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Appendix 1 – Strategic Matters & Partners

The following table identifies the Strategic Partners (prescribed bodies (highlighted yellow) and other organisations (highlighted blue)) that the council has proactively engaged as part of the preparation of the draft Elmbridge Local Plan (Regulation 19) and supporting evidence base documents where relevant.

Strategic Partner	Matter													
	Matter 1: Housing	Matter 2: Travellers	Matter 3: Employment / Retail	Matter 4: Transport	Matter 5: Flooding	Matter 6: Minerals, Waste & Utilities ¹	Matter 7: Health ²	Matter 8: Education ³	Matter 9: Green & Blue Infrast.	Matter 10: Green Belt & Landscape	Matter 11: Natural Environ. / TBHSPA	Matter 12: Climate Change	Matter 13: Historic Environment	Matter 14: Heathrow
Epsom & Ewell Borough Council	✓	✓		✓	✓					✓		✓		
Mole Valley District Council	✓	✓	✓	✓	✓				✓	✓		✓	✓	
Royal Borough of Kingston upon Thames	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	
Runnymede Borough Council	✓	✓	✓	✓	✓				✓	✓	✓	✓	✓	✓
Spelthorne Borough Council	✓	✓	✓	✓	✓				✓	✓		✓	✓	✓
Guildford Borough Council	✓	✓	✓	✓	✓				✓	✓	✓	✓	✓	

¹ On the Matter of Minerals, Waste and Utilities, the council has engaged with the County Council which, with the exception of neighbouring London Boroughs, has responsibility for mineral and waste planning across neighbouring Surrey Boroughs and Districts.

² On the Matter of Health, the council has engaged with the County Council and Surrey Heathlands Health and Care Partnership Integrated Care System which, with the exception of neighbouring London Boroughs, has responsibility for health services across neighbouring Surrey Boroughs and Districts.

³ On the Matter of Education, the council has engaged with the County Council which, with the exception of neighbouring London Boroughs, has responsibility for education services across neighbouring Surrey Boroughs and Districts.

Strategic Partner \ Matter	Matter 1: Housing	Matter 2: Travellers	Matter 3: Employment / Retail	Matter 4: Transport	Matter 5: Flooding	Matter 6: Minerals, Waste & Utilities ¹	Matter 7: Health ²	Matter 8: Education ³	Matter 9: Green & Blue Infrast.	Matter 10: Green Belt & Landscape	Matter 11: Natural Environ. / TBHSPA	Matter 12: Climate Change	Matter 13: Historic Environment	Matter 14: Heathrow
Department for Education								✓						
Education Funding Agency								✓						
Garden Trust / Surrey Gardens Trust													✓	
Heathrow Strategic Planning Group (HSPG)*			✓									✓		
Historic Royal Palaces									✓			✓		
Joint Strategic Partnership Board (JSPB) ⁴											✓	✓		✓
Local Enterprise Partnership (M3)	✓		✓		✓					✓		✓		
Local Nature Partnership (SWT)									✓	✓	✓	✓	✓	
Local Planning Authorities in the South East Region	✓													
London Nature Partnership									✓			✓		

⁴ And by association other local planning authorities, organisations and bodies that form the Joint Strategic Partnership Board – see the relevant Matter section in Section 4 of the Duty to Cooperate Statement of Compliance

Strategic Partner	Matter													
	Matter 1: Housing	Matter 2: Travellers	Matter 3: Employment / Retail	Matter 4: Transport	Matter 5: Flooding	Matter 6: Minerals, Waste & Utilities ¹	Matter 7: Health ²	Matter 8: Education ³	Matter 9: Green & Blue Infrast.	Matter 10: Green Belt & Green Landscape	Matter 11: Natural Environ. / TBHSPA	Matter 12: Climate Change	Matter 13: Historic Environment	Matter 14: Heathrow
National Grid						✓								
Network Rail				✓								✓		
Open Space Society									✓					
Reigate & Banstead Borough Council	✓	✓			✓					✓		✓		
Royal Borough of Windsor and Maidenhead					✓							✓		
Royal Society for the Protection of Birds									✓					
South Western Rail				✓								✓		
Southern Gas Networks						✓								
Sport England									✓					
SSE						✓								
Surrey Ambulance Service							✓							
Surrey Fire & Rescue ⁵														

⁵ Engaged at all Regulation 18 consultations stages and during the preparation of the 2018, 2019 and 2022 Infrastructure Delivery Plans (IDPs).

Strategic Partner	Matter													
	Matter 1: Housing	Matter 2: Travellers	Matter 3: Employment / Retail	Matter 4: Transport	Matter 5: Flooding	Matter 6: Minerals, Waste & Utilities ¹	Matter 7: Health ²	Matter 8: Education ³	Matter 9: Green & Blue Infrast.	Matter 10: Green Belt & Green Landscape	Matter 11: Natural Environ. / TBHSPA	Matter 12: Climate Change	Matter 13: Historic Environment	Matter 14: Heathrow
Surrey Futures Board	✓		✓	✓	✓				✓	✓		✓		
Surrey Heath Borough Council	✓	✓			✓					✓		✓		
Surrey Police ⁶														
Sutton & East Surrey Water						✓								
Tandridge District Council	✓	✓			✓					✓		✓		
Thames Landscape Strategy Partnership ⁷									✓	✓		✓	✓	
Thames Water Utilities Ltd					✓	✓								
Transport for the South East				✓								✓		
UK Power Network						✓								
Waverley Borough Council	✓	✓			✓					✓		✓		

⁶ See footnote 5.

⁷ And by association other local planning authorities, organisations and bodies that form the Thames Landscape Strategy Partnership – see the relevant Matter section in Section 4 of the Duty to Cooperate Statement of Compliance

INTERIM LOCAL STRATEGIC
STATEMENT FOR SURREY
2016-2031

DECEMBER 2017

Interim Surrey Local Strategic Statement 2016 – 2031

Executive Summary

Introduction

This draft interim Local Strategic Statement (LSS) for Surrey is not a statutory document, but is intended to set out a consensus around common objectives and priorities through an overarching spatial planning vision for the county covering the period 2016 - 2031. It is a key tool to help councils manage growth sustainably and provides important evidence to demonstrate that cooperation on strategic matters is an integral part of their Local Plan preparation. It is informed by existing and new evidence developed to support Local Plan preparation by the borough, district and county councils.

The LSS provides an important high level statement which articulates the growth ambitions and spatial priorities of Surrey authorities for the short to medium term and will form the basis of engagement on strategic issues as authorities progress Local Plans. It will also enable authorities to respond collectively on sub-regional and regional matters such as the London Plan review and engage with any sub-regional infrastructure and spatial development strategies arising from the devolution bid for the Three Southern Counties (3SC) and with Transport for the South East as it develops its transport strategy.

Shared challenges across Surrey

The overarching challenge facing local planning authorities is how to balance development pressures in this area of buoyant economic growth close to London, Heathrow and Gatwick without compromising the quality of life of its residents and the high quality natural and built environment. Particular challenges include the following.

- As far as possible, meeting development needs in a sustainable way where the design and quality of development remains high in a county that faces significant constraints including Green Belt and migratory pressures from London.
- Delivering the mix, size and tenure of homes required to meet the needs of specific groups of the population including travellers, the elderly, students and those with identified affordable housing needs.
- Supporting a strong, competitive economy and fostering increased competitiveness and connectivity in the face of infrastructure deficits, environmental constraints and competition from other uses across the county.
- Delivering the service and infrastructure improvements needed to support Surrey's residents, now and in the future, given the substantial gaps in funding identified and the level of growth anticipated.
- Dealing with the effects of climate change, in particular the challenges posed by flood risk.
- Safeguarding the high quality natural environment and habitats across the county in the face of significant pressure for growth.
- Safeguarding mineral reserves from sterilisation where extraction could be economically viable to ensure sufficient resources to supply the construction industry.

A sustainable growth strategy for Surrey

Vision

Our vision is for a county of **well-functioning, well-connected places and healthy communities**. Surrey recognises its role in the wider South East and will build on its strengths while retaining the qualities which give the county its distinctive character. Through collaborative working, local authorities and partner agencies will seek positive and innovative solutions to shared challenges to meet the need for homes, support

economic prosperity and infrastructure improvements and to maintain and enhance the natural and built environment.

Strategic objectives of the interim LSS

The following strategic objectives are intended to guide Local Plans in delivering the overall vision for the county.

- **Objective 1: Supporting Economic Prosperity** - Local authorities will work with partner organisations including the LEPs, business support organisations, the business community and education and training providers to help support a strong, competitive economy.
- **Objective 2: Meeting Housing Needs** - Local planning authorities will work together and with infrastructure providers to deliver planned growth and positively seek to accommodate their housing requirement and meet specific housing needs.
- **Objective 3: Delivering Infrastructure** - Local authorities will work together with public and private sector partners to ensure sufficient capacity is available or can be delivered to support growth and meet the needs of new development.
- **Objective 4: Supporting environmental sustainability, natural resource management and conserving and enhancing the character and quality of the countryside and openness of the Green Belt** - Local planning authorities will work together and with partners to invest in natural capital, avoid adverse effects on the environment, improve resilience to climate change and protect heritage assets to support economic prosperity and the wellbeing of residents.

Sub-areas

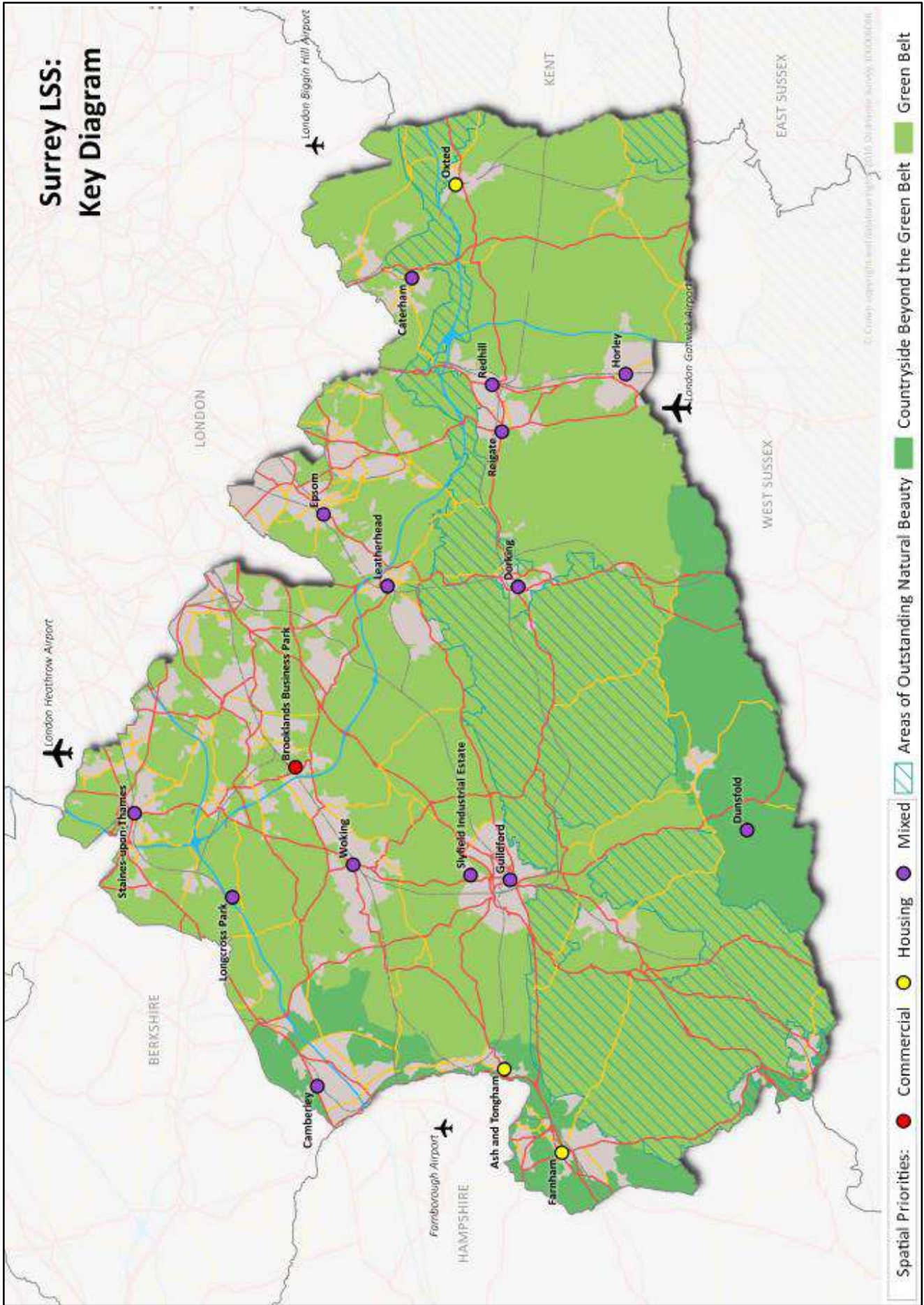
The LSS considers four sub-areas to allow an additional level of detail to be provided on how the LSS challenges present themselves in different parts of the county. The sub-area sections also provide a more detailed commentary on the key priorities and locations for growth in each area. However, it should be noted that the sub-area sections present a strategic overview and the evidence bases underpinning Local Plans will add a finer level of detail on the functional links of each local authority area on different issues including with those beyond the county boundary. The four sub-areas the LSS considers are as follows.

- **Upper M3:** Located in north west Surrey and made up of the boroughs of Elmbridge, Runnymede and Spelthorne.
- **East Surrey:** Made of up the boroughs and districts of Epsom & Ewell, Mole Valley, Reigate & Banstead and Tandridge
- **Blackwater Valley:** The Blackwater Valley extends over north east Hampshire, north west Surrey and the southern parts of Bracknell Forest and Wokingham districts and incorporates areas of Guildford, Surrey Heath and Waverley boroughs in Surrey.
- **A3 corridor:** The corridor surrounding the A3 incorporates large areas of the boroughs of Guildford, Waverley and Woking.

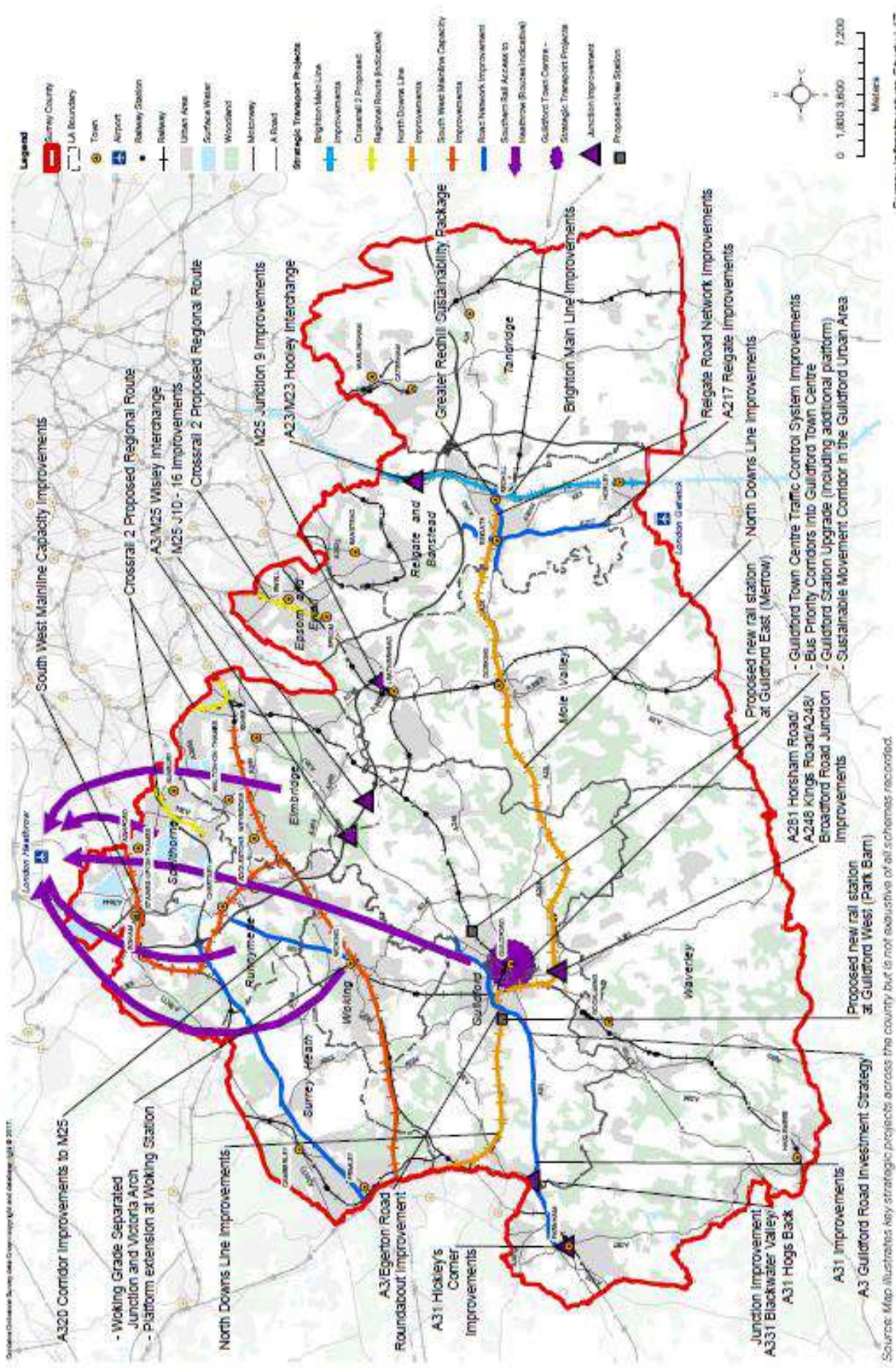
The key diagram presents an overview of the potential constraints to development across the county and the spatial priorities over the period of the interim LSS.

The strategic transport projects map from the Surrey Infrastructure Study highlights some of the priority strategic projects across the county. Crossrail 2 straddles the boundary with Greater London and there are projects such as the A3/Hook junction improvements just outside Surrey that will allow for improved capacity and connectivity and help to bring forward and support growth to meet future housing and economic needs in the county.

Surrey LSS: Key Diagram



Strategic transport projects



Delivery and Monitoring

Infrastructure investment is critical to unlock scheme delivery, achieve the sub-area priorities and – ultimately - deliver the LSS strategic objectives.

- Investment in transport and flooding infrastructure as well as education and health provision, is needed from service providers, relevant authorities and Government agencies.
- Bids to, and grant funding from, Government and other organisations such as the Coast 2 Capital and Enterprise M3 Local Enterprise Partnerships will be important to delivery transport infrastructure, flood mitigation infrastructure and measures to promote economic development.
- Use of section 106 money collected from developers, and Community Infrastructure Levy receipts will help manage the impacts of new growth and can be used as match funding to leverage in additional funding.

Achieving the LSS strategic objectives will require close working between local authorities both within and beyond the Surrey county boundary and statutory bodies such as the Environment Agency. Whilst this LSS focuses on the Surrey county area, functional planning areas and infrastructure corridors, frequently cross administrative boundaries. Particular matters which will require joint working beyond the county boundary are:

- Housing and traveller accommodation
- Development for employment uses
- Retail needs
- Transport
- Education health and other services
- Green infrastructure, landscape and flooding

Monitoring of the strategic objectives of the LSS through a series of key indicators will be co-ordinated on a regular basis by SPOA.

1. Working Together

Background

- 1.1 In July 2014, Surrey Leaders' Group agreed to establish a Strategic Planning and Infrastructure Partnership to facilitate joint working to address strategic issues and deliver on strategic priorities.
- 1.2 The Partnership was formed in response to various issues and pressures, in particular:
- to assist Surrey authorities with their ongoing work and cooperation when preparing Local Plans and satisfying the Duty to Cooperate legal requirement, which requires authorities to demonstrate how they have engaged "constructively, actively and on an on-going basis" with neighbouring authorities and other organisations on strategic planning matters;
 - the need to make a stronger case for infrastructure investment in Surrey; and
 - emerging pressures from London, notably unmet housing needs, and the advantage of having a collective voice to engage with the Mayor/GLA.
- 1.3 The scope of the Partnership envisages the development of a planning and investment framework which would comprise:
- 1) a Local Strategic Statement (LSS) that sets out shared objectives around spatial, infrastructure and economic issues and a broad direction for spatial planning on strategic priorities;
 - 2) a Memorandum of Understanding on how councils will work together towards an LSS and more generally on strategic planning; and
 - 3) an Investment Framework to support the delivery of the strategic priorities in the LSS including a co-ordinated approach to infrastructure funding and delivery that builds on the Surrey Infrastructure Study.
- 1.4 The LSS is not a statutory document, but is intended to set out a consensus around collective needs and common objectives and priorities through an overarching spatial planning vision for Surrey. It is a key tool to help councils manage growth sustainably and provides important evidence to demonstrate that strategic cooperation is an integral part of their Local Plan preparation. It is informed by existing and new evidence developed to support Local Plan preparation by the borough, district and county councils and by the Surrey Infrastructure Study. It reflects the Coast to Capital and Enterprise M3 Strategic Economic Plans (SEPs) and takes account of other wider relationships.

Case for an 'interim' LSS for 2016-2031

- 1.5 A Memorandum of Understanding has been agreed by the County Council and all of the Surrey boroughs and districts. It is supported by a Terms of Reference for the Partnership that sets out how the signatories to the MoU - the Surrey Planning and Infrastructure Partnership Board - will work to deliver the LSS and other work to help meet the requirements of the Duty to Cooperate. The MoU and ToR are set out in Annex 1.
- 1.6 There has been considerable progress made on the first stage of work to compile an evidence base involving completion of Strategic Housing Market Assessments (SHMAs) and Green Belt assessments and assembling an overview of infrastructure needs and economic growth ambitions. However, due to the different positions and timetables for Local Plan preparation for each borough and district not all studies have been completed.
- 1.7 All Surrey authorities now have up-to-date SHMAs that are considered to be compliant with the National Planning Policy Framework (NPPF). Guildford, Waverley and Woking have worked together to

produce a West Surrey SHMA and Runnymede and Spelthorne have worked together on a joint SHMA. Elmbridge, Epsom & Ewell and Mole Valley have undertaken a joint SHMA with the Royal Borough of Kingston upon Thames and a revised SHMA for Surrey Heath, working jointly with the Hampshire districts of Hart and Rushmoor has been completed. Reigate & Banstead published an updated SHMA and supplementary paper on housing need/demand to support the Core Strategy Examination in 2012 and this evidence was found 'sound' by the Inspector. Tandridge also published its own SHMA in 2015 with a supporting technical paper concluding that the district is a functional component of an HMA including LB Croydon, Reigate & Banstead and Mid Sussex. Annex 2 sets out the objectively assessed housing need (OAHN) for each borough and district compared with Local Plan targets and annual housing completion rates.

- 1.8 A number of boroughs and districts have published recent Green Belt assessments: Elmbridge, Mole Valley, Guildford, Reigate & Banstead, Runnymede, Spelthorne, Tandridge, Waverley and Woking. For Epsom & Ewell, assessment work is underway/continuing to confirm the robustness of existing Green Belt boundaries. Surrey Heath is not currently planning any Green Belt assessment work. Some benchmarking is likely to be needed given the varying methodologies used.
- 1.9 The [Surrey Infrastructure Study](#) provides an overview of the development pressures the county is facing as set out in existing and emerging Local Plans and the infrastructure needed to support expected growth to 2031. These pressures include Surrey not just meeting its own growth needs but also its continuing role in housing those who work in London and want or need to live outside the capital. The report presents the anticipated infrastructure requirement for each element of infrastructure (including transport, schools, healthcare, social care, community facilities, green infrastructure, flood defences, waste, utilities and emergency services), maps existing capacity against expected development and highlights the extent to which there is a gap in funding to enable the delivery of the infrastructure required. It provides a comprehensive picture of growth and infrastructure at a strategic level across Surrey and will help to inform how decisions on infrastructure priorities and funding will impact on job creation and the extent to which meeting housing needs might be achieved.
- 1.10 The Enterprise M3 SEP (2014) and the Coast to Capital SEP (2014) set out the visions and aims for their areas and the interventions necessary to support and deliver the economic growth envisaged. In particular, they identify the most important towns for the economy and growth that are to be targeted for regeneration and investment. Both LEPS are expected to refresh their SEPs in 2018. The districts and boroughs also have their own economic strategies and, as part of their local plan work in planning for economic development, are starting to build up evidence on the needs of the Functional Economic Area (FEA) of which they form a part and the quantity and quality of employment land through employment land reviews.
- 1.11 There are also wider relationships with other areas that need to be taken into account in considering strategic planning issues especially:
 - Blackwater Valley - Surrey Heath has been working closely with Rushmoor and Hart councils in Hampshire on housing market and employment land assessments, but the wider Blackwater Valley area with its functional travel to work and housing market links also extends to parts of Guildford, Waverley and Bracknell.
 - Gatwick Diamond - There have been strong working relationships between the four east Surrey authorities and the West Sussex authorities of Crawley, Horsham and Mid Sussex for many years

and a first Gatwick Diamond Local Strategic Statement was endorsed by Surrey County Council, West Sussex County Council and Crawley, Horsham, Mid Sussex, Mole Valley and Reigate & Banstead in 2011. A revised LSS was agreed in June 2017.

- London - Surrey authorities are involved in discussions with the Mayor/GLA and other local authorities across the wider South East on shared priorities including infrastructure and the full review of the London Plan. There is also a Heathrow Strategic Planning Group that has recently been set up that covers authorities in Greater London, Surrey and Berkshire which have strong links to the airport and are impacted by its growth.

1.12 Despite progress on the evidence base, there are still gaps that will need to be filled before an LSS looking to 2036 and beyond can be developed. This LSS, however, will provide an important interim statement enabling Surrey authorities to articulate their growth ambitions and spatial priorities for the short to medium term and engage on strategic issues as they progress Local Plans. It will also enable them to respond collectively on sub-regional and regional matters such as the London Plan review and engage with any sub-regional infrastructure and spatial development strategies arising from the devolution bid for the Three Southern Counties (3SC) and with Transport for the South East as it develops its transport strategy.

2. Surrey Overview

Context

- 2.1 Situated between Greater London to the north, the South Downs National Park to the south west and Gatwick Airport to the south, Surrey is the most urbanised shire county in England. Home to about 1.15m people in 2015, some 87% of the population live in urban areas. The county is characterised by a polycentric settlement pattern of large and small towns but with no one dominant city or conurbation. Guildford is the most significant urban settlement and county town. Other major towns are Camberley, Epsom, Redhill, Staines-upon-Thames and Woking.
- 2.2 About 85% of the area is countryside and approximately 70% is designated as Metropolitan Green Belt. Large parts of Surrey's countryside are recognised nationally to be of high landscape quality. A total of 44,800 hectares of the county is covered by national landscape designations including the Surrey Hills Area of Outstanding Natural Beauty (AONB) and the High Weald AONB. The County also contains a number of Special Protection Areas (SPAs), which put particular limitations on development. This includes, but is not limited to, the Thames Basin Heaths SPA that covers significant parts of north and west Surrey.
- 2.3 Surrey is one of the top-performing economies in the UK with high productivity output, strong growth rate and a diverse business base with good representation of growth sectors such as advanced manufacturing/engineering, business and professional services, pharmaceuticals, life sciences and healthcare and niche and emerging sectors. It is home to 66,540 active businesses (2014) including a significant number of international headquarters, but 99.5% of businesses are small and medium enterprises. The county undoubtedly benefits from its strong strategic location relative to London. Proximity to Heathrow and Gatwick Airports and the network of road, rail and air links ensures that UK, European and global markets are easily accessible. Surrey's continued economic growth is important to the prosperity of the UK.
- 2.4 The county also benefits from a highly skilled workforce. Patterns of commuting are dominated by flows across the London boundary especially to Central London and to Heathrow and Gatwick airports and firms that support the airports are an important source of jobs for Surrey residents. There is also significant in-commuting to Surrey from surrounding authorities, particularly by those in lower paid jobs who cannot access suitable housing in the county.
- 2.5 Surrey's success, attractiveness and typically high quality of life and proximity to London mean that it is a desirable place to live and there is high demand for housing to meet the needs arising from its resident population and immigration, most especially from London. However, there are some pockets of deprivation in certain urban areas in Guildford, Woking and parts of Elmbridge, Reigate & Banstead, Spelthorne and Tandridge. House prices tend to be high - the average house price in Surrey in 2015 was £450,000, compared with £317,000 in neighbouring counties - and there is a considerable need for affordable housing, especially for family homes, that is not being met.
- 2.6 The recent recession, however, has shown that Surrey's economic success cannot be taken for granted and investment in infrastructure, particularly transport infrastructure is needed to support a strong, competitive economy. With the exception of the orbital M25, the main road and rail links are radial, focussed on London, prompting calls for investment to improve the North Downs Line connecting Redhill (and Gatwick), Guildford and Reading. The M3, M23 and M25 motorways and the A3 trunk road all experience congestion at peak times on key stretches and many 'A' roads have congestion

bottlenecks, particularly in the more densely populated northern parts of the county and around Guildford. The cost of congestion to the Surrey economy is estimated at £500 million per annum.

- 2.7 Surrey's population is expected to grow by some 100,000 people by 2031, but those aged 20-69 will decrease slightly whereas those over 70 will increase. An ageing population will give rise to greater demands for different forms of housing and increasing needs for healthcare and accessible infrastructure.

Analysis of strengths, weaknesses, opportunities and threats

- 2.8 A Surrey-wide SWOT analysis has been prepared as part of establishing the context for the LSS. It is based on an assessment of a range of strategic documents including the Surrey Infrastructure Study, Local Transport Plan, Rural strategy, Enterprise M3 and Coast to Capital SEPs, Surrey Joint Health and Wellbeing Strategy, Surrey Landscape Character Assessment, Natural Capital Investment Strategy for Surrey and various Surrey Future and Surrey Connects documents.

Strengths

- High quality landscapes including AONB
- A strategic location in the South East with road, rail and airport connections to London, the rest of the UK and international business destinations
- A large and diverse concentration of knowledge industries, IT, telecommunications, biotechnology and advanced engineering companies
- A highly skilled workforce
- A number of well-regarded universities, further education colleges and research centres
- Generally high quality of life across Surrey - pockets of deprivation exist but are limited
- Important biodiversity assets including internationally protected sites

Weaknesses

- Lack of appropriate infrastructure constrains business growth
- High levels of traffic congestion cost the county up to £550m in lost earnings each year
- High risk of flooding in parts of Surrey from fluvial sources putting homes, businesses and people at risk
- Significant housing affordability issues across the county
- Many rail services at capacity with peak time overcrowding
- Access to services and public transport in more rural areas continues to be an issue
- Pockets of deprivation do exist with a range of social problems
- Deterioration of landscape and woodlands in places and the loss of heathland and downland
- Changes in farming in rural Surrey and small rural businesses having shut down or moved
- Pollution from congestion and other activities is an issue in parts of the county

Opportunities

- Investment in Surrey would provide an opportunity to drive economic growth across a much wider area
- Opportunities to address road congestion and improve public transport and journey time reliability
- Opportunities to use technology and innovative ways of working to increase productivity
- Town centre regeneration can improve the vitality and viability of Surrey's centres and benefit the visitor economy
- Airport expansion at Heathrow and/or Gatwick offers opportunities to secure investment in road and rail
- Growth Towns of Guildford and Woking and Step up Towns of Camberley and Staines-upon-Thames offer opportunities for significant economic growth
- Crossrail 2 offers opportunities to improve transport connectivity and increase capacity on the SWML to help bring forward and support new housing
- Securing high quality development supported by the right infrastructure will facilitate intensification and promote healthy and sustainable communities
- Investment in the natural environment can help future-proof against the effects of climate change and extreme weather

Threats

- Continued threats to the natural environment and biodiversity and the need to deliver SANG to mitigate impacts on the TBH SPA leads to land constraint issues in terms of housing delivery
- Congestion threatens business growth across the county
- Lack of affordable housing contributes to recruitment difficulties in some sectors
- A substantial gap in funding to deliver the necessary infrastructure to support growth
- An ageing population will present a number of challenges
- Crossrail 2 brings with it a number of challenges including added pressures for development
- Significant flood risk in parts of the county exacerbated by the impacts of climate change
- High land values and housing pressures makes safeguarding employment sites a concern in parts of the county
- Expansion of Heathrow will need improved surface access to be delivered
- London and Surrey are increasingly interconnected - the flow of migrants from London into Surrey increases pressure to provide additional housing in the county

2.9 Proposed changes to national planning policy will also have implications for the LSS, for example expected changes to the NPPF and the provisions of the Neighbourhood Planning Bill and forthcoming Housing White Paper. The Government's emphasis on meeting housing needs on brownfield sites and building starter homes for sale, will have implications for ensuring that there is sufficient employment land to meet economic growth needs and for an authority's ability to deliver a range of tenures to meet identified housing needs.

Shared Challenges

2.10 The very things that make Surrey an attractive location in which to live and work also constrain its growth. The overarching challenge facing the county is how to balance development pressures in this area of buoyant economic growth close to London, Heathrow and Gatwick without compromising the quality of life of its residents and the high quality natural and built environment. Particular challenges include the following.

- As far as possible, meeting development needs in a sustainable way where the design and quality of development remains high in a county that faces significant constraints including Green Belt and migratory pressures from London. On the basis of evidence to date, it appears that Surrey is only likely to be able to meet between approximately 50% and 75% of its objectively assessed

housing needs over the next 15 years (see Annex 2) and few adjoining authorities will be able to contribute to meeting any unmet needs.

- Delivering the mix, size and tenure of homes required to meet the needs of specific groups of the population including travellers, the elderly, students and those with identified affordable housing needs in a county that has historically struggled to meet the needs of identified groups due to environmental constraints, high affordability pressures and availability of sufficient housing land.
- Supporting a strong, competitive economy and fostering increased competitiveness and connectivity in the face of infrastructure deficits, environmental constraints and competition from other uses across the county.
- Delivering the service and infrastructure improvements needed to support Surrey's residents, now and in the future, given the substantial gaps in funding identified and the level of growth anticipated. Reliance on public sector funding is no longer an option and there is a need to lever in a much higher proportion of investment from the private sector including through developer contributions.
- Dealing with the effects of climate change, in particular the challenges posed by flood risk, and the need to address air quality issues in parts of the county.
- Safeguarding heritage and the high quality natural environment and habitats across the county in the face of significant pressure for growth.
- Safeguarding mineral reserves from sterilisation where extraction could be economically viable to ensure sufficient resources to supply the construction industry.

3. Sustainable Growth Strategy for Surrey

Vision

- 3.1 Our vision is for a county of **well-functioning, well-connected places and healthy communities**. Surrey recognises its role in the wider South East and will build on its strengths while retaining the qualities which give the county its distinctive character. Through collaborative working, local authorities and partner agencies will seek positive and innovative solutions to shared challenges to meet the need for homes, support economic prosperity and infrastructure improvements and to maintain and enhance the natural and built environment.

Strategic Objectives

3.2 Objective 1: Supporting Economic Prosperity

Local authorities will work with partner organisations including the LEPs, business support organisations, the business community and education and training providers to help support a strong, competitive economy by:

- identifying and safeguarding strategic employment sites and promoting their regeneration to support existing businesses and to meet anticipated development needs in current and emerging sectors;
- ensuring a range of sites and premises, including new employment land allocations in Local Plans, are available in sustainable locations or locations that can be made sustainable to meet anticipated local and inward investment needs;
- encouraging a mix of uses in and around town centres to ensure an appropriate balance between commercial and residential development;
- encouraging education and training providers to ensure skills provision meets business requirements and the resident workforce can benefit from new job opportunities; and
- recognising that minerals are necessary to support sustainable economic growth and safeguarding potentially viable mineral resources.

3.3 Objective 2: Meeting Housing Needs

Local planning authorities will work together and with infrastructure providers to deliver planned growth and positively seek to accommodate their housing requirement and meet specific housing needs by:

- identifying the potential barriers to the delivery of major sites and regeneration opportunities in town centres and prioritising infrastructure investment that supports their delivery;
- ensuring a range of housing types and sizes to help meet the need for starter homes, self-build properties, traveller pitches/plots, affordable housing and the needs of an ageing population;
- maximising the potential of brownfield land to deliver housing without compromising the supply of employment sites to provide for business needs;
- undertaking Green Belt assessments and, where required and appropriate, to consider local boundary reviews to help meet identified needs, notwithstanding the need to maintain the general extent of the Green Belt in Surrey and identifying additional Green Belt land where justified; and
- ensuring that pressures for intensification result in well-designed developments that respect local character, enhance the historic environment, promote sustainable transport choices and contribute to improved health and wellbeing.

3.4 **Objective 3: Delivering Infrastructure**

Local authorities will work together with public and private sector partners to ensure sufficient capacity is available or can be delivered to support growth and meet the needs of new development. The following priorities are identified.

- Investment should be programmed to fund identified improvements so that development and infrastructure delivery can be aligned.
- Investment is needed in road improvements to enhance connectivity and journey time reliability along the strategic route network especially the A3 corridor and congested parts of the local road network (including the transport network outside Surrey) to support the delivery of major sites.
- Modal shift and active travel are encouraged by increasing opportunities for sustainable travel through improvements to bus, cycling and pedestrian facilities to tackle congestion.
- Investment is needed to upgrade rail infrastructure and improve capacity and quality of passenger services in line with the Surrey Rail Strategy especially the North Downs Line, South West Mainline, Crossrail 2 and Southern Rail Access to Heathrow.
- Investment is needed in wider social and community infrastructure including education, healthcare and leisure facilities that addresses both cumulative development impacts and needs relating to strategic sites.
- Blue and green infrastructure is maintained and enhanced, including through the preparation of green infrastructure strategies, and green infrastructure is identified, developed and implemented in conjunction with new development to enhance landscape and townscape, manage flood risk and improve resilience to climate change.
- Superfast Broadband is delivered to those remaining areas not yet connected and to all new developments
- Investment is needed in energy and water and sewerage infrastructure to support future growth priorities.
- Investment is needed in flood mitigation measures, including the River Thames Scheme, to reduce the risk of flooding to homes, businesses and infrastructure.
- Existing waste management facilities and viable sites for additional facilities are safeguarded to ensure sufficient capacity to address future waste management needs.

