



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.

First Name*	Roger
Last Name*	Blake
Organisation (if applicable)	Railfuture Ltd
Responding on behalf of (if applicable)	Railfuture's national Infrastructure & Networks Group, and London & South East regional branch
Address	
City, Town or Village	
Postcode*	N16 0DX
Email address	roger.blake@railfuture.org.uk

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:



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

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

Please clearly state which chapter, policy, site allocation, appendix or other document you are commenting on, giving a page number where appropriate:
Chapter 2 – Spatial Strategy. Strategy 4 and Policy S4 – Dorking. Pages 20-21.

Comment:

Strategy 4 - Railfuture welcomes the recognition accorded to the area around the two adjacent railway stations: *“One area that does have potential is land at, and around, Dorking (Main) railway station. This area is the most accessibly located in the town, with fewer constraints than in the historic town centre. The reduction in office floorspace requirements for one of Dorking’s longstanding employers at Pixham End provides an opportunity to release a low-density office campus site for mixed redevelopment, including higher density residential development close to the station. Similar opportunities exist on the station site itself and adjoining offices.”*

Policy S4 - Railfuture welcomes the proposal for an Area Action Plan to guide the future development of Dorking town centre, and are especially encouraged to note this reference in ‘Opportunities’ for site allocation SA28: *“11) To coordinate with the landowners/ promoters of Land at Dorking Railway Station (Site Allocation SA29) and Land at Regent House (Site Allocation SA34), to achieve a well-integrated development that takes advantage of any opportunities to establish a complementary design approach across both sites.”* We therefore suggest that the Area Action Plan boundary be extended to include site SA28 as well as sites SA29 and SA34, so that the necessary holistic rather than individual site-based approach can be embedded for the whole area around the two adjacent railway stations. In addition, in view of their combined scale and significance, a single specific development brief or similar planning framework should, we suggest, be developed in order to ensure that all three sites are considered together even if delivered separately.



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

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

Please clearly state which chapter, policy, site allocation, appendix or other document you are commenting on, giving a page number where appropriate:
Chapter 6 – Infrastructure. Infrastructure 1 – Policy INF 1: Promoting sustainable transport and parking. Pages 83-84.

Comment:

Railfuture welcomes the general 'direction of travel' set out in Policy INF 1 "Promoting sustainable transport and parking", and in particular the District Council's opening commitment to *"work[s] with the local highway authority, neighbouring authorities and other key transport bodies to develop strategies for the provision of transport infrastructure necessary to support sustainable development. This includes planning for development that facilitates more sustainable modes of transport..."*

It goes without saying that rail is a particular sustainable mode of transport, and Dorking is blessed with both radial and orbital routes accessed via two adjacent stations. Their proximity additionally thereby affords opportunities for interchange between the different directions of travel to and from an even wider choice of destinations. The substantial surface car park directly off the A24, the generous secure cycle parking and well-served bus forecourt at Dorking Main station, linked by a short walk to and from Dorking Deepdene station, already provide Dorking with a multi-modal transport hub. The prospect of three significant development sites in close proximity should in our view be seen as a rare opportunity to expand and enhance Dorking Transport Hub as a signature project epitomising the Council's ambitions to play a leadership role in supporting sustainable transport and mode shift particularly to rail.

Dorking Main and Dorking Deepdene are respectively the third and fourth-busiest stations in Mole Valley District, yet compared with Leatherhead and Ashted, the first and second-busiest stations respectively, they have a lower proportion of use by season ticket holders. That will undoubtedly be due to a number of factors, but one might be the relative under-supply of station car parking spaces for commuters using each of the two stations, given the car park's unrivalled location on the A24. It is a widely-reported experience to find it full on weekday mornings even before the end of the peak period, which can only serve to suppress the latent demand for rail travel at both peak and off-peak times.

The Council will be aware of the preferred scenario in the draft Transport Strategy recently consulted by Transport for the South East [TfSE] which anticipates a more than doubling of rail trips by 2050. Great Western Railway's plans to introduce a second Reading-Gatwick Airport service imminently is to be welcomed in that context. TfSE's plan to move on from an adopted Transport Strategy to an 'inner orbital' Area Study including the North Downs line corridor, in turn leading to a TfSE Strategic Investment Plan, will present the supportive regional context for taking forward the development - using the vehicle of up to three local development sites - of an expanded and enhanced Dorking Transport Hub.



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

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

Please clearly state which chapter, policy, site allocation, appendix or other document you are commenting on, giving a page number where appropriate:
Chapter 6 – Infrastructure. Infrastructure 4 – Policy INF 4: Infrastructure delivery. Pages 88-89.

