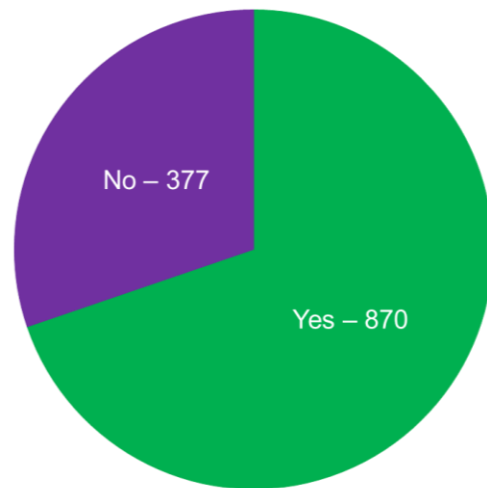


Additional greenfield option:

A further greenfield option was then proposed that could help to support vibrant and successful rural communities and local services:

Modest Expansion of Existing Villages:
 review existing village boundaries to increase the area where development can take place, without involving a large expansion into greenfield land.

Further Greenfield Option: Modest Expansion Of Existing Villages - Poll Results



This was considered to be less substantial than the other options for development and was met with some approval; 870 respondents indicated that they were in favour whilst 377 showed disapproval.

All poll results:

The table below summarises the poll results for each of the potential sources of land for additional housing development.

Options		Yes	No
Brownfield Options	Town Centre Redevelopment	624	644
	Reallocate Commercial And Retail Land	870	364
	Mixed Use Redevelopment	1112	138
	Rural Employment Sites	505	746
	Increase Suburban Densities	659	579
	Reallocate Recreation Land	214	1059
Greenfield Options		Preferences expressed *	
	Urban Extensions	698	
	Expand An Existing Rural Village	500	
	New Settlement	521	
		Yes	No
	Modest Expansion Of Existing Villages	870	377

* See 'Greenfield options' for further explanation of choice of preference.



Section 3: Summary of comments

This section examines and summarises key themes expressed by those who submitted more detailed responses, either by email/letter or by completing a survey form (online or paper) with additional comments. The summary groups comments into common themes.

Principle of Brownfield First

Use every last potential site without compromising the living environment, but supply limited

A strong preference was expressed for brownfield land to be thoroughly exhausted as a first priority, accompanied by a commensurate upgrade in infrastructure. Comments from individuals revealed a perception of the existence of an adequate supply of brownfield sites to meet demand. Within the development industry, whilst accepting the priority given to the development of brownfield sites, the view was that the supply from this source was limited, and would not meet the housing need. It was felt that the approach would rely heavily on the re-allocation of employment land and, even then could not be the sole answer to the provision of housing in the District. It will remain important to protect town and village amenities and quality of life.

From those who analysed the evidence base for the housing supply figures there were comments questioning the robustness of the 'Identified Supply' figure of 2,900 dwellings detailed on in the Brownfield Land Availability Assessment (Table 3.4: Potential sources of Housing Land), with several respondents indicating that brownfield land could provide sites for more homes than this number. With regards to the *unimplemented permissions*, some within the development industry expressed the view that a review of their deliverability needed to be conducted and a lapse rate applied to take account of the proportion of consents that are ultimately unimplemented. In relation to the *windfall and garden land allowances* some felt that this represented an overly large percentage of identified supply. There was also some questioning of the inclusion of *allocated housing sites* from the 2000 Local Plan without a reappraisal of their suitability as elements of the forthcoming spatial strategy. Finally, there was some concern about the housing figures from sites identified with *potential development capacity* - attention was drawn to the low proportion of units indicated as deliverable in the first five years of the plan, the absence of an allowance for non-delivery, and the fact that of 65% of this housing capacity relied on three of the thirteen sites listed.