3.5 **Objective 4: Supporting environmental sustainability, natural resource management and conserving and enhancing the character and quality of the countryside and the openness of the Green Belt**

Local planning authorities will work together and with partners to invest in natural capital, avoid adverse effects on the environment, improve resilience to climate change and protect heritage assets to support economic prosperity and the wellbeing of residents by:

- recognising the importance of natural capital and the role of ecosystem services and pursuing opportunities for improving biodiversity and the air and water environment alongside development;
- positively managing and improving the condition of internationally, nationally and locally designated sites of nature importance;
- conserving and enhancing the distinctiveness of Surrey's landscapes and the natural beauty of the Surrey Hills AONB and High Weald AONB having regard to landscape character assessments and AONB Management Plans;
- promoting positive and high quality management of the countryside, particularly in areas closer to London, appropriate viable open space uses in the Green Belt and improving public access; and
- ensuring that land used for mineral working is restored to an appropriate future use and managed so that it brings value to the environment and local community.

Sub-area Priorities

- 3.6 This strategy also envisages a number of spatial priorities for four sub-areas. The delivery of these priorities will support the implementation of the strategic objectives.

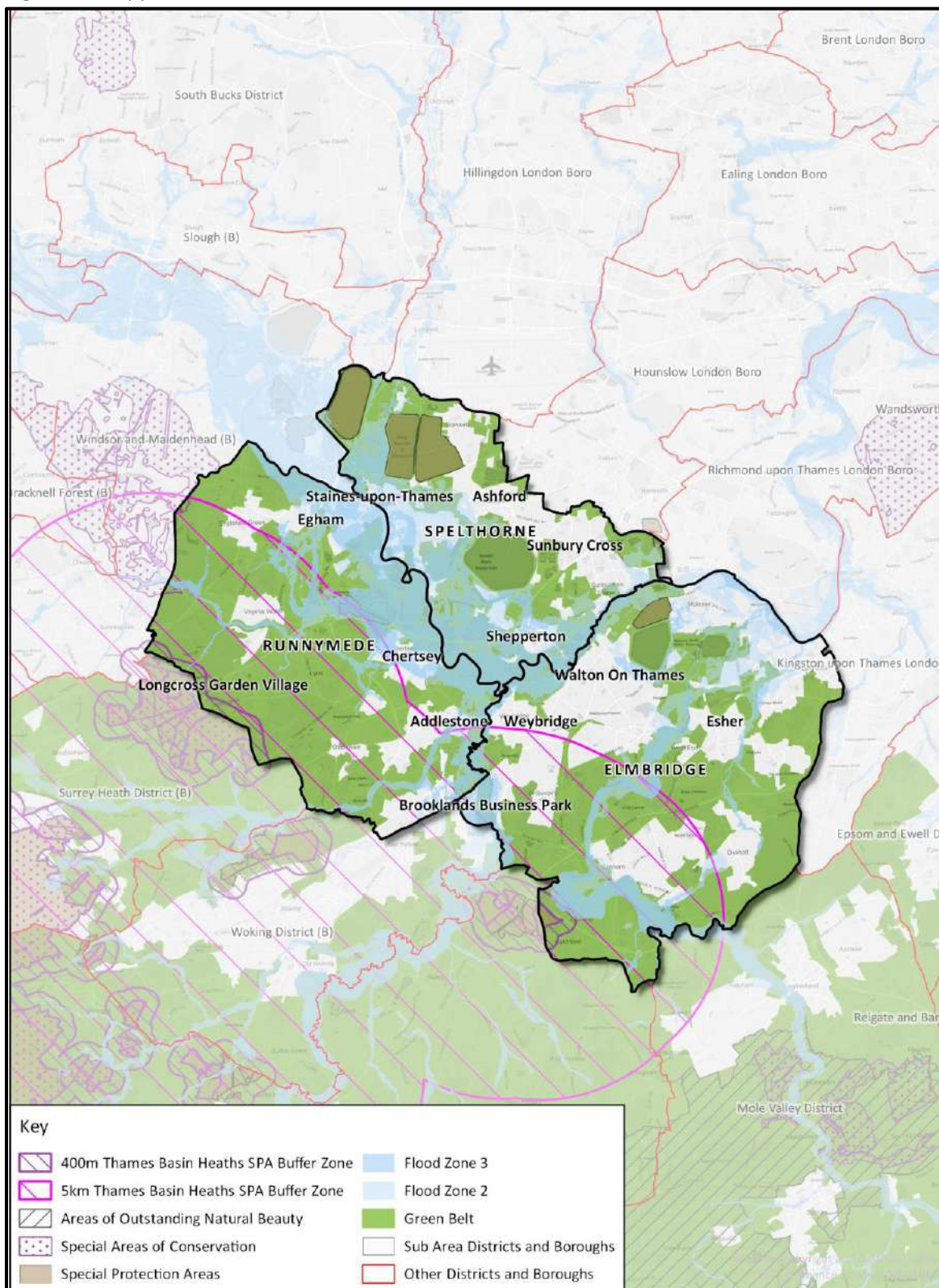
Upper M3

- 3.7 The Upper M3 Sub-area in north west Surrey includes the three boroughs of Elmbridge, Runnymede and Spelthorne. It has strong links with London including Heathrow Airport. The sub-area is relatively densely developed compared to the rest of Surrey and this is reflected in pressures on infrastructure, particularly health services, school places and congestion on the road network - with associated poor air quality - including stretches of the M25 (Junctions 10-14), M3 and A3 that run through it. There is a need for improved surface access to Heathrow and a Southern Rail Access that would also extend southwards to Woking/Guildford. Early consideration needs to be given to the impact on infrastructure should the expansion of Heathrow Airport be approved.
- 3.8 The largest town in the Upper M3 area is Staines-upon-Thames, which is a centre of sub-regional importance and is identified as a Step-up Town in the Enterprise M3 LEP's SEP. There is a range of other smaller centres in the sub-area including Walton-on-Thames, Weybridge, Esher, Ashford, Sunbury, Shepperton, Addlestone, Chertsey and Egham.
- 3.9 The local economy is generally characterised by high employment rates, skill levels and output per head with a high incidence of knowledge-based industries especially professional and financial services, ICT and advanced engineering. There is also a significant wholesale, storage and distribution sector that is partly related to the proximity of Heathrow Airport. The relative value of residential development in the area will require key employment sites to be protected. Alongside this, new sites for warehousing and distribution uses will need to be allocated where appropriate given the projected demand for such uses.
- 3.10 A significant part of the sub-area is designated Green Belt, which separates the towns and villages and contains the outward sprawl of London. However, gaps between settlements are more limited especially in those areas closer to London. In terms of the natural environment, there are internationally designated sites such as the Thames Basin Heaths SPA, South West London Waterbodies SPA and Windsor Forest and Great Park Special Area of Conservation (SAC). For new residential development within 400m – 5km of the Thames Basin Heaths SPA, there must be adequate Suitable Alternative Natural Greenspace (SANG) provided to ensure it does not give rise to significant adverse impacts on the ecological integrity of the SPA.
- 3.11 The River Thames and its tributaries such as the River Mole, River Wey and Bourne flow through the Upper M3 Corridor and many areas are at risk from fluvial flooding. The proposed River Thames Scheme would reduce flood risk in Egham, Staines-upon-Thames, Chertsey, Shepperton and Sunbury. The Scheme consists of large scale engineering work including the construction of a flood channel as well as improvements to three of the Thames weirs. There are also a number of major reservoirs and other artificial water bodies in the sub-area as a result of former mineral workings.
- 3.12 Given that the amount of developable land in the area is severely constrained, the ability to meet housing needs within the area will also be constrained. As well as maximising delivery on urban sites, reviews of Green Belt across the upper M3 area may indicate the potential to release some additional land subject to the necessary infrastructure being provided.

3.13 The key challenges facing the sub-area are:

- significant pre-existing infrastructure pressures, coupled with a lack of available funding for new/improved infrastructure and residents' concerns that more development will not be supported by adequate infrastructure investment;
- high levels of development pressure, in particular for housing, due to proximity to London and Heathrow set against significant constraints to development;
- high land values that favour market housing and limit delivery of affordable housing and warehousing;
- keeping town centres vibrant in the face of changing shopping habits and increased demand for leisure activities such as restaurants, cinemas and gyms etc.; and
- potential impacts of airport expansion.

Figure 3.1: Upper M3 - Constraints



Sub-area priorities and key locations

- 3.14 The sub area priorities in the Upper M3 are to:
- work with service providers and developers to deliver infrastructure to address existing problems and to support future growth given that pressure on existing infrastructure is a significant barrier to new development;
 - meet as much housing need as possible in a sustainable way, including promoting measures to reduce the need to travel and sustainable transport choices;

- deliver a better mix of housing especially smaller family housing, affordable homes and specialist accommodation with major housing sites supporting a mix of different sizes and types of homes including affordable homes to ensure balanced communities;
- safeguard key employment sites and identify potential sites for the expansion of warehousing and distribution uses; and
- maximise the development potential of Longcross Village as a new settlement.

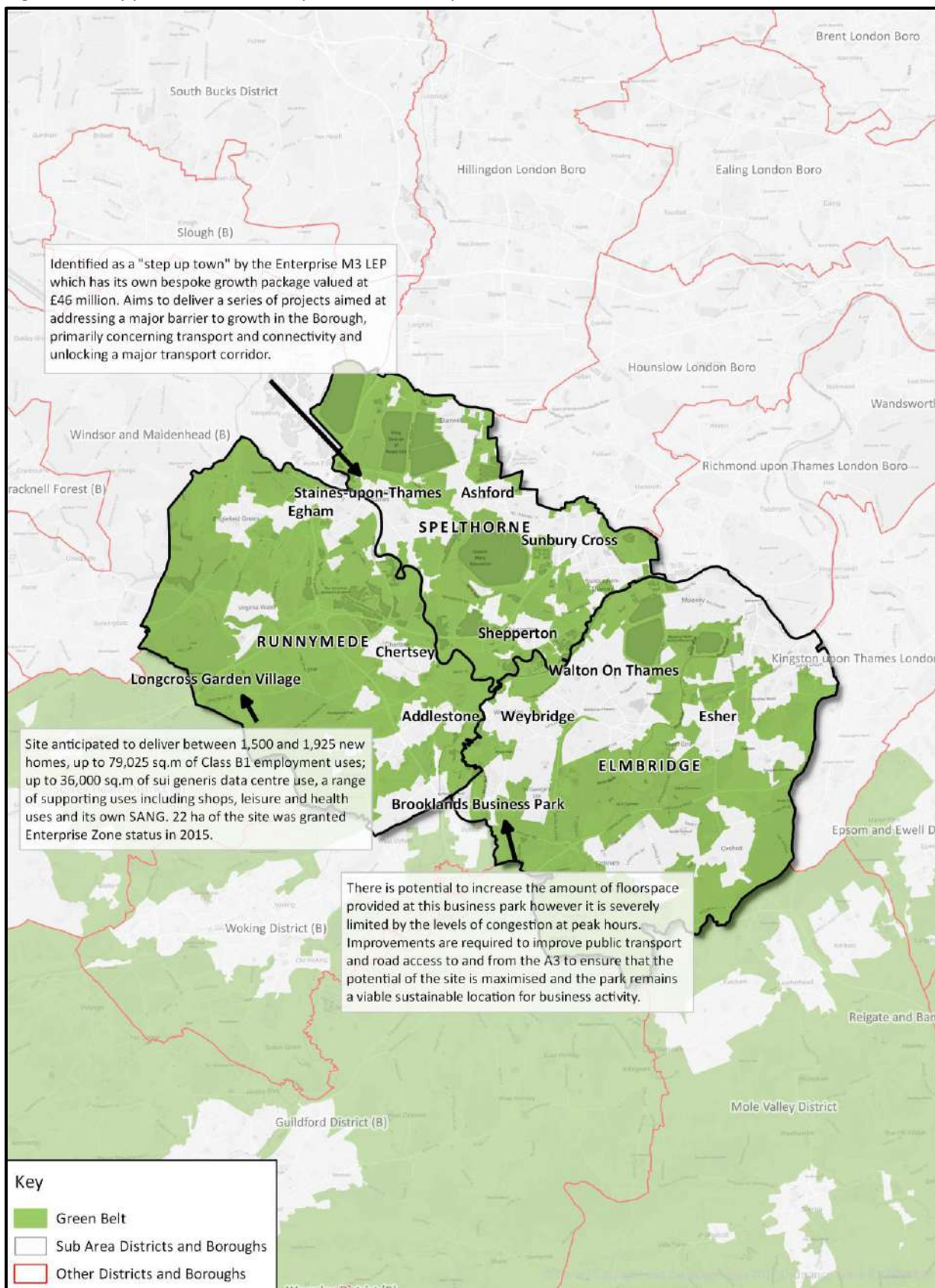
Table 3.1 shows how the Upper M3 sub area priorities help meet the strategic objectives of the LSS.

Table 3.1: Upper M3 – Sub-area priorities and strategic objectives

	Supporting economic prosperity	Meeting housing needs	Delivering infrastructure	Supporting environmental sustainability, natural resource management and conserving and enhancing the character and quality of the countryside and Green Belt
Work with service providers and developers to deliver infrastructure to address existing problems and to support future growth	√	√	√	√
Meet as much housing need as possible in a sustainable way	√	√		√
Deliver a better mix of housing especially smaller family housing, affordable homes and specialist accommodation	√	√		
Safeguard key employment sites and identify potential sites for the expansion of warehousing and distribution uses	√			
Maximise the development potential of Longcross Village as a new settlement	√	√	√	√

3.15 The key locations in the Upper M3 area which will help address the sub area priorities and the wider strategic objectives are set out in Figure 3.2.

Figure 3.2: Upper M3 - Sub-area priorities and key locations



3.16 Longcross Village: The emerging Runnymede Local Plan identifies redevelopment of this 125 hectare site (which includes 117 hectares in Runnymede) for a new Garden Village and Enterprise Zone to include:

- provision of between 1,500 and 1,925 homes, an office park and a range of supporting uses including shops, leisure and health uses, a range of open spaces and its own SANG¹; and
- delivery of Longcross Park Enterprise Zone on 22 hectares of the site (as part of the Enterprise M3 LEP ‘multi-site Enterprise Zone’ with Basing View Business Park in Basingstoke and Whitehill and Bordon in East Hampshire).

3.17 Staines-upon-Thames: There are a number of regeneration initiatives to deliver improved commercial, retail and residential opportunities commensurate with its role as a Step-up Town. These include:

- redevelopment of key sites such as Majestic House, Bridge Street Car Park and the extension of the Elmsleigh Centre; and
- infrastructure improvements such as increasing capacity in the vicinity of Staines Bridge and also in the wider Staines area to the east of the town.

3.18 Brooklands Business Park: This is the largest business park in the Upper M3 and key employment location with a mixture of employment uses on 58 hectares ranging from high quality offices at the Heights and Velocity through to large format warehousing and distribution centres on the Brooklands Industrial Estate. The Park has potential to increase the amount of floorspace provided, however it is severely limited by local levels of congestion at peak hours and transport infrastructure improvements are required if the potential of the site is to be maximised and the Park is to remain a viable and sustainable location for business activity.

3.19 Table 3.2 shows how the Upper M3 key locations deliver the sub-area priorities.

Table 3.2: Upper M3 – Key locations and priorities

	Work with service providers and developers to deliver infrastructure to address existing problems and to support future growth	Meet as much housing need as possible in a sustainable way	Deliver a better mix of housing especially smaller family housing, affordable homes and specialist accommodation	Safeguard key employment sites and identify potential sites for the expansion of warehousing and distribution uses	Maximise the development potential of Longcross Village as a new settlement
Longcross Village	√	√	√	√	√
Staines-upon-Thames town centre	√	√	√	√	
Brooklands Business Park	√			√	

¹ Please note that a hybrid planning application has already been granted planning permission on the northern site under RU.13/0856 for the demolition of the existing buildings and redevelopment of the site to provide: up to 79,025sqm of Class B1 employment uses; up to 36,000sqm of sui generis data centre use; up to 200 dwellings; up to 6,300sqm of ancillary uses including Class A1-A5 uses (i.e. retail uses, café/restaurants and a public house of up to 1,550sqm), class D1 uses (i.e. childcare facilities up to 600sqm), Class D2 uses (i.e. health and leisure uses up to 1,900sqm ; and the creation of Publicly Available Open Space. RU.13/0857 has granted the use of the adjacent site as Publicly Available Open Space which would be used as a SANG.

Duty to Cooperate

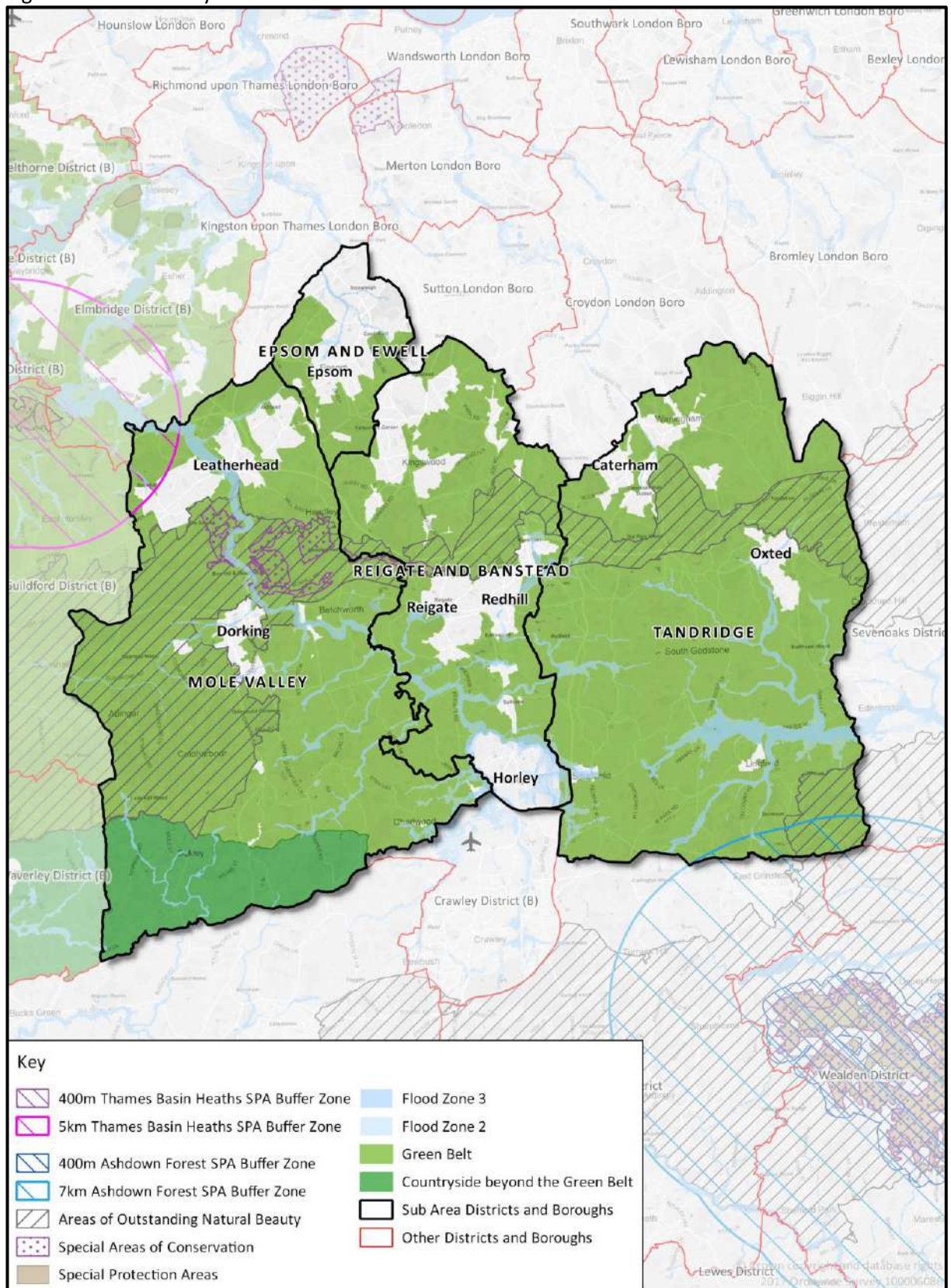
- 3.20 The following strategic issues have been identified as important duty to cooperate priorities for the three Upper M3 authorities.
- Housing: The upper M3 area cuts across at least two HMAs. Elmbridge is in a Kingston and north Surrey HMA whilst Runnymede and Spelthorne are considered to be in a separate HMA. However, the overlapping nature of travel to work patterns and migration in the region means there are strong links between these two HMAs which have been recognised in their respective SHMAs. Each authority has either undertaken, or is undertaking, an assessment/review of Green Belt which will inform plan preparation.
 - Development for employment uses: The FEAs for each of the authorities cover the Upper M3 Sub-area and there are recognised cross-boundary linkages with adjoining London Boroughs. Demand for warehousing and distribution uses, which is strong across the Upper M3 area, will be more difficult to meet due to both the lack of suitable sites and the value of available sites. Much of the area also sits within a wider FEA that focusses on Heathrow and future airport growth and associated development will have a significant bearing on the nature of development and infrastructure required in the north west Surrey part of the Upper M3.
 - Infrastructure: The M25 runs through the southern part of the Upper M3 area and has impacts on congestion in this area. Other issues such as flooding and the Thames Basin Heaths SPA also cut across the Upper M3 area and on-going cooperation through existing mechanisms will be vital to support the delivery of new development. One aspect of any co-operation going forward from the Upper M3 sub area could be joint lobbying for improvements to roads, rail and flood defences on the Thames and in relation to Heathrow expansion.
- 3.21 Given that land in the Upper M3 area is severely constrained, it is unlikely that all the development needs identified will be met in full. To seek to maximise housing delivery, consideration will need to be given as to whether other less constrained sub-areas in Surrey, or beyond the county boundaries are able to support additional development in order to meet any unmet needs.

East Surrey

- 3.22 The four East Surrey authorities - Epsom & Ewell, Mole Valley, Reigate & Banstead and Tandridge - fall within the Gatwick Diamond economic area. However, they also sit in a wider and strategically important location between London and Gatwick Airport, and are traversed by the M25 corridor. In particular, settlements in the north of the sub-area have a strong functional relationship (both in terms of housing and economy) with south London.
- 3.23 The main towns in the area include Epsom, Dorking, Leatherhead, Redhill, Reigate, Horley, Caterham, Banstead and Oxted. Epsom performs a sub-regional role and Redhill a sub-regional retail role. Other towns, including Caterham, Dorking, Leatherhead and Oxted have more local catchments.
- 3.24 Between these main towns is a network of suburban areas and smaller settlements and sensitive and protected countryside. The northern areas of the sub-area in particular have a fragmented countryside character, which provides important recreational opportunities for the population of the sub-area and beyond. The Green Belt in the north of the sub-area is particularly important in managing the very high development pressures that exist and preventing existing settlements from merging.
- 3.25 In the southern parts of the sub-area, the character is more rural, with dispersed villages and a working landscape, but where development pressures remain high and the Green Belt designation plays a key role in helping to prevent urban sprawl and the encroachment of development into the wider countryside.

- 3.26 The sub-area as a whole exhibits diverse landscape typologies (arising from its varied geology), from the North Downs in the north to the Weald in the south. The character of towns and villages in the sub-area is influenced by these landscapes, and historic use of local building materials. It is traversed by a network of locally, nationally and internationally designated landscapes and habitats, including the Surrey Hills AONB, High Weald AONB and the Mole Gap to Reigate Escarpment (SAC), extensive tracts of woodland, and a network of watercourses including the River Mole. Ashdown Forest SPA and SAC also impacts on south east Tandridge and the provision of SANG may be required to mitigate the impact of new housing. The NPPF requires AONBs to be afforded the highest level of policy protection.
- 3.27 The quality of the natural environment is one of the main ‘selling points’ of East Surrey, and together with its high levels of connectivity and strong economic base, make it an attractive place to live and do business.
- 3.28 The population of East Surrey is, in general, well educated, highly skilled and in well paid employment. However this overall prosperity hides pockets of deprivation and poverty. The desirability of the area means that market housing is expensive and beyond the reach of many, and limited land supply only serves to exacerbate this meaning that those in greatest need (including travellers and travelling showpeople) may experience barriers to accessing housing, education and training, and poor living environments.
- 3.29 Given the economic, social and environmental context, the key challenges facing the sub-area are:
- balancing high levels of growth pressures with the need for protection of the environment and local character, and the need for social equity;
 - ensuring infrastructure and services have the capacity to respond to the changing needs of the existing population as well as new population and service uses arising from new development;
 - ensuring that the area is resilient in the face of change – both short term change resulting from development, change as a result of national decisions about the future of Gatwick Airport, and the longer term challenges of climate change;
 - not taking economic prosperity for granted and growing the local economy (including the rural economy) to provide more job opportunities for local people and reduce the need to commute;
 - maintaining the quality of life and environment that attracts people, businesses, investment and visitors to the sub-area; and
 - delivering housing that is affordable to those looking to remain, live and work in the area, specifically a mix of affordable housing tenures that meet the range of needs within East Surrey.

Figure 3.3: East Surrey – Constraints



Sub-area priorities and key locations

3.30 The priorities for the East Surrey Sub-area are:

- the regeneration and enhancement of town centres to increase their vitality and viability, to attract residents, businesses and visitors, and make the best use of limited land supply to help meet the high levels of housing need;

- delivering opportunities to increase the sustainability and resilience of settlements outside the current built up areas and support the rural economy;
- the provision of employment space that meets the changing needs of business and provides local employment opportunities for local residents, minimising the need to commute out of the area for work;
- investment in key transport hubs, and interventions to address transport bottlenecks which cause delay and frustration and reduce the attractiveness of the sub-area as a place to invest;
- to promote measures to reduce the need to travel, including sustainable transport choices (making it easier for residents to get around, contributing to an increase in health and wellbeing and reducing air pollution and emissions) and high quality and reliable electronic communication connectivity;
- to maintain and enhance a coherent network of landscapes and green infrastructure corridors providing environmental benefits and recreational opportunities for the local and wider population; and
- to ensure new housing types across the area meet the range of local needs (particularly for the young/first time buyers/renters and older people) and are as affordable as possible.

Table 3.3 shows how these priorities help meet the strategic objectives of the LSS.

3.31 Additionally, priorities for the following key corridors have been identified.

- East–west transport corridor: To work with transport agencies and providers on interventions to east-west road and rail corridors to improve:
 - service frequency, reliability, level crossing downtime and station facilities along the North Downs line;
 - M25 capacity and junction enhancements including junction 8 (Reigate);
 - interventions along the A25 to improve route resilience and reliability; and
 - interventions to improve the A22 and minimise congestion.
- North-south transport corridor: To work with transport agencies and providers on interventions to north-south road and rail corridors to improve:
 - service frequency, reliability, and station facilities on the Brighton Mainline;
 - A23/M23 improvements including at the Hooley Interchange and M23 Spur; and
 - interventions along the A217/A240 to improve route resilience and reliability.
- River Mole and tributaries corridor: To work with the Environment Agency to improve river corridor management and resilience and minimise flood risk, including:
 - Burstow Stream Flood Alleviation Scheme; and
 - Redhill Brook Flood Alleviation Scheme / upstream storage options.

Table 3.3: East Surrey - Sub-area priorities and strategic objectives

	Supporting economic prosperity	Meeting housing needs	Delivering infrastructure	Supporting environmental sustainability, natural resource management and conserving and enhancing the character and quality of the countryside and Green Belt
Regeneration and enhancement of town centres	√	√	√	
Sustainability and resilience of centres outside current build up areas	√	√	√	√
Provision of employment space that meets changing needs and provides local employment opportunities	√			
Investment in transport hubs, and transport bottlenecks			√	
Promoting measures to reduce the need to travel			√	
Maintaining and enhancing a coherent GI network				√
Ensuring new housing types meet local needs and are as affordable as possible		√		

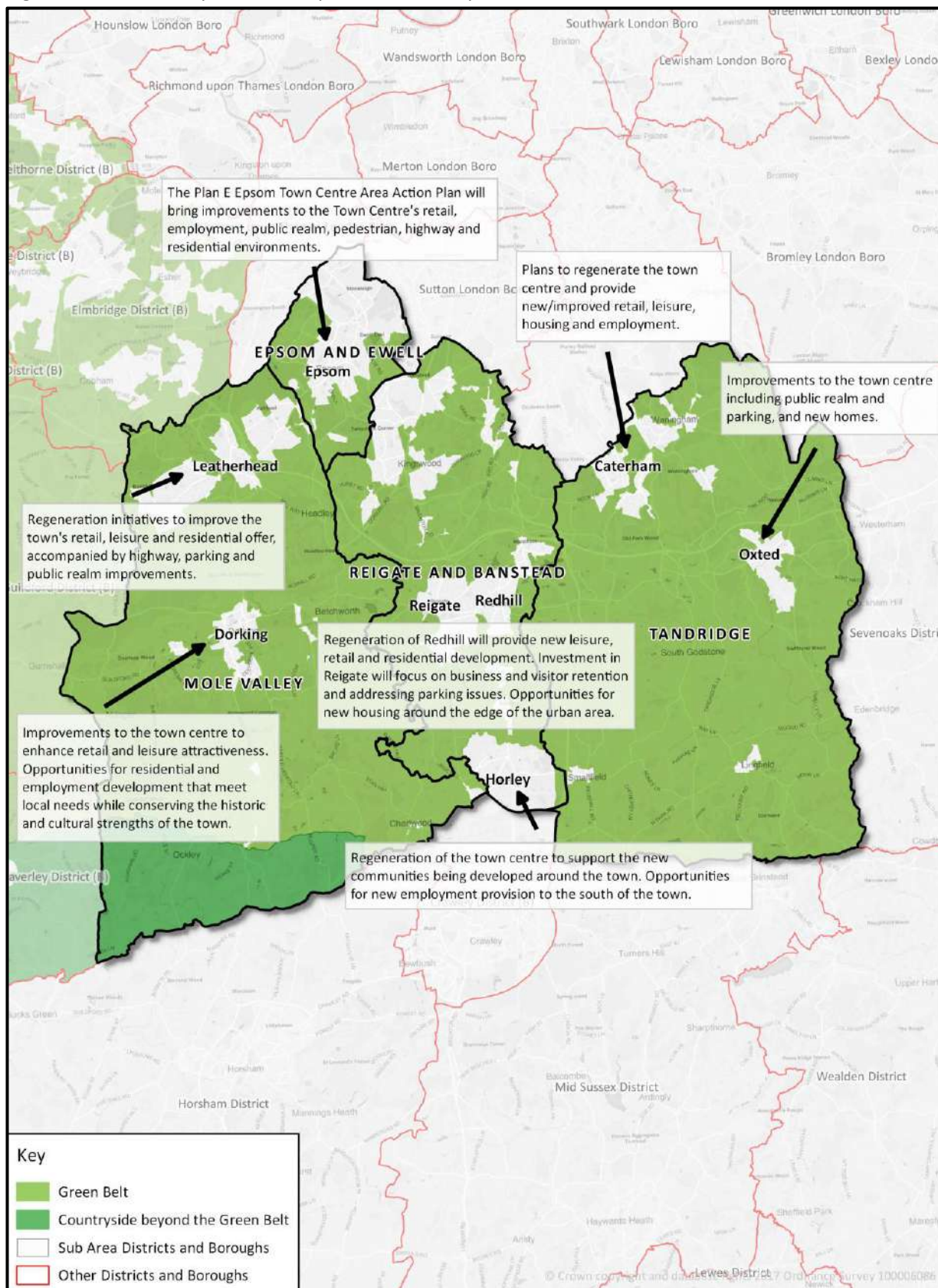
3.32 The key locations which will help address the sub area priorities and the wider strategic objectives are set out in Figure 3.4.

3.33 Epsom: Delivery of Plan E, Epsom Town Centre Area Action Plan, will bring improvements to the town centre’s retail, employment, public realm, pedestrian, highway and residential environments.

- New housing will continue to be delivered within the town centre to achieve the local plan target of 635 new residential units.
- New retail floorspace of up to around 2,400sqm of convenience retail and 7,700sqm of comparison retail by 2026 will help to cement the town’s position as a secondary regional centre and complementing the existing ‘market town’ offer.
- Around 6,000sqm of new employment floorspace will be developed in the town centre, along with measures to retain and enhance existing employment sites (particularly offices).
- Qualitative improvements to the pedestrian, highway and public realm environments in the town

centre are currently in the process of being implemented, with further upgrades planned for the next 10 years. Delivery of the Kiln Lane Link has been identified as being essential, and opportunities are being explored for improved and intensified employment offers at the borough's two main trading estates to facilitate this scheme.

Figure 3.4: East Surrey – Sub-area priorities and key locations



- 3.34 Leatherhead: The Transform Leatherhead initiative is seeking to improve the town's retail, leisure and residential offer, accompanied by highway, parking and public realm improvements including:
- High Street retail and leisure quarter - focal point for majority of retail and leisure offer, incorporating public realm improvements and changes to traffic management;
 - riverside quarter – potential for enhancement through improved landscape creation and links to sports/leisure across river. Redevelopment of office buildings to act as focus for change;
 - new urban quarter – based around Bull Hill site, mixed use redevelopment for retail, leisure, hotel, residential and parking uses; and
 - infrastructure improvements to include replanning of the town centre one-way system around Bull Hill; public realm improvements to High Street, Church Street and North Street; improvements to Swan Centre car park; new pedestrian link to leisure centre; new riverside park.
- 3.35 Dorking: Improvements to the town centre to enhance retail and leisure attractiveness, and identify opportunities for residential and employment development that meet local needs while conserving the historic and cultural strengths of the town will include:
- new convenience retail; improved comparison retail offer;
 - new residential and employment development on designated sites within town centre boundary; and
 - improved leisure facilities at Meadowbank, improved public transport interchange facilities at Dorking mainline station, public realm enhancements.
- 3.36 Redhill/Reigate: Regeneration of Redhill town centre will provide new leisure, retail and residential development, and investment in Reigate town centre will focus on business and visitor retention and addressing parking and transport issues. Proposed new development includes:
- up to 1,450 new homes, including smaller flatted units in Redhill town centre and urban extensions to the east of Redhill, east of Merstham and south west of Reigate, to provide family homes and other housing types which may include retirement accommodation, self build opportunities and starter homes as well as more traditional types of affordable housing;
 - up to 9,500sqm of retail floorspace and 7,000sqm of office floorspace, along with new leisure and community uses (including new primary school and health centre); and
 - measures to reduce flooding in Redhill and Reigate, new parking provision in both towns, Reigate Road network improvements, measures to improve A25 corridor resilience and interventions to promote walking and cycling and legibility in and between the two towns.
- The borough council will also continue to work with transport providers to secure new platform provision at Redhill and Reigate stations, and lobby for measures to reduce level crossing down-time in Reigate and improvements to M25 J8.
- 3.37 Horley: Regeneration of the town centre through making better use of underused council assets will provide new mixed use development to support the new communities being developed around the town. Opportunities to provide a new large scale employment area to the south of the town are also being explored.
- Up to 1,880 new homes will be built including smaller flatted units in Horley town centre, and family and affordable homes in the North West Sector (currently under development) and new smaller scale urban extensions.
 - Up to 2,750sqm of new retail floorspace and up to 200,000sqm of new employment floorspace (office led) will be developed.
 - There will be mitigation measures to manage flooding related to the River Mole and tributaries, interventions to improve A217/A23 corridor resilience, and new road junction off M23 Spur would be required to serve new employment development.

- 3.38 Oxted: Tandridge District Council is working with the Oxted BID to deliver improvements to the viability and vitality of the town centre. This includes:
- up to 60 new homes in a highly sustainable location on the town centre gasholder site;
 - a parking review including consideration of potential to increase and improve the quality of town centre parking; and
 - public realm improvements to Oxted shopping streets, as part of BID.
- 3.39 Caterham: Tandridge District Council is currently preparing a masterplan to regenerate Caterham town centre (Hill and Valley) and provide new/improved retail, leisure, housing and employment floorspace, accompanied by improvements to access and public realm. The precise details of what the masterplan will deliver are still being determined.
- 3.40 Table 3.4 shows how each key corridor and location delivers on the sub-area priorities.

Table 3.4: East Surrey – Key locations and priorities

	Regeneration and enhancement of town centres	Sustainability and resilience of smaller settlements	Provision of employment space	Investment in transport hubs and bottlenecks	Promoting sustainable transport choices	Network of landscapes and GI corridors	Ensuring housing choice and affordability
East West transport corridor		√		√	√		
North south transport corridor		√		√	√		
River Mole and tributaries corridor						√	
Epsom	√		√	√	√		√
Leatherhead	√		√	√	√	√	<u>√</u>
Dorking	√		√	√	√	<u>√</u>	√
Redhill/Reigate	√		√	√	√		√
Horley	√		√	√	√	√	√
Oxted	√						√
Caterham	√		√	√			√

Duty to Cooperate

- 3.41 The following strategic issues have been identified as important duty to cooperate priorities for the four East Surrey authorities.
- Housing and traveller accommodation: Ensuring that objectively assessed needs for housing and traveller accommodation are met as far as possible taking into account the levels of constraint that exist in East Surrey and the surrounding area. As part of its emerging Local Plan, Tandridge District Council has agreed a strategy to pursue a development which would accord with the principles of a Garden Village. Its location will be decided as the Local Plan progresses to submission stage in 2018. Development would not be expected to start until mid-way through the plan period at the earliest. It will be important for authorities to work together to understand the more localised impact on growth near shared boundaries on infrastructure and services (see below).
 - Development for employment uses: Ensuring that economic growth and employment floorspace proposals across East Surrey (and beyond) are complementary and together meet, as far as possible, the economic growth needs of the sub-area.
 - Retail needs: Ensuring that retail growth proposals across East Surrey (and beyond) are complementary, meeting needs as far as possible whilst safeguarding the continued vitality and viability of a range of different town and local centres.
 - Infrastructure: Working together, with the County Council and service providers, to ensure that strategic infrastructure provision meets the needs of the wider area, taking into account each authority's development plans. This may include in relation to transport (road and public transport), education, health, utilities, communications technology and burial provision.
 - Green infrastructure, landscape and flooding: Ensuring that, where relevant, green infrastructure networks connect across administrative boundaries and that a joined up approach is taken to flood risk mitigation and management. Exploring opportunities for shared local landscape designations across the sub area.
- 3.42 Addressing these strategic issues is, in reality, a much wider challenge and cooperation with authorities that fall outside the East Surrey sub-area, but have a functional relationship with it, will be vital to ensure that every attempt is made to meet development needs in an appropriate and sustainable manner.
- 3.43 The decision to locate a new runway at Heathrow may have implications for planning priorities in East Surrey. The local authorities that surround Gatwick Airport will therefore need to continue to work together to understand and manage the implications of continued growth at Gatwick as a single runway airport as well as the decision about new runway capacity.

