



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

Consultation Period: 3 February to 23 March 2020

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

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

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

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

Respondent	Clerk to Buckland Parish Council
Organisation (if applicable)	Buckland Parish Council
Responding on behalf of (if applicable)	Buckland Parish Council ("BPC")
Email address	parishcouncil@bucklandsurrey.net
Submitted to MVDC	Wednesday 11th March 2020

Please submit your consultation response:

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



Our approach

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

Yes No

Any other comments:

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

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

Do you broadly agree with these approaches?

Yes No

Any other comments:



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

Yes No

Any other comments:

BPC is aware Buckland Estate:

(i) included in its submission to the MVDC Call for Green Belt Land several existing “under-utilised farm and commercial sites” which the Estate considers potentially relevant to increasing housing stock; and

(ii) stated it can be expected to continue to prioritise optimising the re-use of previously developed sites over new build on previously undeveloped land.

BPC has previously stated its aversion to any development of open green belt pasture or agricultural land in Buckland when there are underutilised and/or redundant sites that have yet to be developed¹ and remains strongly opposed to any proposal to include such land within a settlement boundary.

BPC confirms, as previously advised², that feedback from the local community, feedback that has been consistent over the last 8 years, is that new build properties in Buckland should focus on modestly sized dwellings with no more than 3 bedrooms to target downsizers and people moving up from smaller starter homes.

Accordingly, BPC questions whether, given the projected shortfall in new housing, MVDC could consider:

(i) proposing new policies (or amendments to existing policies such as RUD19) to help landowners optimise the delivery of modestly sized new homes through the re-use of previously developed and currently underutilised buildings; and

(ii) defining appropriate criteria against which MVDC could assess “under-utilised farm and commercial sites in rural parishes” to identify MVDC preferred isolated locations (i.e. not within proposed settlement boundaries) that could be sensitively redeveloped to help reduce the unmet demand for new homes that it is otherwise suggested will require the use of undeveloped greenfield land across Mole Valley; and

asks MVDC, to ensure any homes delivered in this way are smaller homes, designed to comply with the wording and spirit of Housing Policy 3 clause 4 with sufficient allocated parking within the curtilage to remove any requirement for the residents to utilise the limited on-road parking within Mole Valley’s rural villages.

¹ 12th February 2018

² 18th October 2018



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

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

Future Mole Valley Evidence Base - Green Belt Review – Regulation 18 Version
Page 106

Comment:

BPC, having consulted the local community, has previously:

(i) expressed the Parish Council's belief that :

- the continuity of ownership, which extends back to the 17th century has ensured, over the centuries, that the scale and style of modest development undertaken (in Buckland) has achieved an appropriate balance between meeting local need and safeguarding the openness of the surrounding countryside in the parish³;
- the fact that the Parish is washed over by the Green Belt is at the core of the village's greater appeal⁴;
- as the Parish of Buckland makes an important contribution to the open character of the area, it should remain washed over by the Green Belt⁵.

(ii) shared informal feedback from the community with MVDC that has emphasised:

- the high value residents place on retaining the spacious, loose-knit and irregular character highlighted in the MVDC Settlement Hierarchy Report (2008)⁶;
- the locally held consensus that limited ribbon development along Buckland's minor lanes and the retention of fields, banks and hedgerows on the opposite side of those roads to the development makes a very important contribution to the open character of this Green Belt village⁷.

BPC therefore welcomes the concluding statement on page 106 that states:

“Much of the existing village has a relatively open character, which contributes to the openness of the Green Belt. Therefore, it is considered that the village should remain washed over by the Green Belt”.

³ 12th February 2018

⁴ 12th February 2018

⁵ 12th February 2018 and 18th April 2018

⁶ 18th April 2018

⁷ 18th April 2018



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Chapter 5: Environment - Page 61 : Introduction of village boundaries to the parish as defined on the policies map.

Comment:

BPC asked MVDC:

(i) if minded to define a settlement boundary for an area of the village centred around the village green and pond, to locate any proposed settlement boundary within the currently defined and long-established Conservation Area⁸; and

(ii) to consider creating a second settlement boundary around an area of land in the east of the parish⁹.

When MVDC published a draft proposal to create one settlement boundary for Buckland aligned to the Conservation Area, BPC, having undertaken further consultation, responded¹⁰ to:

- ask MVDC to reconsider the local community's suggestion for any proposal to introduce settlement boundaries to Buckland to include a "Buckland East" boundary within which local feedback had suggested infill development is likely to be more easily delivered.
- request a realignment of one section of the proposed boundary to exclude an area of open pasture adjacent to the curtilage of a dwelling to preserve the openness of the Green Belt by excluding the undeveloped open field (consistent with earlier feedback);
- express a preference for a lower density proposal for the only site falling wholly outside the Conservation Area¹¹ and, suggest an area of otherwise redundant land for consideration¹².

BPC, having reviewed the proposed settlement boundaries on the policies map continues to believe that there are opportunities in the village for new homes to be built within the proposed settlement boundaries without detriment to the character of the village (including its Conservation Area) or causing any harm to the Green Belt.

