Issues and Options:
Setting a strategic direction for development
July 2017

See our video at www.futuremolevalley.org
Introduction
What is Future Mole Valley?

Future Mole Valley is the name for our next Local Plan. It will set out plans for development in the District over the fifteen years 2018 - 2033. It will include targets for delivering new housing, identify locations for new development, and contain policies for guiding the type, scale and mix of new development. It will also set out those areas which will continue to be protected for landscape, heritage or nature conservation purposes. Once adopted, the Plan will form the basis on which planning applications will be decided in the District.

Why are we reviewing the Local Plan?

We need to plan to meet the future needs and aspirations of people who want to live and work in Mole Valley. Many people who work in Mole Valley cannot afford to live in the District. That causes problems not only for them, but also businesses looking to recruit staff. There is also an ageing population, many of who want to remain in the District but find it hard to do so because there is not the type of housing to meet their needs. Other pressures, such as the way people shop and use their leisure time, are changing and lead to different needs for retail and leisure facilities. We want to ensure that Mole Valley continues to be a prosperous, inclusive and mixed community. Accommodating these changing demands is the challenge that we face and we need your help in deciding how to do that.

What happens if we do nothing?

If we do nothing, we will not meet the future needs of the District. Our existing Plan will become out of date and once that happens, it carries little weight in decision-making on applications for new development in the District. Development will still take place, but we will not have such clear control over it, and applications may be granted on appeal regardless of the views of local people or the wider needs of the District. In the worst case scenario, the Government could step in and impose a plan on Mole Valley. That is not an outcome that benefits anyone – we want a plan that is made by Mole Valley for Mole Valley.

What evidence has been gathered?

We have gathered some facts and figures together to inform the Local Plan review. These include estimates of future demand for development; and assessments of the likely supply or capacity for new development over the same period. The key results are shown in the boxes below for housing, commercial uses (offices, industry and warehousing), and retail uses. All the evidence documents are available to view – see links at the end of document.

Housing: demand and supply

<table>
<thead>
<tr>
<th>Demand (including affordable housing)</th>
<th>Identified Supply:</th>
<th>Residual (unmet) demand</th>
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<td>5900</td>
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- Housing Demand
- Identified Supply:
  - Unimplemented permissions
  - Brownfield capacity
  - Windfall allowance
  - Allocated housing sites
  - Garden land allowance
- Residual (unmet) demand
What does the evidence show?

The evidence shows that there is insufficient space to meet forecast demand, particularly for housing, and there are implications for commercial and retail uses. This means that we need to review our current approach to see where that unmet demand might be accommodated.

What options are there for meeting unmet demand?

Our starting point is to look at whether additional housing can be accommodated on brownfield\(^1\) land (our ‘Brownfield First’ approach). There are choices that need to be made about how and where such development could take place, and we want your views to help us decide.

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\(^1\) ‘Brownfield land’ is land that has been previously developed and any associated fixed surface infrastructure. Further clarification is given in the glossary to the National Planning Policy Framework [https://www.gov.uk/government/publications/national-planning-policy-framework--2](https://www.gov.uk/government/publications/national-planning-policy-framework--2).
If making better use of brownfield land is not enough, we will investigate whether demand can be met outside the District. This will depend on neighbouring authorities’ plans and their appetite for development.

And if that is not enough to satisfy demand, we will need to consider the release of greenfield land. Given the scale of the shortage of housing it is likely that at least some demand will need to be met in this way. We set out some options to consider. A related question is whether there are social advantages in allowing modest additional development in the rural villages. We explain more about this later.

**Brownfield First**

We want your views on the following ideas. You may find some acceptable and some not: we want to know why.

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**Town centre redevelopment**

This approach looks to deliver high density on sites in town centres. It could also apply to larger neighbourhood centres. One example is the Transform Leatherhead project being undertaken by MVDC. We estimate that if built to higher densities, the centre of Leatherhead could provide up to 350 extra homes.

**Issues**

As the most densely developed parts of the built up area, town centres have the potential to accommodate high density development for housing and other uses. The land required for infrastructure, like access roads, amenity space and parking is generally reduced. In addition, higher density development results in a concentration of people which supports town centre shops and services - which lower density suburban developments do not do. It is also more environmentally sustainable because it means people have a greater opportunity to travel on foot, cycle or use public transport thereby reducing their reliance on cars. Finally, it is an approach which lends itself to smaller sized dwellings for which there will be a growing demand.

However, within Mole Valley this approach has its limitations. Town centres are limited in size and as a consequence so are the sites where this type of development can be achieved. The District’s two principal town centres are largely covered by Conservation Area designations. This does not mean that new development is precluded, but it does restrict the extent to which taller buildings can be delivered. It would also not deliver family orientated housing.

