

Future Mole Valley Plan consultation: response from Ockley Parish Council

1. Approach

We agree with the overarching approach to development (Introduction – page 11) – i.e.

- (a) Brownfield approach first
- (b) Increasing the efficient use of brownfield sites
- (c) Use of undeveloped land

Any other approach would appear to be extremely difficult given the very high proportion of Green Belt Land in Mole Valley.

2. Spatial Strategy

- (a) Agree with S2 commentary (page 16) where it says Land beyond the Green Belt is “significantly constrained by landscape, heritage and nature conservation designations, as well as being adversely affected by aircraft noise and suffering from comparatively poor access to local services and public transport”
- (b) Agree with the proposed extensions into the Green Belt and “Land beyond the Green Belt” as being necessary to achieve the overall objective
- (c) Plans for Dorking: This doesn’t really address the major problem of traffic congestion, particularly the A24/A25 crossing. Abolition of parking charges would make a major contribution to revitalising the town.
- (d) Agree that the strategy for rural areas (S5) is broadly a good middle ground providing some much needed housing for rural areas without compromising the character of the villages

3. Housing

- (a) The overall demand for housing in Mole Valley over the 15 year period is at least 6735. *A number of other figures are mentioned in the paper and it would be useful to identify the true figure or explain the differences.* Based on the overall distribution of the required 6735 houses (para 3.1) over the different delivery headings is probably about as good as it could be bearing in mind the various constraints such as Green Belt, infrastructure, etc. But see paragraph 7(f) below regarding SA05 at Beare Green.
- (b) We welcome the much improved policy with regard to the number of affordable houses required in a rural housing development. We trust that this policy will be rigorously followed and will not be diluted by financial viability arguments. i.e. if the proposed development is not financially viable then it doesn’t get built.

- (c) We would hope that in practice policy H2(4) would allow for the proportion of affordable dwellings for rent to be greater than 90%, even allowing for 100% for rent if this meets the needs of the community. Indeed our indications are that very few of those requiring homes in our community would be able to raise the deposit required or to afford mortgage repayments on a purchase of an “affordable” house/shared ownership.
- (d) We would expect that all new affordable homes would be ‘affordable’ in perpetuity, and all those with a ‘rent’ tenure would be available to rent in perpetuity.
- (e) We welcome the statement that “social rent would be encouraged” as “affordable” is very often not affordable in practice. We recognise that it is often not practical for financial viability reasons and we believe that strong representations should be made to the government to provide more funds to build social housing.
- (f) We agree with the continuation of the “rural exception site” policy in H2(6).
- (g) We broadly agree with the housing mix policy of H3 but suggest that in practice the mix should be determined on housing surveys in the area before development proposals are agreed.
- (h) With reference to the number of habitable rooms we find Appendix 4 inconsistent with the statement “All new housing should have sufficient internal space to cater for a variety of different household needs, with the aim of promoting ease of liveability, accessibility and quality of life. Providing a sufficient level of internal space can also help facilitate home working and minimise the need to travel” on page 33.
- (i) The National Space Standard dictates that ‘A dwelling with two or more bed spaces has at least one double (or twin) bedroom’, but we consider that separately to this standard the FMV Plan should stipulate that the bedroom within each new *one bedroom* dwelling should be a double or twin in size. This would then allow for a couple to occupy a one bedroom property, thereby making such a home more affordable for many people.
- (j) We cannot understand why MVDC is trying to adopt an Affordable Housing Strategy based on the draft policy H2 on the day after the consultation has closed.

4. Economy

- (a) EC4 appears to be sensible at first sight but would prefer to see some positive proposals rather than merely saying there would be “support for”.

- (b) EC5 – Supports agriculture, horticulture and forestry development where there is a business or trade but not necessarily for hobby farming such as Six Oak.
- (c) EC6 – Although not related to horse-riding per se it is perhaps worth noting here the sorry state of many of the bridleways that have been largely destroyed by off-road vehicles.