Buckland Estate has expressed its disappointment at MVDC's decision not to include the curtilage of Tapwood House within the Buckland East settlement boundary. BPC was surprised by its omission and would not object to MVDC amending the proposal to include this otherwise isolated curtilage within Buckland East.

Residents who have engaged in the consultation process from the outset have, in the main expressed support for the proposed settlement boundaries. BPC believes the commitment Buckland Estate has given¹³ that "*any specific proposal will need to be consistent with Buckland Estate continuing to act as custodian for the village, a village the family has a deep respect for and a community they wish to continue to live within*" has been key to securing this support.

⁸ 18th April 2018

⁹ 18th April 2018

¹⁰ 22nd October 2018

¹¹ Listed in the Consultation Report as SA19 - Bromley Barns Field

¹² Listed in the Consultation Report as SA20 - Land East of Pilgrim Cottage

¹³ Buckland Annual Parish Meeting - 19th March 2018



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

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Chapter 7 : Site Allocations - Buckland : Pages 119-123, with reference to Future Mole Valley Evidence Base SHELA Regulation 18 Version
Chapter 6 – Modest additions to Rural Villages

Comment:

BPC has previously stated its aversion to any development of open green belt pasture or agricultural land in Buckland and remains strongly opposed to any proposal to include such land within a settlement boundary.

BPC notes that the proposed settlement boundary for the centre of the village, that closely corresponds to the Conservation Area, has been extended to include three adjacent dwellings and a small area of “*redundant*” land denoted SA19. BPC asks MVDC to require the density and design of any proposed development located on SA19 to fully respect the site’s adjacency to the Buckland Conservation Area. BPC, having previously suggested a maximum of two dwellings would be a more appropriate target capacity for this site is disappointed to see the expected yield has increased from three to four.

BPC notes the MVDC statement that “the presence of a village boundary may facilitate small scale infill development over and above identified allocations should land become available over the plan period.¹⁴” is consistent with BPC having judged there to be a realistic expectation of proposals coming forward for infill development, especially within the proposed Buckland East settlement boundary.

BPC is surprised by the suggestion of a 1-5 year deliverability for the allocated sites in Buckland, especially given the plan is unlikely to be adopted before year 4. In light of previous statements made by Buckland Estate, the volume of ongoing estate projects and the modest level of estate resource BPC would have expected perhaps one site to fall within a 5-10 year timeline and the remainder to fall in the final 5 years of the 15 year plan.

BPC welcomes MVDC clarification, that prior to proposing site allocations, MVDC required a professionally prepared and detailed tree survey to be submitted to enable the projected capacity for each site to take account of any need to safeguard trees on that site.

A small number of residents have raised site specific concerns which BPC recognises MVDC Development Control will need to consider when a planning application is made and that appropriate input will need to be sought, at that time, from the MVDC Historic Environment Officer.

BPC asks MVDC to recognise there is widespread local concern that a significant increase in on street parking is evident in Buckland’s village centre that is already undermining the vitality of local businesses and amenities and having an adverse impact on residents.

Cont’d

¹⁴ SHELA, Chapter 6, Para 4, page 26



MVDC Development Control, citing NPPF Para 109, has recently approved the creation of new homes in the centre of the village with insufficient off-street parking to accommodate the anticipated number of vehicles MVDC has acknowledged it is reasonable to expect the new homes to generate. Notwithstanding, MVDC dismissed local concern on the basis that given the absence of parking controls, a refusal to grant permission for the new home would be inconsistent with national planning legislation.

Chapter 6 of the SHELAA, within paragraph 6.1 on page 26, states “Additions to local housing stock [...] could help to support vibrant and successful communities”. For this to truly apply to Buckland MVDC needs to find a means to ensure development of any of the proposed allocated sites can and will be required to allocate and retain sufficient land within the curtilage of the new homes to provide adequate off-street parking for residents and their visitors.



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

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

Chapter 7 : Site Allocations – Betchworth : SA08 Page 107 with reference to Future Mole Valley Evidence Base SHELAA Regulation 18 Version Volume 4

Comment:

BPC therefore welcomes the concluding statement on page 98 that states:

“Much of the existing village has a relatively open character, which contributes to the openness of the Green Belt. Therefore, it is considered that the village should remain washed over by the Green Belt”.

BPC considers the inclusion of site SA08, an action that will require the removal of this land from the Green Belt, to be wholly inappropriate.

BPC disagrees with the assessment of environmental issues included within the sustainability appraisal set out on page 13 of Volume 4 of the SHELAA.

Dogs, currently housed externally onsite, bark for extended periods when vehicles enter or leave the site and regularly trigger barking at Crossways Kennels (located immediately to the south of SA08). The noise of barking dogs travels a considerable distance, particularly outside times of peak traffic.

The conclusion MVDC has included in the report i.e. “additional noise associated with increased use of the site would be very limited”, is clearly incorrect.

Even if there were to be no increase in the number of dogs present onsite a five-fold increase in the number of pitches should reasonably be expected to lead to a significant increase in vehicular movements with no reason to expect the behaviour of the dogs presently guarding the site will change.

BPC has concluded any development of SA08 would be inappropriate development in the Green Belt.