Principle of Greenfield Release

Protect valued countryside and review land's continuing effectiveness as Green Belt

Many impassioned comments were submitted stating that development of greenfield land should not be allowed under any circumstances; stressing that once developed, it would be lost forever. The role of greenfield land in people's mental and physical health was cited, as was the impact on tourism and nature conservation. Comments included a number of references to the Green Belt in terms of its perceived physical qualities, as opposed to its



policy functions. However, there was also recognition by many respondents that greenfield land would have to form part of the solution.

There was some strongly worded support for the retention of the Green Belt - with a concern that the greenfield options would lead to urban sprawl and the loss of settlement identities through coalescence. The distinctness and separation between different towns and villages was a valued feature of Mole Valley and there was concern about the ongoing erosion of the Green Belt. The Green Belt is an important asset which should be protected as a matter of principle for future generations. The use of the term greenfield to encompass the Green Belt and wider countryside was challenged by some.

A few questioned the validity of housing shortage as grounds for building on the Green Belt. Others stated that Mole Valley had not demonstrated that it has fully examined all other reasonable options for meeting its identified development requirements in accordance with the criteria set out in the Housing White Paper, in particular with regards to use of surplus public land and the optimisation of densities.

On the other hand, there were also a number of comments which supported the need for a review of the Green Belt through examining the extent to which parts of it continued to fulfil its planning policy remit. There was call, mainly from those in the development industry, for a wholesale review of the Green Belt boundary involving the revisiting of settlement boundaries and the making decisions against clear criteria to identify land suitable for development. Some felt that this should build on previous work undertaken in 2013/14. However, the extent of the release of land, and how and where this should occur, varied considerably - from small scale piecemeal revisions of village boundaries to the de-designation of land bordering major roads and rail lines, in addition to the cases put by development industry representatives for specific sites.

Housing Numbers for Mole Valley

Lobby against national spatial strategy

The argument that Mole Valley and the South East more generally was already 'overcrowded' and that the focus on the South East could not be sustained over the long-term was a regular response. It was felt that a change in the national growth strategy was required to stimulate economic development, and with it housing, in other parts of the country. The point was made that at some stage the 'tipping point' would be reached and that the continued focus on the south-east could not be sustained over the long-term. It was felt by a number that Mole Valley District Council needed to make this argument to central government.

There was an element of resistance to the provision of housing based on statistical projections which allowed for the migration of households into the Mole Valley area (particularly from London), as opposed to simply providing for the need arising from the existing resident population.



Review housing need figures in the light of changing circumstances

With respect to the projected housing need numbers for Mole Valley, the evidence behind the figures was brought into question. Some did not feel the numbers had been adequately explained, some refused to accept that such a large number of houses were necessary, and some were resistant to the provision of housing based on projections which allowed for the migration of households into the Mole Valley area, as opposed to simply responding to the need arising from the existing resident population.

Conversely, many in the development industry felt that the figures underestimated housing demand in the area. A variety of points were raised. A number of responses pointed to high rent levels and high land and house prices in the area and disagreed with the approach of the Strategic Housing Market Assessment that an increase in the housing need figures, as a result of market signals indicating affordability issues, was not required in Mole Valley. There was also some questioning of the use of a separate set of projections (produced by the Greater London Authority - GLA) for the Royal Borough of Kingston upon Thames, an authority belonging to the same strategic housing market area as Mole Valley, which resulted in lower figures for internal migration from it to the other three Surrey authorities that make up the Housing Market Area. Conversely, the GLA in their response welcomed the consideration of longer term historic migration trends in the Kingston segment of the SHMA, but felt that its data should have been used for the other three Surrey local authorities as well.

One comment stated that the employment growth forecasts used by the SHMA were now out of date and that this cast doubt on whether the appropriate level of job growth was being planned for.

Some expressed concern about the discrepancy between the periods covered by the SHMA (2015-2035) and the Local Plan (2018-2033) and felt that they should be aligned to ensure housing need is dealt with coherently. The 3 year discrepancy between the commencement point of the SHMA and the Local Plan was highlighted and the need to take account of the potential accumulated shortfall from the period between the continued adherence to the lower annual housing target of the adopted Core Strategy up until the adoption of the new Local Plan.