Comment:

Railfuture welcomes the general thrust of Policy INF 4. We are further encouraged by this statement in the Council's 2016 Infrastructure Delivery Plan referred to [page 13] and in particular its second sentence as directly applicable to our following comments on Site Allocations SA28, SA29, and SA34: *"Mole Valley would like to encourage train travel as an alternative to the car to help ease congestion on the roads and promote the use of a more sustainable mode of travel. To facilitate this it is likely that car parking at stations will need to be increased to ensure there is sufficient capacity and people are not deterred from using the train."*

In more general terms, Railfuture does understand that delivery of new infrastructure will very largely be in response to the demands generated by new developments. It is not intended as criticism to suggest a distinction between what might be characterised as that reactive approach and what might be described as a complementary pro-active approach. That observation is offered in the context of a potential new infrastructure intervention which is not directly development-related yet has the potential to add significant value to a Dorking Transport Hub, reflecting current Core Strategy Goal 4 for Transport namely *"To .. encourage more sustainable transport choices by improving travel options and accessibility."* The potential new infrastructure intervention would take the form of a direct and dedicated passenger interchange between the two adjacent Dorking rail stations. Thus far it is envisaged as a step-free walkway between the south end of the northbound platform 1 at Dorking Main and the east end of the eastbound platform 1 at Dorking Deepdene, configured as an L-shaped link with a lift at the change of direction.

Railfuture advocates this, which has already been shared with Dorking Town Forum, the Dorking Town Partnership, the Community Rail Partnership for the North Downs line, and informally with Network Rail, for consideration as part of the 'inner orbital' Area Study and Strategic Investment Plan to be prepared by Transport for the South East. Railfuture also looks forward to it being incorporated in due course in Mole Valley District Council's next Infrastructure Delivery Plan.



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

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

Please clearly state which chapter, policy, site allocation, appendix or other document you are commenting on, giving a page number where appropriate:
Chapter 7 – Site allocations. Policy S4: Dorking. Site allocation SA28: Pixham End, southern parcel, Pixham Lane. Pages 124-125.

Comment:

As noted above in our comments on Chapter 2, Strategy 4 and Policy S4, we are much encouraged by the following references in 'Opportunities' for this site: *"11) To coordinate with the landowners/ promoters of Land at Dorking Railway Station (Site Allocation SA29) and Land at Regent House (Site Allocation SA34), to achieve a well-integrated development that takes advantage of any opportunities to establish a complementary design approach across both sites."* and also *"12) To increase long stay car parking capacity."* reinforced by the extract from the Council's 2016 Infrastructure Delivery Plan quoted in our comment on the previous page.

Various calculations and estimates are available but one possible measure would for example seek to increase the proportion of season ticket holders at the two Dorking stations to the highest level of all ten Mole Valley stations, as a possible indicator for encouraging commuting by rail, through the provision of additional long-stay station car parking. Such provision should be at a level to leave sufficient spare capacity for also encouraging off-peak rail travel. One such broad-brush calculation estimates that an additional 500 car parking spaces would make a very significant contribution to enabling as well as simply encouraging that mode shift to rail, especially in the strategic policy context of commitment to a substantial long-term increase in the number of rail trips.

The extent to which that additional provision of long-stay car parking capacity be made on this Site Allocation SA28 in relation to the extent of its provision on Site Allocation SA29 is of course a matter for more detailed consideration in the Area Action Plan if extended, and/or development brief. Across the three sites taken together we are under no illusions about the challenge of accommodating about as many additional car parking spaces as new dwellings and at the same time meeting the other necessary Requirements. It could be that the inclusion of Site Allocation SA28 in the Area Action Plan, and/or a single development brief for all three sites, might generate a more optimised outcome to achieve the stated 'complementary design approach' through for example a re-balancing of the proportion of different uses between the sites.



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

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

Please clearly state which chapter, policy, site allocation, appendix or other document you are commenting on, giving a page number where appropriate:
Chapter 7 – Site allocations. Policy S4: Dorking. Site allocation SA29: land at Dorking railway station, Station Approach. Pages 126-127.

Comment:

Railfuture endorses the first 'Requirement' for this site: "1) The development shall replace and, where possible, increase railway station car parking capacity." and, as with our comments on the previous page for Site Allocation SA28, we are greatly encouraged by the first of the 'Opportunities': "9) To coordinate with the landowners/ promoters of Land at Pixham End (Site Allocation SA35) and Land at Regent House (Site Allocation SA34), to achieve a well-integrated development that takes advantage of any opportunities to establish a complementary design approach across both sites."

Our comments on Site Allocation SA28 are equally applicable here.



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

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

Please clearly state which chapter, policy, site allocation, appendix or other document you are commenting on, giving a page number where appropriate:
Chapter 7 – Site allocations. Policy S4: Dorking. Site allocation SA34: land at Regent House, Station Approach. Pages 133-134.

Comment:

Again Railfuture welcomes the first of the identified 'Opportunities': "7) To coordinate with the landowners / promoters of Land at Pixham End (Site Allocation SA28) and Land at Dorking Railway Station (Site Allocation SA29), to achieve a well-integrated development that takes advantage of any opportunities to establish a complementary design approach across both sites."

Our comments on Site Allocation SA28 are equally applicable here.