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# Shaping Elmbridge A New Local Plan

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**Useful Summary: Shaping the options**

**Elmbridge Local Plan Evidence Base**

**July 2019**



**Elmbridge**  
Borough Council

*... bridging the communities ...*

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# 1. Introduction

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## Purpose

- 1.1 The purpose of this useful summary is to provide more detail how the five options presented in the Options Consultation document 2019 were formed. The document aims to provide stakeholders and interested parties with more detail to help inform their response to the consultation.
- 1.2 It also seeks to provide an overview of the key influencers including the responses to the Strategic Options Consultation 2016 and outputs of the Local Plan evidence base (referred to as the 'technical documents') that have shaped the five options.

## Overview

- 1.3 In forming the five options for housing growth, the Council has taken into account of Government policy and guidance as set out in the National Planning Policy Framework 2019 (NPPF) and national Planning Practice Guidance, alongside the responses to the Strategic Options Consultation and a number of thematic Local Plan evidence base documents (referred to as the 'technical documents').
- 1.4 The key technical work on housing need includes:
  - The Standard Methodology figure which sets the Local Housing Needs Figure of 623 new homes per year.
  - Strategic Housing Market Assessment 2016 which provides the qualitative information of the type of homes needed, this includes a breakdown of the size and tenure and proportion of affordable homes needed.
- 1.5 The key technical work on land supply includes:
  - Land Availability Assessment 2018
  - Green Belt Boundary Review 2016
  - Green Belt Boundary Review -Sub Division work 2018
- 1.6 Based on the above, in particular evidence on housing need and land supply, five options have developed to how the Local Plan could respond to the challenge of housing need. These are:
  - Option 1-intensify urban area
  - Option 2-optimise urban area and 3 area of Green Belt release
  - Option 3-optimise urban area and large Green Belt release
  - Option 4-optimise urban area
  - Option 5-optimise urban area and small areas of Green Belt release

- 1.7 The positives and negatives associated with each option is also set out. These were considered against the Sustainability Appraisal which has informed each of them and sits alongside the consultation document.

## Background

- 1.8 The Council is preparing a new Local Plan which will set out how communities and places within the Borough will develop over the next 15 years. The Local Plan is a statutory requirement and the Government has made it clear that all local authorities must have an up-to-date Local Plan.
- 1.9 It is proposed that the new Local Plan will contain strategic policies, allocations and designations along with reviewed development management policies which will support the implementation of the Council's preferred approach for growth.
- 1.10 Work on the new Local Plan commenced in 2014 with the formal decision to prepare a new Local Plan made in September 2016. Following the initial evidence gathering the first key stage of the plan preparation process is to identify the strategic issues and options for the Local Plan. This took the form of the Strategic Options Consultation (SOC).
- 1.11 The Strategic Options Consultation 2016 including an initial preferred option for housing growth were presented to communities through a formal consultation document. The SOC was open from Friday 16 December 2016 until Friday 24 February 2017.
- 1.12 Within the framework of national planning policy and guided by the evidence on development needs and land supply at that time, the Council formulated the initial three Strategic Options for a new spatial strategy/ development strategy. The housing growth options considered appropriate for the development strategy were:
1. Strategic Option 1: Increase densities in urban areas to meet needs in full and maintain existing Green Belt boundaries;
  2. Strategic Option 2: Meet as much need as possible through a combination of amending Green Belt boundaries to remove land that is performing weakly against the criteria of that designation and through increasing densities in the urban area where appropriate;
  3. Strategic Option 3: Meet needs in full by amending Green Belt boundaries regardless of the degree to which land was meeting the purposes of Green Belt.
- 1.13 At the time of examining the strategic options, the Council considered the Government's continuing position which placed significant importance on Green Belt as a planning designation. However, the Council was acutely aware that Government also set out that councils must also seek to meet housing need and, as part of the plan making process, consider whether land currently designated as Green Belt still meets those purposes.

- 1.14 With this in mind and having considered the evidence base and the sustainability of the options, the Council considered that Option 2 to be its preferred option. This initial preferred option was considered to balance the Government's directive to increase the levels of development, and in particular, housing development in the Borough whilst recognising that there are constraints on the amount of developable land which could prevent us from meeting our development needs in full.
- 1.15 The initial Option 2 stated that Green Belt boundaries should be amended where the designation is at its weakest; the areas are in sustainable locations; and the areas are not, or are only partially, affected by absolute constraints, which prevent development. Following these principles, the Council considered there to be three Key Strategic Areas within the Green Belt where the designation could be removed.
- 1.16 In light of the response to the SOC 2016, the publication of a new National Planning Policy Framework in 2018 and update 2019, Planning Practice Guidance in particular the introduction of the new Standard Methodology for calculating housing need and confirmation of what the Government considered to be exceptional circumstances to justify amendments to Green Belt boundaries, it was considered appropriate to review and re-evaluate the housing growth options previously put forward in the SOC 2016.
- 1.17 The review and re-evaluation which has included additional technical work has led to the identification of five options as to how the Local Plan could respond to housing need. This includes the original three options (Options 1,2 and 3) which have evolved and two new options (Options 4 and 5).

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## 2. Key national planning policy drivers

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### Plan-led approach and boosting housing delivery

- 2.1 The Government in the National Planning Policy Framework (published July 2018 and update in February 2019) reinforced its objectives to significantly boost the supply of homes in England and ensure that growth should be genuinely plan-led.
- 2.2 Paragraph 15 of the NPPF states that “succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings”. The NPPF also requires that, as a minimum, Local Plans should provide for an area’s housing and other development needs, as well as any that cannot be met within neighbouring areas, where it is practical to do so and is consistent with achieving sustainable development.
- 2.3 Specifically, paragraph 11 of the NPPF states that “plans and decisions should apply a presumption in favour of sustainable development”.
- 2.4 For plan -making this means that;
- a) Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
  - b) Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses. As well as any needs that cannot be met within neighbouring areas, unless:
    - i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type and distribution of development in the plan area [footnote 6 sets out the national constraints which include Green Belt]; or
    - ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”
- 2.5 With paragraph 11 in mind, the Council must be satisfied that its Local Plan and preferred approach does all it reasonably can to meet the Borough’s challenging development needs in a sustainable manner that conforms with current national policy.
- 2.6 The Local Plan will be examined by an independent Inspector appointed by the Secretary of State to assess whether it has been prepared with legal and procedural requirements, and whether it is sound. Paragraph 35 of the NPPF specifies four tests of soundness; a) “positively prepared”, b) “justified”, c) “effective” and d) “consistent with national policy”. The Council must also demonstrate that it has met its obligations under the Duty to Co-operate on

strategic matters.

- 2.7 The number of new homes the Council is expected to plan for is set by the Government's standard methodology. This was introduced in July 2018 and the calculation for Elmbridge is 623 new homes per year. Prior to the introduction of the standard methodology our own technical work, indicated that 474 new homes per year were need.
- 2.8 The requirement to plan for 623 new homes, is three times higher than what the Council had previously been planning for in its Core Strategy 2011 and currently there is on average 282 new homes built in Elmbridge each year.

## **Maintaining supply and delivery of homes**

### **5 year- housing land supply**

- 2.9 The NPPF requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.
- 2.10 Paragraph 73 states that "the supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:
- a) 5% to ensure choice and competition in the market for land; or
  - b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
  - c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply."
- 2.11 As the Elmbridge Core Strategy was adopted in 2011, the five years supply must be measured against the local housing need figure calculated using the Government's Standard Methodology. Delivery is also measured against the local housing needs figure and population projections.

### **Housing Delivery Test**

- 2.12 To maintain the supply of housing, the NPPF also requires local planning authorities to monitor progress in building out sites which have permission. A Housing Delivery Test measures performance over a rolling three years period. Where performance is below an adopted up-to-date target or local needs figure there is a phased response. This ranges from the requirement to produce an action plan, to adding a buffer to the housing supply figures and ultimately rendering the Local Plan out of date.
- 2.13 The NPPF requires that action plans are prepared in line with national

planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years. You can find the [Elmbridge Borough Council Housing Delivery Action Plan 2019](#) on our website.

- 2.14 In accordance with paragraph 14 of the NPPF, a Local Plan is considered out of date and a 'presumption in favour of sustainable development' applied to planning application involving the provision of housing providing the following apply:
- c) a local planning authority has at least a three-year supply of deliverable housing sites (against its five-year housing supply requirement, including the appropriate buffer set out in paragraph 73); and
  - d) the local planning authority's housing delivery was at least 45% of that required over the previous three years.

## **Optimising development land and achieving appropriate densities**

- 2.15 Nationally, there is a drive to deliver more homes faster, as well as achieving the effective use of development land. The NPPF 2019 supports this approach, as it places emphasis on effective and optimal use of land, particularly brownfield land as well as promoting the use of minimum density policies, upward extensions, conversions and reallocation of sites in other uses to deliver housing. Specifically, paragraph 122 states that planning policies should support development that makes efficient use of land and paragraph 123 states it is important that planning policies avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.
- 2.16 Paragraph 123 also states that "where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:
- a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;
  - b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and
  - c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance

relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)".