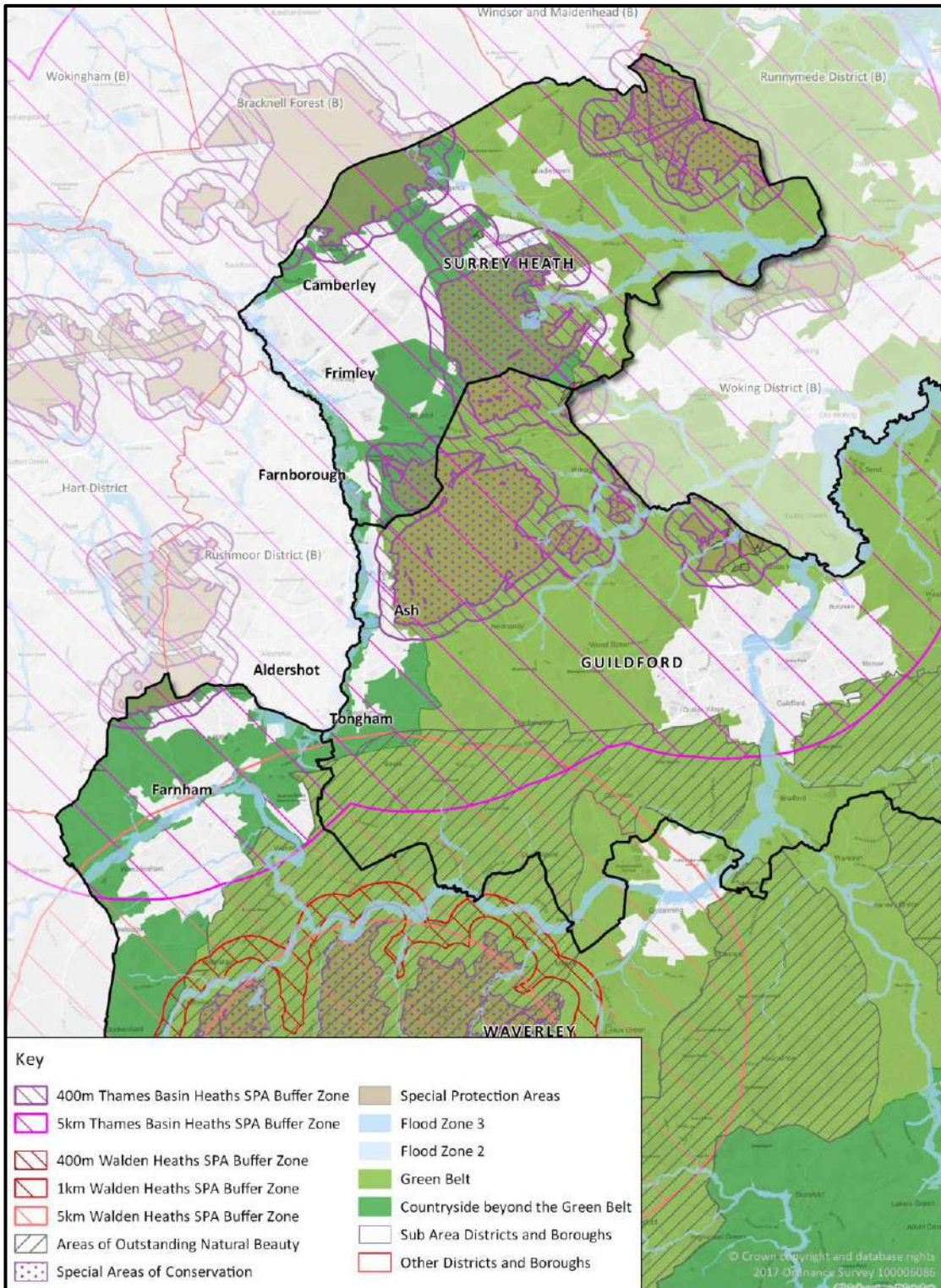
Blackwater Valley

- 3.44 Extending over north east Hampshire, north west Surrey and the southern parts of Bracknell Forest and Wokingham districts, the Blackwater Valley incorporates areas of Guildford, Surrey Heath and Waverley boroughs in Surrey. The area is characterised by both its built-up nature and areas of significant environmental value.
- 3.45 Much of the population lives within five towns - Aldershot, Camberley, Farnborough, Farnham and Fleet - and a number of smaller settlements including Ash, Frimley and Tongham, but no single centre dominates the area. The Blackwater Valley is characterised by strong and complex economic and functional relationships that have developed between these centres as a result of their close proximity and the area is well connected in terms of rail infrastructure and to the strategic road network, including the M3 and A3. The Frimley Health NHS Foundation Trust/ Hospital, which provides services to approximately 900,000 people, is a significant employer in the area. The environmental quality of

the rural area is high and includes Green Belt and designations of national and international significance such as the Thames Basin Heaths SPA.

- 3.46 The Enterprise M3 LEP has pinpointed the Blackwater Valley as a significant location for future growth and investment, identifying Farnborough as a Growth Town and Camberley and Aldershot as Step-up Towns within its SEP. The Growth Towns are recognised as crucial to driving economic growth across the whole Enterprise M3 LEP area and the Step-up Towns are seen as having “untapped potential”. Camberley is an important retail centre. More generally, protecting the vitality and viability of town centres within the Blackwater Valley is important given their role as key employment centres and in facilitating social interaction and community cohesion.
- 3.47 Both the built up nature of the area and the growth agenda means that countryside in the Blackwater Valley is under increasing pressure. Located in, on the edge of or outside of the Green Belt, much of the area is a target for opportunistic developers and/or the subject of strategic site allocations in Local Plans. Small, ad-hoc development has taken place on the edge of Ash and Tongham (it is anticipated that 2000 homes will eventually be constructed in this area alone), presenting challenges for infrastructure providers and the delivery of joined-up strategic planning.
- 3.48 Development in the northern part of the Blackwater Valley (especially within large areas of Surrey Heath) is constrained by areas designated as part of the Thames Basin Heaths SPA. The SPA also has a ‘zone of influence’ which extends significantly into the Blackwater Valley. Development proposals expected to have adverse effects on the SPA will not be permitted unless mitigation measures such as the provision of Suitable Alternative Natural Green Space (SANG), are sought from development in the ‘zone of influence’. Surface water flooding is also a significant issue and a consideration for development in parts of the Blackwater Valley including Ash.
- 3.49 Given the economic, social and environmental context, the key challenges facing the sub-area are:
- meeting objectively assessed needs, including traveller accommodation, given constraints to development such as the SPA and the amount of developable land available;
 - identifying sufficient SANG to facilitate development in the 400m – 5km SPA zone;
 - maintaining the identity of individual settlements in the Blackwater Valley;
 - ensuring that all planning permissions (including those in the countryside) are supported by sufficient developer contributions and satisfactory infrastructure provision;
 - ensuring that development proposals satisfactorily address surface water flood risk and take all available opportunities to reduce it;
 - encouraging sustainable transport and reducing traffic congestion on the A31 and A331 (where concentrations of nitrogen dioxide are predicted to exceed air quality objectives); and
 - providing sufficient wastewater capacity to support future residential development in the area.

Figure 3.5: Blackwater Valley – Constraints



Sub-area priorities and key locations

3.50 The priorities in the Blackwater Valley are to:

- work with infrastructure providers to secure the delivery of improvements required to support/deliver planned residential and economic growth including electrification of the North Downs Line (facilitating increased train service frequency), traffic management and promoting sustainable transport choices and environmental schemes across the area and sufficient SANG to facilitate development.;
- Increase housing supply including traveller accommodation;

- deliver more affordable housing in Ash and Tongham to meet assessed needs; and
- maintain the competitiveness of town centres.

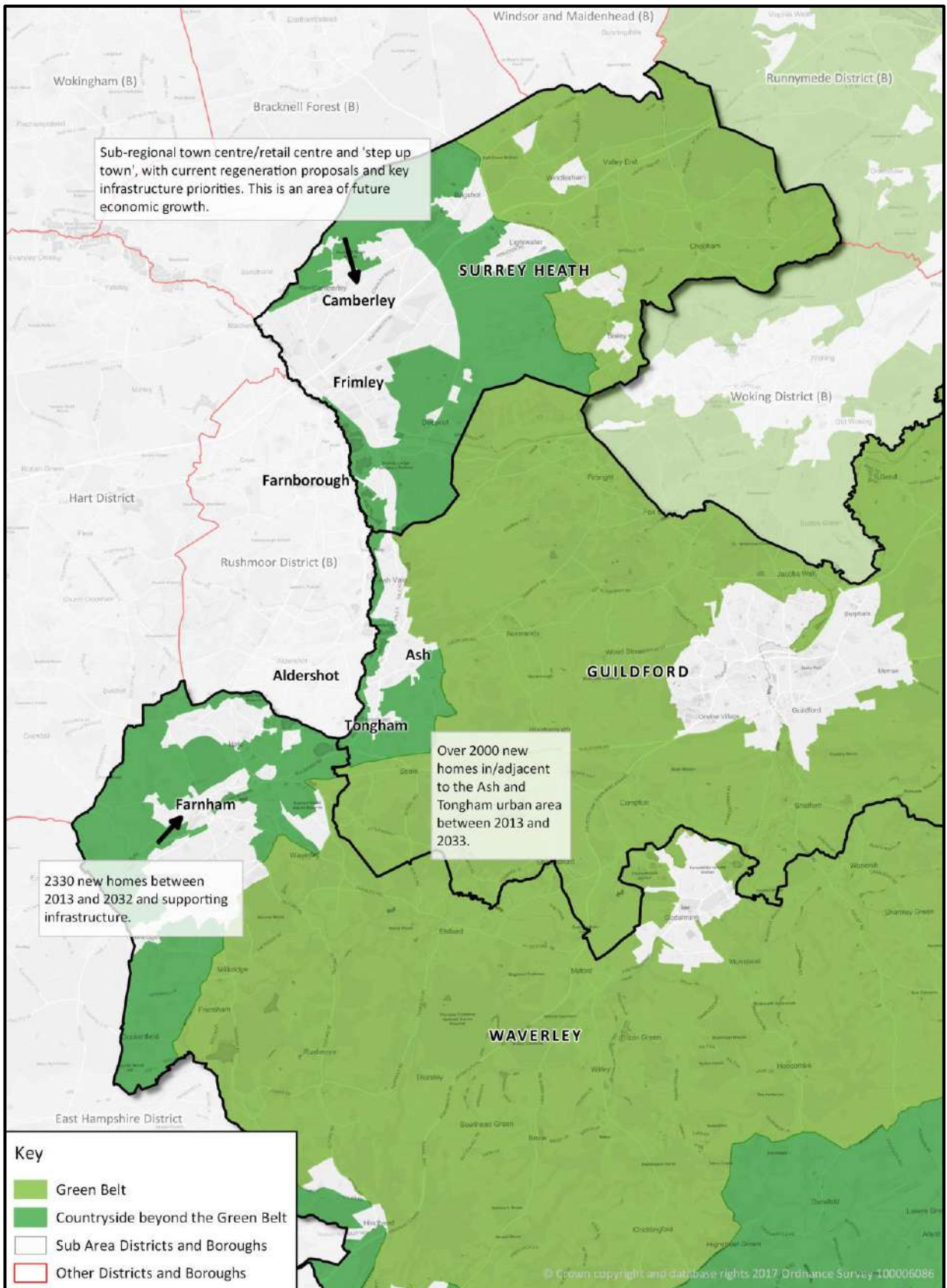
Table 3.5 shows how the priorities help meet the strategic objectives of the LSS.

Table 3.5: Blackwater Valley – Sub-area priorities and strategic objectives

	Supporting economic prosperity	Meeting housing needs	Delivering infrastructure	Supporting environmental sustainability, natural resource management and conserving and enhancing the character and quality of the countryside and Green Belt
Work with infrastructure providers to secure the delivery of improvements to support planned residential and economic growth	√	√	√	√
Increase housing supply including traveller accommodation		√		
Deliver more affordable housing in Ash and Tongham to meet assessed needs	√	√		
Maintain the competitiveness of town centres	√	√	√	

- 3.51 The key locations in the Blackwater Valley sub-area which will help address the spatial priorities and the wider strategic objectives of the LSS are set out in Figure 3.6.
- 3.52 Farnham: Waverley Borough Council’s Main Modifications to its Submission Local Plan Part 1 provisionally identifies Farnham for 2,780 additional new homes between 2013 and 2032. Such growth must be supported by appropriate infrastructure improvements, especially improvements to junction capacities and measures to reduce the impact of motor vehicles and improve accessibility, connectivity and safety for walkers and cyclists.
- 3.53 Camberley town centre: There are a number of regeneration initiatives to deliver improved commercial, retail and residential opportunities. These include the redevelopment of key sites such as London Road and infrastructure improvements such as the A30/A331 corridor improvements.

Figure 3.6: Blackwater Valley – Sub-area priorities and key locations



3.54 Ash and Tongham: Guildford Borough Council's submission Local Plan provides for:

- over 2,000 new homes to be constructed in/adjacent to the Ash and Tongham urban area between 2013 and 2033;
- more affordable housing to meet assessed needs - Guildford Borough Council has set up a housing company to help achieve this; and
- supporting infrastructure, including the provision of a new road and footbridge scheme to enable the level crossing closure on the A323 adjacent to Ash Railway Station and sufficient SANG.

3.55 Table 3.6 shows how the Blackwater Valley key locations deliver the sub area priorities.

Table 3.6: Blackwater Valley – Key locations and priorities

	Work with infrastructure providers to secure the delivery of improvements to support planned residential and economic growth	Increase housing supply including traveller accommodation	Deliver more affordable housing in Ash and Tongham to meet assessed needs	Maintain the competitiveness of town centres
Farnham	√			√
Camberley town centre	√			√
Ash and Tongham	√	√	√	

Duty to Cooperate

3.56 The following strategic issues have been identified as important duty to cooperate priorities for the Blackwater Valley authorities where the physical and administrative geography creates a number of cross-boundary issues that pose various challenges for planners.

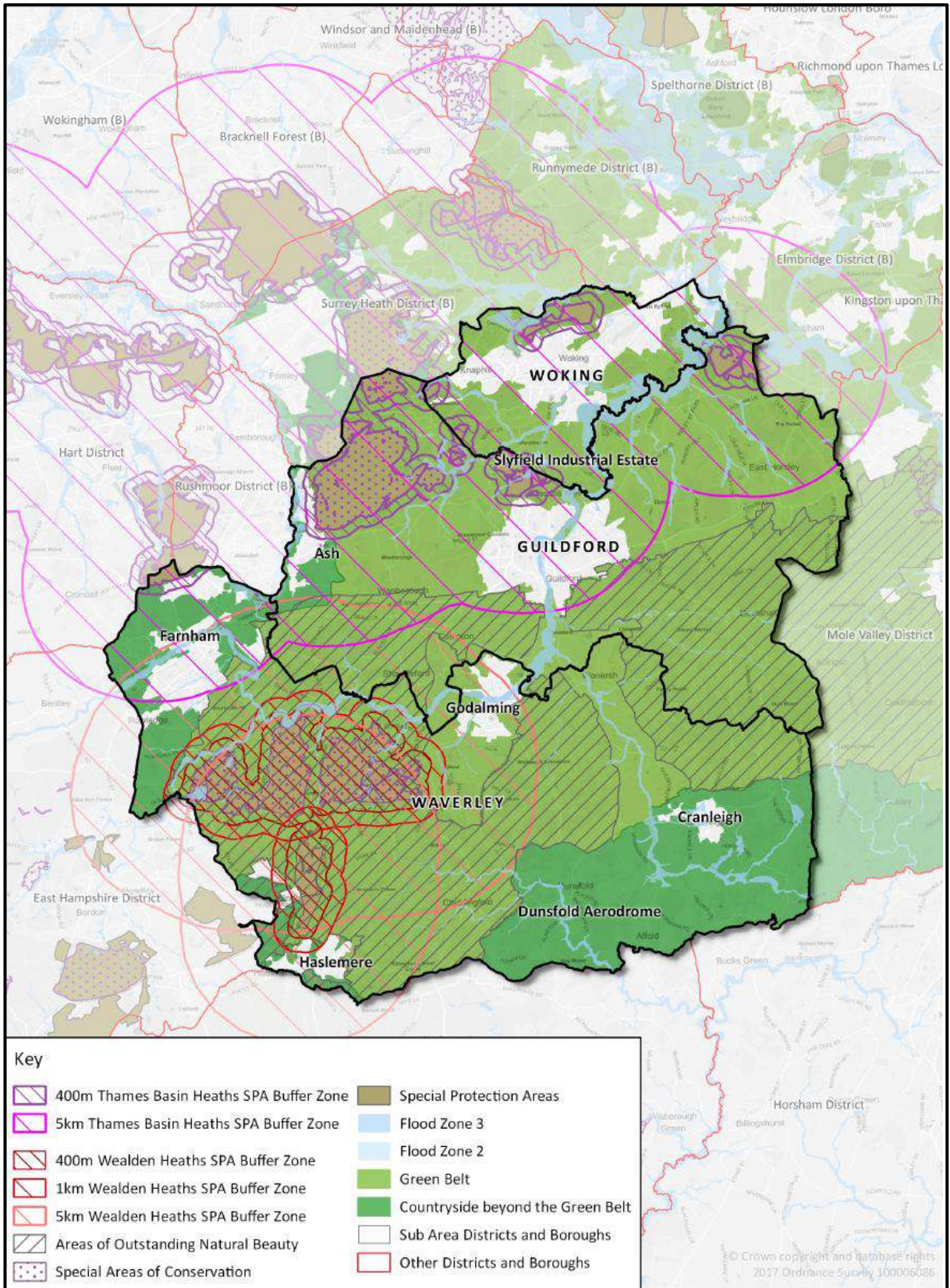
- **Housing and traveller accommodation:** A complex set of migration and commuting interactions between the two housing market areas (the West Surrey HMA and the Hart, Rushmoor and Surrey Heath HMA) are evidenced in the West Surrey SHMA 2015. The SHMA notes that 11.1% of Rushmoor residents commute to Surrey Heath, whilst a further 8.4% work in Guildford. Over 17% of Waverley residents commute to Guildford, with 6.7% of Guildford residents undertaking the reverse journey. More than 2,900 Hart residents commute to Surrey Heath. Understanding and addressing the implications of such commuting patterns requires collaboration between multiple local authorities.
- **Development for employment uses:** Understanding the implications of the complex commuting patterns has implications for how local economic needs are met.
- **Infrastructure:** Given that travel to school patterns do not necessarily follow administrative boundaries, residential development in one local authority or county can increase demand for education provision in neighbouring authorities. Providing sufficient school places in the area therefore requires collaboration between Hampshire and Surrey County Councils as the education authorities and the various local planning authorities in the area.

A3 corridor

- 3.57 Connecting London to the south coast, the A3 dual carriageway forms a crucial part of the strategic road network in Surrey and Hampshire. The corridor surrounding the A3 incorporates large areas of the boroughs of Guildford, Waverley and Woking. Major settlements located within the Surrey A3 corridor include Godalming, Guildford and Woking.
- 3.58 Both Guildford and Woking are home to a number of global corporations, many of which are located in large office complexes within existing business/ research parks or town centres. The Surrey Research Park is of regional significance with regard to specialist high-tech and research industries and maintains close links to the University of Surrey, which is based in the town. Guildford is also home to a University of Law and Music College. Such establishments attract students from outside the area and help build and strengthen the skilled future workforce of the area. The Royal Surrey County Hospital is also located in Guildford.
- 359 Waverley is generally considered to play a secondary role to Guildford in the commercial property market area and predominately hosts micro enterprises; a 2015 business count indicated that 91% of businesses in the borough have fewer than ten employees.
- 3.60 The West Surrey Strategic Housing Market Assessment (SHMA) 2015 identifies Guildford, Woking and Waverley as being within the same housing market area. The area is one of the least deprived in the country, although small pockets of notable deprivation exist. House prices are particularly high, creating affordability issues for key workers and resulting in high levels of commuting into the boroughs (although the area's proximity to London also results in high levels of out-commuting). The SHMA identifies a significant need for new housing in the area, including a mix of housing types and tenures.
- 3.61 Identifying both Guildford and Woking as Growth Towns, the Enterprise M3 LEP has pinpointed the A3 corridor as a significant location for future growth and investment. The Growth Towns, which fall within the 100 best performing UK localities, are recognised as crucial to driving economic growth across the whole Enterprise M3 LEP area. Improving connectivity through transport investment schemes within and around the Growth Towns is a key aim of the SEP. The compact nature of Guildford and Woking mean most places are already easily accessible, but there remain opportunities for promoting greater use of sustainable modes of transport.
- 3.62 The north of the A3 corridor area benefits from easy access to Heathrow Airport. Gatwick Airport is also located in close proximity to the three boroughs and the area retains good rail connections to London and the South East generally. However, the A3, which runs through large parts of Guildford, Waverley and Woking, suffers from congestion and rural areas outside of the main settlements generally have limited access to public transport, creating a dependency on car travel with associated air quality impacts. Improving rail capacity and securing upgrades to the A3 through Guildford and the A3/M25 Junction 10 at Wisley are crucial to the future growth of the area.
- 3.63 The A3 corridor features a number of major visitor attractions including RHS Wisley and G-live in Guildford and the New Victoria Theatre in Woking. These attractions draw visitors to the area and increase the prosperity of the local economy. As major retail centres, Woking and Guildford also attract a number of day visitors to the area.

- 3.64 The character and heritage of historic towns such as Guildford and Godalming, and the tranquillity and beauty of the surrounding landscape adds to the area's unique appeal. Guildford and Waverley in particular feature a large number of conservation areas and other heritage assets. Development in such locations must respect and enhance their setting.
- 3.65 Outside of the major settlements, large parts of Guildford, Waverley and Woking are designated Green Belt. The Thames Basin Heaths SPA and Wealden Heaths SPA are located towards the north and south of the A3 corridor respectively, whilst the Surrey Hills AONB transcends the south of the borough of Guildford and large parts of Waverley. Many visitors are attracted to the area to pursue leisure and recreational activities (such as cycling and walking) within the Surrey Hills, whilst the southern part of Waverley is also commonly regarded as a gateway to the South Downs National Park.
- 3.66 These constraints present significant challenges to development in the area. The NPPF emphasises that inappropriate development in the Green Belt will not be permitted unless in very special circumstances and states that AONBs should be afforded the highest level of policy protection. As a European designated site, the Thames Basin Heaths SPA is protected from harmful development and residential proposals within 400m - 5km of it must ensure adequate SANG is provided to mitigate the development's anticipated impact. Such mitigation measures are also now commonly requested of development affecting the Wealden Heaths SPA. Major brownfield sites represent significant development opportunities and a 'brownfield first' approach has been adopted across the area.
- 3.67 Flood risk is also a constraint to development in the A3 corridor. Parts of Guildford town centre, Godalming and the historic settlements that have built up along local rivers are at high risk of flooding and therefore inappropriate locations for certain forms of development and there is a need to protect sensitive groundwater resources in Guildford and Godalming.

Figure 3.7: A3 Corridor – Constraints



- 3.68 The key challenges facing the sub-area are considered to be:
- balancing the need to protect and enhance the distinctive natural and built environment of the area with meeting the area's development needs in a sustainable way and avoiding harming areas which are coming under increasing development pressure in the absence of up-to-date local plans;
 - ensuring that the planned growth of the area is deliverable and can be supported by the appropriate level of infrastructure provision;
 - maximising the delivery of affordable homes, including private market housing at more 'affordable' prices, and increasing the supply and mix of housing (including traveller accommodation, homes for the elderly, smaller family homes, student accommodation and specialist homes);
 - developing a feasible and viable flood alleviation scheme that can help unlock brownfield land for redevelopment and reduce flood risk; and
 - improving accessibility to more sustainable modes of transport, particularly outside of the urban centres.

Sub-area priorities and key locations

- 3.69 The priorities in the A3 Corridor are to:
- utilise and make best use of brownfield sites to meet needs;
 - protect the area's unique natural environment from harmful and inappropriate development;
 - ensure infrastructure upgrades are delivered, including the promotion of sustainable transport choices, to support planned growth;
 - increase housing supply and address affordability issues through a mix of tenures and house types and by meeting traveller accommodation needs;
 - maintain and improve existing strategic employment sites and establish new employment floorspace in appropriate locations to facilitate a buoyant local economy with good quality offices, business parks and industrial areas; and
 - support the rural economy by working with infrastructure providers to improve broadband and allowing the sustainable growth of rural businesses and enterprises where development proposals accord with Green Belt policy.

Table 3.7 shows how the priorities help meet the strategic objectives of the LSS.

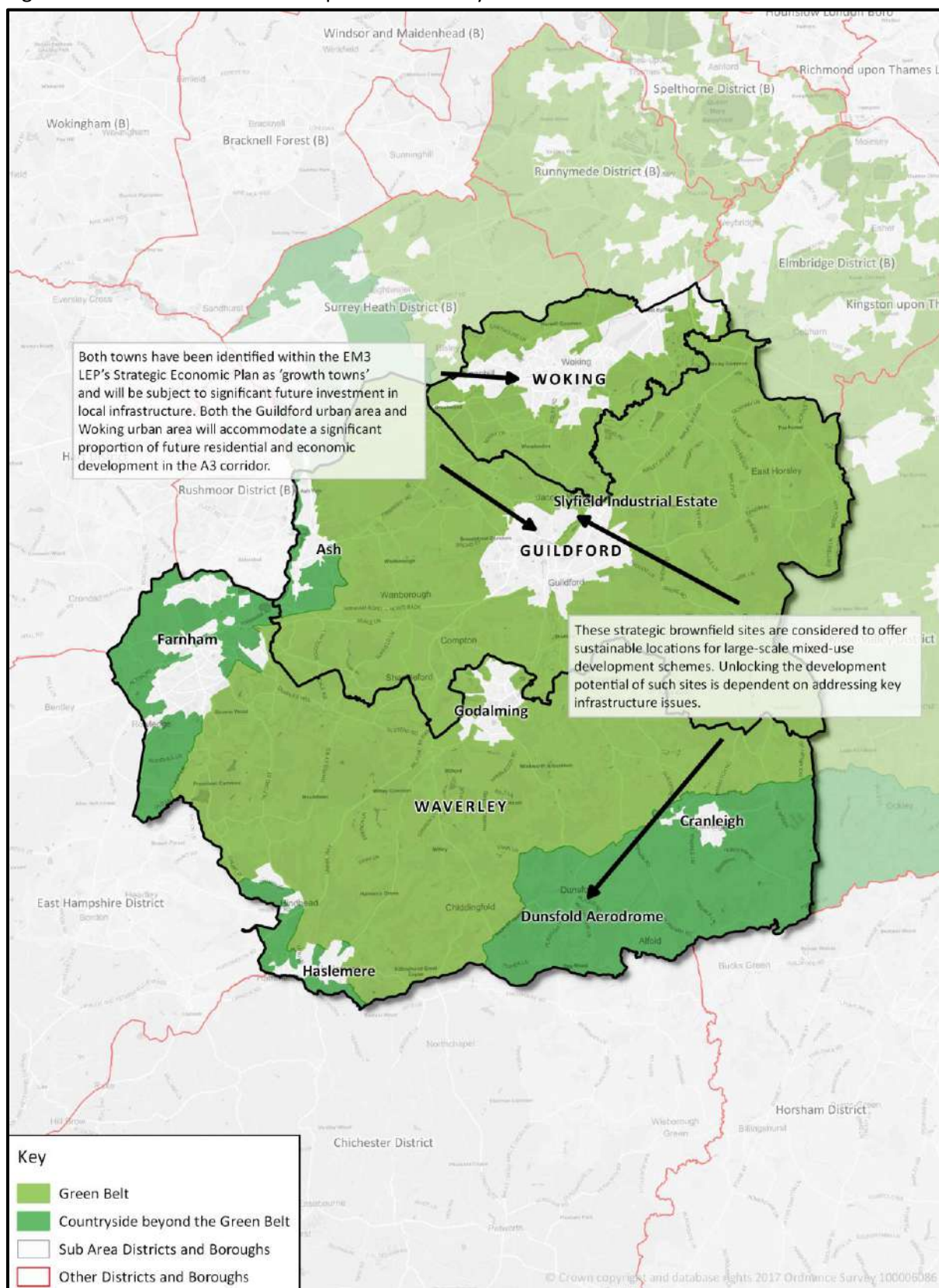
Table 3.7: A3 Corridor – Sub-area priorities and strategic objectives

	Supporting economic prosperity	Meeting housing needs	Delivering infrastructure	Supporting environmental sustainability, natural resource management and conserving and enhancing the character and quality of the countryside and Green Belt
Utilise and make best use of brownfield sites to meet needs	√	√	√	√
Protect the natural environment from harmful and inappropriate development				√
Ensure infrastructure upgrades are delivered to support planned growth	√	√	√	
Increase housing supply and address affordability issues and meeting traveller accommodation needs	√	√	√	
Maintain and improve existing strategic employment sites and establish new employment floorspace	√	√	√	
Support the rural economy	√	√		√

- 3.70 The key locations in the A3 Corridor which will help address the sub-area priorities and the wider strategic objectives are set out in Figure 3.8.
- 3.71 Strategic brownfield sites: The emerging Guildford and Waverley Local Plans allocate Slyfield Industrial Estate and Dunsfold Aerodrome for large scale mixed use development.
- Slyfield – The site is allocated for the provision of approximately 1,000 homes, four traveller pitches, light industrial uses, community facilities, waste facilities and a new sewage treatment works.
 - Dunsfold – The site is allocated for a new settlement comprising up to 2,600 homes, an expanded business park with 26,000 sqm of new employment floorspace, a range of supporting uses including shops, health and community facilities and a new primary school.

Unlocking the development potential of these sites is dependent on addressing key infrastructure issues.

Figure 3.8: A3 Corridor – Sub-area priorities and key locations



- 3.72 Guildford: Guildford urban area will accommodate a significant proportion of the sub-area's future residential and economic development commensurate with its role as a Growth Town. There are a number of regeneration initiatives being proposed for the town centre to deliver improved residential, commercial and retail opportunities. These include:
- a new retail-led, mixed-use redevelopment on the North Street regeneration site;

- approximately 1,172 new homes, particularly on upper floors as part of mixed use developments; and
- infrastructure improvements, especially more effective routes within and across the town centre for pedestrians and cyclists.

3.73 Woking: Woking urban area will accommodate a significant proportion of the sub-area’s future residential and economic development commensurate with its role as a Growth Town. There are a number of regeneration initiatives being proposed for the town centre to deliver improved residential, commercial and retail opportunities. These include:

- redevelopment of key major sites such as the Victoria Square Development;
- over 2,000 new homes, approximately 27,000 sqm additional office floorspace and up to 75,000 sqm of additional retail floorspace; and
- infrastructure improvements particularly to improve public transport and cycle facilities.

3.74 Table 3.8 shows how the A3 Corridor locations deliver the sub-area priorities.

Table 3.8: A3 Corridor – Key locations and priorities

	Utilise and make best use of brownfield sites to meet needs	Protect the natural environment from harmful and inappropriate development	Ensure infrastructure upgrades are delivered to support planned growth	Increase housing supply and address affordability issues and meeting traveller accommodation needs	Maintain and improve existing strategic employment sites and establish new employment floorspace	Support the rural economy
Strategic brownfield sites	✓	✓	✓	✓	✓	
Guildford	✓	✓	✓	✓	✓	
Woking	✓	✓	✓	✓	✓	

Duty to Cooperate

3.75 The following strategic issues have been identified as important duty to cooperate issues for the A3 Corridor authorities.

- **Housing and traveller accommodation:** The West Surrey SHMA, published in September 2015, identifies an acute need for housing in the area. Woking Borough Council’s Core Strategy, adopted in October 2012, sets a housing target of 292 dwellings per annum; a figure which falls significantly short of its OAHN of 517 new homes a year. Given the provisions of paragraph 47 of the NPPF, both Guildford and Waverley are required to assess whether any of this ‘unmet need’ can be accommodated alongside their own OAHN within their boroughs. It has been recognised by the three authorities that ongoing cooperation will be required to explore how issues of unmet need are addressed across the housing market area. The September 2017 Main Modifications to the Submission Waverley Local Plan Part 1 propose that the borough’s housing target be

increased to 590 additional homes a year (this includes meeting 50% of Woking's unmet need) which will make a significant contribution to meeting the sub-area's housing needs.

- Development for employment uses: Local planning authorities are encouraged to work closely with neighbouring authorities, the county council and LEPs to prepare and maintain a robust evidence base to understand existing business needs and likely changes in the market. The three councils are confident that the boroughs of Guildford, Waverley and Woking combined form an appropriate FEA for joint working.
- Infrastructure: Much of the growth proposed in both Guildford and Waverley is dependent upon upgrades to the A3 (co-ordinated by Highways England through Road Investment Strategy 1 and 2) and cooperation with Highways England is particularly significant to the plan-making process.

4. Delivery and Monitoring

Delivery

- 4.1 Infrastructure investment is critical to unlock scheme delivery, achieve the sub-area priorities and – ultimately - deliver the LSS strategic objectives.
- Investment in transport and flooding infrastructure as well as education and health provision, is needed from service providers, relevant authorities and Government agencies.
 - Bids to, and grant funding from, Government and other organisations such as the Coast 2 Capital and Enterprise M3 Local Enterprise Partnerships will be important to delivery transport infrastructure, flood mitigation infrastructure and measures to promote economic development.
 - Use of section 106 money collected from developers, and Community Infrastructure Levy receipts will help manage the impacts of new growth and can be used as match funding to leverage in additional funding.
- Duty to cooperate beyond Surrey
- 4.2 Achieving the LSS strategic objectives will require close working between local authorities both within and beyond the Surrey county boundary. Whilst this LSS focuses on the Surrey county area, functional planning areas, and infrastructure corridors, frequently cross administrative boundaries.
- 4.3 The following relationships have been identified which cross the Surrey administrative boundaries and will therefore require joint working between authorities and bodies other than the 11 Surrey districts and boroughs and the county council:
- Housing and traveller accommodation: Strategic housing market areas cross administrative boundaries. Joint working not only within Surrey but also with authorities in Greater London (including the Mayor of London), Berkshire, Hampshire, West Sussex and Kent will be required to understand how housing and traveller accommodation development pressures can be sustainably accommodated, and to understand the more localised impacts of growth near shared boundaries on infrastructure and services.
 - Development for employment uses: FEAs cross administrative boundaries and for Surrey, both Heathrow and Gatwick on the county's border provide a particular focus for economic activity. Joint working with adjoining authorities outside Surrey (including the Mayor of London), as well as the Coast to Capital and Enterprise M3 LEPs, and (within Coast to Capital) the Gatwick Diamond will ensure that economic growth and floorspace proposals across Surrey and beyond are complementary and together meet - as far as possible - the economic growth needs of the area.
 - Retail needs: Ensuring that retail growth proposals across Surrey (and beyond) are complementary, and meet needs as far as possible whilst safeguarding the continued vitality and viability of a range of different town and local centres, will require cross boundary working with the local authorities that adjoin Surrey.
 - Transport: A number of strategic transport corridors cross Surrey, and important transport hubs sit adjacent to the County boundary.
 - Heathrow and Gatwick Airports
 - M25, M3 and M23
 - A3, A23
 - Brighton Mainline, South West Mainline, North Downs Line, Crossrail 2
 - Joint working with the Department for Transport, Highways England, Network Rail, Transport for London and public transport providers, along with adjoining county councils, will therefore be important to fully understand the pressures on strategic routes and develop technical solutions and ensure appropriate funding.

- Education health and other services: Local government administrative boundaries often do not reflect the reality of how people access services (such as schools, GPs and burial options), how healthcare is provided and how other services such as utilities are provided. It will therefore be important that the growth aspirations and plans of Surrey districts and boroughs are shared and discussed with County Councils and neighbouring authorities in their role as education providers, with Clinical Commissioning Groups and other NHS Trusts and with utilities providers.
- Green infrastructure, landscape and flooding: Landscapes and water courses do not respect administrative boundaries. Joint working between local authorities, and statutory agencies and bodies, will be vital to understand the impact of growth on these resources and secure appropriate investment, including in flood risk management measures and measures to avoid adverse impacts on the Thames Basin Heaths. Similarly joint working between local authorities will be needed to safeguard the overall coherence of the Metropolitan Green Belt.

Monitoring

4.4 The strategic objectives of the LSS will be monitored by Surrey local authorities on a regular basis using the following indicators.

4.5 Objective 1: Supporting economic prosperity. Monitoring criteria will include:

- losses and gains in employment floor space (B1a, B2 and B8 uses) – overall total and for each safeguarded employment site;
- analysis of how well losses and gains in employment floorspace relate to meeting identified needs at a district level will be carried out to provide a Surrey-wide overview; and
- sufficient land bank of permitted reserves exists to meet Surrey's current and future demand for minerals.

4.6 Objective 2: Meeting housing needs. Monitoring criteria will include:

- number of additional dwellings completed;
- number of starter homes granted planning permission/completions;
- number of custom and self build properties granted planning permission/completions;
- number of traveller pitches/plots granted planning permission/completions;
- number of affordable homes granted planning permission/completions;
- number of sheltered housing schemes and C2 care home/extra care schemes granted planning permission/completions;
- % of new homes granted on previously developed land; and

A Surrey-wide overview on how provision in each of the above categories relates to meeting assessed needs will be prepared.

Details of proposed/allocated Green Belt release sites will also be gathered.

4.7 Objective 3: Delivering Infrastructure. Monitoring criteria will include:

- annual list of pipeline strategic transport schemes correlated against the key corridors highlighted in the LSS to see if investment is being directed to the most strategically important locations;
- annual update on rail improvement schemes would need to be provided in a similar way as suggested above for road schemes;
- percentage coverage of the county with access to superfast broadband;
- number of new school places created;
- number of patients per GP-average figure on a borough by borough basis (from NHS choices);
- capacity available from permitted waste management facilities to demonstrate net self-sufficiency; and

- number of planning permissions granted for alternative development in areas safeguarded for waste-related development AND where an objection was raised by the county council.

Details of strategic healthcare and leisure schemes across the county will also be collated and reported.