Amongst the reasons given by both sides for some sort of revision of housing need figures was the need to employ the latest updated housing projections (2014), the need to comply with the Government's forthcoming standardised methodology for Strategic Housing Market Assessments, and the need to take account of the potential impact of the UK's decision to leave the European Union.



Brownfield Options

Rejection of 'high-rise', but some cautious support for appropriate increases in height in certain locations

A wide range of comments were made regarding design and density, particularly with respect to town centres. Design issues raised included the importance of good quality, locally-distinctive design and high environmental standards.

A recurrent fear of 'high-rise' was expressed, and it appears this is how the phrase 'taller buildings' was interpreted, although what high-rise meant in terms of storeys and building heights was rarely clarified in the responses. The objection was made on the basis of their appearance, their compatibility with the character of the surrounding area, and a perceived association with social problems. However, there was also some support for a limited increase in height in appropriate locations – particularly in town centres and areas with good public transport accessibility, rather than suburban or village locations.

Increase densities but only in accordance with character and adequate infrastructure, difficult option to realise in practice

Some voices expressed the view that the *Increasing Suburban Densities* option was a relatively attractive and less drastic alternative in comparison to some of the other development strategies, allowing an evolution rather than a more radical transformation. However, at the same time the importance of design that was sympathetic to its surroundings was emphasised on a number of occasions and concerns about strains on the infrastructure of existing built-up areas were prominent. Furthermore, voices from the development industry stressed that experience suggested a strategy based on increasing suburban densities would be piecemeal, uncertain and likely to meet significant resistance from the local people and highlighted that large swathes of the built environment were subject to protected policies which served as effective blocks on development.

Protect District's centres from becoming dormitory communities and equip them to compete as retail destinations

There were some who questioned the conclusions from the available data which regards to the demand for employment land within Mole Valley and a comment suggesting that it would see demand for industrial land grow as industrial land in London is displaced. There were also a few comments questioning whether the implications of Mole Valley's relationship and position within the Local Enterprise Partnership and Gatwick Diamond areas had been given appropriate weight and commenting that the implications of aviation and business related development within the District for employment and housing needs should be fully explored through the plan-making process.

With regards to the residential development of employment sites, although there was a degree of support for this, the sustainability of the loss of business premises on individuals' ability to work locally was questioned, in particular with regards to the impact on transport infrastructure. It was felt that once the employment land was lost it would be difficult to secure further provision to meet the District's needs and any future re-provision would



inevitably be in a less central location with associated pressure on the Green Belt and greenfield land.

Concern at the conversion of the District's settlements into commuter dormitories was raised and the need to retain a sustainable balance was emphasised.

In relation to the retail sector there was a feeling that the District's retail centres were lacking in their 'offer' and there was a need for more recognisable, dynamic high street names. On the other hand there was a call for protection and greater support for small, independent retailers to retain the character of high streets, with West Street, Dorking also being specifically highlighted as an area which merits special attention.

A handful of comments drew attention to the impact of technology and changing working patterns on the District's development strategy. Homeworking, online shopping and driverless vehicles were identified as key innovations for the future, the effect of which needed to be taken into account. The need for quality broadband infrastructure within the District was highlighted.

Protect Rural Economy Sites

The comments pertaining to the redevelopment of Rural Economy sites saw their loss as being detrimental both to the rural economy, and the character and life of rural communities set against a limited contribution to housing supply. It was felt that employment opportunities were already limited in rural areas and it was pointed out that for some such business uses a rural location was essential. A few dissenting voices felt that a more contextual approach needed to be adopted with individual sites on suitable previously developed land and able to meet local needs looked upon favourably.

Protect Open Spaces in the Built Up Area

Comments made in relation to the option of developing open spaces within the built area and relocating them to the periphery registered strong disapproval. Proximity within the built-up area to types of open spaces such as allotments and playing fields was regarded as extremely important particularly for the younger, the elderly users, those with lower mobility, and those with lower incomes. The negative impacts of this approach on health, the character of urban areas and as an incentive for increased car use were noted in responses. It was highlighted that a likely future increase in flatted accommodation in urban areas would mean that a greater number of people would rely on these spaces.