## Green Belt land

- 2.17 The NPPF provides strong protection for the Green Belt and provides clarification of the circumstances in which release may occur. Specifically, paragraphs 136-137 implemented the Housing White Paper proposals to establish a criterion that should be satisfied before 'exceptional circumstances' are used to change Green Belt boundaries.
- 2.18 Paragraphs 133, 134, 135, 136, 137, 138 and 139 of the NPPF set out the policies which must be considered if a Local Planning Authority needs to amend or review their Green Belt boundaries. Paragraph 136 makes clear that boundaries can only be altered in exceptional circumstances, through the preparation or review of the Local Plan, whilst paragraph 138 sets out the need to promote sustainable patterns of development.
- 2.19 Paragraph 136 states there is a requirement to fully examine "all reasonable options" for meeting identified development needs before releasing Green Belt. This will be assessed through the examination of the plan, considering whether the proposed strategy;
- a) Makes as much use as possible of suitable brownfield sites and underutilised land;
  - b) Optimising the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and
  - c) Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development as demonstrated through the Statement of Common Ground.
- 2.20 The NPPF requires that when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be considered (paragraph 137). Furthermore, the paragraph states that 'where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and / or is well-served by public transport'.
- 2.21 Finally, paragraph 140 states that once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

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## 3. Summary of key technical documents

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### Overview

- 3.1 The new Local Plan must be informed by an evidence base and over the past four years the Council has been preparing a series of technical documents on a wide range of topics to understand what new development is needed and to guide decisions on how much new development can be accommodated in the borough and where it should be located.
- 3.2 In addition, there are several supporting documents produced to inform the Local Plan as it is being prepared to ensure the plan preparation complies with national policy and guidance as well as regulatory and legislative requirements. This includes a Sustainability Appraisal and Habitats Regulation Assessment which assist to shape the Local Plan throughout the plan making process.
- 3.3 The role of the supporting and technical documents in forming the options is explained in the following section of this summary paper. Those that have been undertaken to date have been published and can be found on the [Council's website](#). Many of these have informed the Options Consultation and there are a number of technical documents which have been undertaken that will be used to inform the next stage in the plan making process. Likewise, there are a number of further detailed technical assessments which will need to be undertaken to support and inform the next stage of the plan making, including the selection of sites.
- 3.4 A summary of Local Plan technical work which has informed the options has been provided below. Table 1 below highlights key findings which need to be considered and have informed the evolution of Options 1, 2 and 3 and led to two new strategic options 4 and 5 being identified.
- 3.5 The technical work includes additional studies which were undertaken as a result of the Strategic Options Consultation 2016. A large number of representations commented that the three Key Strategic Areas of Option 2, identified through the Green Belt Boundary Review 2016 were too large and that further work should be under taken to determine whether there were smaller local areas that could be released. Furthermore, work should be done to identify more brownfield and under-utilised urban land for opportunities for housing.
- 3.6 As such, in response the Council commissioned independent consultants to undertake an Urban Capacity Study to assist the Land Availability Assessment 2018 in boosting the Borough's land supply and a fine-grained review of the Green Belt to identify smaller sub -areas that could be assessed against Green Belt purposes. The further Green Belt work, Green Belt Boundary Review 2018 was undertaken by the independent consultants.

Table 1: Key findings from the technical work informing the five options for housing growth

Theme	Key findings	Technical Document
<b>Local Housing Need</b>	<p>623 new homes per annum            Over 15 year plan period= 9,345 homes            Over whelming need for smaller homes: (1 bed: 28% 2 bed: 42% 3 bed: 29% 4 bed +: 1%)            Acute need for affordable home – 70% of all need. (Social rented: 56%, Affordable rented: 2%. Intermediate: 12%, market: 30%).</p> <p>Based upon the evidence presented in the 2017 Gypsy and Traveller Accommodation Assessment, the estimated additional pitch provision needed to 2031 for Gypsy, Roma and Travellers in Elmbridge who meet the new definition of a Traveller is for 2 additional pitches and 7 additional pitches for 'Unknown' travellers.</p>	<p>Local Housing Need figure: Standard Methodology utilising 2014 ONS population projections            Strategic Housing Market Assessment 2016            Gypsy and Traveller Accommodation Assessment (GTAA) 2016</p>
<b>Urban Land Supply</b>	<p>Approximately 5,300 homes over a 15 -year period in the urban area.</p> <p>There remains a shortfall of circa. 4,000 homes across the plan period.</p> <p>Lack of a 5 -year land supply against the Local Housing Need figure.</p> <p>In the urban area it is considered there is opportunity for a total of 7 pitches to be accommodated in a 1 to 5 year period. There is also an opportunity to accommodate a site containing up to 15 pitches in the urban area in the long term.</p>	<p>Land Availability Assessment 2018. Informed by:            Density Study 2019            Urban Capacity Study 2018            Gypsy and Traveller Site Assessment (GTSA) 2018</p>
<b>Green Belt performance</b>	<p>Overall the Green Belt is performing, there are no areas which do not perform Green Belt function.</p> <p>12 Local Areas were identified as weakly performing in Green Belt terms, these were then assessed for their development potential.</p> <p>A finer grain review in 2018 identified smaller sub -areas across the</p>	<p>Green Belt Boundary Review 2016            Green Belt Boundary Review 2018            GBBR- Accessibility Assessment 2019            GBBR -Previously Developed Land Study 2019</p>

	<p>Borough's Green Belt that could be assessed against Green Belt purposes. The findings identified in total 94 potential Sub Division Areas (SAs) defined by defensible boundaries.</p> <p>All the SAs were appraised for their performance against the relevant purposes of Green Belt as well as their role and importance in terms of the function of the wider Green Belt and its integrity.</p> <p>The GBBR 2018 recommends 48 Sub Division Areas (some in part) for further consideration as their performance was not integral to overall Green Belt performance.</p>	
<b>Potential land supply from Green Belt</b>	<p>Further assessment of the 12 weakly performing Local Areas found that 3 were not affected by absolute constraints or were only partial affected and which were considered to have potential for strategic (large scale) development. The total area was approximately 188 hectares (approximately 3% of the Green Belt in the Borough).</p> <p>It is estimated that there could be 33 development sites made up of sub division areas and weakly performing local areas could deliver approximately 4,700 homes*. The total area was approximately 338 hectares (approximately 6% of the Green Belt in the Borough).</p> <p>In addition, a further 32 sites promoted with the capacity to deliver 8,143 new homes.</p> <p>*includes site promotions on land within shortlisted sub division areas and local areas.</p>	<p>Green Belt Boundary Review (GBBR) 2016 GBBR 2018 Review of Absolute Constraints 2016</p> <p>Call for Sites exercises Strategic Options Consultation 2016</p>
<b>Infrastructure</b>	<p>Based on the scenario of delivering Local Housing Need (612 homes per year- the figure published at the time of undertaking the update) in the urban areas. This was considered to be the most capacity intensive growth scenario.</p> <p>The Infrastructure Delivery Plan 2019 concluded that at this stage there are no major concerns at this early stage.</p>	<p>Infrastructure Delivery Plan (baseline) 2018 Infrastructure Delivery Plan (baseline) 2019 Open Space and Recreation Areas Assessment (2014)</p>

	<p>The next stage of the IDP is to provide infrastructure providers with the details of sites and quantum of development to support the preferred approach and site selection.</p>	
<b>Transport</b>	<p>Effective capacity on the road network is significantly influenced by a number of aspects including driving behaviour of individuals, commuter patterns, changing road conditions and weather.</p> <p>There are congestion issues and key pinch points across the Borough at am and pm peaks. Any growth will exacerbate those pinch points and restrict flows at the am and pm peak times.</p> <p>Therefore, mitigation measures and management at the am and pm peak times will be required. The specific details will depend the location of sites and the quantum of development.</p> <p>In addition, future growth must be accompanied by a strategy and policies that delivers modal shift towards sustainable modes of transport and reduces reliance on the ownership of private motor vehicles.</p> <p>It is unlikely that the impact on the highway infrastructure will be 'severe' as to prevent development coming forward.</p>	<p>Emerging Transport Assessment (TA) and modelling.</p>
<b>Employment &amp; Commercial</b>	<p>Rationalisation of Strategic Employment Land, including intensification and redevelopment to meet current and future employment needs. In particular the need for smaller, affordable employment floor space to support SME and start ups and to support the Elmbridge Economic Strategy 2019-2023.</p>	<p>Strategic Employment Land Review 2019 Elmbridge Economic Strategy 2019-2023</p>
<b>Town centres, retail and community hubs</b>	<p>Consider the Borough's retail centre boundaries and existing primary and secondary frontages to ensure that they are fit for purpose, support the delivery of community hubs and that land opportunities are optimised.</p>	<p>Emerging Retail centre boundary and frontage reviews. Past monitoring data taken from the Council's Authorities Monitoring Report 2017/18</p>

## Understanding Elmbridge's Local Housing Need

- 3.7 Housing need is an unconstrained assessment of the number of homes needed in an area. The National Planning Policy Framework 2019 (NPPF) expects local planning authorities to follow the standard method for assessing local housing need. Previously, a locally prepared Strategic Housing Market Assessment (SHMA) would provide this information and this evidence was used to inform the Strategic Options consultations in 2016.
- 3.8 However, in response to the national housing crisis, Government policy has focused on increasing housing supply and providing the right homes in the right places to meet housing need. The NPPF requires Local Plans to meet their housing need unless other national policies indicate otherwise<sup>1</sup>.
- 3.9 The details on how to calculate local housing need (LHN) using the standard methodology is set out in the online Planning Policy Guidance: [Housing and economic needs assessment](#).
- 3.10 Using this methodology, the latest published Local Housing Need Figure for Elmbridge is 623 homes per year for the next 15 years. This equates to a 1% growth in the number of homes in the Borough each year. This is significantly higher (31%) than the scale of need identified in the Council's Kingston and North Surrey Strategic Housing Market Assessment (SHMA) (2016) on housing need. Previously, this was 474 dwellings per annum.
- 3.11 The Core Strategy's adopted housing target is 225 dwellings per year, but this is out of date as it pre-dates the NPPF publication in 2012. A revised housing target will be identified in the new Local Plan. For context, on average 282 new homes are built in Elmbridge each year.

### Size, type and tenure of new homes

- 3.12 The SHMA also provides evidence regarding the size, type and tenure of homes needed in Elmbridge. The assessment concluded there is an overwhelming need for smaller new homes (C3 accommodation) and an acute need for affordable housing (primarily social rented tenure).
- 3.13 The housing need can be broken down by the size of homes required. Table 2 below indicates that the primary need is for 1, 2- and 3-bedroom homes (99%) with just 1% being for 4 plus bedroom homes. The delivery of smaller homes will provide much needed choice and balance the supply in the housing market.

Table 2: Number of Bedrooms Needed

Number of Bedrooms	Percentage Needed %
1 bed	28%
2 bed	42%

<sup>1</sup> Paragraph 11, [National Planning Policy Framework](#), February 2019

3 bed	29%
4+ bed	1%

- 3.14 In the past, the delivery of new homes in Borough has been dominated by four or more-bedroom properties and this is reflected in the data in the Authority Monitoring Report 2017-18. The number of new four bed (plus) homes in the Borough has already achieved over the 1% identified in the SHMA (2016). The continued oversupply of larger homes could further exacerbate affordability issues and going forward this size of home no longer positively contributes towards meeting local housing need.

### **Need for Affordable homes in Elmbridge**

- 3.14 The SHMA identifies that the gross annual affordable housing need in Elmbridge Borough is for 458 dwellings. Consisting mostly of concealed and newly forming households unable to buy on the open market, the net annual need for affordable homes (taking account of potential supply e.g. new builds and relets) is 332 dwellings per annum (6,640 net units across a 20-year period up to 2035). Under the Government’s proposed methodology this is significantly increased by 747 dwellings per annum based on affordability ratios. However, currently the Government has ‘capped’ this figure to 623 homes per year. There has been no indication as to when this cap will be lifted.