4.8 Objective 4: Supporting environmental sustainability, natural resource management and conserving and enhancing the character and quality of the countryside and openness of the Green Belt .

Monitoring criteria will include:

- measuring biodiversity improvements/net gains (against positive measure implemented in the Biodiversity Opportunity Area Policy Statements);
- assessing the condition of sites and whether they are being managed positively; and
- details of planning permissions granted for mineral restoration and enhancement schemes (SCC AMR).

MEMORANDUM OF UNDERSTANDING AND TERMS OF REFERENCE FOR THE SURREY STRATEGIC PLANNING AND INFRASTRUCTURE PARTNERSHIP

The MoU and ToR set out below were agreed in principle by Surrey Leaders Group at its meeting in July 2014 and have now been formally agreed by each of the local authorities.

Memorandum of Understanding ('the Memorandum')

1. Introduction

Surrey Leaders have agreed to meet for the purposes set out in the Terms of Reference for the Surrey Strategic Planning and Infrastructure Partnership.

This Memorandum sets out the basis on which Surrey Leaders have agreed to work together for those purposes, and in particular to help meet the requirements of the Duty to Cooperate through a programme of work undertaken irrespective of plan making timetables at individual authorities.

Under section 33A of the Act (amended by section 110 of the Localism Act 2011) and in accordance with the National Planning Policy Framework (NPPF) it is a requirement under the Duty to Cooperate for local planning authorities, county councils and other named bodies to engage constructively, actively and on an on-going basis in the preparation of development plan documents and other local development documents. This is a test that local authorities need to satisfy at the Local Plan examination stage, and is an additional requirement to the test of soundness. The Duty to Cooperate applies to strategic planning issues of cross boundary significance. The Districts and Boroughs within Surrey are currently all at various stages of Local Plan preparation. However, they all have common strategic issues and as set out in the National Planning Practice Guidance (NPPG) "*local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination.*" The statutory requirements of the Duty to Cooperate are not a choice but a legal obligation. Whilst the obligation is not a duty to agree, cooperation should produce effective and deliverable policies on strategic cross boundary matters in accordance with the government policy in the NPPF, and practice guidance in the NPPG.

2. Working in partnership

The Memorandum sets out a framework for joint working between the local authorities which are represented by the Leaders of each authority who have each signed it ('the Signatories'). It sets out where cooperation will take place and identifies key outcomes. The Memorandum will be reviewed regularly to ensure it is compliant with the statutory duty and the NPPF, and is otherwise fit for purpose and up to date.

It is essential that in producing evidence and seeking to deliver outcomes Districts and Boroughs work together in an effective way. It is particularly essential that when evidence on a cross boundary basis is required by an individual District/Borough (or grouping) other Districts and Boroughs will respond positively and in a timely manner. Periodically the Signatories may agree to action to be taken to a common timeframe. The Signatories will cooperate on the basis that amended evidence bases do not invalidate existing tested plans (see NPPG paragraph 30 ref ID 3-030-20140306). Whilst this applies to housing need assessments and 5-year housing supplies it is considered that this is the main area where there is a real potential for shifts in the evidence base.

3. Evidence Base

The local authorities in Surrey have identified key strategic areas of evidence gathering and technical work that require joint working and could be subject to separate arrangements for combined working/commission. This evidence base will be set on an agreed common methodology. This includes:

- Identification of all housing need², including agreement on Housing Market Areas and agreement to prepare an up to date Strategic Housing Market Assessment.
- Economy and employment needs and opportunities
- Strategic infrastructure with strong links to work with Enterprise M3 LEP and Coast to Capital LEP on their strategic economic plans and funding bids/programmes
- Development of strategic growth options across the County (principally housing integrated with jobs and required infrastructure/services)
- Constraints such as, AONB, Special Protection Areas and Special Areas of Conservation and flooding.
- Green Belt designation

As a matter of principle before undertaking any technical studies the Districts and Boroughs will explore with other authorities where there is scope for joint studies using a common methodology.

4. Housing Market Areas

Government policy places much emphasis on housing delivery as a means for ensuring economic growth and addressing the current national shortage of housing. Consequently, it is critical at Local Plan Examinations to ensure that local authorities are exploring all possible means to meet the objectively assessed housing need in their housing market area. Paragraph 47 of NPPF is very clear that 'local planning authorities should use their evidence base to ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this framework...'. District and Boroughs are already co-operating on work in this regard and will continue to make that commitment.

There are already several Strategic Housing Market area Assessments (SHMAs) underway or completed. These would form a good basis to understand the degree of consensus from a technical point of view of Housing Market Areas (HMAs) in the County and adjoining authorities. This exercise should be completed in late 2014 once all districts and boroughs have an up to date SHMA.

5. Infrastructure

It is considered that this should be split between strategic infrastructure identified at a LEP level and local infrastructure that each authority will continue to pursue working in partnership as appropriate. The sound work done to date by Surrey Future is key and it is valuable that work has been done to map infrastructure in Surrey and collaborate with the LEPs on bidding for funding. For credibility and collaboration this will need to connect closely with existing local plans and infrastructure delivery plans. The local authorities will continue to co-operate and work in partnership on infrastructure primarily through Surrey Future.

² Housing need includes Gypsy, Traveller and Travelling Showpeople accommodation

6. Other strategic issues

The local authorities and other partners have acknowledged that there are other strategic matters that they could work in partnership to address. Paragraph 178 of the NPPF stresses that public bodies have a duty to cooperate on planning issues that cross administrative boundaries such as

- provision of retail, leisure and other commercial uses;
- the provision of health, security, community, water supply, waste management and cultural infrastructure;
- the provision of minerals and energy
- climate change mitigation and adaptation; and
- green infrastructure

Where relevant, the local authorities will work together to address these matters if it is considered beneficial to do so.

7. Working arrangements

The work set out in this Memorandum will be led on a day to day basis by the lead planning officer for each of the local authorities in Surrey through the Surrey Planning Officers Association (SPOA). SPOA will meet monthly and will liaise with the Surrey economic development officers and Planning Working Group as necessary. Work will be commissioned, where appropriate, singly, jointly or severally by the local authorities which are represented by the signatories to this Memorandum through the appropriate procurement processes of the lead authority and arrangements to finance any work commissioned will be made through a separate agreement.

SPOA will report, through the Chair, to the Surrey Chief Executives and thereafter to the Joint Leaders Board. This governance structure will be formalised and protocols put in place for reporting and for administration.

8. Limitations

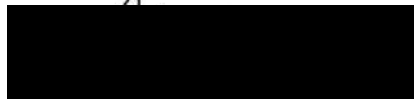
The purpose of the Memorandum is to facilitate joint working of the local authorities which are represented by the Signatories as set out in the Terms of Reference.. The Memorandum does not seek to restrict or fetter the discretion of any of the authorities in the exercise of its statutory functions and powers, or in its response to consultation or determining planning applications.

Signatories

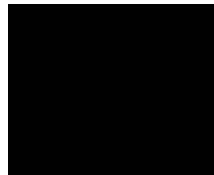


Councillor Stuart Selleck
Leader, Elmbridge Borough Council

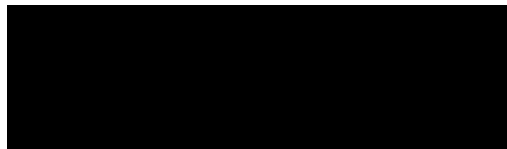
Elmbridge



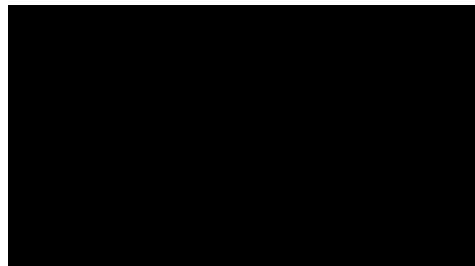
Epsom and Ewell



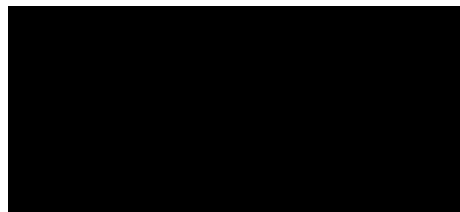
Guildford



Mole Valley



Reigate and Banstead



Runnymede

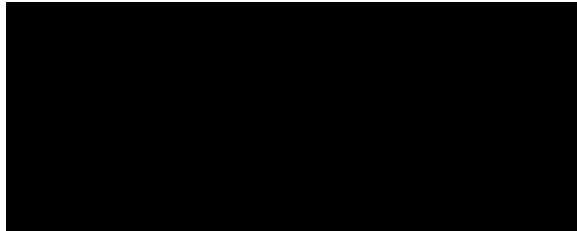


Spelthorne

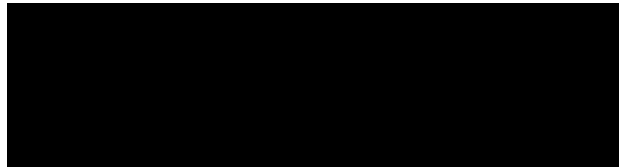
Surrey County Council



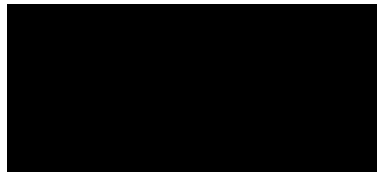
Surrey Heath



Tandridge



Waverley



Woking



SURREY STRATEGIC PLANNING AND INFRASTRUCTURE PARTNERSHIP

Terms of Reference

1. Objectives

- 1.1 The Signatories to a Memorandum of Understanding dated 5 April 2017 have agreed to meet for the purposes set out in these terms of reference to provide a vehicle for cooperation and joint working between local authorities within Surrey.
- 1.2 The Signatories will address matters relating to: (i) the Duty to Cooperate to comply with section 33A of the Planning and Compulsory Purchase Act 2004; (ii) infrastructure investment and funding streams; (iii) strategic planning interaction with Greater London and other adjoining and relevant authorities and (iv) associated planning issues that are of joint interest to the member organisations. In summary:
- To identify and co-operate on spatial planning issues that impact on more than one local planning area across Surrey; and
 - To support better integration and alignment of strategic spatial, infrastructure and investment priorities across Surrey.
- 1.3 The Signatories are acting together in accordance with their powers under sections 13, 14 and 33A of the Planning and Compulsory Purchase Act and section 1 of the Localism Act 2011 for the purposes set out above by:
- Providing a framework to evidence that the Local Authorities are working ‘constructively, actively and on an ongoing basis’ on strategic planning matters to support delivery of Local Plans which will be able to be assessed as ‘sound’.
 - Being ‘spatially specific’ where there is a strategic focus on particular areas within Surrey or overlaps with adjoining areas.
 - Providing a basis for working collaboratively with the GLA/Mayor and other authorities on the long term growth of London, particularly in relation to the next full review of the London Plan and the Mayor’s Long Term Infrastructure Plan.
 - Integrating strategic spatial, economic and infrastructure priorities for Surrey with a clear set of (agreed) objectives for delivering ‘sustainable’ prosperity in Surrey. This should build on the priorities in Surrey Future, the Strategic Economic Plans and local plans and collaboration with the LEPs and Surrey Local Nature Partnership.
 - Providing a positive voice for Surrey, setting out its case for investment and why it is important to the national economy.
 - Helping to align business/investment priorities of other key bodies, e.g. Environment Agency, transport operators and utility companies.
- 1.4 The Signatories will act to deliver cooperation across the Surrey area to maximise the effectiveness of plan making, infrastructure delivery, growth and a single strategic voice in respect of Greater London planning issues.
- 1.5 The Signatories will put in place a single agreed framework, in the form of a Memorandum of Understanding, within which the Duty to Cooperate can be undertaken on an ongoing and rolling programme irrespective of individual plan making timetables of individual authorities.
- 1.6 For the avoidance of doubt, the Signatories cannot exercise any of the functions of a planning authority or competent authorities, including setting formal planning policy or exerting control over planning decisions, nor can they fetter any decisions made by other bodies such as the LEPs.

2. Functions

2.1 The Signatories will :

- agree frameworks for working effectively at a strategic planning and infrastructure level to ensure the best and most appropriate outcomes for Surrey through the Duty to Cooperate
- act together as a vehicle for joint working, liaison and exchange of information related to the Duty to Cooperate
- agree a spatially specific strategic vision for Plan and infrastructure delivery
- retain an overview of, and monitor, the implementation of projects and plan making across Surrey and the wider area of influence.
- identify the sustainable development issues that impact on more than one local planning area and agreeing how these should be prioritised and managed (covering the whole local plan cycle from plan-making, through to delivery and monitoring)
- support better integration and alignment of strategic spatial and investment priorities in the Surrey area, ensuring that there is a clear and defined route through the statutory local planning process, where necessary

2.2 In carrying out these functions, the Signatories may, subject to the necessary procurement arrangements and authorities being put in place by the local authorities represented by them:

- act on behalf of member organisations to commission studies, surveys and reports
- provide advice to member and stakeholder organisations, including making non-binding recommendations for a course of action

2.3 Surrey Leaders may review these terms of reference at any point.

3. Meetings of the Signatories

3.1 The Signatories may invite key stakeholders to attend their meetings as may be agreed. Minutes of the outcomes of meetings will be made available to the local authorities represented by the Signatories.

3.2 Other communication regarding their activities will be agreed by the Signatories.

4. Statutory/Non-statutory Duty to Cooperate Bodies

4.1 There are a number of public bodies that are subject to the Duty to Cooperate. These are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended by The National Treatment Agency (Abolition) and the Health and Social Care Act 2012 (Consequential, Transitional and Saving Provisions) Order 2013. These bodies are currently:

- the Environment Agency
- the Historic Buildings and Monuments Commission for England (known as English Heritage)
- Natural England
- the Mayor of London
- the Civil Aviation Authority
- the Homes and Communities Agency
- each clinical commissioning group established under section 14D of the National Health Service Act 2006
- the National Health Service Commissioning Board
- the Office of Rail Regulation
- Transport for London

- each Integrated Transport Authority
 - each highway authority within the meaning of section 1 of the Highways Act 1980 (including the Secretary of State, where the Secretary of State is the highways authority)
 - the Marine Management Organisation.
- 4.2 The National Planning Practice Guidance suggests that these bodies play a key role in ensuring Local Plans are as effective as possible on strategic cross boundary matters. The Signatories will ensure, through provisions to invite stakeholders when required or through the work undertaken by the Surrey Chief Executives and SPOA, that preparation of a Local Strategic Statement has involved these statutory bodies as far as is proportionate given the policy context under consideration.
- 4.3 Local Enterprise Partnerships and Local Nature Partnerships are not subject to the requirements of the duty. But local planning authorities and the public bodies that are subject to the duty must cooperate with Local Enterprise Partnerships and Local Nature Partnerships and have regard to their activities when they are preparing their Local Plans, so long as those activities are relevant to local plan making. Local Enterprise Partnerships (LEPs) and Local Nature Partnerships (LNPs) are prescribed for this purpose in Town and Country Planning (Local Planning (England) Regulations as amended by the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012 to include Local Nature Partnerships.
- 4.4 There is existing effective working between Councils, LEPs and LNPs. In this context, the Signatories will ensure that they are aware of Strategic Economic Plans and the delivery of a strategic approach to encouraging biodiversity. The Signatories will ensure, through provisions to invite stakeholders when required or through the work undertaken by the Surrey Chief Executives and SPOA, that preparation of a Local Strategic Statement has involved these bodies as far as is proportionate given the policy context under consideration.
- 4.5 The Signatories will be advised by SPOA via the Surrey Chief Executives.

Table A1: Housing Delivery: Objectively assessed needs, Local Plan targets and completions

District/Borough	OAHN (net dpa)	Adopted Local Plan target (net dpa)	Average completions 2006/7 – 2015/16 (net dpa)	Annual completions 2015/16 (net)	Outstanding permissions (including under construction) at 31.03.2016 (net)
Elmbridge	474	225	338	240	1,197
Epsom & Ewell	418	181	257	169	465
Guildford	654	654 ¹	271	388	1,554
Mole Valley	391	188	216	158	1,002
Reigate & Banstead	620	460	541	535	1,992
Runnymede	535 ²	494 ³	216	405 ⁴	n/a
Spelthorne	757 ⁵	166	199	308	1,437
Surrey Heath	382	191	189	305	2,402
Tandridge	470	125	254	316	1,241
Waverley	507 ⁶	590 ⁶	240	343	2,579
Woking	517	292	274	360	1,770
Surrey	5,737	3,566	-	3,527	-

Position as at December 2017

¹Provisional figure – Draft Submission Local Plan: strategy and sites (December 2017)

²Represents the upper end of a range of housing need of 466 – 535 for the period 2013 – 2033. SHMA subject to review Autumn 2017

³Provisional figure – Draft Submission Local Plan (December 2017)

⁴Excludes student accommodation

⁵Represents the upper end of a range of housing need of 552 – 757 for the period 2013 – 2033. SHMA subject to review Autumn 2017

⁶Provisional figure – Main Modifications to Submission Local Plan Part 1: Strategic Policies and Sites (September 2017)

Appendix 3: Strategic Partners & Responses Received to the Regulation 18 Consultations

The following table identifies the Strategic Partners (prescribed bodies (highlighted yellow) and other organisations (highlighted blue)) and where they have responded to the Regulation 18 Consultations.

Strategic Partner	Regulation 18 Consultation	Strategic Options Consultation 2016/17	Options Consultation 2019	Creating our vision, objectives and the direction for the Development Management Policies 2020
Epsom & Ewell Borough Council		✓	✓	✓
Mole Valley District Council		✓	✓	✓
Royal Borough of Kingston upon Thames		✓	✓	✓
Runnymede Borough Council		✓	✓	
Spelthorne Borough Council		✓	✓	
Guildford Borough Council		✓		
Woking Borough Council		✓	✓	
London Borough of Richmond upon Thames		✓	✓	✓
Surrey County Council		✓	✓	✓
Greater London Authority / Transport for London		✓	✓	
English Heritage / Historic England		✓	✓	✓

Strategic Partner	Regulation 18 Consultation	Strategic Options Consultation 2016/17	Options Consultation 2019	Creating our vision, objectives and the direction for the Development Management Policies 2020
Environment Agency		✓	✓	✓
Natural England		✓	✓	
National Highways		✓	✓	
Surrey Heartlands Health				
Homes & Community Agency (Homes England)				
Affinity Water				
British Telecommunications PLC / Open Reach		✓		
Department for Education			✓	✓
Education Funding Agency				
Gardens Trust / Surrey Gardens Trust				
Heathrow Strategic Planning Group (HSPG)*				
Historic Royal Palaces			✓	
Joint Strategic Partnership Board (JSPB)*				
Local Economic Partnership (M3)				

Strategic Partner	Regulation 18 Consultation	Strategic Options Consultation 2016/17	Options Consultation 2019	Creating our vision, objectives and the direction for the Development Management Policies 2020
Local Nature Partnership (SWT)			✓	✓
Local Planning Authorities in the South East Region (response received from other LPAs)		✓	✓	✓
London Nature Partnership				
National Grid			✓	
Network Rail		✓		
Open Space Society				
Reigate & Banstead Borough Council		✓		
Royal Borough of Windsor and Maidenhead				
Royal Society for the Protection of Birds				
South Western Rail				
Southern Gas Networks				
Sport England			✓	
SSE				
Surrey Ambulance Service				

Strategic Partner	Regulation 18 Consultation	Strategic Options Consultation 2016/17	Options Consultation 2019	Creating our vision, objectives and the direction for the Development Management Policies 2020
Surrey Fire & Rescue				
Surrey Futures Board				
Surrey Heath Borough Council				
Surrey Police				
Sutton & East Surrey Water				
Tandridge District Council		✓	✓	
Thames Landscape Strategy Partnership				
Thames Water Utilities Ltd		✓	✓	
Transport for the South East				
UK Power Network				✓
Waverley Borough Council		✓	✓	

Appendix 4 - Housing Market Area (HMA) & Strategic Housing Market Assessment (SHMA) Engagement Activities

Date	Activity	Engaged	Purpose	Outcome
March 2014 – June 2018	Agreement to the preparation of a Surrey Local Strategic Statement and Memorandum of Understanding and Terms of Reference for production.	<ul style="list-style-type: none"> • Elmbridge Borough Council • Epsom & Ewell Borough Council • Guildford Borough Council • Mole Valley District Council • Reigate & Banstead Borough Council • Runnymede Borough Council • Spelthorne Borough Council • Surrey County Council • Surrey Heath Borough Council • Tandridge District Council • Waverley Borough Council • Woking Borough Council 	Following a meeting in March 2014 attended by the Leaders; Planning Chairman / Portfolio Holders; Chief Executives; and Heads of Planning from all the Surrey Boroughs and Districts and the County Council, a resolution was reached to move forward with a joint partnership and document (the Local Strategic Statement) to allow County-wide priorities and opportunities to be identified as a way to assist the delivery of strategic planning matters.	<p>In practical terms it was agreed that to achieve an effective Local Strategic Statement, work needed to be carried out by the co-operating Councils in two stages:</p> <ol style="list-style-type: none"> 1. the completion of a consistent evidence base across the County; and 2. putting the evidence base to work through the draft Statement itself. <p>The evidence base requiring collection included the preparation of a Strategic Housing Market Assessment (SHMA) and Green Belt Boundary Review.</p> <p>At a meeting of Cabinet on 19th November 2014, Elmbridge Borough Council agreed that Memorandum of Understanding and Terms of Reference for the preparation of the Surrey Local Strategic Statement. All other Surrey authorities, with the exception of Surrey Heath Borough Council and Waverley Borough Council, have agreed to sign / proceed with this work.</p>
July 2014	Informal discussions with Royal Borough of Kingston upon Thames re: possible joint working on a SHMA	<p>Led by the Royal Borough of Kingston upon Thames the following Local Authorities were engaged:</p> <ul style="list-style-type: none"> • Elmbridge (Surrey) • Epsom & Ewell (Surrey) • Merton (London) • Richmond upon Thames (London) • Sutton (London) • Wandsworth (London) 	<p>Elmbridge Borough Council was contact by the Royal Borough of Kingston upon Thames to discuss the opportunity of exploring a local sub-market Housing Market Area or Areas covering the North West Surrey / South West London area.</p> <p>The Royal Borough explained that they were in the process of contacting a number of neighbouring authorities for expressions of interest.</p>	<p>Elmbridge Borough Council responded positively stating that it was keen to explore opportunities for joint-working as it had recently undertaken an internal piece of work to identify the HMA in which the Borough was located. The results of this pointed to a Kingston-centric HMA encompassing a number of neighbouring authorities within the North Surrey / South West London areas.</p> <p>Those local authorities expressing interest in potential joint working were:</p> <ul style="list-style-type: none"> • Elmbridge; • Epsom & Ewell; • Kingston upon Thames; • Merton; and • Richmond upon Thames. <p>Both the London Boroughs of Sutton and</p>

Date	Activity	Engaged	Purpose	Outcome
				<p>Wandsworth were in the process of preparing their own SHMAs and did not express an interest in joint working.</p> <p>It was agreed that Mole Valley District Council would also be engaged due to the linkages identified by Elmbridge Borough Council through its own evidence base research.</p>
17/09/14	<p>Joint Strategy Housing Market Assessment Meeting</p> <p>Kingston Council Offices</p>	<p>Attended by:</p> <ul style="list-style-type: none"> • Elmbridge • Epsom & Ewell • Merton • Richmond upon Thames • Royal Borough of Kingston upon Thames • Surrey County Council 	<p>The aim of the meeting was to understand each local authority's Local Plan preparation positions and to discuss the opportunities for exploring the possibility of a North West Surrey / South West London HMA and subsequent SHMA.</p>	<p>It was agreed that all local authorities would benefit from further joint-working and exploring the potential to produce a joint SHMA.</p> <p>Only the London Borough of Richmond upon Thames was cautious taking this work further at this stage as they have not identified any short-term policy drivers (e.g. review of Core Strategy) to progress and expressed their desire to wait the outcome of the Further Alterations to the London Plan Examination process.</p> <p>It was agreed that the Royal Borough of Kingston upon Thames would lead on the preparation of a draft brief for tender.</p>
03/10/14	Draft Consultants Brief for Comment	<ul style="list-style-type: none"> • Elmbridge • Epsom & Ewell • Merton • Richmond upon Thames • Royal Borough of Kingston upon Thames • Surrey County Council 	<p>The draft Brief was circulated to all local authorities and the County Council providing the opportunity to suggest any amendments and to check that the brief met the requirements of the National Planning Policy Framework (NPPF).</p>	<p>With the exception of the London Borough of Richmond upon Thames, all local authorities and the County Council submitted comments that were considered and used to produce a Final Brief.</p> <p>It was at this stage in the process that officers from Richmond upon Thames had been in contact with their counterparts at the Royal Borough of Kingston upon Thames to say they no longer wished to pursue opportunities for joint-working on a HMA / SHMA.</p> <p>Their reasons being that they had not identified</p>

Date	Activity	Engaged	Purpose	Outcome
				short term policy drivers to progress and they were keen to await the outcome of the FALP Examination process. They are also keen to take account of work by other neighbouring boroughs within their housing sub-region, such as Wandsworth and Hounslow.
29/10/14	Joint meeting with other local authorities	<p>Attended by:</p> <ul style="list-style-type: none"> • Elmbridge • Epsom & Ewell • Mole Valley • Royal Borough of Kingston upon Thames <p>Apologies received from:</p> <ul style="list-style-type: none"> • Merton • Surrey County Council 	The aim of the meeting was to provide an update on Local Plan Progress and discuss the draft Consultants Brief and joint-working arrangements with regards to procurement; finance and timetables.	<p>Additional joint-working arrangements that were required to continue in the process were identified. This included a Inter Authority Agreement; Terms of Reference and Tender Evaluation Methodology.</p> <p>It was agreed that the Royal Borough of Kingston upon Thames would progress this matters and share for comment with the other local authorities involved.</p>
November 2014 onwards	Draft & Finalisation of Inter Authority Agreement, Terms of Reference and Tender Evaluation Methodology	<ul style="list-style-type: none"> • Elmbridge • Epsom & Ewell • Merton • Mole Valley • Royal Borough of Kingston upon Thames 	<p>A number of documents were drafted by the Lead Authority (Royal Borough of Kingston upon Thames) and shared amongst the group for comment and, where necessary, agreement by relevant officers / departments e.g. Head of Service & Legal.</p> <p>The documents included:</p> <ul style="list-style-type: none"> • Inter Authority Agreement. • Terms of Reference. • Tender Evaluation Methodology. <p>The documentation set out the joint working relationship and the key objectives to be achieved, mutual obligations between the authorities and the process for procurement and tender evaluation. It also includes some standard issues around confidentiality, FOI requests, dispute resolution, liability and indemnity. Following the procurement of a consultant, the Inter Authority Agreement is to be</p>	<p>Draft documents produced, circulated for comment, amended and finalised by all local authorities involved.</p> <p>Formally established joint-working arrangements permitting the continuation of the HMA / SHMA.</p>

Date	Activity	Engaged	Purpose	Outcome
			<p>replaced by a Collaboration Agreement which deals with the relationship between the Councils in terms of monitoring and managing the performance of the consultant.</p> <p>A contract between Kingston as Lead Authority and the Consultant is needed to reflect the fact that the Consultant is being appointed for and on behalf of all authorities.</p>	
28/11/14 to 22/12/14	Invitation to Tender / Quote	<ul style="list-style-type: none"> • Elmbridge • Epsom & Ewell • Merton • Mole Valley • Royal Borough of Kingston upon Thames 	Inviting submissions from suitably qualified and experienced consultants to undertake the HMA work and subsequent SHMA(s).	Submissions received and to be evaluated by the project team.
13/01/15	Evaluation Panel Meeting	<p>Attended by:</p> <ul style="list-style-type: none"> • Elmbridge • Epsom & Ewell • Merton • Mole Valley • Royal Borough of Kingston upon Thames 	The local authorities met to discuss the submissions received and produce a joint evaluation score to determine the appointment of the consultants.	A joint evaluation score was produced however, given the nature and potential complexity of the work it was considered appropriate for the potential consultants to be interviewed and allowed the opportunity to openly discuss their proposed approach and answer the questions that some local authorities had.
04/02/15	Meeting with Cobweb Consulting	<p>Attended by:</p> <ul style="list-style-type: none"> • Elmbridge • Epsom & Ewell • Merton • Mole Valley • Royal Borough of Kingston upon Thames 	<p>The aim of the meeting was to hear from the consultants regarding their tender submission and allow them to present their process for undertaking a SHMA.</p> <p>During the presentation the consultants responded to the questions that had been asked in advance by the commissioning authorities.</p>	All questions had been answered and the group was confident in appointing the consultants after the presentation.
24/02/15	Email from Lead Authority re: Merton involvement	<ul style="list-style-type: none"> • Elmbridge • Epsom & Ewell • Mole Valley • Royal Borough of Kingston upon Thames 	Position update.	An email from the Lead Authority informed Elmbridge and Epsom & Ewell Borough Councils and Mole Valley District Council that the London Borough of Merton had decided to withdraw from the group.

Date	Activity	Engaged	Purpose	Outcome
03/03/15	Collaboration Agreement	<ul style="list-style-type: none"> • Elmbridge • Epsom & Ewell • Mole Valley • Royal Borough of Kingston upon Thames 	The Collaboration Agreement is required to ensure that each local authority is aware of the terms and conditions of the project and, in particular issues relating to funding and payment; the treatment of confidential information; and the termination of the agreement.	The Collaboration Agreement was signed by an authorised officer of the remaining four local authorities.
12/03/15	Inception Meeting	<ul style="list-style-type: none"> • Elmbridge • Epsom & Ewell • Mole Valley • Royal Borough of Kingston upon Thames 	The meeting between the local authorities and consultants was the formally starting point of the project and used to finalise the brief, ensuring that the work would comply within the requirements of the NPPF.	The meeting provided a clear working framework for each of the parties involved. This included the establishment of reporting practices and a request for the base data required to commence the identification of appropriate HMA(s).
18/05/15	Draft HMA Paper Meeting	<ul style="list-style-type: none"> • Elmbridge • Epsom & Ewell • Mole Valley • Royal Borough of Kingston upon Thames 	<p>To discuss and finalise the draft HMA Paper amongst the local authorities involved and with the consultants.</p> <p>Agree arrangements for consulting on the proposed HMA as part each local authority's duty to cooperate requirements.</p> <p>To discuss future joint-working arrangements in terms of how the group is going to seek to deliver the housing numbers identified in the SHMA once completed.</p>	<p>Amendments would be made to the HMA Paper prior to consultation with other local authorities and prescribed bodies.</p> <p>The Royal Borough of Kingston upon Thames would coordinate the consultation with other partnership local authorities identifying and providing contact details for duty to cooperate partners.</p> <p>Elmbridge Borough Council would start to draft terms of reference for a partnership group that would seek to discuss and agree how the HMA / SHMA is taken forward i.e. how the housing numbers are to be delivered.</p>
05/06/15 – 19/07/15 July 2015	Housing Market Area Consultation	<p>The consultation on the proposed Housing Market Area (HMA) was led by Royal Borough of Kingston upon Thames. The Borough Councils of Elmbridge and Epsom & Ewell and Mole Valley District Council submitted contacts for those local authorities and prescribed bodies that were to be engaged.</p> <p>Those submitted by Elmbridge Borough Council were identified on the basis of the Elmbridge</p>	As an important part of the duty to cooperate, the four authorities wished to obtain the views of other local authorities, with whom housing market linkages may be present, on the conclusions drawn by the consultants over appropriate housing market area boundaries. A number of prescribed bodies such as the relevant Local Enterprise Partnerships and the Greater London Authority were also to be	<p>10 consultees responded to the proposed HMA consultation:</p> <ul style="list-style-type: none"> • Greater London Authority • Guildford • Reigate & Banstead • Richmond upon Thames • Runnymede and Spelthorne (Joint Response) • Surrey Heath

Date	Activity	Engaged	Purpose	Outcome
		<p>Local Plan: Duty to Cooperate Scoping Statement (January 2015) that had already been subject to two rounds of consultation to identify and agree relevant strategic matters to be addressed in the Elmbridge Local Plan, and those consultees that the Council need to work with.</p> <p>In many cases more than one contact at a relevant organisation was consulted e.g. three separate contacts were notified from the Greater London Authority.</p> <p>The list below is those organisations consulted. Duplicates, as explained above, have been removed.</p> <ul style="list-style-type: none"> • Coast to Capital LEP • Crawley Borough Council • Enterprise M3 • Gatwick Diamond Initiative • Greater London Authority • Guildford Borough Council • Homes and Communities Agency • Horsham District Council • London Borough of Merton • London Borough of Richmond • London Borough of Sutton • London Borough of Wandsworth • London LEP • Reigate & Banstead Borough Council • Runnymede Borough Council • South London Partnership • Spelthorne Borough Council • Surrey County Council - Strategy, Transport and Planning • Surrey Heath Borough Council • Tandridge District Council • Waverley Borough Council • West London Alliance • Woking Borough Council 	<p>engaged.</p> <p>Consultees were asked three specific questions:</p> <ol style="list-style-type: none"> 1. Do you agree with the proposed Housing Market Area? 2. If you do not agree, please explain why. Please refer to paragraph numbers where relevant. 3. If you consider changes should be made to the proposed Housing Market Area please state which areas should/should not be included and explain why. 	<ul style="list-style-type: none"> • Sutton • Tandridge • The Gatwick Diamond Initiative • Waverley <p>In summary, there were no objections to the proposed HMA, however there were a couple of queries regarding the exclusion of Richmond upon Thames, and a couple around the detailed methodology.</p> <p>Richmond upon Thames provided additional information which was subsequently included in the revised Housing Market Area Paper which highlighted that they shared a number of linkages and characteristics with the proposed HMA but also more inner London Boroughs including Wandsworth.</p> <p>The four authorities are confident with the HMA identified in that they form a coherent and self-contained HMA as identified from strong migration linkages and supported by evidence of house price patterns and commuting links.</p> <p>A SHMA will be progressed on the basis of a Kingston and North West Surrey HMA.</p>

Date	Activity	Engaged	Purpose	Outcome
August 2015	Stakeholder Interviews	<ul style="list-style-type: none"> • Crawley Borough Council • Elmbridge Borough Council • Epsom & Ewell Borough Council • Greater London Authority • Guildford Borough Council • Horsham District Council • London Borough of Merton • London Borough of Richmond upon Thames • London Borough of Sutton • London Borough of Wandsworth • Mole Valley District Council • Reigate & Banstead Borough Council • Royal Borough of Kingston upon Thames • Runnymede Borough Council • Spelthorne Borough Council • Surrey County Council • Waverley Borough Council • Woking Borough Council 	<p>An important element of the SHMA is the canvassing of views of relevant stakeholders on the current state of the housing market, possible changes in the future, and key issues around housing supply, demand and need; for both affordable and market housing.</p> <p>The consultants therefore contacted public, private and voluntary/community sector partners who may be able to contribute to the SHMA.</p>	
September 2015 – March 2016	HMA Partner Meetings & Cobweb	<ul style="list-style-type: none"> • Elmbridge Borough Council • Epsom & Ewell Borough Council • Mole Valley District Council • Royal Borough of Kingston upon Thames 	Several steering group meetings took place as well as informal discussions to agree the assumptions made within the report; the draft report; and final report.	The final report dated June 2016 was published.

Appendix 5 - Kingston & North East Surrey (Elmbridge, Epsom & Ewell and Mole Valley) Housing Marker Area – Regulation 18 Consultations and Consultations relating to the Matter of Housing Need & Provision

Elmbridge Borough Council

Local Plan Regulation 18 & 19 Consultations / Representation Period

Stage	Title	Date	Epsom & Ewell Response	Mole Valley Response	RBK Response
Regulation 18	Strategic Options Consultation	2016 / 2017	16.03.2017	28.02.2017	24.1.2017
Regulation 18	Options Consultation	Summer 2019	23.09.2019	26.09.2019	10.10.2019
Regulation 18	Creating our vision, objectives and the direction for Development Management Policies	January 2020	06.03.2020	09.03.2020	09.03.2020
Regulation 19	Draft Local Plan	June 2022	TBC	TBC	TBC

Consultation on the evidence base (insofar as exploring opportunities to address housing need)

Document	Date	Epsom & Ewell Response	Mole Valley Response	RBK Response
Land Availability Assessment Methodology (2016) Consultation	18.02.2016	None received	10.03.2016	04.03.2016
Urban Capacity Study – Method Statement Consultation	20.11.2017	Yes	None received	None received
Urban Capacity Study – Final Report Consultation	19.04.2018	27.04.2018	04.05.2018	03.05.2018
Absolute Constraints Methodology Consultation	16.07.2015	28.07.2015	29.07.2015	None received
Green Belt Boundary Review 2016 – Expression of interest for a joint study (email)	26.11.2014	Informal discussion	Informal discussion	23.12.2014
Green Belt Boundary Review 2016 – Workshop	19.05.2015	Attended	Attended	Attended
Green Belt Boundary Review 2016 – Draft Methodology Consultation	28.05.2018	11.06.2016	12.06.2016	11.06.2015
Green Belt Boundary Review 2016 – ARUP & EBC Response & Actions to the Draft Methodology Consultation (circulated)	27.07.2015	Sent to	Sent to	Sent to
Green Belt Boundary Review 2016 – Draft Local Area Parcels Consultation	08.09.2015	Not Consulted*	15.09.2015	08.09.2015
Green Belt Boundary Review 2016 – ARUP & EBC Response & Actions to the Draft Local Area Parcels Consultation (circulated)	18.12.2015	Not sent	Sent to	Sent to
Green Belt Boundary Review 2016 – Draft Report Consultation	18.12.2015	None received	15.01.2016	27.01.2016
Green Belt Boundary Review 2018 – Supplementary Work – Draft Methodology Consultation	05.12.2017	22.12.2017	None received	15.12.2017
Green Belt Boundary Review 2018 – Supplementary Work – Draft Report	November 2018	None received	None received	None received

* Not an adjoining local authority whereby it is considered that the issue under consideration would have a direct impact.

