



Email: planning@ashteadresidents.org.uk

9th March 2025

Mole Valley District Council
Pippbrook
Dorking
Surrey
RH14 1SJ

For the attention of Aiden Gardner

Dear Mr Gardner,

Environmental Impact Assessment Application No: MO/2025/0276
Location: Land at Ermyn House, Ashtead, Surrey, KT22 8UX

I write on behalf of the Ashtead Residents' Association with regard to the above EIA Screening Opinion application, recording our comments.

We recognise that the Mole Valley Local Plan 2020-2039 includes this site as DS2 in Section 9 Development Site Allocations, and whilst there is an allocation of 140 dwellings this is also noted to be indicative. See MVDC Local Plan 2020-2039, page 122.

The applicant has however requested the screening opinion on the basis of assessing the site for up to 360 dwellings, considerably in excess of the MVDC Local Plan allocation.

They have also advised in their Request for screening opinion letter that they will issue technical reports as follows:

“The Planning Application Technical Reports

The Applicant intends to submit an application for outline planning permission which will be accompanied by a range of technical reports and information to address environmental matters including:

- Acoustic Report;
- Arboricultural Assessment
- Air Quality Assessment;
- Archaeology Assessment;
- Ecological Impact Assessment (EcIA) Report and Biodiversity Impact Assessment;
- Contaminated Land Assessment;
- Flood Risk Assessment;
- Landscape and Visual Impact Assessment;
- Heritage Statement;
- Energy Assessment;
- Lighting Strategy; and
- Transport Assessment (including Travel Plan).”

We would agree that at least all of these studies are required but that they should also take into account the nearby development proposals set out in either live planning applications or in the MVDC Local Plan site allocation policies.

The Ashtead residents Association have also previously commented upon planning Application ref MO/2025/0033, Land South of Ermyn Way, Ashtead, KT22 8TX where the applicant has proposed up to 270 dwellings which is also the number included in the MVDC Local Plan 2020-2039 Site Allocation.

In this immediate locality we also have to consider the development that is proposed at The Murrey’s Application Number MO/2023/1539, which is currently at appeal and soon to be determined by the Planning Inspectorate. This is currently proposing to add 60 dwellings and a 66 bed care home.

We are also aware of the pre-application work currently being undertaken by Kier Property on MVDC Local Plan 2020-2039, Site Allocation Policy DS45 Bull Hill, Leatherhead.

According to the MVDC local Plan this site could provide 300 dwellings. We are not aware of the developers aspirations, that is, whether they are working to this number of dwellings, or more or fewer. However, it appears that this application is making progress and is likely to come forward in the near future.

In addition, the MVDC Local Plan Policy DS47, Swan Centre Leatherhead proposes a further 150 dwellings plus other uses. We are unclear as to the status of this proposal and whether this is also part of the Kier Property plans. In any event this is also likely to come forward in the near future.

Each of the MVDC site Allocation Policy statements included in the MVDC Local Plan 2020-2039 require the developers of each of these plots to:

“Demonstrate through traffic modelling that the proposed development would not have any significant impact on the transport network in terms of capacity or congestion, **both individually and cumulatively with other nearby developments**, or that any such impact can be mitigated to an acceptable degree”.

It appears that each of these sites are all likely to impact on the local Highway network and the existing roundabout and traffic signals in the vicinity of the Ermyn House site. Therefore, a cumulative transport assessment has to be undertaken according to the requirements of Policy DS1, DS2, DS45 and DS47.

We note that the current DS1 application has not provided a detailed breakdown of the number of 1 bed, 2 bed, 3 bed and 3 + bed dwellings that are proposed, or the split of private to affordable, they merely state the total number of dwellings that they may be considering.

In this screening opinion under Appendix 2 Table 1 the applicant has provided a breakdown of their 360 units but this is at variance with the MVDC Policy set out in the 2020-2039 Local Plan. For this reason, we have made our own assessment based on the MVDC criteria.

We have carried out our own assessment of the potential number of cars that would be generated by applying MVDC Local Plan 2020-2039 housing and car policies to the plots.

This shows that if we consider DS1 (as per MVDC Up to 270 dwellings), DS2 (as per the Applicants suggested 360 dwellings), DS45 (as per MVDC 300 dwellings), DS47 (as per MVDC 150 dwellings dwellings), the ADDITIONAL number of cars due to the residential element of the 4 schemes is up to 2264.

Of these 1324 would arise from the additional 630 Dwellings on sites DS1 and DS2.

It is therefore essential that a detailed cumulative transport assessment is carried out by the developers of the 4 sites and each should consider the actual numbers of dwellings being proposed by the neighbouring developments. If consultations have already commenced between the developers and MVDC and the numbers of dwellings has increased above the MVDC Site Allocation Policies these new numbers should be included in the assessment. Where there has been no pre-application discussions we believe it would be appropriate to include the Local Plan site allocations as these represent the aspirations of Mole Valley Council.

It will no doubt be argued by the applicant that a transport assessment suggesting that people will walk, cycle or take public transport will mitigate the impact that these additional householders cars will impose on the already congested local transport network. However, given the critical nature of the single point of access and egress from the DS1 and DS2 sites and the distances to the Ashtead railway station, shops and amenities it is highly unlikely that people will walk, cycle or take a bus. We believe the local road network should be assessed using the peak hour traffic levels together with a significant number of cars arising from the cumulative car number calculations. Our calculation of car numbers generated by the developments and based only on the residential elements of the 4 sites are enclosed. Of course the proposed commercial and community uses may add further vehicles to these totals.