### **Elmbridge’s housing land supply**

- 3.15 Assessing land supply means finding out whether there is enough land in the Borough to accommodate the identified housing need of 623 homes per year.
- 3.16 An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. The assessment is an important source of evidence to inform plan-making and decision-taking, and the identification of a 5-year supply of housing land. It can also inform as well as make use of sites on brownfield land registers.
- 3.17 The NPPF requires that Local Planning Authorities maintain a five-year supply of deliverable housing sites. The latest land supply position against the standardised Local Housing Need Figure has been published in the Council’s Authority Monitoring Report 2017/18 (AMR). The AMR includes the 5-year land supply findings.
- 3.18 The Council does not have a 5-year land supply and many responses from the Strategic Options consultation 2016 stated that not enough urban sites were looked at. To address this issue, the Council commissioned Troy Planning + Design to prepare an Urban Capacity Study (UCS) with the aim of assessing the potential to accommodate new housing development within the defined urban areas of the Borough.
- 3.19 This study was the initial assessment of urban land and found that the potential exists to accommodate 5,454 new dwellings in the existing built up

areas across the Borough over 15 years. The findings from the UCS then informed a revised Land Availability Assessment (LAA) 2018.

- 3.20 A Land Availability Assessment is a technical study which provides the information needed for the 5-year land supply calculation and housing trajectory which are published in the Authorities Monitoring Report produced each year. It also helps to inform future planning policy by assessing land for its development potential. From this assessment, sites can be chosen to be included in the Local Plan to help meet the Local Housing Need (LHN).
- 3.21 An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing (and economic) development uses over the plan period. The methodology for the assessment of land availability is set out on the Government’s planning guidance webpages: [Housing and economic land availability assessment](#).
- 3.22 All available types of sites were investigated and this included sites in employment uses where available, suitable and deliverable / developable. Strategic Employment Land was considered for employment uses only with no residential uses in line with evidence (Strategic Employment Land Review 2019) and policy on employment needs. Other employment sites across the Borough were considered for mixed use schemes and changes of use to residential.
- 3.23 The LAA includes sites in the Borough’s town and village centres which were assessed for housing. Many of the sites included in the LAA retain their mixed use and often some include change of uses from retail to restaurant on ground floor level. Larger schemes were often discounted for mixed use schemes including residential because of issues with multiple land ownership.
- 3.24 It is important to note that the sites included in the LAA are an estimate. The LAA document explains that estimation of housing potential is based on the best information available at the time of writing.
- 3.25 The results of the LAA 2018 demonstrated that there is a shortfall of housing and the Borough’s housing need of 623 homes per year cannot be met in the urban area based on the assessment carried out and densities indicated for this version of the LAA.
- 3.26 The table below sets out the total figures from the LAA 2018. These do not include the windfall allowances and percentage discounts for non-implementation. The table below just presents the raw data on the sites identified in the LAA 2018.

Table 3: Urban sites in the LAA 2018

Sources	No. of new homes
Planning permission from 30.09.2015 - 30.09.2018 (Deliverable)	900
Under construction 30.09.2015 - 30.09.2018 (Deliverable)	848

LAA 1-5 years (Deliverable)	841
LAA 6-10 years (Developable)	1435
LAA 11-15 years (Developable)	2312
<b>Total</b>	<b>6336</b>
<b>Per year delivery (average over 15 years)</b>	<b>422</b>

- 3.27 The LAA 2018 will be reassessed to take account of the national Planning Practice Guidance recommendation to change assumptions on the development potential of sites if insufficient sites have been identified.
- 3.28 Although Green Belt sites have been discounted in the LAA 2018, promoted Green Belt sites and Green Belt sites suggested in the evidence base document (the Green Belt Boundary Review 2016 and 2018) have been assessed. The following table indicates the numbers of units from this source.

Table 4: Discounted Green Belt Sites in the LAA 2018

<b>Green Belt sites</b>	<b>No. of new homes</b>
Units from sites in the Green Belt Review evidence	4,790
Units from sites promoted by landowners	8,143
<b>Total</b>	<b>12,933</b>

## **The Green Belt Boundary Review**

- 3.29 A series of Green Belt Boundary Review (GBBR) documents have been prepared to inform the identification of the Council's initial Strategic Options Consultation 2016 and subsequent review and re-evaluation of the options in relation to the consideration of Green Belt Land. The Green Belt Boundary Review Overview Paper 2019 brings together the findings of this work. Table 5 provides an overview of the purpose and key findings of each GBBR document.
- 3.30 It is the findings of the Borough wide -GBBRs carried out for the Council by Ove Arup and Partners Limited (ARUP) 2016 and the Sub -Division Work 2018 which as been utilised when considering land supply and housing growth options.

## Summary of the purpose and findings of the GBBR series

Table 5: Overview of the purpose and findings of the GBBR series

Name of GBBR assessment	Purpose	Findings
<b>Green Belt Boundary Review 2016</b>	<p>Considered how the Green Belt performs against the relevant purposes set out within the National Planning Policy Framework (NPPF) 2012 at two scales:</p> <p>Strategic Green Belt Area Assessment, which focussed on the role of the Green Belt in Elmbridge Borough within the wider sub-regional context of the Metropolitan Green Belt and the different functional areas of Green Belt within the Borough;</p> <p>Local Green Belt Area Assessment, which assessed 78 'Local Areas' and two non-Green Belt Areas identified on the basis of the presence of permanent and defensible boundaries.</p>	<p>Identified 13 Local Areas were identified as weakly performing in Green Belt terms.</p>
<b>Review of Absolute Constraints 2016</b>	<p>Identified the relevant constraints that are located in the Borough which, in accordance with national policy at the time, would prevent development taking place as the impacts from such development could not be mitigated.</p>	<p>Provided comprehensive assessment of Local Areas land parcels as identified in the Green Belt Boundary Review 2016 and identified those areas of land entirely or partially affected by 'absolute' constraints that would prevent development taking place and where it would not be possible to mitigate impacts.</p> <p>The data was used to assess the 94 potential Sub Division Areas (SAs) defined in the GBBR 2018 (Sub Division work)</p>
<b>Green Belt Boundary Review (Sub Division work) 2018</b>	<p>Finer grained review to identify smaller sub -areas across the Borough's Green Belt that could be assessed against Green Belt purposes. Appraised sub areas for their performance against the</p>	<p>Identified in total 94 potential Sub Division Areas (SAs) defined by defensible boundaries.</p>

	relevant purposes of Green Belt as well as their role and importance in terms of the function of the wider Green Belt and its integrity.	Recommended 48 Sub Division Areas (some in part) for further consideration as they are not important to the Green Belt.
<b>Green Belt Boundary Review – Assessment of Weakly Performing Local Areas 2019</b>	Considers in further detail the role and the development potential of the identified weakly performing Local Areas identified in the GBBR 2016, in particular those which do not have the opportunity to facilitate strategic development.	Concluded that out of the 13 weakly performing Local Areas, three had been previously identified as the KSAs. Of the remaining ten weakly performing Local Areas, five had a developable area with the potential to accommodate small scale development. Four had no opportunity to accommodate development.
<b>Green Belt Boundary Review - Minor Boundary Amendments 2019</b>	Detailed review of the whole of the Green Belt within the Borough where it adjoins the existing built-up area to consider (and if necessary make) minor amendments to the boundary line.	Recommends 83 minor boundary amendments of which 58 propose to remove land from the Green Belt, with 25 amendments proposing to add land to it. If implemented, these proposed amendments would result in 32.42ha of land being removed from the Green Belt and 3.83ha of land that is proposed to be added to it
<b>Green Belt Boundary Review - Previously Developed Land 2019</b>	Assessed the extent of Previously Developed Land (PDL) (as defined in the NPPF) on the weakly performing Local Areas (LAs), including Key Strategic Areas (KSA), and all of the Sub Areas (SA) as identified in the GBBR 2016 & 2018.	The study found that approximately 70 of the areas examined are considered to have an element of PDL, including all 3 Key Strategic Areas, 7 of the Local Areas, and 58 of the sub-areas
<b>Green Belt Boundary Review - Accessibility Assessment 2019</b>	Considered the accessibility of the Green Belt weakly performing Local Areas including the three KSA and all the Sub Areas (SAs) identified through the GBBR 2016 and 2018, to major service and employment centres as well as range of more local services and facilities	One area which had excellent overall accessibility and 59 areas with fair or good overall accessibility. In total 70 areas benefitted from fair to excellent access to a bus stop on a route with at least a 'good' service, whilst 23 areas benefitted from fair to excellent access to a railway station.

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## 4. Shaping the options- Option 1

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### Option 1- intensify urban area

- 4.1 The technical documents on housing need and land supply are paramount in the formation of each option. Firstly, we know what the Borough's housing need is, as this is produced through national policy using the standard methodology, 623 homes per year. With this figure, it is then possible to explore options on how we can best meet the Borough's housing need using the findings from the technical work the Council has undertaken in relation to land supply.
- 4.2 Option 1 utilises the findings from the Land Availability Assessment 2018 and proposes:

**Option 1 would deliver all the new homes needed in our borough over the next 15 years by:**

- **Significantly increasing densities on all sites across the urban area; and**
- **Identifying open spaces, such as allotments and playing fields for redevelopment and relocating these uses within the existing Green Belt.**

- 4.3 This option would deliver 9,345 new homes but would require all housing sites in the future to be delivered at very high densities of over 85 dwellings per hectare. This would effectively double the current density average and would lead to taller buildings than currently in the urban area.
- 4.4 This option would rely on the intensification of all urban sites which would mean an approach that maximised the number of homes a development site could accommodate with little regard for or weight to the existing character of the area across the Borough.