Request to meet (potential) unmet housing need – letters sent under the Duty to Cooperate

Date	Epsom & Ewell Response	Mole Valley Response	RBK Response
27.01.2020	06.03.2020	24.02.2020	Not consulted*
18.10.2021	08.03.2022	27.10.2021	01.11.2021

* The letter was sent to those LPAs in the South East Region

**Epsom & Ewell Borough Council
Local Plan Regulation 18 Consultation**

Stage	Title	Date	Elmbridge Response
Regulation 18	Partial Review of the Core Strategy Housing I&O Consultation	September 2017	23.10.2017

Consultation on the evidence base (insofar as exploring opportunities to address housing need)

Document	Date	Elmbridge Response
Green Belt Boundary Assessment – draft Methodology Consultation	October 2016	28.10.2016
Draft Strategic Housing Land Availability Assessment Methodology Consultation	February 2017	02.03.2017
Draft Duty to Cooperate Scoping Statement	May 2017	19.05.2017
Draft Constraints Study	June 2017	10.07.2017

Request to meet (potential) unmet housing need – letters sent under the Duty to Cooperate

N/A

**Mole Valley District Council
Local Plan Regulation 18 & 19 Consultation / Representation Period**

Stage	Title	Date	Elmbridge Response
Regulation 18	Future Mole Valley – Issues & Options Consultation	July 2017	11.08.2017
Regulation 18	Consultation Draft Local Plan	February 2020	23.03.2020
Regulation 19	Draft Mole Valley Local Plan 2030 – 2037, Proposed Submission Version	September 2021	04.11.2021

Consultation on the evidence base (insofar as exploring opportunities to address housing need)

N/A

Request to meet (potential) unmet housing need – letter sent under the Duty to Cooperate

Document	Date	Elmbridge Response
Formal request (letter) to assist in meeting MVDC's unmet housing need	03.03.2021	30.04.2021

Royal Borough of Kingston upon Thames

Local Plan Regulation 18 Consultation

Stage	Title	Date	Elmbridge Response
Regulation 18	Consultation on the Direction of Travel for the Royal Borough of Kingston upon Thames	24.06.2016	TBC
Regulation 18	Local Plan Early Engagement (Regulation 18) – May 2019	May 2019	24.07.2019
Regulation 18	Shaping the Future Together: Our Vision for Kingston 2021 – 2034	June 2021	30.09.2021

Consultation on the evidence base (insofar as exploring opportunities to address housing need)

Document	Date	Elmbridge Response
Green Belt and Metropolitan Open Land (MOL) Assessment Methodology	10.08.2017	01.09.2019

Request to meet (potential) unmet housing need – letters sent under the Duty to Cooperate

N/A

Appendix 6 - Elmbridge Borough Council's response to the Review of Absolute Constraints (2016), Draft Methodology Consultation

Authority / Organisation	Comments	Action
Runnymede Borough Council	<p>Firstly, with regard to the Functional Flood Plain constraint, there is some ambiguity as to whether you actually consider this to be an Absolute Constraint. The first paragraph in the table suggests that Flood Zone 3b (Functional Floodplain) is an Absolute Constraint, and we would concur with this. However, the second paragraph refers to areas within Flood Zone 3b where the existence of infrastructure or solid buildings is not defined as Functional Floodplain. Whilst not necessarily disagreeing with this, the way the last sentence of this paragraph is written suggests that Flood Zone 3b as a whole is not an Absolute Constraint for this reason, and we would disagree with that viewpoint. It may be that this is not what the paragraph is attempting to portray, and is only referring to those areas in 3b containing the existing infrastructure and/or buildings; the definition is therefore ambiguous in this respect, and some thought needs to be given to clarifying this point.</p> <p>Your other remaining Absolute Constraints relate to biodiversity, and we would agree that all those listed are Absolute Constraints. However, we are of the opinion that other environmental constraints should also be considered as Absolute. These are Ancient Woodland, SNCI, SAC, AONB, LNR, Registered Park & Garden and Scheduled Monument. The consideration of Ancient Woodland and SAC aligns with paragraph 118 of the NPPF together with SSSI and SPA, the protection of AONB is referred to in paragraph 115 of the NPPF, and the protection of Registered Parks & Gardens and Scheduled Monuments aligns with paragraph 132. SNCIs and LNRs while of local rather than national importance should nevertheless be considered inappropriate for development because of their ecological importance. Should you have any of these designations in your borough we would suggest that you consider them as Absolute Constraints.</p>	<p>Add wording to clarify that the second paragraph only relates to developed areas within the 1 in 20 year outline.</p> <p>Wording to be added to clarify that the purpose of this stage is only to consider those 'absolute' constraints that are strategic. Other constraints that are more local in nature e.g. scheduled ancient monuments, listed buildings etc., will be considered at the site assessment stage. For this reason, it is therefore not proposed to amend the list of absolute constraints to include Scheduled Ancient Monuments, Local Nature Reserves (LNR) or Sites of Nature Conservations Importance (SNCI).</p> <p>Add Ancient Woodlands and Registered Parks and Gardens into the list of absolute constraints.</p> <p>There are no Special Areas of Conservation (SAC) or Areas of Outstanding Natural Beauty (AONB) in Elmbridge and therefore it is not proposed to include these as 'absolute' constraints.</p>
Environment Agency	We agree with your assessment of the absolute constraints for Elmbridge Borough Council. We have no additional absolute constraints to suggest.	Noted.
Natural England	<p>Natural England agrees that the following areas should be considered as 'absolute' constraints:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Sites of Special Scientific Interest <input type="checkbox"/> Special Protection Areas or Ramsar Sites <input type="checkbox"/> Suitable Accessible Natural Greenspaces 	Noted
Spelthorne Borough Council	<p>The absolute constraints identified appear to be reasonable and we cannot suggest any further constraints. Development for net additional dwellings within 400m of the Thames Basin Heaths SPA is generally regarded as a constraint, however there can be exceptions to this and as such it is not considered an 'absolute' constraint.</p> <p>In terms of evaluating the separate parcels of land in the Green Belt, you could helpfully mention what you will do if a parcel is only partially affected by an absolute constraint. Whether this would necessitate splitting the parcel or evaluating further at a sites stage.</p> <p>Other than the above, we have no further comments to make.</p>	<p>Noted.</p> <p>The Council considered the inclusion of net additional dwellings within 400m of the Thames Basins Heath SPA as an absolute constraint. However, as noted by Spelthorne Borough Council there have been exceptions to this where it has been considered possible to mitigate potential impacts.</p> <p>It is envisaged that where a parcel is affected by an absolute constraint the parcel would be amended and only those parts of the parcel not affected by an absolute constraint would be taken forward to the next stage of assessment. Amend methodology to clarify approach to parcels where only partially affected by an absolute constraint.</p>
Epsom and Ewell Borough Council	We understand that this stage in the process is to identify 'absolute constraints' which would rule out any development potential in areas affected by these constraints. 'Absolute constraints' are those whose impacts cannot be mitigated and the list of 4 identified by the Council would fit this description.	Noted.

	We would welcome further consultation on the methodology which will identify the policy constraints to form the basis of the 'further assessment' of any parcels of the Green Belt which have been identified as having the potential for future development. We suggest that infrastructure considerations should form part of this.	The Council will undertake a similar consultation exercise when developing the methodology for the assessment of sites. Detailed infrastructure requirements will form part of this assessment. Once the Council has established its Objectively Assessed Housing Need, the development sites and cumulative impact on infrastructure will be considered in developing a housing target that is deliverable.
Mole Valley District Council	This is to confirm that MVDC has no objection to the list of absolute constraints identified. It is noted that other constraints will be considered as part of the site assessment process.	Noted.
Greater London Authority	The Mayor wishes to inform you that he has no comment to make on the consultation document.	Noted.
Surrey County Council	<p>You may wish to consider whether the following should also be acknowledged in your definition of 'absolute constraints':</p> <ul style="list-style-type: none"> • Within a Registered Historic Park and Garden, Grades I, II* and II • Within Ancient Woodland or within 15m buffer of Ancient Woodland • Registered Commons and Access land • Local Nature Reserves • Any greenspace designated as Local Green Space • Existing open space, sports areas • Severance, removal or modification of Public Rights of Way <p>The concept of 'absolute constraints' is a difficult concept for nature conservation sites as it does not reflect any policy or guidance at national or local level. The process of identifying those constraints highlighted in the document could place additional pressure on those constraints which are not such as Sites of Nature Conservation Importance. In some cases, Sites of Nature Conservation Importance may support priority habitats and species. In reality, there is a gradation from upper tier to lower tier nature conservation sites and there is a need to assess a particular development's impact on the features of a site in order to achieve the 'moving from a net loss of bio-diversity to achieving net gains for nature' NPPF para 9 bullet point 2.</p> <p>Overall, the review of the upper level "absolute constraints" methodology is in line with national planning and local flood risk assessments. However, the Elmbridge SFRA indicates areas that are susceptible to groundwater flooding and the Borough Council should consider this as part of more detailed assessment work. Similarly, while mineral safeguarding areas (MSAs) and existing and allocated waste sites represent constraints on development, and could potentially result in objections to proposals for non-minerals / waste related development, they are not absolute constraints but matters for the Borough Council to consider as part of further more detailed assessment work.</p> <p>On a point of detail, the table in paragraph 1.5 refers to Suitable Accessible Natural Greenspace (SANG). This should read Suitable <i>Alternative</i> Natural Green Space (SANG).</p>	<p>Wording to be added to clarify that the purpose of this stage is only to identify those 'absolute' constraints that would be considered to be strategic. Other constraints that are more local in nature e.g. Local Nature Reserves (LNRs), Local Green Space etc., will be considered at the site assessment stage. For this reason, it is therefore not proposed to amend the list of absolute constraints to include LNRs, Local Green Space, existing open space and sports areas or Public Rights of Way. In addition to not being strategic, the Council does not consider these to be absolute constraints in that mitigation can often be achieved to avoid harm or loss. With regards to open space and Local Green Space it is also important that the need for such land is balanced against whether surpluses or deficits have been identified within local areas and any potential release of Green Belt land.</p> <p>However, the Council does agree that Registered Historic Parks and Gardens and Ancient Woodland can be considered to be strategic absolute constraints and will amend the methodology accordingly. The Council does not intend to include the 15m buffer for Ancient Woodland, as this is considered to be a mitigation measure and will be taken into account at a later stage as part of the site assessment work.</p> <p>The Council also agrees that Registered Commons and Village Greens should be considered as an absolute constraint. The process for deregistering Common land is difficult with applications required to the Secretary of State and replacement land needed for all those areas over 200sqm. In terms of Village Greens, registration protects the land and makes it a criminal offence to do anything that would top the use of the land for recreation and enjoyment.</p> <p>The Council notes that the concept of 'absolute' constraints is a difficult one for nature conservation sites, however, it is important to recognise the hierarchy of such sites and that this informs the approach to assessing constraints.</p> <p>Local nature conservation sites, Local Green Space, existing open space and sports areas, groundwater flooding, Public Rights of Way, Local Nature Reserves, and Minerals Safeguarding Areas will be considered as part of detailed site assessment work in due course.</p> <p>Referring to SANG as Suitable 'Accessible' Natural Greenspace accords with Core Strategy Policy CS13: Thames Basin Heaths Special Protection Area and associated guidance within the Developer Contributions Supplementary Planning Document.</p>
Highways England	Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.	Noted.

Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN).

Having examined the documents, we do not offer any comment to this proposal.

Appendix 7 – Elmbridge Borough Council & ARUPs response to the Green Belt Boundary Review (2016), Draft Methodology Consultation

Authority / Organisation	Comments	Council / ARUP Response & Action Points
Runnymede Borough Council	<p>From a Runnymede viewpoint we agree with the content of tables 3.2, 4.1 and 4.2, although we would request that in table 3.1, the Runnymede entry in the column 'Local Plan Status' be amended as follows:</p> <p><i>"The Council's Local Plan was adopted in 2001. A new Local Plan is in preparation with policies guiding development in Runnymede up to 2035. Officers are currently compiling an evidence base."</i></p>	<p>Support noted.</p> <p>The draft Methodology will be amended to include the additional text.</p> <p>Arup Response: Change completed; Table 3.1 updated.</p>
Runnymede Borough Council	<p>Last paragraph of Section 3.3, pg 11:</p> <p><i>"The guidance recognises that Green Belt is a strategic policy and hence a strategic issue in terms of the Duty to Cooperate. Areas of Green Belt should therefore be assessed collectively by local authorities. This is important particularly for areas of Green Belt land that fall into different administrative areas, and the significance attached to that land."</i></p> <p>The LSS is important in this respect, and in the spirit of this PAS guidance Runnymede would welcome the early opportunity to see the outcome of the assessment particularly in relation to the parcels of land which abut the Runnymede boundary.</p> <p>Parcel 44 largely comprises Runnymede land, and so for this parcel particularly we would wish to have early sight of the assessment, in order to ensure consistency with the assessment of the same parcel in our own review.</p>	<p>A consistent assessment of land parcels straddling the local authority boundaries of Elmbridge and Runnymede will largely be assisted by the same consultants completing individual reviews for both authorities.</p> <p>Nevertheless, where parcels straddle local authority boundaries the Council will share the draft Review for those parcels concerned with the appropriate Council(s) prior to any wider form of consultation.</p> <p>This should allow a neighbouring authority the opportunity to check the level of consistency with their Green Belt Boundary Review. The Council will proactively work with neighbouring authorities to agree wording as far as possible. The Council is however, under no duty to amend its work.</p> <p>Arup Response: Comments noted.</p>
Runnymede Borough Council	<p>3.4.1, pg 11</p> <p><i>"This Review covers only the areas of the Green Belt falling within the administrative boundary of Elmbridge Borough Council. However, the methodology and proposed Green Belt parcels will be shared with the neighbouring and wider partner authorities and discussed at a workshop to be held on 19th May 2015. Comments received will be taken into account as the Review progresses."</i></p> <p>As indicated above, parcel 44 takes in an area within the administrative area of Runnymede, so this paragraph should be amended to reflect this situation (which may also be replicated elsewhere with other adjoining boroughs).</p>	<p>Agreed.</p> <p>The paragraph should be amended to reflect the approach being taken whereby there is no defensible boundary along the Borough Boundary and the parcels extend beyond into neighbouring boroughs / districts.</p> <p>Arup Response: Change completed; section 3.4.1 updated.</p>
London Borough of Richmond upon Thames	<p>We confirm the Green Belt context as set out in Table 3.1.</p> <p>However the Borough will be embarking on a partial review / alterations of its existing plans (i.e. Core Strategy and Development Management Plan) and that there will be a report to Cabinet in July 2015 providing more detail. It is proposed to take forward the Site Allocations Plan alongside the review of the Local Plan documents, and as such the programme for the Site Allocations Plan will need to be reviewed and aligned with CS and DMP partial review. (So the reference to adoption in autumn 2015 is incorrect).</p>	<p>Support noted.</p> <p>The Council will ensure that the text included in the draft report regarding Richmond's Local Plan position is correct and is reflective of their latest position and the information which is publically available. The Council will seek the agreement of Richmond Borough Council over the proposed text prior to publication.</p> <p>Arup Response: Comments noted. Text for inclusion within the document agreed.</p>
London Borough of Richmond upon Thames	<p>To prevent neighbouring towns merging into one another: Purpose 2 Assessment, the settlements are agreed as set out in Table 4.2. Developments in Thames Ditton should not be allowed if they harm the setting or are detrimental to the significance of the Ancient Monument, Hampton Court Palace a neighbouring historic asset across The River Thames within the Borough of Richmond upon Thames.</p>	<p>With regard to other barriers to development e.g. Ancient Monuments etc., this forms part of the next stage in setting our objectively assessed housing target and will be considered as part of the assessment of constraints and individual site assessments.</p> <p>In terms of moving forwards the Council is proposing additional consultations on other constraints to development. Richmond Borough Council will be consulted.</p>

London Borough of Richmond upon Thames	We agree the Large Built-Up Areas should include Hampton within the London Borough of Richmond upon Thames and the settlements are considered appropriate	Arup Response: Comments noted.
Greater London Authority	Thank you for consulting the Mayor of London on the Elmbridge Borough Council - Green Belt Boundary Review Methodology Consultation. The Mayor wishes to inform you that he has no comment on the consultation methodology.	Support noted.
Homes and Community Agency	Thank you for consulting with the Homes and Communities Agency in relation to the green belt boundary review methodology received on 28 th May 2015.	Comments noted.
	<p>The Homes and Community Agency are regularly consulted on the preparation of such matters. The Agency does not have any asset holdings within this area and therefore our comments and involvement is limited. However, The Agency supports the principles contained within the plan-making process in relation to the creation of successful places by increasing the supply of housing and jobs and ensuring that these meet the needs of the local community and provision of a high quality sustainable community.</p> <p>The Agency trusts that these comments are helpful, and hopes that the Local Plan progresses smoothly through to adoption.</p>	Comments noted.
Spelthorne Borough Council	Large Built-Up Areas – Purpose 1 Assessment	
	On Map 4.5 Large Built-Up Areas, it would seem logical, having added Sunbury to the defined area, to extend this to include the adjoining urban areas of Ashford and Stanwell as this forms one continuous urban area through the middle of Spelthorne.	<p>Agreed. The map will be amended to show Sunbury-upon-Thames and Ashford and Stanwell as one continuous urban area. In addition, these areas effectively form part of the 'Greater London Built-Up Area' as there is no separation between these areas. This approach will be consistent to that for Epsom & Ewell.</p> <p>Arup Response: Agreed. Table 4.1 updated to include Sunbury-on-Thames / Ashford / Stanwell as one Large Built-Up Area for Purpose 1; Map 4.5 to be updated.</p>
	It also appears inconsistent not to show the urban areas of Hounslow as part of the Greater London Built-Up Area	<p>Agreed. The map will be amended to shows all areas within London as part of the 'Greater London Built-Up Area'.</p> <p>Arup Response: Agreed. Map 4.5 to be updated.</p>
Spelthorne Borough Council	Large Built-Up Areas – Purpose 2 Assessment	
	The same comments as above apply in respect of Sunbury/Ashford/Stanwell. The whole of Shepperton should be shown, rather than just the part south of the M3.	<p>Agreed. The map will be amended to identify the extent of Shepperton.</p> <p>Arup Response: Agreed. Map 4.6 to be updated.</p>
Spelthorne Borough Council	Definitions	
	<p>The definition of “openness” given in the Glossary on page A1 seems to be contrary to the text elsewhere in the document and, in particular, Section 4.4.3. In the glossary it says that openness refers to the visible openness of the GB in terms of the absence of built development and “a topography which supports long views”. In contrast and more correctly Section 4.4.3 confirms that openness is about the lack of built development rather than landscape or topographical considerations.</p> <p>The definition of “contiguous” seems to depart from the usual dictionary definition meaning “having a common boundary” and does not appear to describe this type of land parcel very clearly. The term “Highly Contiguous” is even more confusing and does not appear to have</p>	<p>The definition set out in the Glossary will be amended to ensure that a consistent approach is taken to the assessment of “openness” in relation to Purpose 3.</p> <p>Arup Response: Change completed; definition of ‘openness’ within the Glossary updated to reflect text contained in section 4.4.3.</p> <p>The definitions will be used as part of the assessment of Purpose 1 and have been used to describe the relationship of the land parcel with the large built-up area(s) and the wider Green Belt. The term need to be considered alongside the term “connected” and “enclosed” which together provide a scoring system for Purpose 1.</p>

been used anywhere in the document.

Arup Response: Remove 'Highly contiguous' from the Glossary as this term is not used in the assessment descriptors.

Spelthorne Borough Council

Boundaries

Section 4.2.2 refers to defensible boundaries, which it is agreed, is important. However, a number of the features mentioned, particularly the River Thames, other rivers and reservoirs are important features **within** the Green Belt rather than being boundary features. Whilst being useful to define parcels it is important that the use of such features as boundaries does not preclude looking at the wider Green Belt across these boundaries. This is particularly so when considering the Green Belt across the River Thames where local authority boundaries also have to be considered.

The Council acknowledges that a number of features that have defined the boundary of a parcel are located within the Green Belt e.g. Rivers, M25 and A3. It is agreed that where such features act as the parcel boundary and it does not go beyond the Borough Boundary, this should not preclude the Review from looking at the wider Green Belt in adjoining authorities and the similar characteristics / relationship of those two areas. This element will be picked up as part of the Strategic Assessment and will be linked to the Local Assessment as set out in the methodology.

Arup Response: Agreed; no required.

I have no other comments to make on the broad methodology except that the scoring system for the Purpose 1 Assessment Criteria does seem overly complicated given the nature of the exercise.

Comments noted. ARUP will be asked to expand on the assessment criteria and provide additional explanation as to how Purpose 1 will be considered.

Arup Response: Change completed; additional text added to section 4.4.1 to explain scoring.

Epsom & Ewell Borough Council

Officers are broadly supportive of the approach taken to assess the Green Belt in Elmbridge and the methodology used.

Comments noted.

Epsom & Ewell Borough Council

As Epsom & Ewell has not undertaken a Green Belt Review we have no specific comments in relation to Table 3.1 and the approaches of other authorities

Comments noted.

Epsom & Ewell Borough Council

We agree with the definition of Large Built-Up Areas considered in the Purpose 1 Assessment in Table 4.1.

Support Noted.

Epsom & Ewell Borough Council

We agree with the definition of Settlements considered in the Purpose 2 Assessment in Table 4.2.

Support Noted.

Epsom & Ewell Borough Council

In general terms, we support the approach taken in identifying both local Green Belt land parcels and larger strategic swathes of Green Belt for assessment. Where local land parcels are assessed and scored, it is important that each parcel is also re-contextualised in terms of its strategic function, both within and beyond Elmbridge. This will aid consideration of whether or not weaker performing parcels could potentially be released from the Green Belt when recommending further investigation in any "Part 2" study.

Support Noted.

As set out in the methodology the assessment of the individual parcels will be linked back to the wider Strategic Assessment to re-contextualise them in terms of the strategic function.

Arup Response: Comments noted.

Royal Borough of Kingston upon Thames

We wish to make two specific comments, one in respect of a statement in the report, and a second in respect of a methodological query, and we also respond on the specific points where you seek agreement.

Firstly, we are unclear why the last paragraph in the Local Green Belt section highlights cross boundary areas as potentially having implications where Green Belt purposes are not met. The potential implications associated with not meeting the Green Belt criteria apply equally to all sites regardless of whether they are on the edge or in the middle of the borough. We don't understand the purpose of highlighting just the boundary areas, and request that this sentence is deleted from the report as set out below.

Last para under 4.2.2 - "It was decided that, in cases where the Elmbridge Borough boundaries do not coincide with permanent, durable boundary features, Local Areas will overlap with Green Belt in neighbouring authority areas to align with the nearest durable feature. This approach will ensure a consistent approach to the assessment

One of the key purposes of this section in the draft methodology is to highlight any potential cross-boundary issues that may occur as a result of the Green Belt Boundary Review. Whilst the draft methodology is clear in stating that the Review

of Green Belt throughout Elmbridge and take into account the strategic, cross boundary nature of the Metropolitan Green Belt. ~~In cases where Green Belt at the edge of the borough is not deemed to meet Green Belt purposes, this may have implications for its designation, not just within Elmbridge but also outside the borough.~~ However, it is important to note that this assessment will not directly influence the approaches to Green Belt in neighbouring authorities and no recommendations will ultimately be made beyond the boundaries of Elmbridge".

will not directly influence the approaches to Green Belt in neighbouring authorities, it is likely that there may be additional implications where parcels do not 'score' as well in meeting the Green Belt criteria, simply because they straddle the Borough boundary. As Green Belt is a cross-boundary strategic issue a neighbouring authority may need to consider the outcomes of the Review and how it will impact on their Local Plan preparation.

Arup Response: Agreed; no change required.

Royal Borough of Kingston upon Thames

Secondly, and referring to the methodology for Green Belt Purpose 2, we understand the scoring matrix, but are unclear what distance parameters will be used to distinguish between 'essential', 'wider' and 'less essential' gaps. The lack of clear distance parameters will make this assessment rather subjective, and could lead to inconsistencies.

As set out on page 37 of the draft methodology, the assessment of a parcel and the role it plays in providing a 'gap' will be a subjective assessment. By taking a subjective assessment the importance of each gap can be considered within the local context e.g. a gap of 1km may be more important in one area than another depending on the setting.

It is considered that the introduction of terms of measurement would introduce a rather rigid assessment that fails to take into account the importance of features that are not easily quantifiable.

Arup Response: Agreed; no change required.

Royal Borough of Kingston upon Thames

Below, we respond to your specific queries:

Table 3.1. The approaches taken by neighbouring authorities to Green Belt / Reviews of the Green Belt Boundary.

The text providing the Green Belt context for Kingston is a direct quote from the Core Strategy, which is fine. However, the Core Strategy also sets out that it is important to recognise that the Green Belt forms part of London's strategic open space network. Thus we propose amending the text to read...

640 hectares of land in the south of the borough is designated Green Belt, just over 15% of its total area. The Core Strategy DPD states that the Green Belt *forms part of London's strategic open space network, and* will continue to be protected from inappropriate development and maintain a clear urban edge to this part of south west London.

Agreed.
The paragraph should be amended to reflect the Green Belt within Kingston forming part of London's strategic open space network.

Arup Response: Change completed; Table 3.1 updated.

Royal Borough of Kingston upon Thames

Table 4.1. Large Built-Up Areas considered in Purpose 1 Assessment.

We are in agreement with the definition of the Greater London built-up area, including as it does the RB Kingston and specifically the built-up areas of Surbiton, Tolworth and Chessington (North and South), as well as the LB Richmond upon Thames and Epsom and Ewell.

Support noted.

Royal Borough of Kingston upon Thames

Table 4.2. Settlements considered in Purpose 2 Assessment.

The same comment applies to that made above in respect of Table 4.1.

Support noted.

Mole Valley District Council

Thank you for your consultation on Elmbridge BC's proposed Green Belt Boundary Review methodology. This letter is an officer-level response on behalf of Mole Valley District Council. Apologies for the slightly late response and thank you for agreeing to an extension.

There are three main points which this Council wishes to raise:

- The approach to be used where Local Areas cross the administrative boundary and include land within Mole Valley;
- Proposed amendments to the boundaries of those Local Areas which cross the

- boundary;
- The approach to classification of settlements within Mole Valley for the analysis under Purpose 1.

Local Areas including land within Mole Valley

It is noted that three of the Proposed Local Areas shown on Map 4 include land within the District of Mole Valley (Areas 3, 10 and 12). The reasons for this are understood, given that the Local Areas are defined by physical features rather than by administrative boundaries. However, the approach could give rise to some misunderstanding, since Elmbridge BC has no jurisdiction over planning policy in those areas.

Comments noted.

MVDC requests that all three areas are re-drawn with reference to alternative physical features, to minimise the inclusion of land outside Elmbridge Borough. The proposed amendments are described below and illustrated on the attached map.

See response below regarding how the actions the Council intends to take regarding the concerns expressed by Mole Valley District Council on the parcels.

As mentioned in Table 3.1, MVDC has already published a Green Belt Boundary Review (GBBR). This was subject to public consultation in January 2013 and a revised version was published in January 2014, as part of the evidence base for the proposed Housing and Traveller Sites Plan.

Comments noted.

MVDC's GBBR did not reach any conclusions about the development potential of specific locations within Mole Valley District and preparation of the Housing and Traveller Sites Plan has been terminated. Nevertheless, the GBBR is a published evidence base document which includes analysis of the performance of areas within the Green Belt close to the boundary with Elmbridge BC.

Comments noted.

MVDC asks that – where land lies within Mole Valley District – Elmbridge BC's consultants play close regard to the contents of MVDC's published Green Belt Boundary Review. This is a large file, so is not included with this letter, but a copy can be downloaded by following these links:

Where available the consultants have reviewed other Surrey and South West London Green Belt studies to ensure that, as far as possible, a consistent approach can be taken to the Review. Where parcels straddle administrative boundaries the Council will seek to ensure that particular regard is paid to the content of other studies.

GBBR for MVDC (excluding Bookham):
http://www.molevalley.gov.uk/media/pdf/s/0/Green_Belt_Boundary_Review_and_SA_-_January_2014.pdf

Arup Response: Comments noted.

GBBR Bookham supplement:
[http://www.molevalley.gov.uk/media/pdf/t/q/Green_Belt_Boundary_Review_and_SA_\(Bookham_Supplement\)_-January_2014.pdf](http://www.molevalley.gov.uk/media/pdf/t/q/Green_Belt_Boundary_Review_and_SA_(Bookham_Supplement)_-January_2014.pdf)

Should the consultants' assessment differ from MVDC's published GBBR, this Council would expect to have the opportunity to discuss this at an early stage and certainly prior to publication of any draft conclusions. A meeting with them would be welcomed when they have formed an initial view.

Furthermore, it should be made absolutely clear in any published documents that any findings about the development potential of those Local Areas which cross the Borough

The Council will share the draft Review for those parcels concerned with the appropriate Council(s) prior to any wider form of consultation. This should allow a

boundary refer *only* to land within Elmbridge's jurisdiction.

neighbouring authority the opportunity to check the level of consistency with their Green Belt Boundary Review. The Council will proactively work with neighbouring authorities to agree wording as far as possible. The Council is however, under no duty to amend its work. A meeting will be arranged if necessary.

Agreed. All versions of the Review will make clear that any further consideration of the parcels and the potential to amend the boundary will only relate to land within Elmbridge Borough.

Arup Response: Comments noted. Text already included in section 4.2.2 to which confirms that the Elmbridge GBBR '*will not directly influence the approaches to Green Belt in neighbouring authorities and no recommendations will ultimately be made beyond the boundaries of Elmbridge*'.

Boundaries of Local Areas: Proposed Amendments

The boundaries of Local Areas 3, 10 and 12 should be amended as described below and shown on the attached map.

Local Area 3: This area is almost entirely within Mole Valley. Its southern boundary appears to be defined with references to the course of the Rye Brook. However, there is another un-named watercourse around 700m north of, and parallel to, the Rye Brook, which would make an appropriate boundary. The land south of this point (including Brook Willow Farm, Patsom House and MVDC's household waste site) should be excluded.

The potential to amend the boundary of Parcel 3 will need to be checked and considered as part of the site assessments whereby the permeability / visibility of the un-named watercourse can be viewed in more detail. From the Council's GIS system this feature is not clear.

Arup Response: The proposed boundaries of Local Area 3 were considered during site visits which took place in June 2015. It was considered that the proposed boundary feature was not sufficiently permanent/defensible to justify a departure from the methodology and to be utilised as a parcel boundary. Therefore no parcel boundary change is proposed.

Local Area 10: This area would be better defined by Oaklawn Road. Although unclassified, this is a clearly defined feature on the ground. The land to the east of the road (all of which is in Mole Valley) should be excluded.

The use of unclassified roads to define boundaries has not been used elsewhere within the Borough or for parcels straddling the Borough boundary. The Council is taking a consistent approach to defining parcel boundaries. No amendment will therefore be made.

Arup Response: The proposed boundaries of Local Area 10 were considered during site visits which took place in June 2015. It was considered that the proposed boundary feature was not sufficiently permanent/defensible to justify a departure from the methodology and to be utilised as a parcel boundary. Therefore no parcel boundary change is proposed.

Local Area 12: This is an example of an area which would be better defined by reference to the administrative boundary. The land within Mole Valley is of an entirely different character to that within Elmbridge, being the low density housing at Patchesham Park. The land within Elmbridge Borough is largely wooded with almost no built development. The administrative boundary coincides with the edge of the woodland, so is discernible on the ground. Therefore the land within Mole Valley should be excluded.

As stated throughout the draft Methodology, the parcel boundaries have been identified using definable and permanent features. To ensure consistency, the varying character of the land within the parcel will generally be recorded as part of the assessment rather new parcels being introduced. Closer consideration will however, be given to making an amendment to Local Area 12 as part of the site visits.

Arup Response: The proposed boundaries of Local Area 12 were

Settlement Classification for Purpose 1

It is noted that Table 4.1 includes Leatherhead/Bookham/Fetcham as a Large Built-Up Area to be considered under Purpose 1, but excludes Ashtead. It appears that this is because only "Tier 1" settlements defined by neighbouring Local Authorities are to be included.

Leatherhead is the only Tier 1 settlement in the north of Mole Valley. Ashtead, Fetcham and Bookham are all Tier 2 settlements.

Footnote 26 includes the statement that "Leatherhead, Bookham and Fetcham are considered as one urban area in the assessment as these settlements have already coalesced." MVDC disagrees that the degree of coalescence between Leatherhead and Fetcham is materially different from that between Leatherhead and Ashtead.

Leatherhead and Fetcham are separated by the River Mole and its floodplain and the Leatherhead/Guildford railway line and its embankment. Leatherhead and Ashtead are separated by the M25 and A24 corridor. The distances are similar. In both cases, there is existing built up development right up to the settlement boundary. All four settlements have their own clear identity.

It is submitted that the definition of Tier 1 and Tier 2 settlements is not the appropriate classification for purposes of a Green Belt review. This definition takes into account factors such as the range of local services and public transport options, which are not directly relevant. It would be more appropriate to define "Large Built Up Areas" in terms of population and/or land coverage. In this respect, it is noted that Ashtead has a very similar population to Chertsey and Addlestone (which are included) and covers a larger amount of land than either of those settlements.

Finally, the relationship between Ashtead and settlements in Elmbridge is remarkably similar to that of Bookham and Fetcham. All three settlements include areas of suburban housing, with expanses of wooded Common to the north. The distance between Bookham/Fetcham and Cobham/Stoke d'Abernon is also very similar to that between Ashtead and Oxshott.

For all the above reasons, MVDC requests that the whole of the built up area including Leatherhead, Ashtead, Bookham and Fetcham is included in the analysis under Purpose 1. This will help to ensure that the function of the Green Belt separating these areas from Cobham and Oxshott is properly considered.

considered during site visits which took place in June 2015. It was considered that the proposed boundary feature was sufficiently permanent and defensible to amend the parcel boundary. Map updated.

For the reasons set out in the response relating to Ashtead and the related settlements in Mole Valley / Elmbridge, the Council will include Ashtead within Table 4.1.

Arup Response: At a high level, Arup disagree that the settlement hierarchy is not an appropriate tool to define settlements for the Purpose 1 assessment. We also note that MVBC describe the purpose of the Green Belt in separating settlements in relation to Purpose 1, but would wish to clarify that Purpose 1 is linked to the concept of sprawl, not coalescence. But, we agree that an exception should be made for Ashtead based on the reasons set out here. Table amended in the Methodology. Map updated.

Guildford Borough Council

Thank you for inviting us to your workshop and consulting us on your forthcoming Green Belt review. Please find below our comments to your proposed methodology, some of which we previously raised at the workshop. I have set out the page/section number to which each comment refers. Where you include text related directly to Guildford I have proposed some wording changes shown as strikethrough, with word additions in red.

On page 12

Guildford Borough Council's review sub-divided land ~~into parcels based on visible features, in terms of natural boundaries.~~ **These parcels were assessed for their contribution to the four main Green Belt purposes. The study consists of a number of volumes which, using environmental capacity and sustainability analysis, identified a range of potential**

Agreed. The draft Methodology will be amended to include the text suggested by Guildford Borough Council.

Arup Response: Change completed.

development areas based on different spatial strategies. This includes strategic sites around the urban areas, small and major expansion around the villages and a new settlement. The study also looked at inseting of villages, major previously developed sites and traveller sites. ~~The sustainability credentials of the land and the environmental capacity of the land were then considered. The study then recommended which parcels of land were suitable for release.~~

Guildford Borough Council

Page 16

The current Local Plan for Guildford was adopted in 2003. Consultation on a new **draft** Local Plan ran from July to ~~October~~ **September** 2014. The Council is in the process of updating the Local Development Scheme.

Agreed.
The suggested text will be amended within the draft Methodology.

Arup Response: Change completed.

Guildford Borough Council

Page 16

~~Outside of the main urban areas, most of the District is designated as Metropolitan Green Belt. The borough consists of 89 per cent Green Belt, the remaining consisting of the urban areas of Guildford, Ash and Tongham with a small proportion of Countryside beyond the Green Belt in the west. Most new development is encouraged to take place in urban areas. The University of Surrey's need to expand is supported in the The 2003 Local Plan which proposes the~~ **included the** removal of Manor-Farm **at the University of Surrey** from the Green Belt.

Agreed.
The suggested text will be amended within the draft Methodology.

Arup Response: Change completed.

Guildford Borough Council

Page 16

Guildford Borough Greenbelt and Countryside Study 2013 (**Volume I, Volume II, Volume II addendum, Volume III, Volume IV, Volume V, Volume VI**).

Agreed.
The suggested text will be amended within the draft Methodology.

Arup Response: Change completed.

Guildford Borough Council

Page 16

Stage 1 involved the compartmentalisation and sub-division of land into separate land parcels with boundaries of each parcel being clearly demarcated by visible landscape features.

Agreed.
The suggested text will be amended within the draft Methodology.

Arup Response: Change completed.

Stage 2 involved a score of zero or one against each of the following four Green Belt purposes as set out in the NPPF:

1. Safeguarding the countryside from encroachment.
2. Prevent towns merging.
3. Restrict sprawl of urban areas.
4. Preserve setting and character of historic towns.

Stage 3 involved assessing the environmental capacity of land surrounding the urban areas and villages to determine whether it may be appropriate to identify a potential development area.

Stage 4 involved assessing the sustainability credentials of potential development areas identified within Stage 3.

The Study also assessed whether a new settlement at Wisley airfield might be appropriate in Green Belt terms, and whether it would be appropriate to inset some villages, major

previously developed sites and traveller sites. The study findings recommended a range of potential development areas that will be considered further through the Local Plan process.

Guildford Borough Council

4.2.2

We note the features used to identify Local Areas and that there was a second process of looking at additional features such as hedgerows to sub-divide land parcels further where appropriate. We consider it important that land parcels are physically and visually contained where possible, as this ensures that the Green Belt score given is applicable to the whole, if not the majority, of the land parcel.

We also note that the assessment will look wider than Elmbridge's administrative boundary to take account of the cross boundary function that Green Belt serves. We would draw your attention to our [Green Belt and Countryside Study \(GBCS\)](#) that has identified six land parcels in the area of Guildford that you are currently proposing to assess as one (including in addition to this land in Elmbridge). Volume II addendum of the GBCS, which was prepared in April 2014 (and refined the way in which two of the Green Belt purposes were interpreted), includes a comprehensive summary of all the land parcel scores. In relation to the area of land in Guildford (land parcels C16 – C19, C21 and C22), the scores vary from 1 to 3 out of a possible maximum of 4. This demonstrates the extent to which the demarcation of land parcels can impact on whether land in Elmbridge is taken forward for further assessment of its development potential (discussed further below).