Build on car parks, railway stations, and unused shops, offices and industrial space

The option to build over car parks was very popular and the Council was encouraged to work with owners of private car parks to maximise these sites as well as their own, although there was some recognition that car park sites were likely to be limited in number and in the amount of housing they could yield. Other sources of housing development which were suggested in multiple responses were building around and above railway stations, and the redevelopment of unused office space, redundant industrial space, and failing shops. Golf courses and petrol stations were also mentioned as potential housing land. Mixed use



development - ground level commercial uses with residential above - was mentioned a number of times as a good format of delivery and suggestions for how this could be implemented included building above schools, shops, hospitals and supermarkets.

Greenfield Options

With regards to all of the greenfield options, some uncertainty was expressed in relation to the scale and form of development implied by each option.

Urban extensions: mixed responses, don't compromise cherished settlement gaps

The comments on *urban extensions* were mixed in tone. The impact on infrastructure was argued from both sides: the pressure new development would impose on existing infrastructure within the built-up area versus the potential of building on existing infrastructure - in particular transport hubs - and the impetus it would give to the support of existing services. It was also highlighted that an urban extension could potentially make a positive contribution to the settlement which they extended through, for example, providing new types of accessible open space. In character terms, some also felt that the number of dwellings required would be more appropriate and better served in an urban context.

Particular concerns were expressed about extensions to the urban areas of Leatherhead, Ashted, Bookham and Fetcham in the north of the District, including issues about the role of the Green Belt in preventing coalescence between distinct settlements.

Conversely, a number of representations were put forward by developers and landowners for sites in and around those locations whose advocates felt they could be delivered without compromising the purposes of the Green Belt. There was also some suggestion that a strategy of multiple smaller scale extensions to one of the larger built up areas should also be considered.

Expand an existing rural village: protect village character and make proportionate changes – don't swamp villages with housing

The comments were varied with respect to the *Expand an existing rural village* option. Given the range in size and services amongst the District's villages, there was some uncertainty as to which level or levels of village within the District's settlement hierarchy this option pertained. Strongly worded concerns were expressed as to the impact of extensions on village character with the feeling that this option would result in the loss of this cherished aspect of these settlements. Concerns were also expressed about the potential for a large volume of housing swamping ill-equipped local infrastructure and services. The need to have recourse to the private car to access necessary services and employment was cited as a key disadvantage of this approach. The need to plan for development in accordance with the existing level of services and infrastructure was articulated more than once in this regard. Other responses emphasized that residential development in certain villages might enable a greater range of local services to be supported.



New settlement: sounds interesting, but where would it go and how long would it take?

Notwithstanding the comments expressing a strong desire to protect greenfield land, a share of comments expressed support for the idea of a *new settlement*. Justifications ranged from seeing it as providing a more secure guarantee that necessary new infrastructure would be provided, that it would take the pressure off other areas, allow existing settlements to be protected, and that it would safeguard the Green Belt and countryside elsewhere. For some this option was seen as the opportunity to develop an innovative eco-village style community.

Others objected to the proposition due to the uncertainty as to where a new settlement might be located and its potential impact on the Green Belt and countryside. It was pointed out that, unlike other neighbouring authorities, there was not a large previously-developed candidate site within the District.

Responses from those in the development industry stressed the difficulties in identifying and delivering such a settlement and the considerable lead-in times before housing would become available. Thus, it would not be able to make a significant contribution to short and medium term housing needs and, in this context, there was a concern about an overreliance on one site. However, there was also a suggestion that a start should be made on a new settlement to provide for need continuing after the plan period. There was a feeling by some that such a stand-alone settlement would not be of a sufficient scale to provide for a great deal of the community's day-to-day needs – resulting in a dormitory estate, and that it would inevitably be reliant on the private car – generating consequent strains on the rural road network.