## How Option 1 was formed?

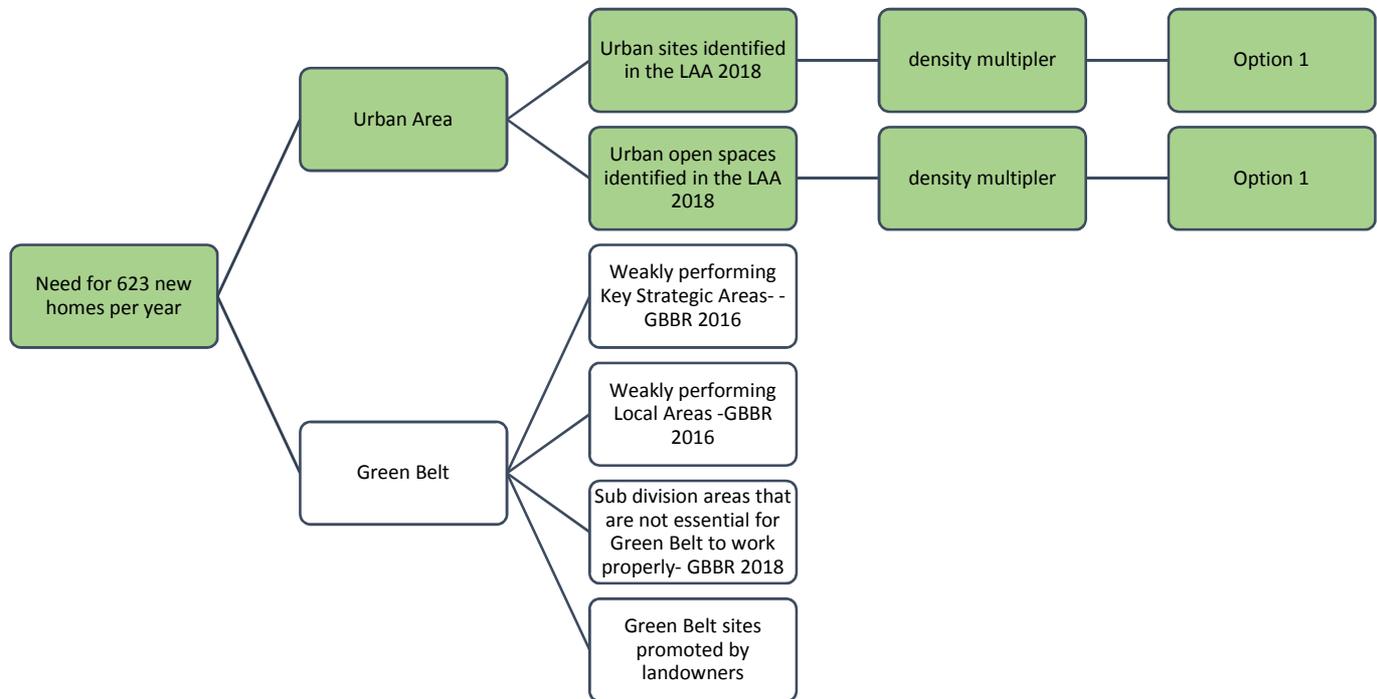


Figure 1: How the technical work informed Option 1

- 4.5 Option 1 was initially presented in the Strategic Options Consultation (SOC) 2016 and it has evolved following the new evidence and findings in the technical documents. In particular the Land Availability Assessment 2018 identified those urban sites that are considered deliverable or developable over the plan period and these totals are used across the five options.
- 4.6 The Land Availability Assessment identifies that there is an estimated land supply in the urban areas to accommodate approximately 5,300 new homes. Therefore, a density multiplier applied to sites identified in the LAA increase the urban supply to meet housing need figure for the plan period. This would be close to doubling the density of all sites. Some open spaces such as allotments and playing fields have been included in this option. It is proposed that these uses would be relocated within the existing Green Belt, which is a compatible use.
- 4.7 The following table sets out the findings of the LAA 2018 per settlement and how Option 1 could work for each settlement in Elmbridge.

**Please note that these total figures do not match the option figures as they do not include those sites under construction and sites with planning permission**

but not yet implemented. These just present those sites identified in the assessment. These totals also exclude any windfall allowances as well as discounted sites for non-implementation.

Table 6: Growth across each Settlement Areas from Option 1. Source: LAA 2018

Settlement	LAA Housing Sites 1 – 5 years	LAA Housing Sites 6-10 years	LAA Housing Sites 11-15 years	Total
Thames Ditton, Long Ditton, Hinchley Wood and Weston Green	116	360	438	914
East and West Molesey	168	106	314	588
Walton on Thames	940	226	1208	2374
Weybridge	90	348	852	1290
Esher	146	888	338	1372
Claygate	22	226	114	362
Cobham, Oxshott and Stoke' DAbernon	106	318	750	1174
Hersham	68	96	368	532
<b>Total</b>	<b>1656</b>	<b>2568</b>	<b>4382</b>	<b>8606</b>

### What could be the benefits of Option 1?

4.8 The Council considers there could be the following benefits from pursuing a strategy based on the approach of Option 1. It should be noted that these benefits are not an exhaustive list and they have not been weighed or ranked. For example, some benefits maybe considered to be greater than others.

Benefits of option 1:

- It will deliver all the homes we need.
- It will continue to direct development to urban areas to protect all of the existing Green Belt and preserve current boundaries.
- The relocation of open space and recreational facilities could mean greater use of the Green Belt by residents.
- Intensification of sites is likely to provide smaller homes with a smaller floor space which could potentially lower the average price of a new home.

### What could be the disadvantages of Option 1?

4.9 The Council considers there could be the following disadvantages from pursuing a strategy based on the approach of Option 1. It should be noted that these benefits are not an exhaustive list and they have not been weighed or ranked. For example, some disadvantages maybe considered to be greater than others.

Disadvantages of Option 1:

- This option would lead to much higher density new developments and tall buildings across the Borough, this could fundamentally change the character of many areas of the Borough.
- This option would continue to place development pressure on those parts of the Borough that have in the past seen more development.
- It is likely the through intensification, new residential development will likely be flats and there wouldn't be a mix of housing types, including family homes.
- The option would rely on all potential sites being developed to their maximum potential, if they fail to, the new plan quickly becomes out-of-date as the number of new homes would not keep up with the Local Plan's target and this would be monitored through the Government's annual Housing Delivery Test.
- The loss of open space in the urban area would affect character but also the character of the environment and new locations may not be as accessible. This could mean residents having to take transport to enable them to access or alternatively it may prevent or deter them from using such facilities in the first place. This could lead to wider effects on resident's health and wellbeing.
- In general, taller buildings (especially those beyond the height already within the Borough) can have higher build costs which could mean prices for new homes remain high and / or affordable housing is deemed economically unviable. Meaning it would not leave enough profit for the development to occur.
- Congestion on the highway network is primarily at pinch points across the Borough at peak times. The introduction of housing is likely to led to increased pressure on the highway network at peak times.

### What does the Sustainability Appraisal say about Option 1?

- 4.10 The Sustainability Appraisal 2019 provides an understanding of the possible positive and negative impacts of each option in terms of its social, economic and environmental effects throughout the plan period. The option was appraised against the 16 sustainability objectives derived from the Scoping Report 2016.
- 4.11 Although Strategic Option 1 has positive impacts in terms of making best use of previously developed land, reducing land contamination and supporting sustainable economic growth, it has a number of major and minor negative impacts in relation to the environment. This is particularly applicable when considering its impacts on historic and cultural assets, flooding and pollution.
- 4.12 The table below provides a summary of the Sustainability Appraisal for Option 1 scored against the Sustainability Appraisal objectives.

Table 7: Summary of the Sustainability Appraisal for Option 1

	SA Objectives															
	Social		Environmental			Economic		Environmental								
	O1	O2	O3	O4	O5	O6	O7	O8	O9	O10	O11	O12	O13	O14	O15	O16
1	-	0	--	0	+	+	--	--	-	-	--	?	+	--	-	-

## **Mapping of Option 1**

- 4.13 During the SOC 2016, there was criticism that the options were too high level and vague and this made it difficult to understand each option. The review of the option and further work has enabled the Council to address this concern and attribute a potential spatial distribution of locations for development against the option. Unlike the previous consultation, information on the sites including potential yields have been mapped which allows people to understand how the options could work.

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## 5. Shaping the options- Option 2

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### Option 2- optimise urban area and 3 areas of Green Belt release

- 5.1 The technical documents on housing need and land supply are paramount in the formation of each option. Firstly, we know what the Borough's housing need is, as this is produced through national policy using the standard methodology, 623 homes per year. With this figure, it is then possible to explore options on how we can best meet the Borough's housing need using the findings from the technical work the Council has undertaken in relation to land supply.
- 5.2 Option 2 utilises the findings from the Land Availability Assessment 2018 and the Green Belt Boundary Review 2016 and proposes:

**Option 2 would not meet housing need in full but would deliver new homes over the next 15 years by:**

- **Optimising densities and ensuring effective use of land across the urban area and that new homes are of the right type to meet local needs.**
- **Create areas for new homes by removing land from the Green Belt where;**
  - **It is weakly performing the purpose(s) of Green Belt policy;**
  - **It is in a sustainable location for new homes; and it is not, or only partially, affected by absolute constraints which prevent development coming forward**
- **Using the Duty to Co-operate to see if other authorities can meet some of our need.**

- 5.3 Option 2 would deliver approximately 6,800 new homes across the existing urban area and within three Key Strategic Areas which could be released from the Green Belt.
- 5.4 The Key Strategic Areas were identified from the technical work in 2016, which indicated that they were weakly performing areas of Green Belt that had potential to accommodate a large housing site within it. Not all of the land contained within the key strategic areas is suitable or available for development. The extent of the potential housing site took into consideration other constraints which would prevent development coming forward. The part which could be suitable has been highlighted on the mapping. In total the three sites could deliver approximately 1,400 homes.
- 5.5 In accordance with the criteria set out in the National Planning Policy Framework, the Council would need to decide whether or not there are exceptional circumstances to alter the Green Belt boundary and for each location to be removed from the designation.