As set out in the draft Methodology the Council will be using physical features that are readily recognisable to define the parcel boundaries. It is not proposed to use hedgerows / tree belts to define parcel boundaries from the outset. However, during the site visits it may become apparent that parcels can be subdivided based on such features as they are sufficiently defensible. If this were the case, this will be identified and a potential new boundary identified.

Arup Response: The proposed boundaries of Local Area 1 were considered during site visits which took place in June 2015. It was considered that Old Lane was a sufficiently significant, permanent and defensible feature to amend the parcel boundary. However, it was not proposed to undertake any further sub-division of the parcel on the basis of hedgerows or field boundaries. Map updated.

Guildford Borough Council

4.4

This paragraph indicates that all land scoring highly against one or more of the purposes assessed will not be taken forward in the potential site identification process (Part 2). Our understanding following the workshop was that the scoring of Local Areas would be used as part of the site selection process but would not serve as an absolute showstopper in the identification of possible sites. This would acknowledge the fact that the overall function of a Local Area parcel would not necessarily be compromised by the potential development of a smaller area within it (discussed further below).

The Council has reviewed its approach to the assessment and how the process will move forwards following the Green Belt Boundary Review. As set out in the draft methodology, it was originally proposed that those parcels that strongly met the Green Belt purposes would not be considered against the absolute (e.g. Flood Zone 3b) and other constraints (e.g. conservation areas).

However, in light of the High Court decision for Calverton Parish Council vs. Nottingham City Council (21/04/15), the Council has reviewed its approach. Paragraph 42 of the decision states:

"... The issue in Solihull was whether the land could be allocated to Green Belt: in other words, the point was addition, not subtraction. The mere fact that a particular parcel of land happens to be unsuitable for housing development cannot be a Green Belt boundary reason for expanding the boundary. In the case where the issue is the converse, i.e. subtraction, the fact that Green Belt reasons may continue to exist cannot preclude the existence of countervailing exceptional circumstance – otherwise, it would be close to impossible to revise the boundary. These circumstances, if found to exist, must be logically capable of trumping the purposes of the Green Belt; but whether they should not in any given case must depend on the correct identification of the circumstances said to be exceptional, and the strength of the Green Belt purposes".

In light of this decision all parcels, regardless of the extent to which they meet the purposes of the Green Belt, will be considered against the absolute and other constraints. It will then be for the Council to decide based on all the evidence whether there are sufficient exceptional circumstances to justify any amendments when considered against the strength of the Green Belt.

This revised approach will also address Guildford Borough Council's concern, and highlight if any smaller sections of land could be considered further without

compromising the function of the wider parcel.

Arup Response: Arup are in agreement with this approach – text added to the methodology and discussed at meeting with EBC on 29/06/15.

Guildford Borough Council

4.4.1 Purpose 1

We support the way in which Purpose 1 is being interpreted. We note that you propose to assess this using Guildford, and the Ash and Tongham urban area (as our first tier settlements). Close to the Elmbridge border is East Horsley. Whilst not an urban area, it is classified as the only village ranked as a Rural Service Centre and therefore may be useful to include as part of your assessment. In addition to this, you will be aware of the potential new settlement at the former Wisley airfield, which abuts the administrative boundary. Whilst this would require an amendment of Green Belt boundaries through our emerging Local Plan in order to be delivered, it has nonetheless been identified in the draft Local Plan that we consulted on in Summer 2014. Given that your study will not be making any decisions, it may be prudent to acknowledge the possibility of this site coming forward, and assess the implications this may have on the Green Belt in the wider area.

In defining the extent of the potential new settlement, the GBCS did consider land extending into Elmbridge. Whilst it concluded that the features following the administrative boundary were an appropriate and defensible Green Belt boundary, we look forward to continuing the discussions related to establishing an appropriate green belt boundary in this area.

We note you state under *Assessment 1(b)* that a tree line is considered to be a soft boundary, lacking in durability. Our GBCS has considered woodlands, hedgerows and trees belts to all meet the tests in the NPPF as they are readily recognisable and are likely to be permanent features given the age of these features.

As set out in the draft methodology, the Council is interested in potential releases of Green Belt land outside of Elmbridge Borough that may impact on settlement patterns and the role of the wider Metropolitan Green Belt. Consideration therefore needs to be given to the emerging Guildford Local Plan and the potential new settlement at the former Wisley airfield and for East Horsley to be 'inset' from the Green Belt.

As the Guildford Local Plan is still at draft stage the level of weight that can be given to the proposals, and the likelihood of them occurring, needs to be carefully considered.

With regard to East Horsley being made 'inset' from the Green Belt, this has been suggested in Volume IV of Guildford Green Belt & Countryside Study, and has been taken forward as a proposal in the draft Guildford Local Plan. It is evidenced that this approach is in accordance with paragraph 86 of the NPPF:

"If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt".

In light of the above, it is considered that there is sufficient evidence to identify East Horsley as a 'settlement' for the consideration of Purpose 2 (Table 4.2 of the draft Methodology).

With regard to a new settlement at the former Wisley airfield, this is a more complex situation. The proposal is included within the draft Guildford Local Plan and an outline application for the development of the site has already been submitted (Ref: 15/P/00012). The application is due to be determined by 7th August 2015.

Located within the Green Belt the proposal is for up to 2,100 dwellings incorporating up to 100 sheltered accommodation units and associated infrastructure including accesses onto the A3 (Ockham Interchange), Ockham Lane and Old Lane and revised access to Elm Corner, a primary school, community provision, nursery provision, health facility, a local centre (incorporating food & drink, retail, a visitor centre and offices), employment area, 8 travellers pitches, sports and recreational facilities (incorporating a floodlit sports pitch and pavilion). Sustainable Drainage Systems and an area of Suitable Alternative Natural Greenspace (SANG) incorporating a landform feature and car parking. The erection of associated utilities infrastructure.

Given the scale of the proposal and its location within Parcel 1 of the Elmbridge Green Belt Boundary Review Local Assessment, the allocation / development of the site would significantly impact on how this area is assessed and is considered to meet the purposes of Green Belt.

Nevertheless, the likelihood of the site being allocated for development / permitted planning permission is untested and given the significant nature of proposal any judgement would be premature.

In this instance consideration has been given to undertaking a number of assessments for Parcel 1. This would include an assessment of the parcel 'as is' i.e. without any form of development having taken place. Other potential assessments could include the development of the site under the Local Plans process e.g. removed from the Green Belt and identified as a Large Built up Area for Purpose 1 or, the development of the site within the Green Belt under the Development Management / very special circumstances process.

These options were discussed at a meeting with Arup on 29th June 2015. During the meeting it was considered that the amendment to Parcel 1 following the site visits deemed multiple assessments unnecessary. How the Review will take into account the potential development of Wisley Airfield is set out below.

Arup Response: The situation regarding Wisley Airfield is noted by Arup and was discussed in detail at the meeting with EBC on 29/06/15. Given the proposed amendment to the boundaries of Local Area 1 (as discussed previously), which excludes the Wisley site from the parcel, it was no longer deemed necessary to undertake a with/without assessment. Commentary will be added in individual pro-formas, commenting specifically on the potential impact of Wisley on scores and the possible need to amend these in light of the development coming forward.

Elmbridge Borough Council is happy to continue discussions with Guildford Borough Council about the exact boundary of the Green Belt within this area, as respective evidence bases and local plans progress.

The Council acknowledges that within the Guildford Green Belt & Countryside Study that woodlands, hedgerows and trees belts are all considered to meet the tests in the NPPF as they are readily recognisable and are likely to be permanent features given the age of these features. Nevertheless, having reviewed these features located along the boundary of the two Boroughs and their rather sporadic / sparse nature in some areas, the Council remains of the opinion that its identification of Parcel 1 is correct within this area subject to the southern boundary of the parcel along Old Lane.

Guildford Borough Council	<u>4.4.2 Purpose 2</u>	We support the way in which Purpose 2 is being interpreted. As above, we consider it may be prudent for the study to assess East Horsley (as it is recommended within Volume IV of GBCS to be inset from the Green Belt) and the potential new settlement at Wisley airfield (which would, if allocated, need to be removed from the Green Belt).	Comment noted. The Council's response to this comment has been is set out above.
Guildford Borough Council	<u>4.4.3 Purpose 3</u>	We support the way in which Purpose 3 is being interpreted.	Support noted.
Guildford Borough Council	<u>4.4.4 Purpose 4</u>	We note you are not proposing to assess land parcels according to this purpose as it is not considered applicable to Elmbridge. Our GBCS has taken a slightly wider interpretation of this purpose and look at the historic setting of settlements. We acknowledge that this goes further than the wording of the NPPF. However given the GBCS did not apply the Green	Comments noted. The Council is aware of the approach taken by Guildford Borough Council in regard to Purpose 4 and the consideration of the historic setting of settlements.

Belt purpose scoring as an absolute showstopper we do not consider that this has unduly served to restrict the subsequent potential site identification process in any way.

As set out in the draft Methodology the Council is taking a stringent approach to its Green Belt Boundary Review and is not seeking to widen the parameters of the assessment. Rather, the potential impact of the development of a parcel / site on the wider area and on other policy designations will be considered as another stage within the wider process of formulating an objectively assessed housing requirement (see Attachment 1).

Guildford Borough Council	<u>4.4.5 Purpose 5</u>	We support the exclusion of this purpose from the assessment given it is applicable to all Green Belt.	Support noted.
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Guildford Borough Council	<u>4.5 Recommendations</u>	We note in this section that the methodology proposes to identify small-scale sub-areas, which might be less sensitive and thus able to accommodate change, and could be taken forward in Part 2. This is re-assuring given our comments above. We would suggest the additional wording is included at Section 4.4 to avoid confusion.	Agreed. Section 4.4 will be amended to reflect the approach take to further assessing the parcels of land against the absolute and other constraints. Arup Response: Amended to ensure consistency with comment GBBR - 32.
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Tandridge District Council	Tandridge District Council would like to thank Elmbridge Borough Council for providing the opportunity to comment on the Elmbridge Green Belt Boundary Review Methodology and for the invitation to the workshop that was held on 19 th May 2015. TDC have the following comments to make: <u>General</u> The methodology is very comprehensive and detailed. However, TDC believe that the title of the document is misleading. Page 43 of the methodology clearly identifies that there will be a 'Part 2' which is likely to <i>'comprise the identification and consideration of the development potential of any Local Areas identified during Part 1 of the Green Belt Boundary Review'</i> . This may be a more appropriate title for the document at this stage. However, it may also be more appropriate to refer to the document as Part 1 for clarity. TDC also think that a change in the name of the document would reaffirm the purpose of the methodology at this stage, which is believed to not consider reviewing the Green Belt boundaries but to gain an understanding of the role and function the Green Belt in Elmbridge performs.	Comments noted. The introduction and section 3.2 of the methodology provides an overview of how the Green Belt Boundary Review and other piece of evidence base preparation fit together. Attachment 1 to this document should also provide additional context to this work. It is the Council's intention to remove reference to 'Part 2' to avoid confusion. Arup Response: Part 2 references removed and further context text from EBC included (see comment 43).
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Tandridge District Council	<u>History</u>	The history chapter in the methodology is very clear and sets out a detailed description of the history for the Green Belt both nationally and locally.	Comments noted.
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Tandridge District Council	<u>Paragraph 3.1.4 Legal Cases</u>	TDC recognise the importance of legal cases and believe that the Solihull case is of relevant. However, there has been a more recent case, Calverton Parish Council vs. Nottingham City Council. This case considers the review of Green Belt boundaries in a Local Plan and exceptional circumstances. As such, it may be helpful to reference this particular case.	Agreed. The Council has considered the Calverton Parish Council vs. Nottingham City Council (21/04/15) case and in light of this has reviewed its approach to the assessment and how the process will move forwards following the Green Belt Boundary Review. As set out in the draft methodology, it was originally proposed that those parcels that strongly met the Green Belt purposes would not be considered against the absolute (e.g. Flood Zone 3b) and other constraints (e.g. conservation areas). The Council now intends to amend its approach so that all parcels, regardless of the extent to which they meet the purposes of the Green Belt, will be considered
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against the absolute and other constraints. It will then be for the Council to decide based on all the evidence whether there are sufficient exceptional circumstances to justify any amendments having weighed this against the strength of the Green Belt.

Arup Response: Agreed, see comment 32.

Tandridge District Council

Section 3.3 Other Context

TDC recognise that this section relates to the Planning Advisory Service (PAS) guidance on Green Belt Assessment. However, the reference date is January 2014. There is an updated PAS advice note on Green Belt dated February 2015. As such, TDC would question whether this section of the methodology should be updated.

Agreed.

The Council will review the draft Methodology in light of the updated PAS Guidance to see if this alters the intended approach of the assessment in anyway.

Arup Response: Arup have reviewed the updated PAS guidance and are satisfied that our methodological approach remains consistent with this. The only substantive change was specifically in relation to how Councils utilise the results of Green Belt Reviews and, in reference to the recent Cheshire East case, suggested that a more sequential approach to releasing Green Belt land for development should be adopted. No change suggested.

Tandridge District Council

Section 3.4 Green Belt Experience

The third paragraph in this section states "It is important to understand how each of the neighbouring local authorities, as well as other authorities in Surrey, are approaching Green Belt issues and the methodology employed in any Green Belt Boundary Review they have undertaken." TDC recognise that all of the Surrey authorities have undertaken an assessment of the Green Belt in their areas slightly differently and for different purposes. TDC feel this should be expressed in this section for clarity. For example, TDC are to carry out a Green Belt Assessment that will assess the Green Belt in Tandridge against the purposes of the Green Belt set out in the framework. However, it will not review the Green Belt boundaries and therefore feel that this sentence in the Elmbridge methodology is misleading. TDC suggest that a footnote is added to this sentence to provide clarity.

Comments noted / agreed.

As part of the draft Methodology a number of other local authorities' Green Belt Studies have been reviewed. The Council is aware that for certain purposes the approaches taken have varied and that the title of those assessments also differs. The approach to the Green Belt Studies being undertaken by Elmbridge Borough Council and Tandridge District Council is however, the same. Both are assessing land within the Green Belt against the purposes as set out in the NPPF.

From the Council's perspective this will work and other pieces of evidence base collection will ultimately lead to a decision regarding the appropriateness of the existing Green Belt boundary and whether any amendments should be made.

However, as pointed out by Tandridge District Council, the decision as to whether or not to amend the boundary will not be made in isolation and as part of this study. In light of this comment and others submitted, the Council intends to include additional text in later Reports to reflect the wider process in which the Green Belt Boundary Review sits (see Attachment 1). This point will therefore be clarified.

Arup Response: Noted and additional text from EBC to be included in the draft report.

Tandridge District Council

Section 3.5 Implications for the Review

TDC agree that the implied emphasis is on each authority to develop a methodology which is appropriate to the local context and is the most effective way to carry out an assessment on the Green Belt.

Comments noted.

TDC are surprised that sprawl and encroachment are not considered under the section on key definitions. Both of these key terms can be interpreted in a number of ways and TDC feel for clarity it would be helpful to see them discussed in this section.

Section 3.4 – 3.5 pulls together evidence from national policy; other Green Belt Assessments; and the experience of the consultants, and how this has been reflected in the Elmbridge Green Belt Boundary Review.

The third bullet point considers 'countryside'. It specifically states "countryside to mean any open land...this interpretation is not appropriate in areas which are entirely semi urban, where Green Belt may have been applied to areas which are open but not genuinely of a 'countryside' character." TDC are not sure what 'countryside' character

The purposes of the key definitions are to identify that there has been a debate / consideration given to these terms when forming the approach to be taken to the assessment. It is not the purpose of this section to set out exactly how each Purpose will be interpreted. Rather this is set out under the appropriate Purposes

is, seeing as the paragraph is intended to define countryside and its character. Further, TDC believe that this section does still not make it entirely clear how countryside is being defined for the purposes of this Green Belt Boundary Review.

in the Local Green Belt Area Assessment (section 4.4). Here both the interpretation of 'sprawl' and 'encroachment' is explained.

Whilst the Council does not wish to unnecessary duplicate sections of the draft Methodology, it is agreed that if other key definitions such as 'sprawl' and 'encroachment' emerged through the same manner this should be reflected.

Arup Response: At this point in the methodology, a selection of terms that we felt to be particularly key to the assessment were defined. This section was not designed to be completely exhaustive. However, we note that sprawl is of particular consequence and have thus expanded our commentary to describe how its definition evolved. But, with regards to Purpose 3, we felt that the definition of countryside, as opposed to encroachment, was a factor which varied so significantly between Green Belt reviews that it warranted particular focus. As set out by EBC, a definition of encroachment is provided later in the methodology section.

Tandridge District Council

Figure 4.1

Figure 4.1 is quite confusing. The figure is named 'methodology overview' but it would appear to merge the methodology with the assessment and therefore it is unclear how both are to be prepared. For example, it is unclear how the stakeholder engagement will / has been used to make any necessary amendments to the methodology. Further, it is unclear what the recommendations are for; is this to identify further areas for study, to recommend policy considerations or to recommend the next steps?

Comments noted.

The purpose of Figure 4.1 is to provide an overview of the approach being taken to the assessment of land within the Green Belt and how this will follow through to the recommendations. To better reflect this, it is agreed that the title should be amended to 'Assessment Overview' as it reflects this process.

A section will be added into the draft Review to summarise the engagement with other neighbouring authorities and prescribed bodies that has taken place as part of forming the draft Methodology. The Council's proposed actions to the responses received to the consultation will also be circulated.

The recommendations / purpose of the Green Belt Boundary Review are set out in Section 4.5 of the draft Methodology. These may however, be amended in response to the comments raised as part of the consultation.

Arup Response: Noted. Title of figure updated.

Tandridge District Council

Section 4.4.2 Local Green Belt Areas (Local Areas)

The fourth paragraph recognises that in some cases when dividing the Green Belt into parcels for assessment, definitive boundaries run parallel to one another and that those features were taken together to form one boundary. However, TDC are unclear which boundary would have been chosen over another.

Comments noted.

Across the Borough there are some instances where potential boundaries are conterminous. In cases such as this it is not considered necessary to identify which feature is a preference.

The fifth paragraph explains how parcels have been overlapped with neighbouring authority area to align with the nearest durable feature. Whilst, this decision does not have a direct impact on TDC as it does not neighbour Elmbridge Borough, it has an indirect impact. As mentioned earlier, there are a number of assessments on Green Belt being carried out by Surrey authorities and it would be helpful if the methodologies could align as closely as possible whilst still taking account of local context. TDC believe that the Green Belt methodology should consider the role the Green Belt in Elmbridge Borough across its administrative boundaries. However, TDC do not feel it is appropriate for the parcels to be drawn outside the administrative boundaries and instead should consider how the parcel within the administrative boundaries has an impact on the wider area. For example, consideration should be given to the merging of

Green Belt is a strategic designation and in accordance with the NPPF it is considered appropriate to parcel areas of land for assessment using definable boundaries. Borough boundaries are purely administrative and often do not follow clear / visible physical features on the ground whereby an appropriate parcel boundary can be easily drawn.

The Council does not intend to amend its approach.

Arup Response: Noted.

settlements over the administrative boundaries. However, this does not require a parcel to be drawn outside the administrative boundaries to consider this.

Tandridge District Council

Map 4.4 Proposed Local Areas for Local Assessment

TDC would question the size of some of the parcels. There are some very very small parcels compared to much larger size parcels. TDC believe it would be more pragmatic to merge some of the smaller parcels together, for example, 40 and 41. It is also likely to produce disproportionate outcomes.

Comments noted.

As set out in the draft Methodology, the parcels have been drawn along likely permanent and defensible boundaries, even where the land either side is often very similar in form and function. The methodology needs to be consistent and so whilst it may be logical to group some smaller parcels and ignore some physical features, this will require additional analysis and increase the level of judgement required. Any movements away from the draft Methodology would require the Council to strongly justify each decision made and is likely to increase the opportunity to challenge the Green Belt Boundary Review e.g. why has the Council made a division here but not there, has this been done to skew the outcome of the assessment?

Arup Response: Noted. Specific parcel amendments beyond the 'base' methodology have been considered during site visits in June 2015 and discussed with EBC. Justification will be provided for these amendments and circulated with proposed responses to consultation comments received.

Tandridge District Council

Section 4.4 – Local Green Belt Assessment

The last sentence in the fourth paragraph states that "...a Local Area fulfilling the criteria weakly across all purposes will be deemed to be weaker Green Belt..." TDC question what constitutes 'weakly'. Is this score 1 and 2 as set out in figure 4.2? TDC would like clarity on this section. For example, if a parcel scores a 1 or 2 for all three purposes out of the five (set out in the NPPF) being assessed, then it is termed 'weaker Green Belt'?

TDC are also unclear how the criteria set out under section 4.4.1 for each purpose relates to the criterion scores set out in figure 4.2. Purpose 1 for example sets out a different scoring system in the table 'Purpose 1 Assessment criteria'.

Comments noted.

As set out in Figure 4.2 Criterion Scores, the overall strength of a Local Area against the Purposes will be considered on a sliding scale of 1-5. The figure identifies that those parcel that overall have a strength rating of 1 or 2 are considered to be 'weak or very weak' (score 1) or 'relatively weak' (score 2). Whilst there will be a degree of flexibility in the scoring for example, if a parcel scored highly against a purpose but not in others, generally those that are rated a 1 or 2 overall will be considered as 'weaker' Green Belt.

Arup Response: Additional text to confirm, with specific reference to scores, where more where areas would be deemed weak or strong overall.

Tandridge District Council

Within the text for purpose 1 there are a few terms that TDC would like clarified:

- Sprawl is defined as 'the outward spread of a large built-up area at its periphery in an untidy or irregular way'. What is meant by untidy?
- requires the assessment to consider the 'nature of the containment'. How is containment being defined, for example does this relate to the physical containment of land use rather than social containment?
- requires the assessor to consider whether there is a 'consistent boundary'. However, it is unclear what the boundary has to be consistent with?

Comments noted.

In the consideration of all parcels a level of judgement will need to be made in terms of how each area meets the criterion of each Purpose. The scores and the associated criteria act as a guide for the assessor.

Untidy will generally be considered to be development at the edge of a large built up area which is dispersed / sporadic and does not appear to be in uniform with development within the large built up area.

As set out in section 4.4.1 of the report, 'containment' will be considered in terms of the built-form e.g. the physical containment of a parcel which might be enclosed by the built-up area on a number of boundaries.

In regard to the last bullet point this should be considered in regard to the assessment criteria set out for Purpose 1 on page 35 of the draft Methodology. The assessor will be looking at whether the boundary features are prominent, permanent and consistent. In terms of consistent this will be whether the feature

remains along the boundary or whether other features appear or if the boundary feature becomes sporadic in parts.

Arup Response: Minor changes made to text to make these definitions tighter, including slight modification of sprawl definition. Arup feels that the 'untidy' reference (now referred to as sporadic or dispersed) reflects the fact that the outward growth of a Large Built Up Area may not be sprawl dependant on the shape of the settlement and the degree to which it is well contained/planned (consistent with the PAS Guidance or Woking Green Belt Review).

Agree that sufficient detail is already provided on the last bullet point. No changed proposed.

Comments noted.

Tandridge District Council

Within the text for purpose 2 there are a few areas where TDC would like clarification:

- The second bullet point refers to 'limited development'. TDC would like to know what limited development is being defined as for the purpose of this assessment.
- The third bullet point considers the assessment to consider 'where development is likely to be possible without coalescence'. Again, TDC would question what development is being defined as.

The purpose of this criterion is to assess whether there is the potential for some level of development to take place within a parcel without impacting on the perceived or actual distance between settlements. Limited development which would not impact upon a wider gap / cause coalescence between settlements will be considered on a parcel by parcel basis having regard to the size and location of the parcel and the separation between.

The definition of development will be any potential work being carried out which meets the statutory definition as set out in Section 55 of the Town and Country Planning Act 1990 e.g. building operations, structural alterations, and construction.

Arup Response: Agree, no change suggested.

Comments noted.

Tandridge District Council

TDC have a few comments to make on purpose 3:

It would be helpful to understand what encroachment is being defined as. Further, the purpose does not state countryside has to be open. Therefore, TDC would be interested to know why the emphasis of the assessment for this purpose is openness.

TDC would like to know how land uses such as golf courses, solar farms, industrial farms and small industrial areas are being considered under this purpose and also in the table named

'Purpose 3 Assessment Criterion' what built form is being defined as.

Encroachment – add definition to the Glossary and the Report.

The emphasis on openness stems from the overarching aim of the Green Belt which is to prevent urban sprawl by keeping land permanently open and as set out in section 3.3.1, PAS Guidance recommends that the approach taken to Purpose 3 should be to look at the difference between land under the influence of the urban area and open countryside, and to favour open countryside when determining the land that should be attempted to be kept open, accounting for edges and boundaries.

Industrial farms, small industrial, and golf course whereby there is built-form will be considered as detracting features from the openness of the Green Belt and will be considered as part of the percentage scores set out under the assessment criterion for Purpose 3. There are no solar farms within the Borough.

Arup Response: Agree, definition of encroachment added.

Appendix 8 – Elmbridge Borough Council’s & Arup’s Response to the Green Belt Boundary Review (GBBR, 2016) Local Area Assessment Consultation

Local Area	Stakeholder Comments	EBC Comments / Response to Stakeholder Comments	Arup Response and Action
1	<p>GBC (28/09/15): (GBC-1) Local Area 1 – this includes our Green Belt and Countryside Study (GBCS) land parcels C19 (part), C21 and C22. The assessment of the extent to which our land parcels score against the main purposes of the Green Belt is contained within Volume II addendum.</p> <p>(GBC-2) Local Area 1 scores 0/5 against purpose (1) To check the unrestricted sprawl of large built-up areas. Whilst this is true for the western side of the parcel, on the eastern side (our land parcel C21 and C22) this land serves to prevent the northward sprawl of East Horsley. I seem to remember from previous comments we’ve made that we had agreed to classify this village as a large built up area.</p> <p>(GBC-3) Local Area 1 scores 3/5 against purpose (2) To prevent neighbouring towns from merging. As previously discussed, although our draft Local Plan has very limited weight at the present time, you were I understand going to include the potential new settlement at Wisley airfield as an either/or scenario? If so then should it be referred to in the commentary? Should it also include the commentary regarding the gap between Cobham / Oxshott and East Horsley to be consistent with the commentary in Local Area 4.</p> <p>(GBC-4) Local Area 1 scores 4/5 against purpose (3) Assist in safeguarding the countryside from encroachment. This is consistent with our study which found that there was minimal existing</p>	<p>EBC: Response to (GBC-2): In response to the consultation on the draft methodology, the Council agreed that there was sufficient evidence to suggest that East Horsley (Guildford Borough) was to be 'inset' from the Green Belt as part of the Guildford Local Plan. However, the Council's response was to identify East Horsley as a 'settlement' in regard to the assessment of the parcel against Purpose 2. East Horsley is not of sufficient size to justify identification as a 'large built-up area' on the same scale as London / Walton / Weybridge / Hersham / Guildford etc.</p> <p>Response to (GBC-3): EBC agrees with the comment that some reference should be made to the potential development at Former Wisley Airfield. In response to the consultation on the draft methodology, Arup stated that commentary will be added in individual pro-formas, commenting specifically on the potential impact of Wisley on scores and the possible need to amend these in light of the development coming forward. This should be followed</p>	<p>Arup (05/10/15): Response to (GBC-2) / (GBC-3): Agree with EBC comments re (GBC-2) / (GBC-3). There could be an argument that this parcel should score 1 for Purpose 2 for consistency with parcels to the north. New assessment text drafted, as well as text referring to Wisley (Rev A).</p>

development and therefore safeguards the countryside from encroachment.

up.
In terms of the consistency of the wording with Parcel 4 and inclusion of the reference to the gap between Cobham / Oxshott and East Horsley, this is not considered appropriate. The scoring of Parcel 1 makes it clear that this area is less important in terms of the general gap which is of sufficient scale to prevent the merging of these settlements. This is particularly the case given that the M25 forms the northern boundary of the parcel.

2	<p>MVDC (15/09/15): (MVDC-1) The part of the local area that is within Guildford Borough is adjacent to the “large built up area” of Bookham/Fetcham, which is in MVDC. The score should either be amended to PASS or it should be clearly re-stated here that the scoring only applies to the land within Elmbridge BC.</p> <p>GBC (28/09/15): (GBC-1) Local Area 2 – this includes our GBCS land parcel D13.</p> <p>(GBC-2) Purpose (1) – agree.</p> <p>(GBC-3) Purpose (2) – our GBCS includes that this parcel prevents the settlements of Effingham Junction (East Horsley) from merging with Little Bookham.</p> <p>(GBC-4) Purpose (3) – agree.</p>	<p>EBC (29/09/15): Response to (MVDC-1): As set out in the methodology, Leatherhead / Bookham / Fetcham / Ashted form one large built-up area spanning the north of Mole Valley District. Nevertheless, the parcel is not at the edge of Bookham as its eastern boundary follows the River Mole / tributary.</p> <p>Response to (GBC-3): It is understood how part of this parcel could be considered to be forming part of an important gap between the settlements of Effingham Junction and Little Bookham, preventing these two areas from merging. However, this principally relates to the southern section of the parcel which falls outside of Elmbridge Borough. Suggest that commentary to this effect is added.</p>	<p>Arup (05/10/15): Response to (MVDC_1): While in close proximity to Leatherhead, the parcel does not meet the criteria set out in the Methodology for assessment against Purpose 1 - parcel is not 'at the edge of one or more distinct large built-up areas'. As agreed at meeting with EBC (01/10/15), pro-forma updated (Rev A) to include qualitative commentary but no change to score.</p> <p>Response to (GBC-3): Agree with EBC comments. Additional commentary added to pro-forma (Rev A).</p>
3	<p>MVDC (15/09/15): (MVDC-1) Inclusion of reference to Leatherhead in Purpose 2 commentary.</p> <p>(MVDC-2) Parcel is in close proximity (300m) to large built-up area of Leatherhead. This should be acknowledged in the commentary on the pro-forma.</p>		<p>Arup (05/10/15): Response to (MVDC-1): Agree with inclusion of Leatherhead re Purpose 2. Pro-forma updated (Rev A).</p> <p>Response to (MVDC-2): While in close proximity to Leatherhead, the parcel does not meet the criteria set out in the Methodology for assessment against Purpose 1 - parcel is not 'at the edge of one or more distinct large built-up areas'. As agreed at meeting with EBC</p>

			(01/10/15), pro-forma updated (Rev A) to include qualitative commentary but no change to score.
4		EBC (01/10/15): (EBC-1) Minor track changes & reference to the M25 forming a defensible boundary to the south preventing the merging of Cobham / Oxshott and East Horsley.	Arup (05/10/15): Response to (EBC-1): Minor track changes addressed; comment on M25 added to pro-forma (Rev A).
5			Arup (05/10/15): Updated to new template (Rev A).
6		EVC (01/10/15): (EBC-1) Minor track changes / comments.	Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A).
7	MVDC (15/09/15): (MVDC-1) Inclusion of reference to Leatherhead in Purpose 2 commentary.		Arup (28/09/15): Response to (MVDC-1): Agree with inclusion of Leatherhead re Purpose 2. Pro-forma updated (Rev A).
8			Arup (05/10/15): Updated to new template (Rev A).

9			Arup (05/10/15): Updated to new template (Rev A).
10	<p>MVDC (15/09/15): (MVDC-1) Inclusion of reference to Leatherhead in Purpose 2</p> <p>(MVDC-2) Parcel should be assessed against Purpose 1 given proximity to Leatherhead.</p> <p>(MVDC-3) Remove land to the east of Oaklawn Road (within MVDC)</p>	<p>EBC (01/10/15): (EBC-1) Purpose 3 score in the Local Area Assessment Pro-Forma is shown as 4 however, identified as 5 on the map. EBC considers that a score of 4 is appropriate and the map should be amended.</p>	<p>Arup (05/10/15): Response to (MVDC-1): Agree with inclusion of Leatherhead re Purpose 2. Pro-forma updated (Rev A).</p> <p>Response to (MVDC-2): Discussed at EBC/Arup meeting 01/10/15. Parcel is not directly at the edge of the large built-up area of Leatherhead, therefore not scored against Purpose 1. However, additional commentary added to pro-forma (Rev A) to note the close proximity. No adjustment to score.</p> <p>Response to (MVDC-3): Discussed at EBC/Arup meeting 01/10/15. No parcel boundary change as Oaklawn Road not considered sufficiently defensible to use as boundary feature.</p> <p>Response to (EBC-1): Score on pro-forma for Purpose 3 (4) is correct. Mapping updated.</p>
11		<p>EBC (01/10/15): (EBC-1): Minor track changes.</p>	<p>Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A).</p>
12		<p>EBC (01/10/15): (EBC-1): Minor track changes.</p>	<p>Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A).</p>

13		EBC (01/10/15): (EBC-1): Minor track changes.	Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A).
14		EBC (01/10/15): (EBC-1): Suggest P3 score of 2 rather than 3 as it is managed landscape?	Arup (05/10/15): Response to (EBC-1): Agree with proposed revised score for Purpose 3. Pro-forma updated (Rev A).
15			Arup (05/10/15): Updated to new template (Rev A).
16			Arup (05/10/15): Updated to new template (Rev A).
17		EBC (01/10/15): (EBC-1): Reference to the A3 as a physical barrier preventing settlements from merging.	Arup (05/10/15): Response to (EBC-1): Pro-forma updated with reference to the A3 (Rev A).
18			Arup (05/10/15): Updated to new template (Rev A).
19		EBC (01/10/15): (EBC-1): Minor track changes.	Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A).
20		EBC (01/10/15): (EBC-1): Reference to the A3 as a physical barrier preventing settlements from merging.	Arup (05/10/15): Response to (EBC-1): Pro-forma updated with reference to the A3 (Rev A).
21		EBC (01/10/15): (EBC-1): Minor track changes.	Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A).
22			Arup (05/10/15): Updated to new template (Rev A).

<p>23</p>			<p>Arup (05/10/15): Updated to new template (Rev A).</p>
<p>24</p>			<p>Arup (05/10/15): Updated to new template (Rev A).</p>
<p>25</p>	<p>RBC (17/09/15): (RBC-1): Ø It is unclear why this parcel has been drawn to include a very small part of Runnymede; the proposed parcel boundary doesn't appear to have logical definition.</p> <p>(RBC-2): Discrepancies between EBC and RBC assessments. For example, for the corresponding Runnymede parcel, the assessment suggests that the river and the railway line provide durable boundaries, and the land parcel is an additional barrier, but the score attributed to the Elmbridge parcel for Purpose 1 criteria(b) suggests that the parcel is providing a barrier in the absence of a durable one. This would appear incorrect. We also question the reference in this criteria to the boundary of the parcel cutting across open land in the north-west of the parcel – this is where the parcel abuts Runnymede, and the railway line.</p> <p>(RBC-3): The Elmbridge and Runnymede parcels are very different, and achieve the purposes of the Green Belt in different ways. This reinforces the question why the small part of Runnymede is included in the parcel.</p>	<p>EBC (01/10/15): (EBC-1): Should P1 score be lower? The north of the Local Area is already developed and connects the built-up area on either side. Travelling through the area there is no 'feel' of separation.</p>	<p>Arup (05/10/15): Response to (RBC-1): Parcel boundary corrected to follow railway line as the borough boundary (Rev A).</p> <p>Response to (RBC-2): The description for parcel 25 describes the boundaries to the east and west of the parcel in line with the agreed methodology (boundaries between the Green Belt and large built-up areas). There are instances where the boundary cuts across open fields and does not follow readily recognisable physical features (specifically to the west of the Brooklands Hotel). While parcel 25 interfaces with a corresponding Runnymede parcel (32) different physical features are applicable for the assessment, thus the differing narrative.</p> <p>Response to (RBC-3): As per response to (RBC-1), mapping updated (Rev A).</p> <p>Response to (EBC-1): Discussed at EBC/Arup meeting 01/10/15. No amendment to score, but pro-forma updated to provide further clarity.</p>

26		EBC (01/10/15): (EBC-1): Minor track changes and suggest a score of 5 for PS1. Consistent with parcel 25 in stopping the outward sprawl of Weybridge and Byfleet. Part of the narrow gap.	Arup (05/10/15): Response to (EBC-1): Agree with proposed revised score for Purpose 1. Pro-forma updated (Rev A).
27		EBC (01/10/15): (EBC-1): Minor track changes and reference to the A3.	Arup (05/10/15): Response to (EBC-1): Pro-forma updated with reference to the A3 and address minor track changes (Rev A).
28		EBC (01/10/15): (EBC-1): Blackhills - 'inset' form Green Belt?	Arup (01/10/15): Response to (EBC-1): Discussed at EBC/Arup meeting 01/10/15. No amendment to pro-forma.
29		EBC (01/10/15): (EBC-1): Minor track changes.	Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A).
31		EBC (22/09/15): (EBC-1): Consider further sub-division / opportunities for release without impacting on the overall parcel / function.	Arup (05/10/15): Response to (EBC-1): Discussed at EBC/Arup meeting 01/10/15. No appropriate boundary features for further sub-division. Agreed that no changes proposed to the land parcel / pro-forma.
32			Arup (05/10/15): Updated to new template (Rev A).
33			Arup (05/10/15): Updated to new template (Rev A).
34		EBC (01/10/15): (EBC-1): Minor track changes.	Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A).