5. Environment

- (a) Support Policies EN2 and EN3 regarding Development in Countryside beyond the Green Belt and in Rural Villages
- (b) EN4. Balance must be struck between
 - (i) Using materials that complement the landscape and environment
 - (ii) Cost of using expensive materials
 - (iii) Avoiding the inappropriate design such as mock farmhouses, mock barns, etc.
- (c) We support the policies relating to biodiversity, green infrastructure, environmental quality and climate change mitigation. EN9 -14.
- (d) We understand that each new dwelling would have at least two car parking spaces, and we welcome this. We consider that these spaces should be planned so that EV charging points can be assigned to each space, whether at the time of development or at a later date.

6. Infrastructure

- (a) We are particularly concerned that the roads will be unable to cope with the increase in traffic arising from the potential developments in Mole Valley. Although we appreciate that studies have been done we fail to be convinced that the roads will be able to cope and we are most unhappy with the apparent lack of concern by SCC; the FMV needs more vision and strategy regarding infrastructure. As it is now, going through Dorking at rush hour is a nightmare with the congestion at the Deepdene roundabout (A24/A25) – if we add additional traffic coming up from the large scale development around Horsham, the additional housing at Beare Green (SA05) and developments in Capel and Ockley we are of the view that it simply will not be sustainable.
- (b) At the very least the A24 should be dualled between Horsham and Capel (as we understand that there are plans but the timing is not clear), the A29 needs significant upgrading to cope with the development at SA05 and Dorking needs an E/W bypass or at the very least a major upgrade to the A24/A25 crossing.

- (c) We therefore believe that the policies for transport infrastructure need to be far more developed before submitting the plan to the inspector.
- (d) Whilst we understand the emphasis on walking and cycling this is naive. For many residents, particularly in rural areas, the idea of walking or cycling to shops, towns, railway stations, etc. is simply not an option; in particular, walking or cycling to Ockley railway station it is not deemed to be safe without designated footpaths or cycling paths.
- (e) Increased use of public transport can only be realised if there is significant improvement to the services, whether more frequent services (particularly bus services at commuter times) or a more reliable train service.
- (f) There is also a need for far more parking spaces at Dorking railway station; there is already a need as the station car park is full by 7am, and expansion here will be imperative in line with new housing development.
- (g) Pot-holes are a major concern and there should be a policy to define action on this problem in the short term.
- (h) It is not satisfactory that MVDC refer to this transport infrastructure as the responsibility of another organisation. We need to see evidence of MVDC working in partnership with organisations to better address the transport concerns of the communities. This not only includes MVDC working in partnership with SCC to plan more investment in the roads, but also MVDC working with SCC and rail and bus companies to improve these public transport and parking services.

7. Site Allocations

- (a) We support the site allocations in Ockley (SA62 – SA65) although we question whether they should all be included in the 1 – 5 year development time frame.
- (b) Traffic speed remains a particular issue along Stane Street in Ockley, and is very much a concern for many residents. We need to see evidence that any new developments having access off Stane Street will result in much needed traffic calming systems along this road.
- (c) Our residents are concerned that there is already a parking issue in Ockley, particularly in Elmers Road. As well as the two designated car parking spaces for each new dwelling, we believe that additional provision should be made for more car parking spaces for current residents. In particular, the residents do not want to see

a scenario whereby someone in one of the new dwellings is parking elsewhere in the village.

- (d) Site SA62 is we believe under current discussion for early development and this we support subject to the detailed planning application. We are concerned at the position of the access road onto the A29 just over the brow of the hill and we hope that if this scheme is to go ahead that suitable traffic calming measures would be installed to reduce the speed of vehicles, particularly southbound.
- (e) We are concerned on the access arrangements for sites SA63 and SA65. Although we understand that Highways have assessed these sites the possible exits are either along the track that serves the sewage works or up School Lane. Both these tracks are very narrow and in the latter case pass very close to existing buildings. They also both have awkward access onto the A29.
- (f) In amplification of the earlier point 6(a) we have concerns over site SA05 at Beare Green with regard to road access onto the A29 where sightlines are not good at each end of the Smallburgh estate boundaries. The A29 is a very busy road during rush hour and the vastly increased traffic flow will cause major back-up of traffic trying to get onto (or come off) the A24.