Additions to rural villages – good idea, but modest means modest

There were a number of positive comments in response to the *Modest Additions to Rural Villages* option. Many saw it as a positive contribution towards keeping local schools and shops open as well as providing affordable accommodation for local people, especially young families. However, some were wary with regards to the scale of the 'modest additions,' and others appeared to interpret it as an *or* rather than an *and* greenfield option in conjunction with other strategies for meeting demand.

Location Suggestions

As well as responses from landowners and agents promoting particular locations or sites, there were a large number of individual responses directing the Council to look towards a broad corridor of land to the south of the District along the A24 and in the vicinity of existing railway stations. In some cases, this was linked to a perception that the north of Mole Valley has taken the lion's share of development for some time. However, other locations were also mentioned, including sites around the existing urban areas.



Alternative spatial development approaches: mixed, balanced dispersal, or proportionate to existing infrastructure

A variety of alternative development strategies for the District were advanced. Some stressed that a mix of all the options would be necessary to meet housing demand and others argued that housing development should be dispersed across the district through multiple smaller-scale incremental additions to existing settlements. A further approach outlined was the expansion of existing rural villages in proportion to the existing extent of shops, services and employment opportunities within them, whilst another was a focus on the development of rural brownfield sites. Some supported the continued application of the current approach set out in the Core Strategy with growth concentrated, according to the settlement hierarchy, in the District's existing higher order centres. Another approach involved was to deliver development through a large number of smaller schemes, which utilise poorly performing Green Belt on the edge of settlements.

Key Planning and Development Issues

Affordability and the housing needs of different groups

Affordability was a very common theme amongst responses. However, the 'affordability' in question often referred less to the tenure of new housing than to the need for units of a smaller size (1, 2 and 3 bed) than in the past, and of a consequently lower market value. There was a call for an increase in the supply of smaller 'starter' homes rather than larger expensive dwellings. However, there was also a substantial call for a high proportion of new units to be affordable in tenure and for a variety of types of affordable housing to be built, including that MVDC should be permitted to build more affordable housing.

There was also a desire for the delivery of units which meet the needs of first time buyers and young families and a number of comments also acknowledged the need for accommodation that caters for the needs of an ageing population and those looking to downsize. The link between providing more affordable housing and supporting local employment was highlighted, as was the importance of affordable housing for those growing up in villages and rural areas.

Designing communities suitable for people with disabilities was highlighted. The need for the Local Plan to address the requirement for additional Gypsy and Traveller sites was also identified.

The comments showed a consistent concern that any new homes should be smaller than in the past, with a need for 1, 2 and 3 bed units. Suggestions were made for the introduction of policies to prevent houses from extending and in the process reducing the stock of smaller housing.

Transport, traffic and parking: better public transport needed, traffic congestion must be dealt with, and be generous with parking

There were many comments about the capacity of public transport, both bus and rail, to meet the challenges of the level of housing growth and reduce the impact of private car use.



Improvements were deemed necessary to the frequency and reliability of services, particularly in southern parts of the District. In this regard the importance of good non-car transportation to and from the train station was mentioned. Enhancements to create coherent dedicated user-friendly pedestrian and cycle links to serve as viable travel alternatives were also mentioned. The provision of charging points for electric vehicles was highlighted.

The consequences of new development on traffic congestion within the road network emerged as possibly the single issue of greatest concern. Many respondents felt that existing traffic congestion problems, particularly around the District's major urban settlements, and at M25 Junction 9, needed to be addressed first before embarking on substantial new housing development. It was felt that there is a lack of investment in transport infrastructure (public transport, roads and cycling) in this area.

With regards to the location of new development in relation to transport networks, the point was made that if new housing was not located near to local services and public transport, the consequences would be increased subsidies to bus services or increased traffic. New development should prioritise creating communities with better access to sustainable transport infrastructure.

A need for generous numbers of parking spaces, as part of new housing developments, was a common motif in responses from individuals – with the perceived impact of lower levels of on-site parking on streets within the surrounding area identified as a problem. Issues were also identified with parking in town centres and at the District's main railway stations.