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2 ‘Greenfield land’ is defined as any land that has not been previously developed.
**Mixed use redevelopment**

This approach focuses on redeveloping sites into mixed use where existing uses are retained and reprovided but in a more efficient manner to release land for residential use. We believe this approach could deliver up to 170 new homes.

**Issues**

One example of this approach could apply to public car parks, which are in sustainable locations with good access to transport and services. A ‘stack and wrap’ technique – converting surface level parking into multi-storey car parks with flats above and wrapped around could make a contribution to the supply of some of the smaller units for which there is a need.

There are a limited number of suitable sites, from which a limited number of homes could be delivered. In the example given, car parks contribute significantly to the economic vitality of the town centres. Any net loss of parking could aggravate the pressure on the remaining parking capacity in the surrounding vicinity.

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**Reallocate commercial and retail land**

This approach looks at the potential for the redevelopment of a small proportion of existing employment sites which are currently safeguarded for such purposes. Depending on the extent to which employment land is reallocated, we believe this could deliver up to 950 extra homes.

**Issues**

The evidence suggests that there may be a small surplus of commercial and retail land over the plan period, which could be used to provide additional housing. Commercial and retail sites are often in locations which are less constrained by the need to respond to the prevailing character of surrounding areas. They frequently have relatively good access to public transport and local services.

The drawback of such approach is that it is likely to reduce the potential for economic growth in the District. Much of the land is well-located with good transport connections and good prospects of viable employment use. It would be difficult for sites to be re-provided within the District and the result would be a net loss of business premises.
**Rural employment sites**

One source of potential housing supply could be by redeveloping sites operating within the rural economy such as equestrian sites, workshops in converted farm buildings and other rural businesses. If a modest number of such sites were allowed to be redeveloped for housing, we believe they could deliver up to 100 houses.

**Issues**

Depending on their location, the development of such sites could bolster the population of rural villages and therefore contribute to the vitality and viability of these communities.

The sites make a significant contribution to the rural economy – providing employment and specialist rural businesses. The amount of housing which could be secured from these sites is likely to be limited and could come at the price of harming the rural economy.

**Increase suburban densities**

This approach involves requiring a higher density approach on sites that come forward within suburban areas. If the density of such schemes were to double, we believe it would provide up to 800 additional homes.

**Issues**

Increasing suburban densities would help raise the concentration of people with an area and help support public transport provision as well as local services and businesses. It would make more efficient use of land which has historically been developed at a low density, and is therefore reliant on the private motor car.

Change would be piecemeal affecting the pattern of development in a random manner, and it would be difficult to provide new infrastructure. It would change the appearance of low density suburban areas, and erode the very character that residents value.

**Reallocate recreation land**

This approach involves building housing on some existing open spaces, and re-providing them on the edge of the built area. We believe this could provide up to 200 extra homes.
These ideas are not mutually exclusive and a combination of them might be appropriate. There may also be other ways of increasing housing supply on brownfield land not set out above. Please let us know what you think.

Will these changes satisfy unmet housing demand?

Changing policies and land use allocations to support some or all of these changes will significantly increase housing capacity, but there is a limit to the amount of development that existing built up areas can or should take if we are to retain the quality of life in those areas. As can be seen from the examples given above, those changes are measured in hundreds of new homes, whereas to tackle the housing crisis and address unmet demand for housing we need to be thinking in thousands. Accommodating more housing on brownfield land will reduce the amount that needs to be met from other options, but will not satisfy it all.

Meeting Demand outside the District

As part of developing a new plan, MVDC is talking to neighbouring councils to see if there are any benefits in joint working to accommodate development.

Do other councils have to listen?

There is a duty to co-operate between neighbouring councils. However, that duty does not extend to them having to agree to take unmet housing demand from Mole Valley.

What is the likelihood of other councils meeting our unmet demand?

Most of our neighbouring councils are in a similar situation to Mole Valley. They need to meet increased housing demand, and have difficulty in doing so because of the nature of their districts. There are also some neighbouring councils (Horsham and Crawley) that have recently adopted local plans, and are already implementing them. The likelihood that our neighbours can or will take some of our housing demand is small. We will investigate that possibility but for the purposes of drafting a new plan, land in neighbouring districts is unlikely to meet any significant amount of Mole Valley’s unmet housing demand.

Issues

Open space in the built up areas is well located. There are large areas of publically accessible common land and countryside near to most built up areas in the District which would remain. Open space could be reprovided on greenfield land without changing its designation. One example could be to build on allotment land, and provide new allotments elsewhere.