## How was Option 2 formed?

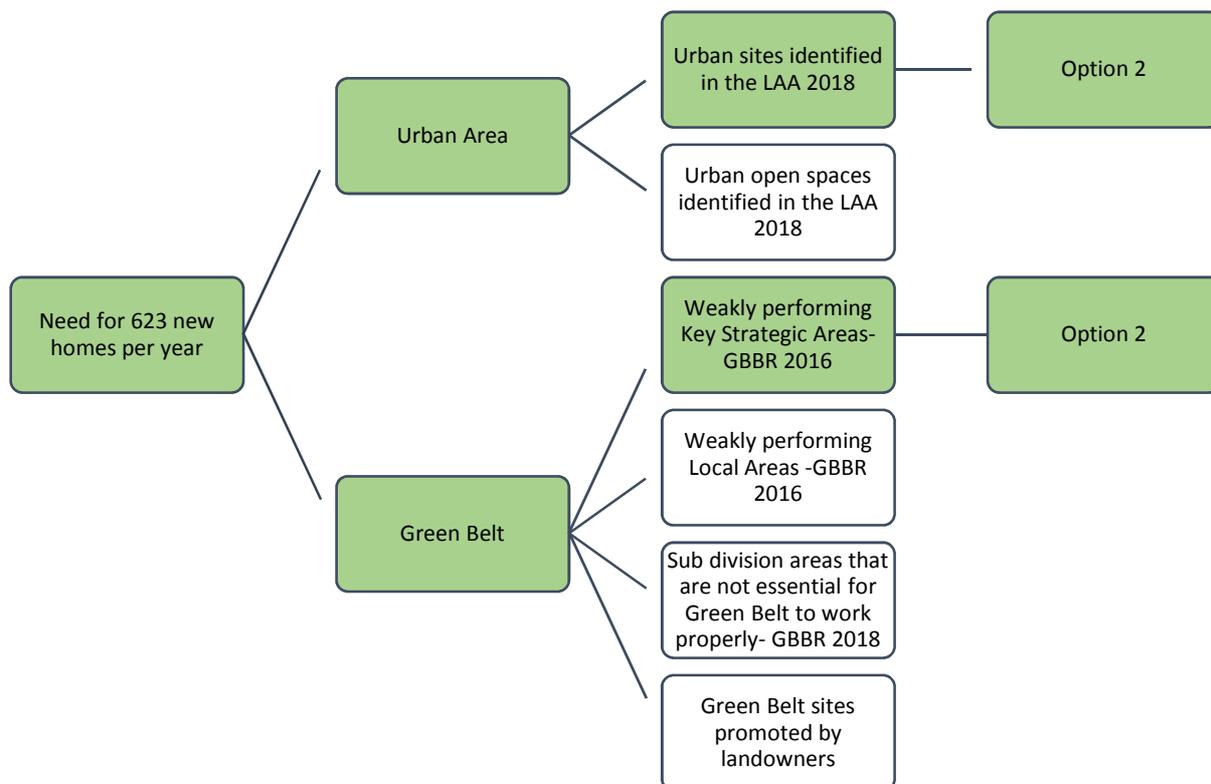


Figure 2: How the technical work informed Option 2

- 5.6 Option 2 was initially presented in the Strategic Options Consultation (SOC) 2016 and it has evolved following the new evidence and findings in the technical documents. In particular the Land Availability Assessment 2018 identified those urban sites that are considered deliverable or developable over the plan period and these totals are used across the five options. In addition, the option continues to utilise the findings of the Green Belt Boundary Review 2016.
- 5.7 The Land Availability Assessment identifies that there is an estimated land supply in the urban areas to accommodate approximately 5,300 new homes.
- 5.8 The three Key Strategic Area have been judged to be weakly performing against the purposes of Green Belt and is either unaffected or only partially affected by ‘absolute constraints’ which limit development opportunities. Guided by the findings of the GBBR 2016 and the Review of Absolute Constraints 2016 the Council considered there to be three key strategic areas within the Green Belt where the designation could be removed.
- 5.9 An initial appraisal of these three areas shows that their potential removal from the Green Belt to meet development needs would provide an appropriate balance of the three roles of sustainable development: economic, social and environmental.

5.10 The three key strategic areas were:

- Land north of Blundel Lane including Knowle Hill Park and Fairmile Park, Cobham (Local Area 14);
- Land south of the A3 including Chippings Farm and The Fairmile, Cobham (Local Area 20); and
- Land north of the A309 and east & west of Woodstock Lane North, Long Ditton (Local Area 58).

5.11 During the 2016 consultation, there was concern that the three KSAs were too large and that the extent of the developable area wasn't clear. The review of the option and the further work has enabled the Council to consider the representations in relation to the size of the KSAs and whether there could be potential to sub-divide these three weakly performing Local Areas of Green Belt.

5.12 However, the evidence undertaken to date continues to support the inclusion of the three Key Strategic Areas. Specifically, the work undertaken by Arup as part of the GBBR 2018- Supplementary Work concluded that there was not an opportunity to sub-divide the three KSA, as it would result in unfit Green Belt boundaries. The explanation of the rational is provided in the Green Belt Boundary Review Overview Paper.

5.13 However, the review of the options has provided an opportunity to provide a clearer indication of the potential developable area of each KSA. This has utilise the Council's evidence on absolute constraints (Review of Absolute Constraints 2016) and information of the availability of land within these areas for development which has been taken from the Land Availability Assessment 2018.

5.14 The following table sets out the findings of the LAA 2018 per settlement and how Option 2 could work for each settlement in Elmbridge.

**Please note that these total figures do not match the option figures as they do not include those sites under construction and sites with planning permission but not yet implemented. These just present those sites identified in the assessment. These totals also exclude any windfall allowances as well as discounted sites for non-implementation.**

Table 8: Growth across each Settlement Areas from Option 2. Source: LAA 2018

Settlement	LAA Housing Sites 1 - 5 years	LAA Housing Sites 6-10 years	LAA Housing Sites 11-15 years	Green Belt Sites 6-10 years	Total
Thames Ditton, Long Ditton, Hinchley Wood and Weston Green	58	180	219	900	1365
East and West Molesey	84	53	157	0	367

Walton on Thames	470	113	604	0	1187
Weybridge	45	174	426	0	645
Esher	73	444	169	0	686
Claygate	11	113	57	0	181
Cobham, Oxshott and Stoke' DAbernon	53	159	375	750	1337
Hersham	34	48	184	0	266
<b>Total</b>	<b>828</b>	<b>1328</b>	<b>2191</b>	<b>1650</b>	<b>6034</b>

## What could be the benefits of Option 2?

5.16 The Council considers there could be the following benefits from pursuing a strategy based on the approach of Option 2. It should be noted that these benefits are not an exhaustive list and they have not been weighed or ranked. For example, some benefits maybe considered to be greater than others.

Benefits of Option 2:

- Option 2 would protect the urban area from significant change in character as the approach to optimising urban land would give weight to the existing character of each area of the Borough.
- The option would continue to direct development to the urban area and uses urban land more efficiently.
- This option would seek to provide the right type of homes to meet need and therefore would provide smaller sized homes that meet local need.
- The development of larger sites as part of the Key Strategic Area could deliver new infrastructure and facilities on site as they would have the critical mass and land space to enable its delivery.
- The option is likely to lead to a higher number of new affordable homes on larger sites. This because, typically, smaller, brownfield sites cost more to redevelop and often squeeze profitability, limiting the amount of affordable housing that can be provided by a developer. In contrast greenfield sites unlike brownfield sites have no demolition or clean-up costs enabling the developer to provide more affordable housing.

## What could be the disadvantages of Option 2?

5.17 The Council considers there could be the following disadvantages from pursuing a strategy based on the approach of Option 2. It should be noted that these benefits are not an exhaustive list and they have not been weighed or ranked. For example, some disadvantages maybe considered to be greater than others.

Disadvantages of Option 2:

- Option 2 fails to plan for all the homes needed.
- Other authorities already indicated they cannot take our need and there would remain a shortfall in unmet housing need.

- The release of the three Key Strategic Areas would result in a 3% loss of Green Belt land.
- Congestion on the highway network is primarily at pinch points across the Borough at peak times. The introduction of housing is likely to led to increased pressure on the highway network at peak times.

### What does the Sustainability Appraisal say about Option 2?

- 5.18 The Sustainability Appraisal 2019 provides an understanding of the possible positive and negative impacts of each option in terms of its social, economic and environmental effects throughout the plan period. The option was appraised against the 16 sustainability objectives derived from the Scoping Report 2016.
- 5.19 Although Option 2 does have a number of minor negative impacts in terms of the environment, it does have positive social and economic impacts which meant that this option was considered the most sustainable for the Strategic Options consultation undertaken in 2016/17.
- 5.20 The table below provides a summary of the Sustainability Appraisal for Option 2 scored against the Sustainability Appraisal objectives.

Table 9: Summary of the Sustainability Appraisal for Option 2

	SA Objectives															
	Social		Environmental			Economic		Environmental								
	O1	O2	O3	O4	O5	O6	O7	O8	O9	O10	O11	O12	O13	O14	O15	O16
2	-	+	+	+	+	+	?	-	-	+	-	?	?	-	+	+

### Mapping of Option 2

- 5.21 During the SOC 2016, there was criticism that the extent of the developable area of each Key Strategic Area wasn't clear enough and the mapping was difficult to understand. Furthermore, without mapping the options were too high level and vague and this made it difficult to understand each option.
- 5.22 The review of the options has enabled the Council to address this concern and provide a potential spatial distribution of locations for development against the option. This also includes providing an indication of the potential developable area within the Key Strategic Areas on the maps.

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## 6. Shaping the options- Option 3

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### Option 3- optimise urban area and large Green Belt release

- 6.1 The technical documents on housing need and land supply are paramount in the formation of each option. Firstly, we know what the Borough's housing need is, as this is produced through national policy using the standard methodology, 623 homes per year. With this figure, it is then possible to explore options on how we can best meet the Borough's housing need using the findings from the technical work the Council has undertaken in relation to land supply.
- 6.2 Option 3 utilises the findings from the Land Availability Assessment 2018 and the Green Belt Boundary Review 2016 and Green Belt Boundary Review-Sub-Division Work 2018 and proposes:

**Option 3 would deliver all the new homes needed in our borough over the next 15 years and would be able to help other boroughs and districts meet their housing need by:**

- **Optimising densities and ensuring effective use of land across the urban area and that new homes are of the right type to meet local needs.**
- **Creating areas for new homes by removing land from the Green Belt where:**
  - **It is weakly performing, or it is not essential for the Green Belt policy to work properly,**
  - **It is being put forward for development by the landowner regardless of strength or importance; and**
  - **It is not, or only partially, affected by absolute constraints which prevent development coming forward.**

- 6.3 Option 3 could deliver approximately 16,300 new homes across the existing urban area and 618 hectares of land to be removed from the Green Belt. If the Green Belts sites within Option 3, were released in their entirety this would equate to a decrease of approximately 11% of the Elmbridge Green Belt.
- 6.4 In accordance with the criteria set out in the National Planning Policy Framework, the Council would need to decide whether or not there are exceptional circumstances to alter the Green Belt boundary and for each location to be removed from the designation.