35	<p>RBC (17/09/15): (RBC-1): Score of Purpose 1(b) is consistent with the Methodology but differs from RBC Study.</p> <p>(RBC-2): Don't entirely agree with Purpose 2 assessment. The parcel forms part of the gap between Weybridge and Byfleet and Woodham only when taken into consideration with the adjoining Runnymede parcel. The scoring for this criterion is therefore also questioned.</p>		<p>Arup (05/10/15): Response to (RBC-1): Disagree. In both cases the boundary is correctly described as durable and permanent. A low score is attributed in RBC study (1/5) and no '+' is assigned in the EBC study, thus score is equivalent (noting the change in methodology). Discussed at EBC/Arup meeting 01/10/15; agreed no changes.</p> <p>Response to (RBC-2): Believe that the score for EBC study is correct. Discussed at EBC/Arup meeting 01/10/15; agreed no changes.</p>
36		<p>EBC (01/10/15): (EBC-1): Clarification required.</p>	<p>Arup (05/10/15): Response to (EBC-1): Discussed at EBC/Arup meeting 01/10/15. Pro-forma updated (Rev A).</p>
37			<p>Arup (05/10/15): Updated to new template (Rev A).</p>
38			<p>Arup (05/10/15): Updated to new template (Rev A).</p>
39		<p>EBC (01/10/15): (EBC-1): Minor track changes.</p>	<p>Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A).</p>

40		EBC (01/10/15):(EBC-1): Minor track changes & agree comments to include Parcels 41, 42 and 43 (including 40) as one.	Arup (05/10/15):Response to (EBC-1): Minor track changes addressed (Rev A). Discussed at EBC/Arup meeting 01/10/15 - agreed that no grouping of pro-formas 40-43, but commentary to remain on pro-formas regarding how these four parcels effectively operate as one.
41		EBC (01/10/15): (EBC-1): Minor track changes & agree comments to include Parcels 40, 42 and 43 (including 41) as one.	Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A). Discussed at EBC/Arup meeting 01/10/15 - agreed that no grouping of pro-formas 40-43, but commentary to remain on pro-formas regarding how these four parcels effectively operate as one.
42		EBC (01/10/15): (EBC-1): Minor track changes & agree comments to include Parcels 40, 41 and 43 (including 42) as one.	Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A). Discussed at EBC/Arup meeting 01/10/15 - agreed that no grouping of pro-formas 40-43, but commentary to remain on pro-formas regarding how these four parcels effectively operate as one.
43		EBC (01/10/15): (EBC-1): Minor track changes & agree comments to include Parcels 40, 41 and 42 (including 43) as one.	Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A). Discussed at EBC/Arup meeting 01/10/15 - agreed that no grouping of pro-formas 40-43, but commentary to remain on pro-formas regarding how these four parcels effectively operate as one.

44	<p>RBC (17/09/15): (RBC-1): Purpose 1: While scoring the same as for RBC Assessment, there are discrepancies between the reviews in the description of the parcel with regard to the boundaries. This should be addressed to ensure consistency and compatibility.</p> <p>(RBC-2): Purpose 3: There are significant differences in the assessed amount of built form in the two assessments, and the 3% suggested in the Elmbridge review seems very low. This is not to say that the percentage in the Runnymede review is correct, it may be that Arup should revisit this issue for the accuracy of both reviews.</p> <p>(RBC-3): The penultimate paragraph in purpose 3 seems to contradict the previous paragraph.</p>		<p>Arup (05/10/15): Response to (RBC-1): Boundaries for Local Area 44 do not completely align with boundaries for General Area 33. No change proposed, however additional text added to pro-forma (Rev A).</p> <p>Response to (RBC-2): The methodology for the EBC GBBR uses emerging data which was not available at the time of the RBC GBR. Furthermore, the boundaries used are different in the EBC case and therefore the result is not comparable.</p> <p>Response to (RBC-3): Agree, pro-forma updated (Rev A).</p>
45		<p>EBC (01/10/15): (EBC-1): Minor track changes and consistency with Parcel 49.</p>	<p>Arup (05/10/15): Response to (EBC-1): The score and text of Purpose 1 in Parcel 49 has been amended to ensure consistency with Parcel 45. Minor tracks changes addressed (Rev A).</p>
47		<p>EBC (01/10/15): (EBC-1): Minor track changes.</p>	<p>Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A).</p>
48		<p>EBC (01/10/15): (EBC-1): Minor track changes.</p>	<p>Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A).</p>
49		<p>EBC (01/10/15): (EBC-1): Minor track changes and consistency with Parcel 45.</p>	<p>Arup (05/10/15): Response to (EBC-1): Score and text for Purpose 1 in Parcel 49 has been amended to ensure consistency with Parcel 45 (Rev A).</p>

50		EBC (01/10/15): (EBC-1): Minor track changes.	Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A).
51			Arup (05/10/15): Updated to new template (Rev A).
52		EBC (01/10/15): (EBC-1): Minor track changes.	Arup (05/10/15): Response to (EBC-1): Minor track changes addressed; due to text change to land parcel 59a, reference to Lower Green has been incorporated (Rev A).
53			Arup (05/10/15): Updated to new template (Rev A).
54		EBC (01/10/15): (EBC-1): Minor track changes.	Arup (05/10/15): Response to (EBC-1): Minor track changes addressed; due to text change to land parcel 59a, reference to Lower Green has been incorporated (Rev A).
56		EBC (28/08/15): (EBC-1): The pro-forma states that it fails purpose 1 as it is not on the edge of a distinct large built up area. The parcel adjoins Weybridge.	Arup (03/09/15): (EBC-1): Acknowledge that local area is adjacent to the large built-up area of Walton-on-Thames / Weybridge / Hersham. Pro-forma updated and re-scored (Rev A).
58		EBC (29/09/15): (EBC-1): EBC needs to understand how the Local Area Assessment fits in with the Strategic Context.	Arup (05/10/15): Response to (EBC-1): Discussed at EBC/Arup meeting 01/10/15. Agreed that no changes required to the land parcel / pro-forma.

59a		<p>EBC (01/10/15): (EBC-1): Minor track changes & consideration of the relationship with Parcel 62 and the separation between Lower Green, Esher and Hersham.</p>	<p>Arup (05/10/15): Response to (EBC-1): Reference to Lower Green and land parcel 62 incorporated (Rev A).</p>
59b		<p>EBC (28/08/15): (EBC-1): The pro-forma and the excel spread sheet show that in terms of purpose 2 it scores 5. However, the area is shaded 3 on the map.</p> <p>EBC (29/09/15): (EBC-2): Minor track changes.</p>	<p>Arup (05/10/15): Response to (EBC-1): Mapping updated (Rev A).</p> <p>Response to (EBC-2): Minor track changes addressed (Rev A).</p>
60			<p>Arup (05/10/15): Updated to new template (Rev A).</p>
61		<p>EBC (28/08/15): (EBC-1): The pro-forma states that it fails purpose 1 as it is not on the edge of a distinct large built up area. I believe the north-west corner of the parcel adjoins the built up area?</p>	<p>Arup (03/09/15): Response to (EBC-1): Acknowledge that local area is adjacent to the large built-up area of Greater London. Proforma updated and re-scored. REV-A issued to Client on 03/09/15. Mapping Updated.</p>
62			<p>Arup (05/10/15): Due to text changes to land parcel 59a, reference to Lower Green has been incorporated (Rev A).</p>
63		<p>EBC (01/10/15): (EBC-1): Minor track changes.</p>	<p>Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A).</p>

64	<p>SBC (30/09/15): (SBC-1): There is an omission in the text under purpose (3) after “island in the,”. This parcel is noted as failing the first test and yet virtually joins the urban area to the south and west. Why is the parcel so small and not part of 56 for example?</p>	<p>EBC (01/10/15): (EBC-1): Minor track changes and completion of sentence.</p>	<p>Arup (05/10/15): Response to (SBC-1): Text amended. With regard to the boundary formation, this aligns with the methodology; therefore no amendment to score.</p> <p>Response to (EBC-1): Minor track changes and sentence completion addressed (Rev A).</p>
65		<p>EBC (01/10/15): (EBC-1): Minor track changes.</p>	<p>Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A).</p>
66		<p>EBC (01/10/15): (EBC-1): Minor track changes.</p>	<p>Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A).</p>
67			<p>Arup (05/10/15): Updated to new template (Rev A).</p>
68	<p>SBC (30/09/15): (SBC-1): The main area of the parcel is in Spelthorne. It is not clear what is meant by development of the land would result in the coalescence of settlements. I would like to look at this site with you more closely but maybe it raises the question of parcel definition again.</p>		<p>Arup (05/10/15): Response to (SBC-1): The parcel forms the majority of the very narrow gap between Lower Halliford and Walton-on-Thames. The narrative describes the whole parcel, not just the area within Elmbridge. It is of a very open character and there are clear views across the Thames between the two settlements. No change to pro-forma/scoring. Updated to new template (Rev A).</p>
69			<p>Arup (05/10/15): Updated to new template (Rev A).</p>

70		EBC (01/10/15): (EBC-1): Minor track changes.	Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A).
71		EBC (01/10/15): (EBC-1): Minor track changes.	Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A).
72a			Arup (05/10/15): Updated to new template (Rev A).
72b		EBC (01/10/15): (EBC-1): Minor track changes.	Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A).
73	SBC (30/09/15): (SBC-1): Parcel 73 seems particularly contrived. Surely the parcel should be 71 extended across the river up to the Borough boundary. Why is the centre of the river used as a boundary? The whole parcel could then be seen as being on the edge of the urban area to the south rather than as Parcel 73 which is divorced from the urban edge, prompting the comment that “development of this sub area is unlikely to cause the merging of these settlements”. As the major part of Parcel 73 is in Spelthorne we would have a problem with such comments.		Arup (05/10/15): Response to (SBC-1): The Thames meets the description of a potential Green Belt boundary set out in the NPPF (readily recognisable and likely to be permanent) and was thus used as a parcel boundary, as per the final methodology. The land is physically severed from parcel 71 by the river and therefore, for consistency, must be treated as a separate area for assessment. That being said, in a similar fashion to some of the local areas at the boundaries with Mole Valley, the parcel does effectively 'touch' the Weybridge / Walton LBUA (bar a small sliver of land). Commentary therefore added to this effect. Further, following consideration, it was felt that a score of 3 may be more appropriate for Purpose 2. Revised wording included in Rev A.

74		EBC (01/10/15): (EBC-1): Minor track changes.	Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A).
75a		EBC (01/10/15): (EBC-1): Minor track changes.	Arup (05/10/15): Response to (EBC-1): Minor track changes addressed (Rev A).
75b			Arup (05/10/15): Checked for consistency against Parcel 76, but no amendments required. Updated to new template (Rev A).
76			Arup (05/10/15): Updated to new template (Rev A).
77			Arup (05/10/15): Updated to new template (Rev A).
78			Arup (05/10/15): Updated to new template (Rev A).
79	SBC (30/09/15): (SBC-1): The majority of this parcel is in Spelthorne and again seems to be a somewhat arbitrarily defined. I would not agree there is dense woodland on the site. The parcel is mainly open with some mature trees and with a private garden to the western end of the island.	EBC (01/10/15): (EBC-1): Minor track changes.	Arup (01/10/15): Response to (SBC-1): The boundaries of the parcel are defined in line with the methodology, in line with parcel 73. Text for purpose 3 revised in Rev A. Response to (EBC-1): Minor track changes addressed (Rev A).
N1			Arup (05/10/15): Updated to new template (Rev A).

N2

Arup (05/10/15):
Updated to new template (Rev A).

Appendix 9 - Elmbridge Borough Council's Response to the Green Belt Boundary Review (2016), Draft Report Consultation

Authority / Organisation	Comments	Council / ARUP Response & Action Points
Runnymede Borough Council	<p>Upon further consideration, we feel that the wording in Table 3.1 (page 17) is slightly misleading regarding how the Runnymede Green Belt review was undertaken, and should be amended to read as follows:</p> <p><i>“Phase 1 involved the identification of parcels based on the following features:</i></p> <ol style="list-style-type: none"> 1. M3 and M25 motorways; 2. A and B roads; 3. Railway lines; 4. River Thames; 5. River Wey. <p><i>These parcels were initially scored against the NPPF purposes of the Green Belt with a score of 1 to 5.</i></p> <p><i>Phase 2 involved assessing the parcels against technical constraints and then re-appraising the refined parcels against the 5 NPPF purposes. Conclusions were then drawn regarding which resulting land parcels could potentially be released based on whether they met the NPPF purposes and their strategic fit within the existing settlement hierarchy.”</i></p>	<p>Amend Table 3.1 as requested.</p> <p>Arup (05/02/16) – Table 3.1 updated.</p>
Runnymede Borough Council	<p>With regard to our comments made to your last consultation, and the response from yourselves and your consultants, we would make the following comments.</p> <p><i>Local Area 25:</i> We note that following our comment, the parcel boundary has been redrawn, using the borough boundary to define the parcel. The comment in the ‘Arup response’ column of your spreadsheet (RBC-1, RBC-3) should presumably read ‘parcel boundary corrected’. It would appear that this parcel does not now cross into Runnymede. With regard to RBC-2, revisions and additions to the text have provided clarity to the assessment.</p>	<p>Noted. Amendment made.</p> <p>Arup (05/02/16) – No action required.</p>
Runnymede Borough Council	<p>Local Area 35: Comments noted. The scoring system in the methodology for purpose 1 lacks clarity.</p>	<p>Arup (05/02/16) – Unclear what additional clarity is required with regard to Purpose 1 assessment methodology. Methodology for Purpose 1 assessment/scoring is as per the Methodology document which was shared with neighbouring authorities 28/05/15 – 10/06/15. At the request of Spelthorne Borough Council some addition text was added to the Methodology document to explain how the Purpose 1 scoring evolved.</p> <p>NB: Error corrected regarding scoring against 1(b) and 1(c) – these two stages have been combined so the text has been amended to remove reference to stage 1(c).</p>
Runnymede Borough Council	<p>Local Area 38: Our comment was not included on the spread sheet.</p>	<p>Noted. Additional comments were submitted via email dated 23rd September 2015, to the Council. Runnymede Borough Council wished to make similar comments regarding Local Area 38 as it had in regard to Local Area 35 i.e. how the Areas perform their functions with the adjoining Parcels in Runnymede Borough. This comment was however unfortunately missed. The Council is grateful to Runnymede Borough Council for raising the oversight.</p> <p>Arup (05/02/16) – It is assumed that the comment on Local Area 35 relates to the Purpose 2 assessment and its role in protecting the gap between</p>

Weybridge and Byfleet and Woodham. As explained on the pro-forma, Local Area 35 is part of the gap between Weybridge and Woodham, and Weybridge and Addlestone. It is acknowledged that the Local Area is only part of these gaps (with the rest being Green Belt land within RBC) hence the assessment description of the parcel forming 'a small part of the wider gap'.

It is noted that in the RBC Study, the land to the west of the River Wey Navigation (RBC General Area 31) scores a 5 for Purpose 2 given the role it plays in protecting the gap between Addlestone, Weybridge and New Haw. However, Local Area 38 (Elmbridge Study) and General Area 31 (RBC Study) play different roles in preventing coalescence – General Area 31 being particularly important in preventing coalescence between Addlestone and New Haw where the gap is particularly small.

Runnymede Borough Council Local Area 44: It is understood that additional data was used for the Elmbridge review, but this doesn't fully explain the discrepancy.

Arup (05/02/16) – To expand on our previous response to this comment, as set out in the methodology the percentage built form utilised for the Purpose 3 assessment with the Elmbridge Study used features classified as manmade (constructed) within the Ordnance Survey MasterMap data, excluding roads and railway lines. This data was not available at the time of the RBC Green Belt Study (which utilised ONS rural-urban classification statistics and Arup's assessment of additional built form outside of the urban areas) and therefore the percentage built form differs between the two studies. Furthermore, the respective parcels are different with the parcel utilised for the Elmbridge Study excluding the section of RBC Green Belt off Hamm Moor Lane (which includes a public house and hard standing) and including the area on the east of the parcel within Elmbridge (which is entirely open and free of built form). The percentage built form considered in the Elmbridge Study was therefore significantly reduced than that for the RBC Study.

In terms of scoring, however, it is noted that local area 44 (Elmbridge Study) and General Area 33 (EBC Study) were both awarded a score of 3 for Purpose 3. While the detailed methodology and scoring criteria for the two studies differed to reflect local context, the consistent scoring demonstrates a consistent assessment of Green Belt land in this area.

Request noted.

Runnymede Borough Council The review only makes recommendations on how the Elmbridge Green Belt performs against the purposes of the Green Belt. The Local Areas are still to be assessed against constraints, and this may involve subdivision of parcels which have been shown to be performing strongly against the purposes of the Green Belt as a whole. For example, and of particular relevance to Runnymede, the results and recommendation for Local Area 25 is that sub division may be appropriate, and the northern area (i.e. that part abutting Runnymede) could be considered further (page 69). With this in mind we would request that we are consulted on any further work in this respect, and indeed any on further proposals in determining which areas might be released from or added to the Green Belt (as reported on page 76 of the methodology).

The Council has confirmed that the Green Belt Boundary Review (GBBR) is only part of the evidence base that will be used to determine potential opportunities for future development within the Borough.

This position is set out in the Conclusion to the Draft Report stating: *"Following this work, further decision making by the Council in updating the Local Plan will determine, which areas, if any might be released from or added to the Green Belt. The Green Belt Boundary Review will ultimately sit as part of a suite of evidence, particularly alongside the Strategic Housing Market Assessment and a Review of Constraints, which will be used to inform future plan making"*.

The Council has already consulted on the constraints that it considers to be 'absolute' in the assessment of development opportunities across the Borough. Runnymede Borough Council responded to this consultation on 22nd July 2015. The Council has also consulted on its 'Site Assessment Methodology'. This document was consulted on in May 2014 with a number of neighbouring authorities and other duty to cooperate bodies. In addition, this document is being revised and will shortly be consulted on again having taken into account the outcomes of the Green Belt Boundary Review and the consideration of

Absolute Constraints. The Council will continue to engage Runnymede Borough Council on cross-boundary strategic planning matters identified by both authorities.

Arup (05/02/16) – No action required.

Mole Valley District Council

Strategic Area C (comment refers to the Profile in Annex 1)

Under the heading Sub-regional Context, the profile for Strategic Area C states *“Woking, to the west of the Strategic Area, and Leatherhead, to the east, form hard edges for this wider Green Belt swathe ...”*

As drawn, Strategic Area C extends well beyond Leatherhead and takes in a significant area of farmland and downland between Leatherhead/Ashted and Tadworth. Much of this land is of a similar character to the rest of Strategic Area C. Therefore, I’m not clear what is meant by this statement and it may be better to leave it out.

Having reviewed the wording the Council considers that the sentence should be amended to hard edges ‘within’ this strategic area where Green Belt meets urban / built-up areas?

Arup (05/02/16) – Agree with suggested wording. Text updated as follows:

‘Woking, to the west of the Strategic Area, and Leatherhead, to the east, form hard edges ~~for~~ within this wider Green Belt swathe, and around the towns the Green Belt become more influenced by urbanising characteristics; for example, land uses such as golf courses, as well as piecemeal developments.’

Mole Valley District Council

Local Area 58 (comment refers to the main GBR report, para 6.1.8):

I note that this is an area identified for further consideration. Although the land is some distance from the Mole Valley boundary, the A243 is a key route between Leatherhead and Chessington/Kingston. There are significant congestion issues, particularly during peak hours, when there is a large volume of traffic flowing between the M25 Junction 9 and employment and residential areas along the A243 corridor. I would therefore be grateful if you could keep MVDC informed if significant development is proposed following further consideration of this area. In particular, any traffic modelling should take full account of the impact on traffic flows along this route.

Noted. The Council is aware of that during peak hours the areas around the M25, Junction 9 and the A243 corridor can become heavily congested. The Council will continue to engage relevant neighbouring authorities and other duty to cooperate bodies as appropriate, as it continue to take forward its Local Plan preparation. The modelling of traffic flows and the potential impacts of new development will also be undertaken as part of this work.

Arup (05/02/16) – No action required.

Mole Valley District Council

Local Area 2 and Local Area 3 (comment refers to the Profiles in Annex 2):

Thank you for acknowledging the proximity of these areas to the edge of Leatherhead and Bookham (Purpose 1). However, I’m uncomfortable with the wording *“...and development in the south may be perceived as sprawl.”*

The statement may be true, but the way it is worded could be taken as implying that there is a prospect of development in the Green Belt north of Bookham and Leatherhead. As you know, this is an extremely sensitive issue locally and it would be preferable if those words were omitted, to avoid any risk of giving the wrong impression. The analysis would still be accurate if the last sentence simply read *“Only a very small strip of Green Belt separates the local area from the edge of the large built up area.”*

Noted. As requested, delete *‘and development in the south may be perceived as sprawl’*.

Arup (05/02/16) – Proposed change is acceptable and pro-formas (Annex Report 2) have been updated.

Mole Valley District Council

Local Area 10 (comment refers to the Profile in Annex 2):

As per my previous comments, I still disagree with the statement that this area is *“not at the edge of a large built up area”* (Purpose 1). The south east corner of Area 10 touches the boundary of Leatherhead built up area. There is no meaningful strip of Green Belt separating the two; the built up area boundary of Leatherhead is the M25 embankment and the M25 is also the boundary of Local Area 10.

Due to the scale of the map in Annex 2 it may appear that the boundary for Local Area 10 is the M25 motor / Junction 9. However, closer examination shows this to the south-east boundary to be the B2430 (Oxshott Road). The southern boundary of the parcel then runs back westwards along the M25. South of the M25 is an area of Green Belt located within Mole Valley Borough which clearly separates Local Area 10 from the built-up area of Leatherhead.

If the whole local area is being assessed, the score should be changed to “PASS”, with a score of 3, to acknowledge that the M25 is a permanent and durable feature. Alternatively, the text should very clearly state that the score only applies to the land which is within Elmbridge Borough.

No amendments are proposed to the scoring of Local Area 10.

Please also delete the words “... and development in the south may be perceived as sprawl.”, as above.

Noted. As requested, delete ‘and development in the south may be perceived as sprawl’.

Arup (05/02/16) – Proposed change is acceptable and pro-formas (Annex Report 2) have been updated.

Noted. The Council will continue to engage relevant neighbouring authorities and other duty to cooperate bodies as appropriate, as it continues to take forwards its Local Plan preparation.

Arup (05/02/16) – No action required.

Mole Valley District Council

I note that none of the local areas adjoining the boundary with Mole Valley are identified for further consideration. Should this change, I would be grateful if you could keep me informed.

London Borough of Richmond upon Thames

We would like to provide an update in relation to your statements made with regard to LB Richmond on page 20/21.

The Council is now in the progress of reviewing and updating the London Borough of Richmond upon Thames Local Plan, consisting of the adopted Core Strategy (CS) (2009) and Development (DMP) Management Plan (2011). It is now proposed to take the site-specific allocations forward alongside the review of the existing policies to allow the Council to align the sites available with the needs of the borough as identified through the Local Plan Review. A consultation on the rationale and cope for the review of the policies contained within the CS and DMP, including the proposed sites to be allocated for development, is taking place from 4 January to 1 February 2016. Further details can be found on our public website: www.richmond.gov.uk/local_plan_review

The initial findings of the scope of the review of our policies, based on our evidence and monitoring, suggests that we are meeting our strategic dwelling target of 315 homes per annum (as set out in the London Plan 2015) and we continue to identify a sufficient five year housing land supply. It is not envisaged that we review Green Belt boundaries as part of the Local Plan Review process. In terms of our timescales, Pre-publication consultation on the first draft of the Local Plan is anticipated to take place late spring / early summer 2016, with Publication in late autumn 2016 and Submission for examination in spring/summer 2017, whereby the adoption of the Local Plan is anticipated to take place in spring 2018.

Whilst we believe that your proposed findings relating to the Green Belt Boundaries are unlikely to impact upon Richmond borough, we expect that we will be discussing overall housing numbers, capacity and the balance of protecting Green Belt vs. meeting housing needs in our Duty to Cooperate meeting on 25 January 2016 and as the preparation of our plans progresses.

Amend Table 3.1 to reflect latest position.

Arup (05/02/16) – Text updated as follows:

Local Plan Status

In July 2015 the Council agreed a new Local Plan programme for progressing the Site Allocations Plan and the initial scope for the partial review of the existing Core Strategy (2009) and Development Management Plan (2011).

The Council is now in the process of reviewing and updating the Local Plan, consisting of the adopted Core Strategy (CS) (2009) and Development Management Plan (DMP) (2011). It is now proposed to take the site-specific allocations forward alongside the review of the existing policies to allow the Council to align the sites available with the needs of the borough as identified through the Local Plan Review. A consultation on the rationale and scope for the review of the policies contained within the CS and DMP, including the proposed sites to be allocated for development, is taking place in January/February 2016.

Pre-publication consultation on the first draft of the Local Plan is anticipated to take place in late spring / early summer 2016, with publication in late autumn 2016 and submission for examination in spring / summer 2017, whereby the adoption of the Local Plan is anticipated to take place in spring 2018. It is not envisaged that a review of Green Belt boundaries will be undertaken as part of the Local Plan process.

Spelthorne Borough Council

Thank you for your further consultation and I note your responses to the comments we have made previously and consequent amendments. I only have a couple of additional points to make at this stage.

Firstly I note that the description of Strategic Area B (page 28) fails to mention the extension into Spelthorne but more significantly, whilst it refers to the Lower Mole River Floodplain, no mention is made of the River Thames and River Wey Floodplains which form a significant part of the area. This would appear to be a significant omission.

Noted.

The narrative on page 28 provides a summary of the three strategic areas whilst a more detailed analysis is included in Annex 1. A cross-reference within the main report to Annex 1 is required at this point however, to make this clear.

As set out in Annex 1 reference is made to the strategic area extending into Spelthorne Borough and also into Slough and Hillingdon. Under the ‘character’ of the Strategic Area, it is stated that three valleys cut through the Area: the Thames and Wey to the west (on the fringes of the Borough); and the Mole, which passes north-south through the centre of the Area.

		<p>Amend text as follows: “The west of the Strategic Area (extending into Runnymede, Spelthorne and into the outer-most fringes of London around Hillingdon) is characterised...” Reference will also be included to the River Thames and River Wey Floodplains.</p> <p>Arup (05/02/16) – Reference added to section 4.2.1 to refer the reader to the detailed analysis of the Strategic Areas in Annex Report 1. Suggested text with regard to Strategy Area B has been added to section 4.2.1.</p>
<p>Spelthorne Borough Council</p>	<p>One of my main concerns relates to parcel definition and the use of the River Thames as a boundary feature. It seems to make no sense to use the middle of the River Thames as a defensible boundary suggesting that one half of the river could function as Green Belt while the other would not! I understand that in defining boundaries the methodology has been consistently applied but where this produces obvious anomalies a more pragmatic approach would seem to be sensible. This is particularly the case with parcels 71 and 73 which have been divided by an imaginary line running along the centre of the River Thames. If considered as a whole the assessment would be very different, as a parcel which adjoins the urban area on one side and open Green Belt on the other. The open water of the river should be seen as a key feature of the openness of the area rather than one which just divides two parcels. Parcel 73 is very much part of the extensive area of Green Belt running through Spelthorne to the north and west.</p> <p>I am concerned that your consultants regard these two combined parcels as “weakly performing local areas” and cannot agree with the conclusions reached by your consultants on the value of these two parcels to the wider Strategic Area B. Your consultants recommend that that the two parcels “could be considered further” and we would welcome the opportunity to contribute to such considerations with a view to reaching a mutually agreed position.</p>	<p>Noted.</p> <p>Arup (05/02/16) – As per the Methodology, the River Thames is identified as a boundary feature between the Green Belt and large built-up area along with roads, railway lines, and water bodies. These features are all ‘physical features that are readily recognisable and likely to be permanent’ and are therefore considered appropriate to be utilised for parcel boundaries. The River Thames is therefore used as the boundary to a number of parcels in this areas and we see no reason why parcels 71 and 73 should be treated differently with regard to how their boundaries are defined. We therefore believe the River Thames is appropriate to utilise as a boundary feature and for that reason believe parcels 71 and 73 should remain separate parcels.</p> <p>As with all boundary features (e.g. M25), the centre of the feature has been taken as the boundary between one parcel and the next. If the edges of these features were taken as the edge of the parcel, then the feature itself (which is part of the Green Belt) would be excluded from the assessment.</p> <p>As set out in Table 5.2, overall parcel 71 is deemed to meet Green Belt purposes weakly, while parcel 73 meets the purposes moderately. Therefore, parcel 71 is automatically recommended for further consideration. However, the report explains that there is a functional relationship between the two parcels including their relationship across the River Thames, and therefore should be considered together in terms of any further consideration.</p> <p>The Council will continue to engage its duty to cooperate partners on the review of the Local Plan evidence base and the preparation of its Local Plan. The Council has already consulted on what it considers to be “absolute constraints” to development and it’s Site Assessment Methodology. Spelthorne Borough Council helpfully responded to both of these consultations. The next stage in the process is to access the constraints to development across the Borough in accordance with the methodologies.</p>
<p>Greater London Authority</p>	<p>Thank you for consulting the Mayor of London on your draft Green Belt Boundary Review. I would like to inform you that he has no comment to make at this stage.</p>	<p>Noted. Arup (05/02/16) – No action required.</p>
<p>The Royal Borough of Kingston upon Thames</p>	<p>Our main concern with the draft Boundary Review relates to the parcels of land that straddle both Elmbridge and Kingston’s boundaries. Notably, parcels 58 and 27 within the Local Area Assessments are located within both authorities, as well as parcels 34 and 12 which border Kingston.</p> <p>Where possible, parcels should be subdivided to ensure that no decisions or recommendations are made across borders into other administrative boundaries. Paragraph 3.4.1 of the draft Boundary Review states:</p> <p><i>“...it is important to note that this assessment will not directly influence the approaches to</i></p>	<p>Noted.</p> <p>The Council has ensured that throughout the report it is clear that the assessment will not directly influence the approaches to Green Belt in neighbouring authorities and no recommendation will ultimately be made beyond the boundaries of Elmbridge. When considering parcels further the Council will only consider those areas that are located within the Borough, should the parcel cross the administrative boundary.</p> <p>It is noted however, that this intention may not be entirely clear within the</p>

Green Belt in neighbouring authorities and no recommendations will ultimately be made beyond the boundaries of Elmbridge.”

Kingston Council would like to ensure that no recommendations are made on sites within our borough boundary, and therefore request that where sites incur into Kingston they are removed from the assessment work. This would ensure that confusion is not caused when the report refers to *‘further consideration’* and *‘recommendations’* for parcels which cover land in both Elmbridge and Kingston.

penultimate section of the report. It is therefore proposed that the following text is inserted into the report (Section 6 – Recommendations, new second paragraph).

“Where it is recommended that the Council may wish to take forward for further consideration some parcels, and where these parcels cross the administrative boundary, consideration should only be given to the area within Elmbridge Borough. As Green Belt is a cross-boundary strategic issue, further discussions are however, likely to ensue with neighbouring authorities as part of this work”.

Arup (07/03/16) – It is noted that section 6 of the report already raises points around the above topic, thus, while we agree with the principle of the above text, it is suggested that the text is integrated into the existing report text as follows:

[Section 6, para 9-10]

“The recommendations of this report should only be applied to Green Belt land located within Elmbridge Borough. They should not be used to directly influence the approaches to Green Belt in neighbouring authorities and no recommendations have ultimately been made beyond the boundaries of Elmbridge.

Any amendments to the Green Belt should not however be considered in isolation. This is particularly the case where the recommendations apply to those Local Area parcels adjacent to the Borough boundary. ~~Green Belt is a cross-boundary strategic issue and the Council will need to engage with neighbouring authorities where relevant.~~ *Where it is recommended that the Council may wish to take forward for further consideration some parcels, and where these parcels cross the administrative boundary, consideration should only be given to the area within Elmbridge Borough. As Green Belt is a cross-boundary strategic issue, further discussions are however, likely to ensue with neighbouring authorities as part of this work.* The Council should be particularly mindful that any proposed amendments should not leave small, isolated ‘pockets’ of Green Belt in another Borough or District.

Noted.
During the parcelisation of land within the Green Belt consideration was given to the complex road network of the A3 and the A309 and whether additional parcels should be introduced both north and south of the main carriageway. The decision was taken however to divide these areas between Parcels 27 and 58, whatever most appropriate. *The logic for this decision is set out in the methodology, which states:*

“In some cases, boundary features are located close together, for example where roads, rivers, and/or railway lines run closely parallel to each other. These features were taken together to form one boundary rather than separately which would lead to small slithers of Green Belt land which would not form logical Local Areas for assessment.”

Given the complexity of the A3/A309 intersection, it was judged prudent to simplify the parcel boundaries here to identify logical areas for assessment.

The Royal Borough of Kingston upon Thames

We have looked at the two parcels that fall into Kingston’s boundary in more detail to assess the impact of including them within your assessments. Both parcels 58 and 27 cut through the main road of the A3 at a key intersection. Applying your methodology, these boundaries can be readily drawn tighter, and where necessary create an additional parcel to account for this complex A3 intersection. National Planning Policy Framework identifies in paragraph 85 that local authorities should:

“define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”

Parcel 58 which is identified as weak in meeting the NPPF purposes, is drawn to include a large area of land from Hook Road in the east (in Kingston’s boundary) spanning west. This parcel boundary includes Kingston, yet following the adopted methodology there is an easily defined boundary on the ground which includes a hedgerow. This parcel did not need to stretch further east to include Kingston within it.

Over half of parcel 27 is located within Kingston. The boundary is not as clearly defined as that of 58 to the south of the area; however we would still request that both of these areas are taken out of the Local Area Assessments.

It is considered that the Hook Road remains the most appropriate boundary for the parcel. Whilst there is a hedgerow running along the boundary of Parcel 58, which is coterminous with the Borough boundary, this not protected. It is not therefore considered to meet the requirements of the NPPF being neither permanent; defensible nor the additional boundary feature (as set out in para. 4.2.2 of the main report) of being durable.

In accordance with the NPPF and Methodology, parcels cross the Borough boundary into neighbouring authorities until the next permanent, defensible or durable boundary is identified. Green Belt is a cross boundary strategic issue and therefore this approach is considered most appropriate. This does mean that land within neighbouring Boroughs and Districts is assessed however, as will be clarified in Section 6 of the report, areas of land outside of the Borough will not be considered further.

Arup (07/03/16): Suggested response provided above.

Noted. The Council's & ARUPs responses and actions to the previous consultations will be resent to the Royal Borough.

The Royal Borough of Kingston upon Thames

It should also be noted that that comments made by my predecessor Andrew Lynch in an email on 11 June 2015 do not appear to have been taken account of in this review. I would welcome an explanation as to why these have not been taken on board.

Appendix 10 - Elmbridge Borough Council's & Arup's Response to the Green Belt Boundary Review: Supplementary Work (2018), Draft Methodology Consultation

Authority / Organisation	Comments	Council / ARUP Response & Action Points
Highways England	<p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>In the case of Elmbridge, Highways England is concerned with the impact on the M25 and A3 up to the junction with the A309.</p> <p>This is a consultation on the methodology of the Green Belt Boundary Review. We raise no concerns with the proposed methodology.</p> <p>However, Highways England will be concerned that the cumulative effect of development proposals have the potential to impact on the safe and efficient operation of the SRN, in this case the M25 and A3 junctions adjacent and within the councils boundary. The council will need to provide sufficient evidence to demonstrate that the proposals have no residual severe impacts on the operation of the SRN or provide proposals to mitigate such impacts to an acceptable level. I look forward to working with you further with regards to your concerns on the A3 and M25 as the consultations process develops in connection with the Elmbridge Local Plan.</p> <p>I hope this is helpful and I look forward to continued involvement with the development of the Elmbridge Local Plan.</p>	Comments noted.
Royal Borough of Kingston upon Thames	<p>Kingston Council does not have any comments to make on the methodology, except that it notes that a parcel that is partly within Kingston appears to be subject to further assessment. The Council reserves the right to comment on the findings of the supplementary work in question, particularly in relation to this parcel. We remain of the view that while it is appropriate that land is assessed in terms of the wider parcel, it is not appropriate for the work to recommend what approach should be taken to any land in the Green Belt that is not within Elmbridge borough.</p> <p>RBK is committed to positive engagement with neighbouring authorities, in line with the Duty to Cooperate, as part of the preparation of its and other council's Local Plans. We thus welcome the opportunity to assist your Council in relation to background evidence that is being undertaken for your forthcoming Local Plan and similarly appreciate the comments provided on the methodology for our Green Belt and Metropolitan Open Land Assessment, which is currently in progress.</p>	Comments noted.
Surrey County Council	We have no comments on the methodology.	Noted.
Reigate and Banstead Borough Council	<p>Thank you for your invitation to comment on Elmbridge's green belt boundary review methodology. We have only one comment to make that might potentially strengthen the methodology. In table 5, under the purpose 2 criteria, there is reference to 'essential', 'wider', and 'less essential' gaps between settlements, but this is currently an entirely qualitative measure – there could be a possibility of adding a quantitative dimension to this by defining how wide each of these gaps might be expected to be. For example, there is an essential gap if the gap between the two relevant settlements is 0-200 metres wide, and so on. This is the kind of criteria we used in our own green belt review at http://www.reigate-banstead.gov.uk/downloads/file/3671/green_belt_review_final_main_report.</p>	<p>The Council used these criteria in undertaking the original GBBR in 2016. It is considered appropriate to maintain consistency between the approach adopted in the original study and this supplementary work, and to allow for comparison between the performance of smaller Green Belt sub-area and the broader Local Areas/Strategic Areas assessed in the 2016 GBBR. Furthermore, it is felt that undertaking the assessment in this way maintains an important element of judgement and perception in relation to the importance of a gap, recognising that this may differ depending on individual circumstances. For example, a</p>

one kilometre gap with limited development in a landscape of rolling topography, where settlements are not visible from one another, may perform less strongly than a larger physical gap in flat countryside where there is intervisibility between settlements and sporadic urban development which may, in perceptual terms, reduce the sense of separation between the settlements. This approach is supported by the Inspector at the Welwyn Hatfield Local Plan examination.

Tandridge District Council

From our experience on undertaking Green Belt Assessments, we have the following comments to make:

I note that the methodology will only be assessing areas against purposes 1 to 3 and I am assuming that the rationale for this has already been provided but I would suggest that it would be helpful to explain it in this document or provide a link/pointer to where it can be found.

Text added to section 2.2.4 to explain rationale for assessing sub-areas against purpose 1-3 only.

At section 2.2.3, within the 2nd paragraph it reads as if you will only be looking at the 'relevant' purposes but then proceeds to state that each area will be assessed against all three, so I would suggest that this is re-worded.

Text amended in section 2.2.3 to clarify approach.

Purpose 1 – It might be useful to explain how you've defined what constitutes a 'large built-up area'.

Text amended in section 2.2.4 to cross-refer to section 4.4.1 of the 2016 GBBR which explains how large built-up areas were defined.

Purpose 3 – It might be useful to define what would be considered encroachment. Furthermore, I note that part of the assessment includes calculating % of built form in a sub-area, and that this will include agricultural buildings, however as you are aware these are listed in the NPPF as an exception and are not considered to be inappropriate or contrary to the purposes, and to do so as part of the GB assessment would be inconsistent with the treatment of a planning application.

Appendix A to the original GBBR includes definition of countryside encroachment as 'a gradual advancement of urbanising influences through physical development or land use change'. Include a cross reference to the Appendix A of the original GBBR.

For each area, an analysis of the scale, nature and character of any built form may be necessary, as well as consideration of its history.