This assessment should include but not limited to:

The signal-controlled junction at the A24 /Ermyn Way/ Grange Road junction

The Knoll roundabout, the A243/M25 roundabout and the A245/B2430 roundabout should also be assessed on the same basis but this time considering the DS1, DS2, DS45 and DS47 site allocations and factoring in the number of new cars arising from these.

In considering this screening assessment application it is also worth noting that Surrey County Council in Pre-App discussions with the applicants for the DS1 site requested an alternative means of access for emergency vehicles.

The solution proposed in the DS1 reserved matters application does not enable a second direct connection to the main A24 and all emergency vehicles would still need to use the only road into the development area via the A24/Ermyrn Way signal-controlled junction.

We assume the same SCC requirements would also apply to the DS2 site. Adding the DS2 site to this and even contemplating the lower MVDC site allocation of 140 units and the resultant congestion along the A24 and Ermyrn Way, it is inconceivable to understand how emergency vehicles would cope at the busiest times of the day.

If the DS2 site allocation was increased to 360 units as indicated in the screening opinion letter the congestion will become much worse with an increased impact on emergency vehicle access.

A cumulative assessment is required and an alternative route providing a direct second access to the main highway would appear to be required. If this is not feasible or affordable the number of dwellings proposed on the combined sites DS1 and DS2 should be substantially reduced based on the SCC requirement, and also the junction capacity, to well below that included in the MVDC Local Plan Site Allocation Policies DS1 and DS2.

In the same way consideration needs to be given to the cumulative impact that these two developments will impose on foul and surface water drainage.

The combined impact on the disposal of sewage and the capacity of the local treatment works is required, this should also assess the impacts of the 4 sites DS1, DS2, DS45 and DS47 as they will all potentially add to the existing foul water drainage network in the area. A capacity calculation to prove that the local treatment works can manage the volumes arising from these developments is an important issue. Of course this may be within the existing capacity but if not then no doubt the local water company will require the developers to invest in the upgrade of the works.

The same applies to surface water disposal and the flood risk assessment should be also undertaken considering the cumulative impact of the DS1 and DS2 sites.

Other technical studies that the applicant has highlighted also require cumulative assessment based upon the impact of the 4 nearby sites:

We believe that the following will have significant combined impacts:

Character assessment – the combined impact on the Character of the area South of the A24 would be considerable. This also needs to take the existing landscape and setting of the existing developments and their surroundings in Ermyrn Way, Green Lane and Stag Leys into consideration. This should also consider the combined impact on the arboriculture of the combined sites.

Archaeology - the combined impact on the archaeology in the area needs to be assessed.

Ecology and Biodiversity – the combined impact of the DS1 and DS2 sites on the Flora and Fauna of the green belt land would be considerable and needs to be assessed.

In addition, in Appendix 2 under the heading Employment the applicant suggests that up to 70 jobs per year would be created by the construction phase of the project, these of course are not permanent jobs and would be of little long-term value to Ashtead/Mole Valley. They also say the loss of the existing office building is of little or no value “The Proposed Development would result in the loss of existing office floorspace, but this is generally vacant and for structural reasons considered less suitable extensive occupation in its location”. This sentence does not make sense and conveniently does not state the area of existing office space. It may currently be vacant, but it has been well occupied for many years and no doubt the current owners are not marketing the building. It may therefore be able to be reused as offices if they had the inclination to do so. The loss of employment is therefore significant.

Under the heading of Social Infrastructure the number of proposed dwellings is provided in Table 1 and is then used to assess school and GP Practice groups capacity. However, this definitely needs to be a cumulative assessment taking all of the proposed development sites in the area into consideration.

The Ashtead Neighbourhood Plan Policies AS-H2 and AS-H3 are aimed at providing smaller and more affordable dwellings for young families. It is likely that the majority of young families will require a state education for their children.

In Table 1 the applicant does declare their hand and shows that they are considering 90 1 bed, 126 2 bed, 72 3 bed and 72 4+ bed homes.

This mix is not in accordance with the MVDC Local Plan 2020-2039 which when applied generates 68 1 bed, 162 2 bed, 94 3 bed and **only 36** 4+ bed homes.

It therefore appears that the 1 and 2 bed home numbers are being forfeited to provide an increase in the 4+bed homes – presumably where the developers expect to make the greatest profits....

The figures provided in Table 2 regarding capacity also need to be substantiated by the schools themselves as it is our belief that the number of available places is much more limited.

This section of the Appendix then goes on to assess capacity at the local GP Practice groups. The applicants figures in Table 3 do not represent the local situation. Doctors and Dentists in the area are already at capacity, you only have to ask anyone who requires an appointment. This impact needs to be assessed based on the DS1, DS2, DS45 and DS47 sites together with the Murrey’s Court application (at appeal).

We would therefore consider that a full EIA is required on the basis of the significant cumulative impacts caused by the adjacent site together with the other nearby sites at Murrey’ Court, Bull Hill, Leatherhead and The Swan Centre, Leatherhead.

Yours faithfully



ARA Planning Officer