## How was Option 3 formed?

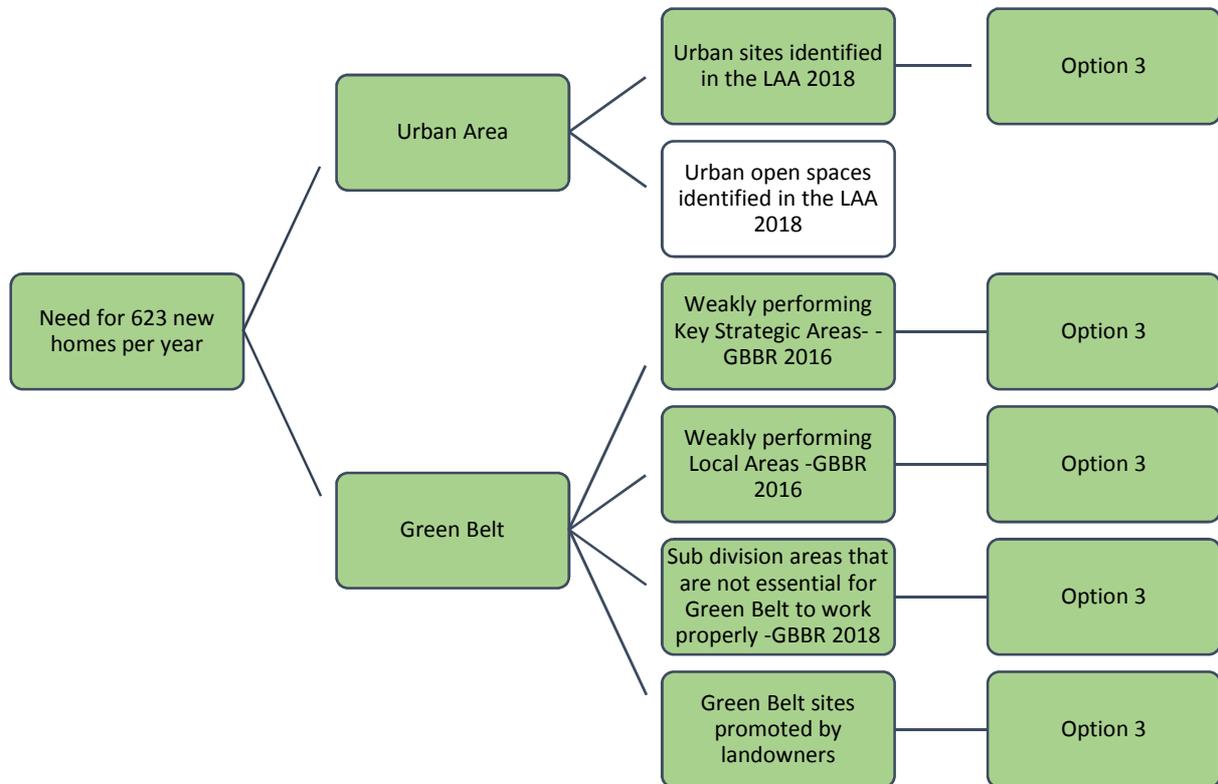


Figure 3: How the technical work has informed Option 3

- 6.5 Option 3 was initially presented in the Strategic Options Consultation (SOC) 2016 and it has evolved following the new evidence and findings in the technical documents. In particular the Land Availability Assessment 2018 identified those urban sites that are considered deliverable or developable over the plan period and these totals are used across the five options. In addition, the option utilises the findings of the Green Belt Boundary Review 2016 and Green Belt Boundary Review- Sub-Division Work 2018 as well as sites promoted for development in the Green Belt.
- 6.6 The Land Availability Assessment identifies that there is an estimated land supply in the urban areas to accommodate approximately 5,300 new homes.
- 6.7 The option presented in the SOC 2016 did not identify potential locations or a quantum of development that could be brought forward within the Green Belt release aspect of Option 3. During the consultation, there was criticism that the option was too high level and vague, this made it difficult to understand each option. The review of the option and the further work has enabled the Council to address this concern and attribute a potential spatial distribution of locations for development against the option.
- 6.8 In relation to the Green Belt aspect of the option, the evidence is presenting an 'evolved' option which includes the following:

- The recommended Green Belt areas for further consideration in the Green Belt Boundary Review. This includes:
  - the Local Areas (known as the Key Strategic Areas, as outlined above in the 'evolved approach to Option 2');
  - Other weakly performing Local Areas identified by the GBBR 2016 and the Assessment of Weakly Performing Local Areas; and
  - the sub-division parcels that are not considered necessary for Green Belt to function properly.
- Green Belt sites promoted for development by landowners which will be made available within the next plan period. Whilst the 'promoted sites' are not supported by the findings of the GBBR as listed above, they are available for development.

6.9 The following table sets out the findings of the LAA 2018 per settlement and how Option 3 could work for each settlement in Elmbridge.

**Please note that these total figures do not match the option figures as they do not include those sites under construction and sites with planning permission but not yet implemented. These just present those sites identified in the assessment. These totals also exclude any windfall allowances as well as discounted sites for non-implementation.**

Table 10: Growth across each Settlement Areas from Option 3. Source: LAA 2018

Settlement	LAA Housing Sites 1 - 5 years	LAA Housing Sites 6-10 years	LAA Housing Sites 11-15 years	Green Belt Sites 6-10 years	Total
Thames Ditton, Long Ditton, Hinchley Wood and Weston Green	58	180	219	1085	1542
East and West Molesey	84	97	157	120	458
Walton on Thames	470	113	604	2262	3449
Weybridge	45	174	426	1111	1756
Esher	73	444	169	1890	2576
Claygate	11	113	57	1080	1261
Cobham, Oxshott and Stoke' DAbernon	53	159	375	4865	5452
Hersham	34	48	184	580	846
<b>Total</b>	<b>828</b>	<b>1328</b>	<b>2191</b>	<b>12993</b>	<b>17340</b>

### What could be the benefits of Option 3?

6.10 The Council considers there could be the following benefits from pursuing a strategy based on the approach of Option 3. It should be noted that these benefits are not an exhaustive list and they have not been weighed or ranked. For example, some benefits maybe considered to be greater than others.

Benefits of Option 3:

- Delivers all the homes we need and could help meet the housing needs of neighbouring boroughs and districts.
- This option would seek to provide the right type of homes to meet need and therefore would provide smaller sized homes that meet local need.
- Exceeding the Local Housing Need Figure and introducing a higher number of new homes into the local market can improve the affordability of housing.
- The option is likely to lead to a higher number of new affordable homes on larger sites. This because, typically, smaller, brownfield sites cost more to redevelop and often squeeze profitability, limiting the amount of affordable housing that can be provided by a developer. In contrast greenfield sites unlike brownfield sites have no demolition or clean-up costs enabling the developer to provide more affordable housing.
- The spatial distribution of the sites under this option would lead to a more even spread of where new homes will be located across the Borough.
- Option 3 would protect the urban area from significant change in character as the approach to optimising urban land would give weight to the existing character of each area of the Borough.
- The development of larger sites could deliver new infrastructure and facilities on site as they would have the critical mass and land space to enable its delivery.

### **What could be the disadvantages of Option 3?**

6.11 The Council considers there could be the following disadvantages from pursuing a strategy based on the approach of Option 3. It should be noted that these benefits are not an exhaustive list and they have not been weighed or ranked. For example, some disadvantages maybe considered to be greater than others.

Disadvantages of Option 3:

- The release of all the Green Belt sites would result in a 11% loss of Green Belt land.
- The option would extend urban areas potentially joining up previously separated towns and villages.
- If all the Green Belt sites were released, the resultant new Green Belt boundaries may not function properly. This is because some of the Green Belt sites promoted by landowners maybe strongly performing or essential for Green Belt policy to work properly
- This option would not direct all new development to the most sustainable locations in the Borough.
- Congestion on the highway network is primarily at pinch points across the Borough at peak times. The introduction of housing is likely to led to increased pressure on the highway network at peak times

### **What does the Sustainability Appraisal say about Option 3?**

6.12 The Sustainability Appraisal 2019 provides an understanding of the possible positive and negative impacts of each option in terms of its social, economic and environmental effects throughout the plan period. The option was

appraised against the 16 sustainability objectives derived from the Scoping Report 2016.

6.13 Option 3 has the most significant negative impacts of all the options presented and this is largely due to the impact of distributing development widely across the Borough.

6.14 The table below provides a summary of the Sustainability Appraisal for Option 3 scored against the Sustainability Appraisal objectives.

Table 11: Summary of the Sustainability Appraisal for Option 3

	SA Objectives															
	Social		Environmental			Economic		Environmental								
	O1	O2	O3	O4	O5	O6	O7	O8	O9	O10	O11	O12	O13	O14	O15	O16
3	++	+	-	-	+	+	?	-	-	+	-	?	-	-	-	-

### Mapping of Option 3

6.15 During the SOC 2016, there was criticism that without mapping the options were too high level and vague and this made it difficult to understand each option. The review of the option and further work has enabled the Council to address this concern and attribute a potential spatial distribution of locations for development against the option.

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## 7. Shaping the options- Option 4

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### Option 4- optimise urban area

7.1 The technical documents on housing need and land supply are paramount in the formation of each option. Firstly, we know what the Borough's housing need is, as this is produced through national policy using the standard methodology, 623 new homes per year. With this figure, it is then possible to explore options on how we can best meet the Borough's housing need using the findings from the technical work the Council has undertaken in relation to land supply.

7.2 Option 4 utilises the findings from the Land Availability Assessment 2018 and proposes:

**Option 4 would not meet housing need but would deliver new homes over the next 15 years by:**

- **Optimising densities and ensuring effective use of land across the urban area and that new homes are of the right type to meet local needs.**
- **Using the Duty to Co-operate to see if other authorities can meet some of our need.**

7.3 Option 4 would deliver approximately 5,300 new homes over the next 15 years. The Option would need to continue to promote the use of good design to ensure the most effective use of all brownfield and urban land within the Borough.