Relocation from within the built area to the edge of the built area would reduce accessibility. It would tend to remove land from locations in which open space is most scarce and has the greatest benefit. This approach is likely to have a negative impact both on the character and the ecological value of places within the built up area.
Greenfield Release

In looking at the possibility of greenfield release, it is important to identify the constraints that limit the use of some land:

- **Natural or physical constraints** including: land of high landscape value\(^3\), land of high nature conservation importance\(^4\), common land, inalienable land\(^5\), land at risk of flooding, land subject to high levels of aircraft noise, and heritage assets\(^6\)

- **Accessibility constraints**, in particular looking at how accessible areas are by means of transport other than private cars (such as rail, bus or cycling)

- **Policy constraints** – the Green Belt

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\(^3\) Surrey Hills Area of Outstanding Natural Beauty, Areas of Great Landscape Value

\(^4\) Special Protection Area, Special Area of Conservation, Sites of Special Scientific Interest, Ancient Woodland, Sites of Nature Conservation Interest

\(^5\) Some of the land held by the National Trust

\(^6\) Registered parks and gardens, listed buildings, conservation areas, ancient monuments
These constraints are displayed on the maps below:

Natural or physical constraints map
Accessibility map
How are natural or physical constraints applied?

The natural or physical constraints are ones that preclude large-scale development taking place because of harm to a feature of recognised importance (such as high quality landscape) or harm to potential future occupiers (such as noise or 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.

What role does accessibility have to play?

Accessible locations are preferred to less accessible locations when considering strategic housing development, although we must take account of normally accessible locations that experience severe congestion at peak periods. The exception to this approach is where a strategic development is able to fund improvements to infrastructure to overcome shortcomings in accessibility.

What about the Green Belt?

The ‘Green Belt’ is a policy that aims to prevent urban sprawl by keeping land permanently open and undeveloped. It differs from the other types of constraints because it is a policy rather than a physical constraint.

The original purpose of the Metropolitan Green Belt was to halt the outward spread of London. It also prevents neighbouring towns merging into one another, and assists in safeguarding the countryside from encroachment (commonly known as ‘ribbon development’). The essential characteristic of the Green Belt is that it protects open and undeveloped land. It is not a policy that primarily protects the beauty of the landscape.

Can the Green Belt be altered?

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 guidance on what might be considered to amount to ‘exceptional circumstances’. The advice is that Green Belt boundaries should only be amended where an authority has examined fully all other reasonable options for meeting identified development requirements, including:

- Making effective use of brownfield land
- Making use of underused land, including surplus public sector land
- Optimising density of development
- Exploring whether other authorities can help to meet some of the identified development requirement

The options considered in the ‘Brownfield First’ and ‘Meeting Demand outside the District’ sections above address these points. There is little if any surplus public sector land available in Mole Valley (for example, former army barracks). It follows that, if sufficient land

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7 Housing White Paper: ‘Fixing our broken housing market’, February 2017
cannot be found on brownfield sites to meet unmet housing demand, then exceptional circumstances do exist, and it will be necessary to explore whether some or all of the unmet demand can be met through greenfield release.

What options are there for greenfield release?

We have set out the main options for large-scale release of greenfield sites below. The size and location of such options will be guided by the constraints outlined above. There are pros and cons to each approach; we want to hear what you think.

Urban extensions

This option would involve significant expansion of one or more of the larger built up areas in Mole Valley - Leatherhead, Dorking, Ashtead, Fetcham and Bookham.

An urban extension would provide large-scale housing development together with the necessary roads and services to support that housing. It would also be necessary to include other uses, such as a neighbourhood centre with shops and open space.

Issues

A significant amount of land would be required to create an urban extension which is well planned and provides enough development to support the cost of providing additional roads and services.

This option would locate new development close to existing local services and have good access to the public transport network. New residents should be able to access these facilities relatively easily, helping to minimise the need to travel. However, this also means that road traffic linked to new development would need to access existing urban road networks, some of which suffer from traffic congestion.

Urban extensions should be well-related to existing large built up areas, and have less impact on the countryside than other greenfield options.

Certain areas around the built up areas are currently protected for their high nature conservation, heritage or landscape value. There are also areas which are defined as common land, where development is not allowed as a matter of principle. These areas would continue to be given appropriate protection.
Expand an existing rural village

This option would involve significant expansion of an existing village in the rural area of Mole Valley.

A village expansion would provide large scale housing development. Services and transport links would be based on the original village centre, but would need to be significantly expanded to support the new housing.

Issues

There would be a significant change in the scale and character of the settlement and its impact on the surrounding countryside. There would be an opportunity to create a well planned development, which makes a contribution to the District’s housing needs including affordable housing.

Expansion on a significant scale would need to support the cost of providing additional infrastructure and services. The increased population could also help to secure the future of local services, which are sometimes difficult to sustain in smaller settlements.