Services and Infrastructure: don't forget schools, clinics and community facilities

Over and above traffic and public transport, a very high number of comments related to the impact on and need for adequate infrastructure. It was stressed that people feel existing infrastructure is already over-stretched and that proper planning for infrastructure is essential with all options. Comments concerned the importance of planning for local services such as schools and health facilities to respond to and support the needs of an increased and demographically evolving population, as well as, to a lesser extent, local shops and community facilities. In terms of physical infrastructure, responses questioned the capacity of the water supply and wastewater infrastructure to cope with increased demand. There was mention of the need for high quality broadband within the District. Questions about the funding of infrastructure were also posed.

Mechanisms to deliver more housing

Various suggestions were made to encourage the delivery of the necessary quantity and quality of new housing including: the removal of affordable housing and infrastructure obligations, an increase in Council tax to subsidise the viability of brownfield sites, greater flexibility of planning requirements for a limited period, and greater use of compulsory purchase powers. Local Development Orders were mentioned to encourage residential led, mixed use development in defined areas. The creation of community land trusts was suggested and restrictions on the use of properties as second homes.



It was pointed out that MVDC is required to provide for self-build aspirations within the Local Plan.

Environmental: protect the district's landscape and nature, and consider Mole Valley's environmental footprint

A wide range of comments were submitted with respect to a variety of different environmental factors. Comments mainly focussed on concerns that the 'magic of Mole Valley' would be ruined through the effect of development on the District's protected landscapes and on nature conservation – through loss of habitat in both greenfield and brownfield areas. There were also comments on issues such as flooding, pollution (particularly air quality issues), the reduction of the District's carbon footprint, the need to promote renewable energy and the provision of recycling facilities.

The effect of a potential loss of agricultural land on food security, feeding a growing population and the maintenance of the countryside was seen by some as a threat.

Meeting Housing Demand in other Authorities' Areas

Responses from neighbouring local authorities confirmed their position that they would not have capacity to accommodate Mole Valley's housing demand and that they were struggling with the challenge of providing for their own identified need (see Statutory Consultee Responses section). Development industry voices emphasised Mole Valley's obligation to actively explore the extent to which it could meet unmet needs from neighbouring local authorities, and particularly those within the Strategic Housing Market Area. There was also criticism from those in the development industry that to be complicit with current national policy the Council should examine the potential to meet its housing need on greenfield land within the District before investigating the capacity of neighbouring authorities to meet demand.

Airport Issues

Comments were made about the need to respond flexibly to any potential Gatwick Airport expansion as well as taking account of the noise contours for a two runway scenario and keeping up to date with research and data on noise impacts.

Process

Decision-making: Be responsible, listen to the people but don't be swayed by the 'NIMBYs'

There were a number of comments articulating a conviction that decision-making must be transparent and the process guided by objective evidence rather than the most vocal NIMBY ('Not In My Back Yard') lobby. There was particular call for councillors to be responsible in their approach to the issue and not to use it as a political football. The importance of locally driven solutions and taking into account the work and the will of local communities as expressed in a Neighbourhood Development Plan was emphasised.



Consultation: Speak to us at the right time and give us all the information we need

Some comments were made regarding the consultation process and the published materials and reports. A clearer, more prominent explanation of the assumptions behind the housing need figures emerged as a request. There was some criticism of the holding of the consultation over a holiday period and also of the mechanisms through which residents' responses were solicited. Some felt that it very difficult to make judgements without knowing potential locations for the various strategic options and others that the form and framing of the consultation questions constrained a broader discussion of strategies for development within the District. Some responses pointed out that further work was required on the evidence base for the Local Plan to ensure consideration was given to all the options for sustainable development within the District. There was a call from others to take into account the work undertaken on the Housing and Traveller Sites Plan in 2014.

Statutory Consultee Responses

A variety of statutory consultees provided responses. A number explained that due to the high level and conceptual nature of the consultation it was not possible provide detailed comments at this stage but that further advice would be given as the Local Plan progresses.