## How was Option 4 formed?

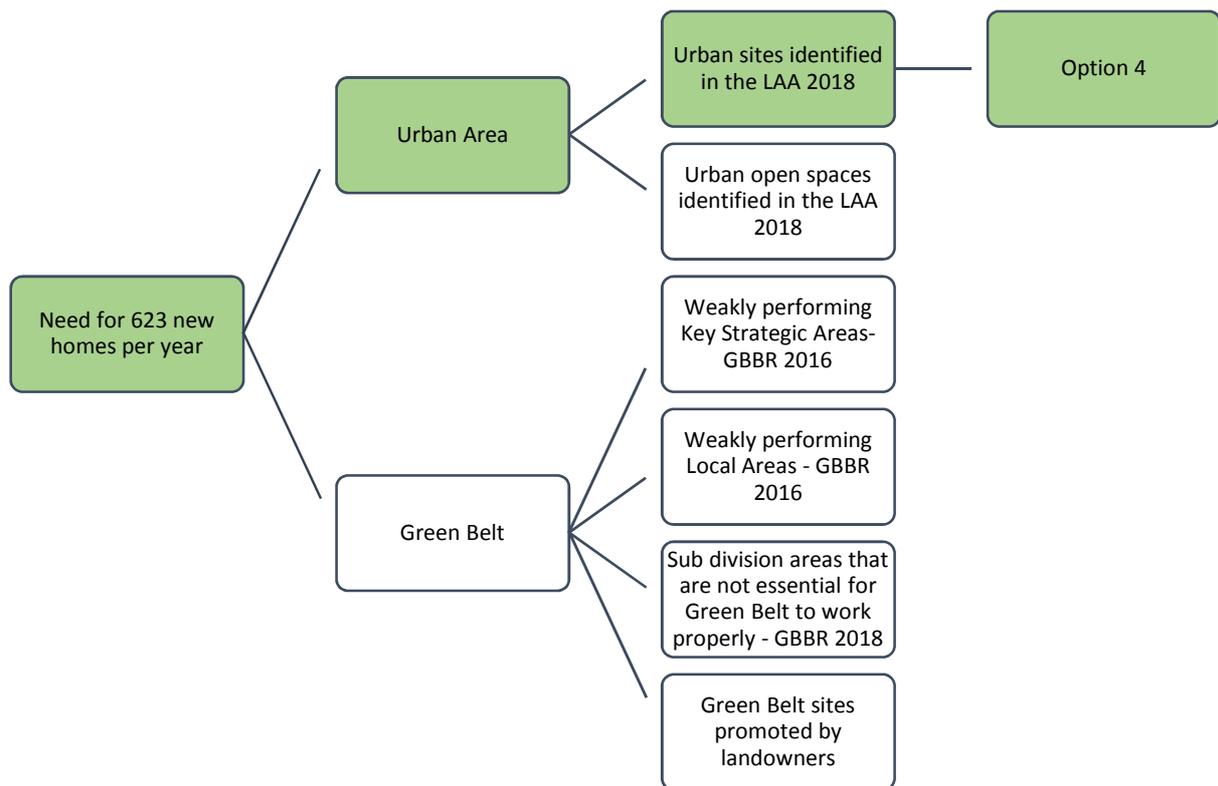


Figure 4: How the technical work has informed Option 4

- 7.4 Option 4 is a new option which has been formed following the new evidence and findings in the technical documents. In particular the Land Availability Assessment 2018 identified those urban sites that are considered deliverable or developable over the plan period and these totals are used across the five options.
- 7.5 The Land Availability Assessment identifies that there is an estimated land supply in the urban areas to accommodate approximately 5,300 new homes
- 7.6 The following table sets out the findings of the LAA 2018 per settlement and how Option 4 could work for each settlement in Elmbridge.

**Please note that these total figures do not match the option figures as they do not include those sites under construction and sites with planning permission but not yet implemented. These just present those sites identified in the assessment. These totals also exclude any windfall allowances as well as discounted sites for non-implementation.**

Table 12: Growth across each Settlement Areas from Option 4. Source: LAA 2018

Settlement	LAA Housing Sites 1 - 5 years	LAA Housing Sites 6-10 years	LAA Housing Sites 11-15 years	Total

Thames Ditton, Long Ditton, Hinchley Wood and Weston Green	58	180	219	457
East and West Molesey	84	97	157	338
Walton on Thames	470	113	604	1187
Weybridge	45	174	426	645
Esher	73	444	169	686
Claygate	11	113	57	181
Cobham, Oxshott and Stoke' DAbernon	53	159	375	587
Hersham	34	48	184	266
<b>Total</b>	<b>828</b>	<b>1328</b>	<b>2191</b>	<b>4347</b>

### What could be the benefits of Option 4?

7.7 The Council considers there could be the following benefits from pursuing a strategy based on the approach of Option 4. It should be noted that these benefits are not an exhaustive list and they have not been weighed or ranked. For example, some benefits maybe considered to be greater than others.

Benefits of Option 4:

- Option 4 would protect the urban area from significant change in character as the approach to optimising urban land would give weight to the existing character of each area of the Borough.
- This option would seek to provide the right type of homes to meet need and therefore would provide smaller sized homes that meet local need
- This option maintains existing Green Belt boundaries.
- The option would continue to direct development to the urban area and uses urban land more efficiently.

### What could be the disadvantages of Option 4?

7.8 The Council considers there could be the following disadvantages from pursuing a strategy based on the approach of Option 4. It should be noted that these benefits are not an exhaustive list and they have not been weighed or ranked. For example, some disadvantages maybe considered to be greater than others.

Disadvantages of Option 4:

- Option 4 fails to plan for all the homes needed.
- Other authorities already indicated they cannot take our need and there would remain a shortfall in unmet housing need.
- There would be fewer new affordable homes built on smaller brownfield sites, this is because, typically smaller, brownfield sites cost more to redevelop and often squeeze profitability, limiting the amount of affordable housing that can be provided by a developer .
- The option would rely on all potential sites being developed to their optimal potential, if they fail to, the new plan quickly becomes out-of-date as the number of new homes would not keep up with the Local Plan's target and this

- would be monitored through the Government’s annual Housing Delivery Test.
- Congestion on the highway network is primarily at pinch points across the Borough at peak times. The introduction of housing is likely to led to increased pressure on the highway network at peak times.

### What does the Sustainability Appraisal say about Option 4?

- 7.9 The Sustainability Appraisal 2019 provides an understanding of the possible positive and negative impacts of each option in terms of its social, economic and environmental effects throughout the plan period. The option was appraised against the 16 sustainability objectives derived from the Scoping Report 2016.
- 7.10 Option 4 has a significant positive impact on protecting and enhancing the landscape character of the Borough and has other minor positive impacts on the environment in terms of reducing the need to travel, making best use of previously developed land, reducing land contamination and conserving biodiversity. However, it does have a significant negative impact on flood risk and minor negative impacts on reducing greenhouse gases, using natural resources, improving water quality and adapting to climate change
- 7.11 The table below provides a summary of the Sustainability Appraisal for Option 4 scored against the Sustainability Appraisal objectives.

Table 13: Summary of the Sustainability Appraisal for Option 4

	SA Objectives															
	Social		Environmental			Economic		Environmental								
	O1	O2	O3	O4	O5	O6	O7	O8	O9	O10	O11	O12	O13	O14	O15	O16
4	-	?	0	+	+	+	-	-	-	-	-	?	+	-	++	+

### Mapping of Option 4

- 7.12 During the SOC 2016, there was criticism that without mapping the options were too high level and vague, this made it difficult to understand each option. The review of the option and the further work has enabled the Council to address this concern and attribute a potential spatial distribution of locations for development against the option.

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## 8. Shaping the options- Option 5

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### Option 5- optimise urban area and small areas of Green Belt release

- 8.1 The technical documents on housing need and land supply are paramount in the formation of each option. Firstly, we know what the Borough's housing need is, as this is produced through national policy using the standard methodology, 623 new homes per year. With this figure, it is then possible to explore options on how we can best meet the Borough's housing need using the findings from the technical work the Council has undertaken in relation to land supply.
- 8.2 Option 5 utilises the findings from the Land Availability Assessment 2018 and the Green Belt Boundary Review 2016 and 2018 and proposes:

**Option 5 would deliver all the new homes needed in our borough over the next 15 years by;**

- **Optimising densities and ensuring effective use of land across the urban area and that new homes are of the right type to meet local needs.**
- **Creating areas for new homes by removing smaller sub-divided parcels of land from the Green Belt where:**
  - **It is weakly performing, or it is not essential for the Green Belt policy to work properly; and**
  - **It is not, or only partially, affected by absolute constraints which prevent development coming forward**

- 8.3 If all 33 small areas of Green Belt were included in the final plan along with the urban sites, Option 5 could deliver approximately 9,400 new homes over the next 15 years, across the existing urban area and within 338 hectares of land removed from the Green Belt.
- 8.4 In accordance with the criteria set out in the National Planning Policy Framework, the Council would need to decide whether or not there are exceptional circumstances to alter the Green Belt boundary and for each location to be removed from the designation.

## How was Option 5 formed?

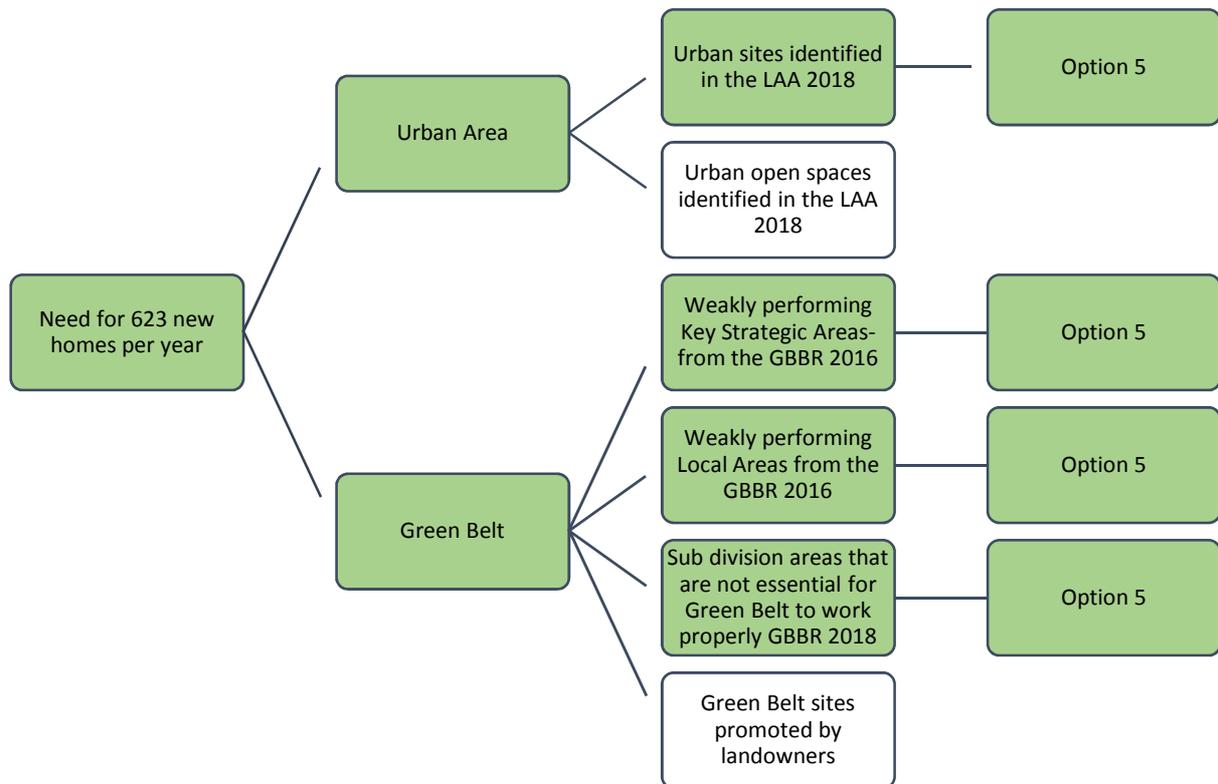


Figure 5: How the technical work has informed Option 5

- 8.5 Option 5 is a new option which has been formed following the new evidence and findings in the technical documents. In particular the Land Availability Assessment 2018 identified those urban sites that are considered deliverable or developable over the plan period and these totals are used across the five options. In addition, the option utilises the findings of the Green Belt Boundary Review 2016 and Green Belt Boundary Review- Sub-Division Work 2018.
- 8.6 The Land Availability Assessment identifies that there is an estimated land supply in the urban areas to accommodate approximately 5,300 new homes.
- 8.7 The Green Belt aspect of the option, the evidence is presenting an option which includes the following:
- The recommended Green Belt areas for further consideration in the Green Belt Boundary Review. This includes:
    - the Local Areas (known as the Key Strategic Areas, as outlined above in the 'evolved approach to Option 2);
    - Other weakly performing Local Areas identified by the GBBR 2016 and the Assessment of Weakly Performing Local Areas; and
    - the sub-division parcels that are not considered necessary for Green Belt to function properly.
- 8.8 The following table sets out the findings of the LAA 2018 per settlement and

how Option 5 could work for each settlement in Elmbridge.