The type of facilities and services would be proportionate to the size of the expanded village. New residents would have to access higher order services by travelling to larger towns or urban areas. It is important that the location of the expanded village is accessible by public transport.

New settlement

This option would provide a new, stand-alone settlement, not based on expansion of an existing town or village. It would have to be large enough to support the provision of new local services, for example local shops, community buildings, health and education services. The size of such a settlement might be larger than the unmet housing need.

Issues

There would be an opportunity to create a well planned development, which makes a significant contribution to the District’s housing needs, including affordable housing.

There would be less impact on the character of existing towns and villages. It could radically change the area of countryside in which it was located. Pressure on existing local roads and services may be less than for other options.
These greenfield options are not mutually exclusive; more than one might be appropriate. There may also be other options that could work. **We are open to considering other ideas.**

**What about pressure on existing services?**

All large-scale greenfield releases will bring with them the need for additional infrastructure\(^8\). We recognise that the demands arising from new development cannot necessarily be accommodated by existing services in towns or villages. Any significant amount of new housing will require the expansion of services or the addition of new facilities to meet the needs of the additional population. This will form part of later stages of drafting the Plan, once the broad scale and location of development has been agreed.

It is also important that new greenfield development should not just be about housing, but needs to include other uses such as employment land and retail and leisure facilities so that they become sustainable communities where people want to live, work, do business and spend their leisure time.

**What about development in rural villages?**

Many of our rural villages have ageing populations, in part because there has been little housing built in them over the last fifty years. This has an indirect impact on local communities by contributing to the loss of local facilities such as shops and pubs, as well as less tangible changes to the sense of community, for example by reducing participation in local sports and social clubs.

One way of reversing this trend may be to allow modest expansion of some or all of our villages through small, sensitively located, high quality housing development which is aimed at younger people or those wanting to trade down. Such development could also support

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\(^8\) By ‘infrastructure’, we mean facilities that support public or related services, such as roads, utilities, schools, health clinics, and playgrounds.
the provision of affordable rural housing for local people, who otherwise would find it difficult to remain in the village in which they work or grew up.

**Modest expansion of existing villages**

This option would involve planning modest additional housing development in rural villages, proportionate to their size. It would require reviewing the existing village boundaries to increase the area where development can take place and enable modest increases in the population of the village and the availability of new housing. It may include parts of the village where there are gaps between buildings or other small sites with potential for redevelopment, but would not involve any large expansion into open countryside.

**Issues**

This option could help to support vibrant and successful rural communities by providing a wider range of housing, including smaller and more affordable dwellings. In turn, it would help to support services such as pubs, shops and village schools.

The amount of additional development would be relatively modest and there would be no radical change in the character or scale of existing villages.

There would not be enough development to support the cost of additional roads, public transport or local services. Therefore, the amount of development would be limited to the capacity of existing services.

Public transport options in most villages are very limited and there would be a continued reliance on the private car to reach higher order facilities.

This option would only deliver a limited amount of development, focused on local needs.

This form of greenfield release is different from the large-scale expansion of a village or creation of a new settlement. While contributing to meeting overall housing demand, the main purpose for the modest expansion of existing villages would be primarily the social benefits that it could bring.

**Next Steps**

There is a lot to think about and investigate in drawing up a Local Plan for the next fifteen years. There will be many different ideas and opinions about how to do it. The Plan may eventually present a combination of more than one of the options we have described. We are asking for your views at this early stage in the process, to help shape the direction that our future work will take.
Once a strategic direction has been agreed, we will carry out more detailed investigations to identify how much, and where, development could go. There will be opportunities to give your views on these more detailed proposals as we move towards a draft Plan.

**How long is it going to take?**

We are consulting on the issues and options outlined above for six weeks, ending in mid-August. Based on the responses received, and the evidence already gathered, MVDC will identify the strategic direction it thinks the Plan should take in the Autumn. Work will then begin on developing that direction into more detailed plans and proposals. A preferred option, in the form of a draft Plan, will be published for consultation next year.

**Where do I give my views on the options?**

Go to:  [www.futuremolevalley.org](http://www.futuremolevalley.org) There is a short questionnaire covering the questions raised above, as well as space for you to give any other ideas you may have.

**Where can I see more detailed evidence?**

Links to the evidence on which the facts and figures are based are available to view on the [www.futuremolevalley.org](http://www.futuremolevalley.org) website. Click on ‘more detail’ on the homepage.

**Can I speak to someone about these ideas?**

If you have questions you want to ask before replying, do please contact the Planning Policy team at: planning.policy@molevalley.gov.uk who will do their best to help. Alternatively, come and talk to us at any of the exhibitions that will be held around the district during the consultation period. Details of these events may be found on the website.