Infrastructure Bodies

Highways England advised that they would be concerned with proposals that had the potential to impact on the safe and efficient operation of the M25, and in particular Junction 9 at Leatherhead. It acknowledged the congestion issues at Junction 9 and other parts of the local road network and stated that it would work with Surrey County Council to mitigate this.

Thames Water noted that generally the provision of infrastructure would be enabled more quickly on a small number of clearly defined large sites than on a large number of less clearly defined small sites and registered its preference for growth to be distributed relatively evenly around the existing main urban centres. Thames Water added that, due to a lesser impact on local sewerage networks, they supported a policy that considers brownfield land before greenfield sites.

Environmental and Heritage Bodies

The *Environment Agency* supported Mole Valley's joint working with neighbouring authorities to prepare a joint Strategic Flood Risk Assessment (SFRA) to inform decisions on the location of future development and emphasised the need for water resources and flood risk management to be provided in a co-ordinated and timely manner to meet the physical and social needs of both new development and existing communities.

Natural England stated Mole Valley should look at providing housing outside the AONB – including in neighbouring districts first. With regards to Urban Extensions and Extensions to Rural Villages, they would review sites on a case by case basis, but would not support a new settlement unless all the other options were more harmful to the environment.

Historic England identified a range of heritage matters that local authorities should consider in conjunction with their spatial development objectives. The *National Trust* in their response



urged MV to consider the impact of the development options on its properties and their statutory significance.

Local Authorities

The following neighbouring local authorities responded to the consultation: *Crawley Borough Council, Elmbridge Borough Council, Reigate & Banstead Borough Council, Waverley Borough Council, Epsom & Ewell Borough Council* and the *Royal Borough of Kingston upon Thames*. There was a consensus amongst them that they would highly unlikely to be able to meet any of Mole Valley's housing demand, whilst Crawley and Kingston were interested in understanding whether there was any scope within Mole Valley for meeting any of their residual unmet need. Epsom and Elmbridge, authorities within the same Strategic Housing Market Area, both expressed the desire for councils to collaborate in the formulation of a strategy for unmet development needs in the wider Housing Market Area.

Regional Bodies

Surrey County Council provided high level comments on flooding, archaeology, library services and extra care accommodation for the elderly. They explained that it was not possible at this stage in the plan process to identify any implications for the delivery of County Council services, or the need for additional infrastructure to support growth. Later, at the point where potential development locations are identified, they would be able to comment further on matters relating to county council infrastructure delivery such as the impacts on education and transport infrastructure.

The *Greater London Authority (GLA)* referenced the use of their household projections in the SHMA (see section above) and also commented about the value of exploring economic linkages between Mole Valley and London and the importance of considering '*the potential role of the borough [sic] in the wider market area for industry and logistics provision given the favourable location within the transport network.*'

Town & Parish Councils / Neighbourhood Forums

A number of town councils, parish councils and neighbourhood forums responded to the consultation – both those situated within Mole Valley and some in neighbouring authorities' areas. A broad range of comments were received, with many focussing on their area as opposed to viewing the wider picture. A number of small-scale development sites were suggested in these responses, as well as an emphasis that the new Local Plan must take into account the wishes of local people put forward in relevant neighbourhood development plans.

Focus Group

A focus group involving six local residents was held during the consultation period. Each individual made it clear how much they loved living in Mole Valley, and those living with parents voiced concerns about whether they could afford to continue to live in the district should they move out. Four of the group were previously aware of the Future Mole Valley consultation; all of these indicated they had found out about it via social media and one had



attended an event. Two of the group recalled seeing a door-drop leaflet but had not acted on it.

The group were generally in favour of most brownfield options, with split opinions on Town Centre Redevelopment and Increasing Suburban Densities. Each individual accepted the need to release greenfield land, with unanimous agreement that Expanding An Existing Rural Village was the best strategy. Urban Extensions met disapproval because of perceived infrastructure issues, and Create a New Settlement was disregarded due to the assumed damage to open countryside. The group were strongly in favour of modest and proportionate development in rural villages.