**Please note that these total figures do not match the option figures as they do not include those sites under construction and sites with planning permission but not yet implemented. These just present those sites identified in the assessment. These totals also exclude any windfall allowances as well as discounted sites for non-implementation.**

Table 14: Growth across each Settlement Areas from Option 5. Source: LAA 2018

Settlement	LAA Housing Sites 1 – 5 years	LAA Housing Sites 6-10 years	LAA Housing Sites 11-15 years	Green Belt Sites 6-10 years	Total
Thames Ditton, Long Ditton, Hinchley Wood and Weston Green	58	180	219	985	1442
East and West Molesey	84	97	157	120	458
Walton on Thames	470	113	604	875	2062
Weybridge	45	174	426	45	690
Esher	73	444	169	760	1446
Claygate	11	113	57	660	841
Cobham, Oxshott and Stoke' DAbernon	53	159	375	1265	1852
Hersham	34	48	184	80	346
<b>Total</b>	<b>828</b>	<b>1328</b>	<b>2191</b>	<b>4790</b>	<b>9137</b>

### What could be the benefits of Option 5?

8.9 The Council considers there could be the following benefits from pursuing a strategy based on the approach of Option 5. It should be noted that these benefits are not an exhaustive list and they have not been weighed or ranked. For example, some benefits maybe considered to be greater than others.

Benefits of option 5:

- Delivers all the homes needed.
- Can improve affordability of housing.
- Provides smaller sized homes that meet local need.
- Smaller areas for development but more evenly spread across the borough.
- Enables delivery of a higher number of new affordable homes on larger sites. This is because typically, smaller, brownfield sites cost more to redevelop and often squeeze profitability, limiting the amount of affordable housing that can be provided by a developer. Greenfield sites unlike brownfield sites have no demolition or clean-up costs enabling the developer to provide more affordable housing.
- Protects the urban area from significant change in character.
- New Green Belt boundaries would function properly.

- Larger sites will deliver local highway improvements and new infrastructure on site.

### What could be the disadvantages of Option 5?

8.10 The Council considers there could be the following disadvantages from pursuing a strategy based on the approach of Option 5. It should be noted that these benefits are not an exhaustive list and they have not been weighed or ranked. For example, some disadvantages maybe considered to be greater than others.

Disadvantages option 5:

- The release of all 33 sites would result in the loss of 6% of Green Belt land.
- Option 5 would result in the extension of urban areas around the edges
- Congestion on the highway network is primarily at pinch points across the Borough at peak times. The introduction of housing is likely to led to increased pressure on the highway network at peak times
- Smaller sites might not have the critical mass to provide significant amounts of affordable homes and infrastructure on site.

### What does the Sustainability Appraisal say about Option 5?

8.11 The Sustainability Appraisal 2019 provides an understanding of the possible positive and negative impacts of each option in terms of its social, economic and environmental effects throughout the plan period. The option was appraised against the 16 sustainability objectives derived from the Scoping Report 2016.

8.12 Option 5 scores significant positive impacts in terms of meeting the local housing need in full, which in turn facilitates the improved health and well-being of the whole population. It scores minor positive results across six environmental objectives and all economic objectives. However, it receives significant negative impacts in terms of energy use and scores minor negative results for the use of natural resources, reducing flood risk, air quality/ pollution and conserving biodiversity.

Table 15: Summary of the Sustainability Appraisal for Option 5

	SA Objectives																
	Social		Environmental			Economic		Environmental									
	O1	O2	O3	O4	O5	O6	O7	O8	O9	O10	O11	O12	O13	O14	O15	O16	
5	++	++	+	+	+	+	+	+	-	-	+	-	?	?	-	+	-

### Mapping of Option 5

8.13 During the SOC 2016, there was criticism that without mapping the options were too high level and vague and this made it difficult to understand each option. The review of the options and further work has enabled the Council to

address this concern and attribute a potential spatial distribution of locations for development against the option.

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## 9. Further work and next steps

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### The Options Consultation

- 9.1 The five options for housing growth and the potential locations for development have been formed by using the technical assessments which have been applied across the Borough. However, they are not fixed and are not a draft plan in disguise. Identifying sites and yields (capacities for new homes) at this options stage may cause concern for communities. The sites shown on the maps are potential locations for development which have been identified through high-level technical work.
- 9.2 The identification of a site in any option does not guarantee that it will be taken through to the final plan or that planning permission will be granted in the future. Detailed technical work will need to be completed to support any site in the final plan.
- 9.3 However, by identifying sites and the spatial distribution, a visual representation of how each option can be presented. This can assist residents and stakeholder's understanding of each option. It also provides a starting point for further evidence to explore the affects on issues such as transport, infrastructure, air quality and viability as the plan preparation continues and a preferred approach for the Local Plan is formed. The output from this further technical work will assist in influencing the selection of sites.
- 9.4 It is acknowledged that there are such distinct differences in the areas across Elmbridge, these differences are brought out in The Settlement Assessment 2016. Therefore, it is likely that no sole option can be applied universally across the Borough sustainably or without significant harmful change to the character of an area. It maybe that the resultant plan could be a combination of different elements of each option.
- 9.5 The role of consultation is to find out from the community what option would be best for their area and why. It is also important that the new Local Plan is based on a shared vision for the Borough, as such we need to ask our communities what makes each area special and how they would like to see it grow in the next 15 years. This information will enable the Council to tailor a bespoke plan for Elmbridge that is led by a clear and shared vision which focuses on place making but also responds to our housing challenges.
- 9.6 The consultation responses, along with the outputs of the technical work including those undertaken to date and those that will need to be undertaken, and the ongoing Sustainability Appraisal, will inform the subsequent approach for the Local Plan and site selection.

## Further work in relation to housing growth

### Understanding Local Housing Need

- 9.7 An update to the SHMA, which identifies the type of new homes need, must be carried out. The Government's standard methodology provides the figure of 623 but it is important to understand the up to date housing mix, type and tenure required. Most importantly this assessment must consider the need for older people accommodation which allows us to plan for the right type of older people accommodation in the Borough.
- 9.8 In addition the GTAA 2017 will need updating as this community is likely to change and the unknown Travellers will need reassessment to find out whether they do meet the new planning definition. Changes to the need figure would impact on the land supply assessment which would also need updating.

### Housing Land supply

- 9.9 The Land Availability Assessment (LAA) 2018 assessment has a base date of 30 September 2018 and so must be updated as there are sites that have now been granted permission, new sites have been submitted for pre-application assessment and ownership status has been confirmed. These changes all affect the findings and hence it is important to update the document.
- 9.10 As well as this, the results of the LAA 2018 show that there is a shortfall of housing and the Borough's housing need of 623 homes per year cannot be met in the urban area. The LAA 2018 will be reassessed to take account of the Planning Practice Guidance recommendation to change assumptions on the development potential of sites if insufficient sites have been identified. This could include a review of density assumptions.
- 9.11 In relation to all the sites included in each option, a very initial indication of the potential number of homes has been provided. However, this will be subject to further work in relation to the availability of land and infrastructure capacity including highways, schools, health facilities and utilities for example, if a site was to be taken forward in the draft plan.
- 9.12 Further work will also include an assessment of the landscape's ability to accommodate change, an update on the Absolute Constraints 2019 and viability work. All of these will influence site selection, the number of homes that could be delivered and the timeframe for delivery, if the site was to be taken forward.
- 9.13 Furthermore, other evidence base studies may restrict these areas from being developed in part or, in their entirety. For example, the Transport Assessment work could identify that the proposed development cannot be accommodated on the existing road network in certain parts of the borough as it would cause a 'severe' impact which cannot be mitigated.

- 9.14 In relation to infrastructure provision, there will be continued dialogue with the relevant infrastructure providers and agencies through the next stage of the plan preparation. Therefore, the Infrastructure Delivery Plan (IDP) will be updated on a regular basis in line with the stages of Local Plan preparations. Post adoption of the Local Plan the IDP will be regularly reviewed.
- 9.15 It should also be noted that the capacities are estimates and that following further assessments as well as discussions with landowners, these will almost certainly change. This could be an increase or decrease.
- 9.16 Therefore, the list of sites and capacity is not conclusive and will be subject to change as the evidence base evolves and as we receive responses through the Options Consultation.

## **Next Steps**

- 9.17 The responses to the Options consultation in conjunction with those received to the SOC 2016 in relation to other matters relating to the Local Plan, such as employment, open space and Local Green Space, along with the emerging evidence base documents, the ongoing Sustainability Appraisal will inform the subsequent preferred approach for the Local Plan and site selection.
- 9.18 It should be noted that if the Council decides to pursue an approach for the Local Plan which includes amendments to the Green Belt, then it will need to provide clear evidenced justification as to the amount of land and its broad location as well as the exceptional circumstances relating to each specific site/location proposed to be removed from the Green Belt. This would be set out in an Exceptional Circumstances Case produced to support the next stage of the Local Plan preparation including site selection. This will need to respond to the expansion on what could constitute 'exceptional circumstances' by Government in set out in the National Planning Policy Framework.
- 9.19 This useful summary paper does not form a view on whether the Council considers there to be exceptional circumstances to justify amendments to the Green Belt boundary.
- 9.20 The Council will need to weigh up the outcome from the consultation with other matters, including the findings of the evidence base documents, to determine the appropriateness, suitability and feasibility of any adjustments to the Green Belt as part of its approach for the Local Plan.
- 9.21 The Council will also need to undertake a further consultation in relation to the review of the Development Management policies.