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Dear Piers Mason

### **Response to Mole Valley Consultation (Local Plan 2018-2033)**

Epsom & Ewell Borough Council (EEBC) thanks Mole Valley District Council (MVDC) for the opportunity to comment on your emerging Local Plan 'Future Mole Valley 2018-2033'. EEBC is an adjoining authority to MVDC and it is therefore a requirement that we positively engage and cooperate on cross boundary issues. EEBC have reviewed your draft Plan and have the following comments:

- i) We have no specific comments in relation to your draft policies. The overall structure and policy approaches appear to be logical and broadly consistent with national planning policy and the objectives of achieving sustainable development.
- ii) On the basis of your proposals under *S2 Strategy 2*, we understand that MVDC intends on meeting its objectively assessed housing need in full by taking a 'brownfield first' approach. EEBC supports this proposed approach and would emphasise the need to make effective use of land as required by national planning policy.
- iii) Upon reviewing your proposed sites allocation, it may be necessary to provide further justification for the development densities that are being proposed in the context of national policy and the limited land availability.
- iv) It is also noted that some of the proposed housing site allocations are very modest in scale and yield e.g. identifying potential development sites of one or two houses. It may be more practical to treat sites of such modest size as part of the windfall supply.
- v) We note that you have a summarised housing trajectory included under Appendix 6. It may be helpful, both for your own and for strategic purposes, to have a more detailed housing trajectory in the subsequent version of your plan.

- vi) It is also noted that the Housing Trajectory included under Appendix 6 projects the delivery of a total of 7,827 new additional houses during the plan period. We note that this could amount to an additional 16% above MVDC's identified minimum objectively assessed housing need. The Mole Valley SHELAA 2020 indicates that this total does not include windfalls. On that basis we suggest that the inclusion of windfall supply could increase the scale of projected delivery by a further 2% to 18% above the minimum housing need. Bearing this in mind and the comments made above regarding densities, there is a possibility that MVDC could help meet some of the unmet housing need generated from those adjoining authorities that have a genuine spatial relationship with the District. EEBC welcomes the opportunity to discuss this further with MVDC. There are potential incentives for such discussions – notably in respect of infrastructure investment and economic development.

With regards to proposed site allocations, the following comments are made:

#### **SA04 Marsden Nurseries, Pleasure Pit Road, Ashtead**

The site lies adjacent to the south-western edge of the EEBC's administrative boundary. It is an operating nursery site (Ashtead Garden Centre) located within the Green Belt and a sensitive location. It is within a Conservation Area and in the vicinity of statutory listed buildings. The loss of the existing garden centre would presumably be a further material planning consideration.

EEBC has previously objected to specific proposals on the site due to the harmful impact on the openness of the Green Belt. Although it is understood that MVDC intends to remove the site from the Green Belt boundary as part of the Local Plan process. We direct MVDC to the two Green Belt Studies prepared and produced in support of the emerging new Epsom & Ewell Local Plan. The Marsden Nurseries site is identified as being located immediately adjacent to Parcels 12 and 13 within the two Green Belt Studies. These parcels score a moderate to high score against the main purposes of the Green Belt. MVDC will be aware of National Planning Policy Paragraph 136, which states that Green Belt boundaries should only be altered in exceptional circumstances when updating plans. Furthermore Paragraphs 137-138 of the Framework emphasise that all reasonable options for meeting the identified objectively assessed need on brownfield land and through optimising density in locations well served by public transport must be explored before Green Belt is released. We take this opportunity to restate these points in relation to this proposed site allocation and suggest that there will be a harmful impact to the openness of wider Green Belt.

#### **SA01 Land South of Ermyn Way and SA02 Ermyn House, Ashtead**

These two sites lie adjacent to each other to the south of Ashtead.

SA01 falls within the Green Belt. The proposed site allocation seeks the development of the land for 250 dwellings, two gypsy and traveller pitches and open space. It is proposed that the land be removed from the Green Belt.

SA02 Ermyn House, Ashted is an existing industrial estate which lies on the edge of the settlement, outside of the Green Belt boundary. The site is currently safeguarded for industrial and commercial purposes. The proposed allocation is for mixed use development including 200 dwellings, two gypsy and traveller pitches and reduced office space.

It is noted that the site is no longer being safeguarded for employment uses and MVDC will need to ensure that their evidence supports reduced employment provision in this location.

In respect of possible harmful impacts on (the neighbouring) Epsom & Ewell Borough; the scale of development on these two sites has the potential to impact one of the key A roads (the A24) that serves the Borough. We suggest that the traffic impact needs to be fully assessed; both alone and in combination with Epsom & Ewell's growth strategy. Appropriate mitigation measures will need to be incorporated where necessary. This may involve further cross boundary engagement through the Duty to Cooperate.

Epsom & Ewell Borough Council (EEBC) will continue to positively engage and welcome future opportunities to work with Mole Valley District Council (MVDC) on strategic cross boundary issues. Please keep us informed on the progress being made on your Local Plan and any other consultations that are important for cross boundary working.

Yours sincerely

A handwritten signature in black ink that reads "David Reeve". The signature is written in a cursive style with a large, looped initial 'D'.

Cllr David Reeve  
Epsom & Ewell Borough Council