The assessment criterion for Purpose 3 refers to 'protecting the openness of the countryside and is least covered by development'. The assessment itself comprises two parts. Firstly, an assessment of the % of built form contained within the sub-area which includes agricultural buildings and other 'appropriate' uses within the Green Belt. This assists in conducting an assessment of openness which is important in judging the degree to which encroachment has taken place. The Inspector for the Welwyn Hatfield Local Plan noted that the consideration of openness is the most important consideration in the context of safeguarding the countryside from encroachment. The second part of the assessment relates to the character of the sub-area and the extent to which it may reasonably be identified as countryside / rural. As the methodology indicates in order to differentiate between different areas, broad categorisation has been developed to encompass assessments of land use (including agricultural land use), morphology, context, scale, and links to the wider Green Belt. It is considered that this combined quantitative and qualitative assessment provides the appropriate approach to assessing countryside encroachment, taking account of the scale, character and use of any built form.

Richmond and Wandsworth Councils

We note the methodology and have no further comments to make at this time.

Noted.

Epsom and Ewell Borough Council

Firstly, EEBC officers would like to express their support for the approach being taken and commend Elmbridge's clear efforts in preparing a detailed evidence to inform the development of a sustainable strategy which will respond positively to the Housing Market Area's Objectively Assessed Housing Needs figure.

Comments noted.

Officers have no specific comments to make on the methodology, however, would like to offer the following general observations:

The GBBR will play an important role within the wider iterative evidence base. The outcomes of which will require the careful balancing of the social, environmental and economic advantages and disadvantages to bring forward a sustainable growth strategy to underpin the Local Plan. This is a matter for EBC, and the process will be undertaken/ evidenced through the Sustainability Appraisal. (Notwithstanding, the need to demonstrate if exceptional circumstances do or do not exist to amend the Green Belt boundary). From EEBC's experience of stakeholder involvement and consultation to date when preparing its Local Plan update, there appears to be a common misunderstanding from interest groups and indeed the development industry of the limitations or otherwise of the outcomes of such Green Belt assessments/ reviews / studies. I would recommend that the role of the study's findings and recommendations within the Local Plan evidence base and the formulation of a sound strategy are highlighted.

Text added to Section 1.1 to highlight the role of the study in the Local Plan process and the formulation of a sound spatial strategy.

Like EBC, EEBC are undertaking a stage 2 of its Green Belt Study (GBS) (published in April 2017) for which a recent stakeholder workshop was held to discuss the methodology. The initial EEBC GBS identified 52 local parcels based on defensible boundaries, the majority of these parcels were of significantly smaller in size than those identified in the EBC GBBR. At this second stage, EEBC considers that further subdivision of its local parcels could not be achieved as they would not be supported by existing defensible boundaries.

Noted.

Runnymede Borough Council

It is welcomed that the draft methodology for the review and its impetus is broadly similar to the methodology employed for the Runnymede Borough Council Green Belt Review Part 2 thus providing a consistent approach across our Local Authority areas.

Comments noted. The Council intends to engage with Duty to Cooperate organisations on a draft version of the study prior to it being finalised.

At this stage we have no comments to make on the draft methodology. However, we reserve the right to make additional comments on the outcome of the review as a part of further Duty to Co-operate engagement, due to the possible close proximity to our boundary of potential areas for release. We note that a 'Weakly Performing Local Area' and a 'Local Area for Potential Sub-division' have been identified in the published Elmbridge Borough Council Green Belt Boundary Review Methodology and Assessment.

Appendix 11 – Elmbridge Local Plan - Duty to Cooperate - Meeting Elmbridge's Housing Need, Letter to HMA Partners & Neighbouring Authorities, January 2020.



Elmbridge
Borough Council

... bridging the communities ...

Civic Centre
High Street, Esher
Surrey KT10 9SD
01372 474474

contactus@elmbridge.gov.uk
elmbridge.gov.uk

FAO: Chief Planning Officer /
Head of Service with the responsibility for
Planning

Sent via email

contact: Suzanne Parkes
Planning Policy & Strategy
Manager
direct line: 01372 474810
e-mail: sparkes@elmbridge.gov.uk
my ref: DtC January 2020
your ref:

27 January 2020

Dear Sir/Madam,

Elmbridge Borough Council Local Plan: Duty to Co-operate

Elmbridge Borough Council is currently preparing a new Local Plan that will set out its development strategy and detailed planning policies for the borough up to 2036. As with most Local Planning Authorities (LPAs) in the South East, one of our biggest challenges is meeting our housing need (as set by the Government's standard methodology) against a back drop of environmental and planning constraints.

As part of the Plan's preparation, the Council is exploring options for how its housing need figure can be met. A preferred option has not yet been determined however, as set out in the [Options Consultation 2019](#), it is highly unlikely that there will be sufficient land within the existing built-up areas to accommodate circ. 9,345 new homes in full. Our estimate is that there is sufficient land to build approximately 5,300 new homes; equating to a potential shortfall of land to accommodate nearly 4,000 new homes.

We appreciate that LPAs are at different plan-making stages and others will be in a similar position in terms of responding positively to the challenge of addressing housing need. However, under the 2011 Localism Act and the provisions of the National Planning Policy Framework (NPPF) I am formally asking whether your authority would be able to meet any of Elmbridge's unmet housing need?

I look forward to hearing from you on this important issue and would be grateful for a response by **Monday 24 February 2020**. Please respond to planningpolicy@elmbridge.gov.uk

If you have any queries please do not hesitate to contact Suzanne Parkes, Planning Policy and Strategy Manager on 01372 474810 / sparkes@elmbridge.gov.uk

Yours faithfully,

Kim Tagliarini
Head of Planning Services

Appendix 12 - Elmbridge Local Plan - Duty to Cooperate - Meeting Elmbridge's Housing Need, Letter to HMA Partners & Neighbouring Authorities, October 2021.



Civic Centre
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FAO: Chief Planning Officer /
Head of Service with the responsibility for
Planning

Sent via email

contact: Suzanne Parkes
Planning Policy & Strategy
Manager
direct line: 01372 474810
e-mail: sparkes@elmbridge.gov.uk
my ref: DtC October 2021
your ref:

18th October 2021

Dear Sir/Madam,

Elmbridge Borough Council Local Plan: Duty to Co-operate

Elmbridge Borough Council is currently preparing a new Local Plan that will set out its development strategy and detailed planning policies for the borough up to 2037. As with most Local Planning Authorities (LPAs) in the South East, one of our biggest challenges is meeting our housing need (as set by the Government's standard methodology) against a backdrop of environmental and planning constraints.

As part of our plan preparation, the Council is exploring options for how its housing need figure can be met. A preferred option has not yet been determined although our emerging evidence base relating to housing land supply shows that there is a realistic possibility that there will be insufficient land within the existing built-up areas to accommodate circ. 9,615 new homes in full. Indeed, current investigations (work is ongoing) would indicate a potential shortfall of 2360 homes (or approximately 25%).

We appreciate that LPAs are at different plan-making stages and others will be in a similar position in terms of responding positively to the challenge of addressing housing need. It is also noted that when we engaged with you in January 2020 on the potential unmet need of Elmbridge Borough and whether this can be met elsewhere, it was stated that your authority was not in a position to meet any unmet need arising from our Borough.

We are mindful however, that the position of your Local Plan may have changed over the last 18 months and that in accordance with provisions of the Localism Act 2011 and the National Planning Policy Framework (NPPF, 2021), we need to clarify whether any such changes might affect our consideration of options for meeting need and related issues.

In short, I am asking whether your authority would be able to assist in meeting any of Elmbridge's unmet housing need? If you consider it is possible for your authority to accept some or all of the unmet need, then we will seek to discuss this with you further and then seek to draw up a Statement of Common Ground to reflect the agreement that some or all of the need can be met by your authority. If not, please explain the reasons.

I look forward to hearing from you on this important issue and would be grateful for a response by 1st November 2021. Please respond to planningpolicy@elmbridge.gov.uk

If you have any queries please do not hesitate to contact Suzanne Parkes, Planning Policy and Strategy Manager on 01372 474810 / sparkes@elmbridge.gov.uk

Yours faithfully,

Kim Tagliarini
Head of Planning Services

Suzanne Parkes
Planning Policy & strategy Manager
sparkes@elmbridge.gov.uk

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Main Number (01372) 732000
Text
www.epsom-ewell.gov.uk
DX 30713 Epsom

Date: 8.3.22
Your Ref: DtC October 2021
Our Ref: DtCLHN_Elmbridge

Contact
Direct line
Email
Victoria Potts
vpotts@epsom-ewell.gov.uk

Dear Ms Tagliarini,

Elmbridge Borough Council Local Plan: Duty to Co-operate

With apologies for the delay, thank you for your letter dated 18 October 2021, further correspondence with my predecessors, John Cheston and Viv Evans (including sending the working draft “How The Strategy Was Formed” paper), and subsequent discussions with me.

The borough covers 3,400 hectares, 42% is designated Green Belt and there are a number of constraints within it including a Site of Special Scientific Interest (SSSI). The remaining land, within the urban area, is densely populated. The overall population of the borough is just over 80,000, making it one of the most densely populated in Surrey.

Epsom and Ewell Borough Council’s (EEBC) Local Housing Need figure as calculated by the “standard method” is 579 per annum, and our latest 5-year housing land supply calculation indicates 0.68yrs housing supply across the borough.

EEBC had conducted a strategic issues and options consultation and a number of studies leading up to its Regulation 18 Local Plan consultation, intended to be undertaken in 2021. The studies included a Green Belt review and a draft Strategic Housing Land Availability Assessment (SHLAA) in 2017. As you will see from the attached 2017 SHLAA, EEBC could only identify capacity for 2,725 new homes leaving a shortfall of 4381 units over the 17-year period (2015-2032) (a shortfall of 4,381 units over a 17-year period).

Owing to the Covid 19 pandemic the decision was taken to delay the Regulation 18 Local Plan consultation. We are in the process of updating our Local Development Scheme (LDS) and conducting up to date evidence base studies, where necessary. These include a new Land Availability Assessment (LAA) and Urban Capacity study, which will update/replace the 2017 SHLAA.

We are therefore in the process of conducting a fresh call for sites to inform the revised LAA and will have a better idea of our capacity when this is complete. However, meeting our own housing need of 579 homes per annum is going to be challenging and, on the evidence available at this stage, we are not able to conclude that EEBC we will be able to meet its identified need or therefore, any of our neighbours' identified unmet need, including the Borough of Elmbridge. Once we have concluded our LAA we would welcome a conversation about our findings. Should you have any questions or require clarification please do not hesitate to contact me.

Yours Sincerely,

A rectangular area where the signature of Victoria Potts has been redacted with a light grey box.

Victoria Potts
Head of Place Development
Epsom and Ewell Borough Council

Kim Tagliarini
Head of Planning Services
Civic Centre
High Street
Esher
Surrey. KT10 9SD

Dear Kim,

Thank you for your letter of 18 October 2021, asking whether Mole Valley District Council would be able to meet any of Elmbridge Borough Council's unmet need.

As you will be aware from the recent Duty to Cooperate activity between the two authorities, namely:

- The Letter from Councillor Stephen Cooksey, the Leader of Mole Valley District Council, to Councillor Stuart Selleck, the then Leader of Elmbridge Borough Council, dated 3 March 2021;
- A meeting with officers from Mole Valley, Elmbridge, Kingston-upon-Thames and Epsom & Ewell on 15 July; and,
- The Statement of Common Ground between Elmbridge and Mole Valley, which was signed on 10 August 2021

Mole Valley finds itself in a similar predicament to Elmbridge.

Mole Valley is currently consulting on its Draft Local Plan (Proposed Submission Version) and within the plan, the Council has been forced to plan for a shortfall of 1,752 against its Government-calculated Local Housing Need (or approximately 23%).

You may be interested to know that the identified capacity of 353 new housing units is above the 2014-based and 2016-based ONS household projections for the District and significantly above the 2018-based household projections of 142 new households per year.

The reasons why Mole Valley is unable to meet its Local Housing Need figure is that the figure is calculated without reference to protected areas that are specifically referred to in the National Planning Policy Framework (Paragraph 11b, footnote 7) and much of Mole Valley is covered by these nationally protected areas:

- 76% of the land in Mole Valley is designated as Green Belt; and
- 36% of the land in Mole Valley is designated as part of the Surrey Hills Area of Outstanding Natural Beauty and this area are not totally subsumed within the Green Belt;

Furthermore, both the District's principal towns, Dorking and Leatherhead, are designated as Conservation Areas.

Despite these constraints, my officers have worked hard to ensure that we do not leave any stone unturned in our pursuit of an appropriate but maximised housing capacity. This has included releasing 131ha of Green Belt, which perform poorly when assessed against the purposes of the

Green Belt but which, nevertheless, are currently designated Green Belt. However, we have now reached a position where any more proposed development would significantly harm the landscape and heritage attributes of the District.

As you know, the Council has itself sought assistance from all of the districts and boroughs in Surrey and the authorities with which it has significant internal migration links in an attempt to offset its unmet housing need but, in all instances, it has been unsuccessful. Therefore, given that the Council cannot meet its own housing need, it is unable to meet any other authorities' housing need.

Nevertheless, I wish you well with your plan making.

Yours sincerely,



Piers Mason,
Executive Head
Planning and Regulation

**Executive Director of Place
Nazeya Hussain**

**Kim Tagliarini
Head of Planning Services**

Sent via email to: planningpolicy@elmbridge.gov.uk



1 November 2021

Your ref: DtC October 2021

Dear Kim

Elmbridge Borough Council Local Plan: Duty to Co-operate

Thank you for your letter dated 18th October 2021.

We note that Elmbridge Borough is likely to have a shortfall in meeting its housing need in full.

We acknowledge the constraints that cover much of the land in Elmbridge Borough and the challenges these present in trying to meet your housing needs within the existing built-up areas.

The Royal Borough of Kingston upon Thames also has significant protected areas:

- 17% of the land in our Borough is covered by Green Belt.
- 15% of the land in our Borough is covered by Metropolitan Open Land.
- 9% of the land in our Borough is covered by Conservation Areas.

My officers are currently working to identify how we can optimise delivery of the sites that have been identified as having potential to deliver additional homes in our Borough. Nonetheless, at this moment in time, we are currently unable to accommodate any unmet housing needs beyond the already very challenging housing requirement prescribed in the London Plan to deliver 9,640 additional homes in the Borough between 2019/20 and 2028/29.

We are currently preparing a new Local Plan to cover the period to 2041. As part of this work we will have recently carried out a further engagement with our local residents to understand their needs given the significant changes experienced during the Covid-19 pandemic and the emerging economic context. We will now proceed with preparing a Local Plan First Draft, which we will be consulting our local residents and key stakeholders - such as yourselves - on in 2022.

My officers will of course continue to liaise with your officers through the Duty to Cooperate and continue to seek ways in which we can help to meet the unmet housing needs of residents of both Elmbridge Borough and the Royal Borough Kingston upon Thames.

Yours sincerely

Tim Naylor
Assistant Director for Strategic Planning and Infrastructure

C.c. Suzanne Parkes

Appendix 13 – Engagement with Other Neighbouring Authorities on the Local Plan Evidence Base, Matter 1 – Housing

Evidence Base	Consulted	Response Received				
		Guildford BC	Woking BC	Runnymede BC	Spelthorne BC	LBR
Establishing the Housing Market Area & Assessing Local Housing Need						
HMA (formation) consultation	July 2015	Yes	No	Yes	Yes	Yes
SHMA Stakeholder Interview	August 2015	Yes	Yes	Yes	Yes	Yes
Local Housing Needs Assessment – Stakeholder Interview	Early 2020	Yes	Yes	Yes	Yes	Yes
Seeking to address Local Housing Need						
Providing for need in the urban areas						
Land Availability Assessment – methodology consultation	February 2016	No	No	No	No	Yes
Urban Capacity Study – methodology consultation	November 2017	No	No	No	Yes	No
Urban Capacity Study – draft report consultation	April 2018	No	Yes	Yes	No	No
Assessing Green Belt and Constraints to development						
Review of Absolute Constraints – methodology consultation	May 2015	No	No	Yes	Yes	No
Green Belt Boundary Review – methodology consultation	May 2015	No	No	Yes	Yes	Yes

Appendix 13 – Engagement with Other Neighbouring Authorities on the Local Plan Evidence Base, Matter 1 – Housing

Evidence Base	Consulted	Response Received				
		Guildford BC	Woking BC	Runnymede BC	Spelthorne BC	LBR
Green Belt Boundary Review Workshop	May 2015	Yes	Yes	Yes	Yes	No
Green Belt Boundary Review – informal consultation with LPAs where Local Areas crossed borough boundaries	September 2015	Yes	No	Yes	Yes	N/A
Green Belt Boundary Review – draft report consultation	December 2015	No	No	Yes	Yes	No
Green Belt Boundary Review: Supplementary Work – draft methodology consultation	December 2017	No	No	Yes	No	Yes
Green Belt Boundary Review: Supplementary Work – draft report consultation	December 2018	No	No	No	No	No

Appendix 14 – Summary of responses received to Elmbridge Borough Council’s Duty to Cooperate Letter regarding Elmbridge’s Housing Need sent to all South East Authorities, January 2020

Local Authority	Able to assist EBC	Local Plan Stage as at January 2020	Yet to establish own housing need and whether this can be met	Unable / unlikely to meet own housing need	LPA area also constrained e.g. GB, AONB	Unable / unlikely to meet own housing need without assistance from other LPAs	Unable / unlikely to meet own housing need without amending GB boundaries	Unable to assist as not an adjoining LPA / neighbouring Borough / HMA	Unable to assist as lack of / no previous DtC engagement by EBC	Considers EBC should amend GB before DtC engaged	Is meeting need. This may include via amending own GB and / or with assistance or already assisting other neighbouring LPAs	Council ceasing operations
Adur District Council	No	Adopted 2017 – under review		✓	South Downs NP & Coastal Authority							
Arun District Council	No	Adopted 2018 – Review commencing						✓	✓			
Ashford Borough Council	No	Adopted – February 2019										
Aylesbury Vale District Council	No	Main Modifications			50% of authority area is either Green Belt or AONB						✓	✓ (31st March 2020)
Basingstoke & Deane BC	No				Areas within the borough have the following designations: Atomic Weapons Establishment [AWE], AONB, Poor Water Quality							
Bracknell Forest BC	No	Submission scheduled for 2020			Thames Basin Heaths SPA and Green Belt			✓				
Brighton & Hove City Council	No	City Plan Part 1 – Adopted March 2016 City Plan Part 2 – Regulation 19 scheduled May/June 2020		✓	Sea (South Boundary) South Downs National Park North, East and West of Urban area			✓				

Canterbury City Council	No	Local Plan – Adopted July 2017 Review set to commence										
Chichester District Council	No	Regulation 19 – Concluded December 2018			South Downs National Park			✓			✓	
Chiltern District Council	No	Submitted for Examination – September 2019			88/87% Green Belt 72% AONB	✓						
Dartford Borough Council	No	Regulation 18	✓		Majority of Dartford designated as Green Belt				✓			
East Hampshire District Council	No	Regulation 19 (Pending)						✓		Implied but not explicitly stated		
Eastbourne Council	No	Regulation 18 – Ended November 2019							✓			
Eastleigh Borough Council	No	Submitted to PINS						✓				
Epsom & Ewell Borough Council	No	Not given		✓								
Fareham Borough Council	No	Regulation 19 – Due this year	✓					✓				
Gosport Borough Council	No	Local Plan Adopted – October 2015				✓		✓				
Guildford Borough Council	No	Local Plan Adopted – April 2019			Green Belt		✓	✓				
Hart District Council	No	Inspectors Report Received/Pre-Adoption						✓			✓	
Hastings Borough Council	No	Pre-Regulation 18		✓								
Havant District Council	No	Not given						✓				

Horsham District Council	No	Regulation 18 – Concluded 30 th March 2020						✓		✓		
Isle of Wight Council	No	Not given										
Lewes Borough Council	No	Pre-Regulation 18			56% South Downs National Park	✓						
Maidstone Borough Council	No	Not given										
Medway Council	No	Not given						✓				
Mid Sussex District Council	No	Mid Sussex District Plan – Adopted 2018						✓			✓	
Mole Valley Council	No	Regulation 19 – Concluded 23 rd March 2020			75% Green Belt, Surrey Hills AONB, Mole Gap SAC		✓					
New Forest District Council	No	Inspectors Report received 25 th March 2020		✓								
Portsmouth City Council	No	Not given (Work on HELAA underway)				✓						
Reading Borough Council	No	Not given			Flood Risk							
Reigate & Banstead BC	No	Local Plan Reviewed – July 2019 Development Management Plan – Adopted September 2019			69% Green Belt, AGLV and Flood Risk			✓				
Rother District Council	No	Core Strategy Adopted – September 2014		✓	82% AONB and additional 7% Internationally designated for nature conservation							
Runnymede Borough Council	No	Main Modifications published – January 2020	✓		Flood Risk, Green Belt and Thames Basin Heaths SPA							

Rushmoor Borough Council	No	Local Plan Adopted – February 2019										
Sevenoaks District Council	No	Inspectors Report Received – 6 th March 2020			93% Green Belt 60% AONB	✓						
Slough Borough Council	No	Not given										
South Bucks District Council	No	Local Plan submitted to PINS – September 2019			87% Green Belt							
South Oxfordshire DC	No	Not given						✓				
Spelthorne Borough Council	No	Regulation 19		✓	65% Green Belt Flood Risk		✓					
Surrey Heath Borough Council	No	Regulation 18		✓	44% Green Belt 42% Thames Basin Heaths SPA 80% 'Other Designations'							
Tandridge District Council	No	EiP			'Green Belt, Landscape and Infrastructure constraints'							
Test Valley Borough Council	No	Not given						✓				
Thanet District Council	No	Post-EiP			SPA/SAC/Ramsar			✓				
Tonbridge & Malling	No	Submitted January 2019 and is now in the Examination phase						✓			✓	
Vale of White Horse DC	No	Not given						✓				
Waverley Borough Council	No	Local Plan Part 1 – Adopted February 2018						✓				

Wealden District Council		Local Plan submitted to PINS – January 2019 Local Plan submission withdrawn – February 2020	✓		Ashdown Forrest SAC/SPA Pevensey levels SAC/Ramsar 53% AONB 7% South Downs National Park	✓		✓				
West Oxfordshire	No	Local Plan Found Sound 2018			33% Cotswolds National Park							
Winchester City Council	No	Not given						✓				
Woking Borough Council	No	Not given						✓		✓	✓	
Wokingham Borough Council	No	Not given						✓				
Worthing Borough Council	No	Reg. 18		✓	South Downs NP & Coastal Authority							
Wycombe District Council	No	Local plan Adopted – August 19						✓			✓	

Appendix 15 - Summary of responses received to Elmbridge Borough Council's Duty to Cooperate Letter regarding Elmbridge's Housing Need sent to all South East Authorities and neighbouring London Boroughs, October 2021

Local Authority	Unable to assist EBC	Local Plan Stage	Yet to establish own housing need and whether this can be met	Unable / unlikely to meet own housing need	LPA area also constrained e.g. GB, AONB	Unable / unlikely to meet own housing need without assistance from other LPAs	Unable / unlikely to meet own housing need without amending GB boundaries	Unable to assist as not an adjoining LPA / neighbouring Borough / HMA	Unable to assist as lack of / no previous DtC engagement by EBC	Considers EBC should amend GB before DtC engaged	Is meeting need. This may include via amending own GB and / or with assistance or already assisting other neighbouring LPAs	Council ceasing operations
Adur District Council	✓	Submitted - EIP November/December		✓	South Downs NP & Coastal Authority							
Bracknell Forest BC	✓	Submission scheduled for end of 2020 - early 2021			Thames Basin Heaths SPA and Green Belt			✓			✓	
Brighton & Hove City Council	✓	City Plan Part 1 – Adopted March 2016 City Plan Part 2 – Regulation 19 scheduled May/June 2020		✓	Sea (South Boundary) South Downs National Park North, East and West of Urban area							

Dartford Borough Council	✓	Regulation 18			Majority of Dartford designated as Green Belt			✓			✓	
Dover District Council	✓	Regulation 19 – March 2021										
Epsom & Ewell Borough Council	✓	Not given		✓			✓					
Fareham Borough Council	✓	Submitted to PINS		✓								
Greater London Authority	✓											
Guildford Borough Council	✓	Local Plan Adopted – April 2019			Green Belt							
Hastings Borough Council	✓	Pre-Regulation 18										
Havant District Council	✓	Not given										
Horsham District Council	✓	Regulation 19 – July 2021		✓				✓		✓	✓	
London Borough of Richmond-Upon-Thames	✓	Pre-Regulation 18		✓								

Mid Sussex District Council	✓	Mid Sussex District Plan – Adopted 2018						✓				
Mole Valley Council	✓	Regulation 19 – Concluded 23 rd March 2020		✓	75% Green Belt, Surrey Hills AONB, Mole Gap SAC							
Reigate & Banstead BC	✓	Local Plan Reviewed – July 2019 Development Management Plan – Adopted September 2019			69% Green Belt, AGLV and Flood Risk			✓				
Rother District Council	✓	Core Strategy Adopted – September 2014			82% AONB and additional 7% Internationally designated for nature conservation							
Runnymede Borough Council	✓	Main Modifications published – January 2020			Flood Risk, Green Belt and Thames Basin Heaths SPA			✓		✓	✓	
Spelthorne Borough Council	✓	Regulation 19		✓	65% Green Belt Flood Risk					✓		

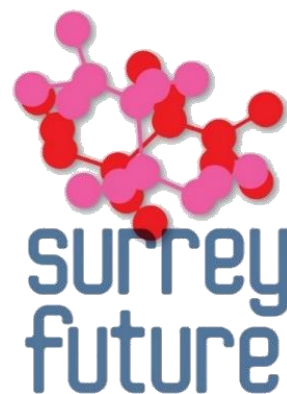
Wealden District Council	✓	Local Plan submitted to PINS – January 2019 Local Plan submission withdrawn – February 2020			Ashdown Forrest SAC/SPA Pevensey levels SAC/Ramsar 53% AONB 7% South Downs National Park			✓				
Winchester City Council	✓	Not given						✓				
Woking Borough Council	✓	Not given				✓						



SURREY'S 2050 PLACE AMBITION

**Our approach
to place leadership
infrastructure & good growth**

Version 1 - July 2019



Preface

Surrey as a place has a central role to play in the regional and national economy and is already making a significant contribution to wealth creation, enterprise, jobs, business, homes, physical infrastructure and skills.

Across Surrey there is also a deeply held ambition for the future – one that recognises the area’s many unique characteristics and strengths and which brings an unwavering focus on creating great places for people to live, work, learn and enjoy. Our fierce ambition for the vitality of our places and our communities is at the heart of what defines our approach to “good growth”.

Our Place Ambition also recognises the value of local engagement and taking a clear and proactive stance with all those who can contribute to the future success of our places including Government departments and national infrastructure providers. It recognises the importance of providing a clear and coherent narrative about what we want to achieve, the opportunities we are determined to grasp and what we will need (such as our fair share of infrastructure and support) in order to succeed.

Place ambition relies on clear and unambiguous place leadership, and fortunately, this is in plentiful supply across Surrey. Our Place Ambition draws on the passion, aspirations, actions and increasing successes being demonstrated by Boroughs and Districts, the County Council, the two Local Enterprise Partnerships and the numerous other stakeholders who have been working collaboratively together to shape the future success of their areas.

The Surrey Place Ambition represents an important step forward in our approach to bringing forward good growth and provides a navigation point from which we will continue to work together to ensure our ambitions are delivered on the ground.



Rob Moran,
Chair, Surrey Future Steering Board

Introduction

1.1 The Surrey Local Authorities and their strategic partners¹ have agreed to work together to ensure that Surrey continues to play a full part in the economic success of the country over the next 30 years, as a key driver of growth, innovation and skills in the national economy, and an excellent place where people can live, work and learn.

To do this we will be taking an ambitious approach to facilitate delivery of 'good growth'.

Good Growth for Surrey ...

- Is proportionate and sustainable, focusing on the places where people both live and work.
- Supports overall improvements to the health and well-being of our residents
- Is supported by the necessary infrastructure investment - including green infrastructure.
- Delivers high quality design in our buildings and public realm.
- Increases resilience and flexibility in the local economy.
- Builds resilience to the impacts of climate change and flooding.
- Is planned and delivered at a local level while recognising that this will
- inevitably extend at times across administrative boundaries.

1.2 Building on our existing partnerships, collaborations and growing track record is key to our approach, particularly on strategic planning² and infrastructure priorities³. Our shared ambition will help us deliver services in the most effective way, maximising private sector investment and government funding opportunities and delivering efficiencies of scale. This will be underpinned by three shared strategic priorities that will inform and support targeted delivery at a local level.

1.3 Surrey's unique strategic position with its close proximity to London and two major airports (Heathrow and Gatwick), access to the South Coast, and its excellent road

¹ The eleven Surrey Districts and Boroughs and Surrey County Council are working together under the auspices of the Surrey Future Steering Board. Partners include Coast to Capital and Enterprise M3 Local Enterprise Partnerships, Gatwick Diamond Initiative and Surrey Nature Partnership - <https://www.surreycc.gov.uk/land-planning-and-development/development/surrey-future/surrey-future-steering-board>

² Surrey Local Strategic Statement: <https://www.surreycc.gov.uk/land-planning-and-development/planning/introduction-to-planning/strategic-development-policy>

³ Surrey Future: <https://www.surreycc.gov.uk/land-planning-and-development/development/surrey-future>

and rail connectivity, its highly skilled workforce, diverse and increasingly digital business base, its world class education facilities, and its excellent quality environment are all valuable assets which will be used to grow our businesses and talent base year on year. However, the very assets that make Surrey such an attractive place to locate to and visit are the ones that need proactive management to ensure that existing challenges, such as traffic congestion, are addressed and that they receive the right level of investment to enhance Surrey's offer for existing and future generations.

- 1.4 Despite a strong track record of growth across Surrey, we are not complacent about the opportunities and challenges ahead. All relevant partners are actively involved and planning ahead for the continuing growth of London's population, the expansion of Heathrow Airport and Gatwick Airport's ongoing development and growth, investment in rail lines and changing work practices and lifestyles. But we also need to tackle the wider issues that will be fundamental to the success of our approach, particularly mitigating and adapting to the impacts of climate change, supporting the health and well-being of our residents and addressing disparities across the County. To do this we need strong strategic leadership at a political level and a willingness to take difficult decisions in the interests of ensuring that long term prosperity and overall success – good growth - is secured for Surrey.
- 1.5 The role of our 'Place Ambition' is to help us deliver this over the next 10, 20, 30 years. It is an agreed growth strategy for Surrey which sets out three long term strategic priorities and eight identified Strategic Opportunity Areas, which will be shaped and delivered within the context of our shared growth vision, principles and values.
- 1.6 Surrey's Place Ambition has therefore been developed to provide us with the maximum opportunities to proactively manage growth while at the same time investing in the right infrastructure and assets, and enhancing the character of the natural environment that makes Surrey the unique and attractive place it is for residents, businesses and visitors alike. It will help underpin the ambition in the local plans developed and implemented by boroughs and districts across Surrey and align these with infrastructure priorities of the County Council and those of other strategic infrastructure providers, for example in areas such as transport, education and utilities. It will help unlock growth opportunities by addressing major infrastructure needs, helping to add capacity to key transport infrastructure and address major congestion issues. It will be reflected in the local industrial strategies

covering the Surrey area⁴, helping to focus investment to maximise productive capacity and increase productivity.

- 1.7 Key to our ambitious approach to delivering good growth will be making full use of our own existing assets, plans and strategies. But we cannot deliver good growth on our own; we will need the help of our strategic partnerships across Surrey and support from our wider sub-national partners and Government, particularly in relation to accessing additional funding and investment opportunities. We will also need to work with our local communities, making sure that there is wide ranging choice in housing, services and jobs across Surrey, and that our places are distinctive, attractive, well designed, full of character and are of the highest quality. Underlying all of this will be our ambition to improve the overall quality of health and well-being across Surrey, recognising that healthy places and people are a key factor in our long term prosperity and fundamental to the delivery of **good** growth.

⁴ Surrey is split between two Local Enterprise Partnership areas – Coast to Capital LEP (which covers Epsom & Ewell, Mole Valley, Reigate & Banstead and Tandridge) and Enterprise M3 (which covers Elmbridge, Guildford, Runnymede, Spelthorne, Surrey Heath, Waverley and Woking)

Surrey in Facts and Figures

Surrey's People

- Surrey is one of the most densely populated shire counties in England with a population of 1.185 million. This is set to grow by at least 106,000 people by 2031 (9% increase).
- One in five of Surrey's population is aged 65+ and this group is expected to grow by 100,000 by 2040 which will present significant challenges for future care provision across the county
- Although Surrey has one of the highest life expectancies in the country there are considerable challenges around maintaining and improving health and well-being. It is estimated that 10,600 children aged 5 to 15 have a mental health disorder. Similarly, there is considerable variation in deprivation, with over 23,000 children in Surrey living in poverty, which is linked to poor health and wellbeing outcomes for them and their parents.

Surrey as a Place

- Surrey covers an area 1,663 km², with 87% within urban areas and 13% rural. 74% of land is covered by national and international designations such as Green Belt and Areas of Outstanding Natural Beauty, placing significant pressures on land to meet development needs, particularly housing.
- The Government estimates that at least 67,500 new homes will be needed in Surrey over the next 10 years (6,750 each year). This is double the amount of new homes required in previous housing targets and current levels of housing completions (3,500 per year).
- Adding to these challenges, will be pressures on Surrey's infrastructure arising from London which is expected to deliver 65,000 new homes each year, many of which will be built in neighbouring outer London boroughs, such as Kingston-upon-Thames and Croydon.
- Significant growth is also planned for neighbouring areas outside London, for example 4,000 new homes in the Aldershot Urban Extension, a new community of 4,000 at Whitehill/ Bordon and 2,000 in North Horsham.
- Surrey has some of the most expensive places to live in the country with housing affordability (gross property value to earnings ratio) of 11.79 compared to 9.79 in the rest of the South East of England.

Surrey in Facts and Figures (continued)

Surrey's Economy

- At just over £40 billion, the Surrey-wide economy is the largest in the South East with the highest GDP per capita of any county in England. But the rate of growth has been slowing down, particularly in East Surrey, and we are therefore collectively no longer maintaining our relative position as a major part of the UK economy.
- There are over 640,000 economically active adults in Surrey and the employment rate of 79% is higher than the national average. Unemployment rates are low with only 0.7% of the population aged 16-64 claiming unemployment benefits.
- The number of jobs in the county is forecast to grow by 59,000 by 2030.
- More than 1 in 3 of the local population aged 16+ are educated to NVQ4+ (equivalent to Degree level or above). In 2018, 54.6% of the population aged 25-64 were educated to NVQ4+ which compares to 46.7% for the South East and 43.2% for England.
- Despite offering excellent transport connectivity for Surrey businesses, it is estimated that road congestion and associated delays on Surrey roads cost the local economy £550m each year.

Surrey's Infrastructure

- Whilst Surrey is one of the best connected places in the country with first class road links to London and surrounding areas, motorways through the county carry 80% more traffic than average for the South East and Surrey's A Roads have 66% more traffic than the national average.
- About 131,000 of Surrey residents (19% of the working population) commute to London every day. 40% growth in passengers on the main line to Waterloo Station is anticipated by 2043, yet significant investment to provide additional capacity and address overcrowding (particularly from stations between Woking and Surrey's border with London) is needed before any growth is considered.
- Surrey has over 98.0% coverage of superfast broadband (>24 Mbps) which is slightly higher than the coverage for the England which is 96.3% (data from June 2019). Surrey currently (June 2019) has a full fibre coverage of 5.54% which is below the figures for England of 7.52%. Full fibre coverage is required to run 5G networks.
- More generally, estimated infrastructure costs to support growth are £5.5bn, with a current (2017) funding gap of £2.5bn.

Developing Our 2050 Place Ambition

Our Vision, Principles and Values

- 2.1 Our **Vision** is for a county of well-functioning and connected places, with healthy communities and a high quality of life. Surrey recognises its important role in the wider South East economy and will build on its strengths while retaining the qualities which give the county its distinctive character. Through collaborative working, local authorities and partner agencies will seek positive and innovative solutions to shared challenges to meet the need for new homes, secure greater economic prosperity and infrastructure improvements and to maintain and enhance the natural and built environment.
- 2.2 Our shared **Principles and Values** will guide the strategic priorities developed through our 2050 Place Ambition, helping to mitigate any negative impacts and maximise the benefits for our local communities⁵. We aim to do this by:
- Taking an ambitious place-based approach which reflects functional relationships and not necessarily always administrative boundaries.
 - Leveraging our unique location, skills base and strategic transport connectivity to secure 'good growth'.
 - Focusing growth and infrastructure investment in areas that, with the right interventions, offer the greatest potential to support long term sustainable growth and increased productivity, including through enhanced connectivity.
 - Addressing the significant challenge of housing affordability across Surrey and the resulting lack of housing for essential workers, by building more, well-designed affordable homes.
 - Supporting a strong economy through the retention and expansion of existing local businesses and increasing opportunities for growth sectors and new businesses to locate and invest in Surrey.

⁵ The Place Ambition focuses on investment priorities at a strategic level (i.e. on a Surrey-wide level) which will be in addition to those developed and secured at a local level (i.e. at a district, borough or community level).

- Maximising all opportunities to enhance the health and wellbeing of Surrey's residents, by reducing existing high levels of commuting, improving air quality, mitigating the impacts of climate change on our environment and natural capital, improving access to high quality green spaces and ensuring that new development contributes positively to community amenities and infrastructure.
- Ensuring that all development is high quality and well-designed, with local authorities leading by example in delivering development that contributes positively to the value of our places and is resilient and adaptable to meet current and future needs.
- Using our own resources and assets to directly drive, influence and support growth across Surrey and specifically, to facilitate a more equitable access to homes and wider choice of housing to meet local needs.
- Taking a positive, proactive and responsive stance towards the opportunities for growth across Surrey to help demonstrate our individual and collective place leadership roles in overcoming and responding to the challenges ahead. We will ensure that this approach is embedded over time in our organisational cultures and in our local plans, policies and strategies.
- Capitalising on the opportunities provided by enhanced digital connectivity and associated transformation of business processes to maximise value from our assets and enhance the quality of the public service offer in both urban and rural areas.

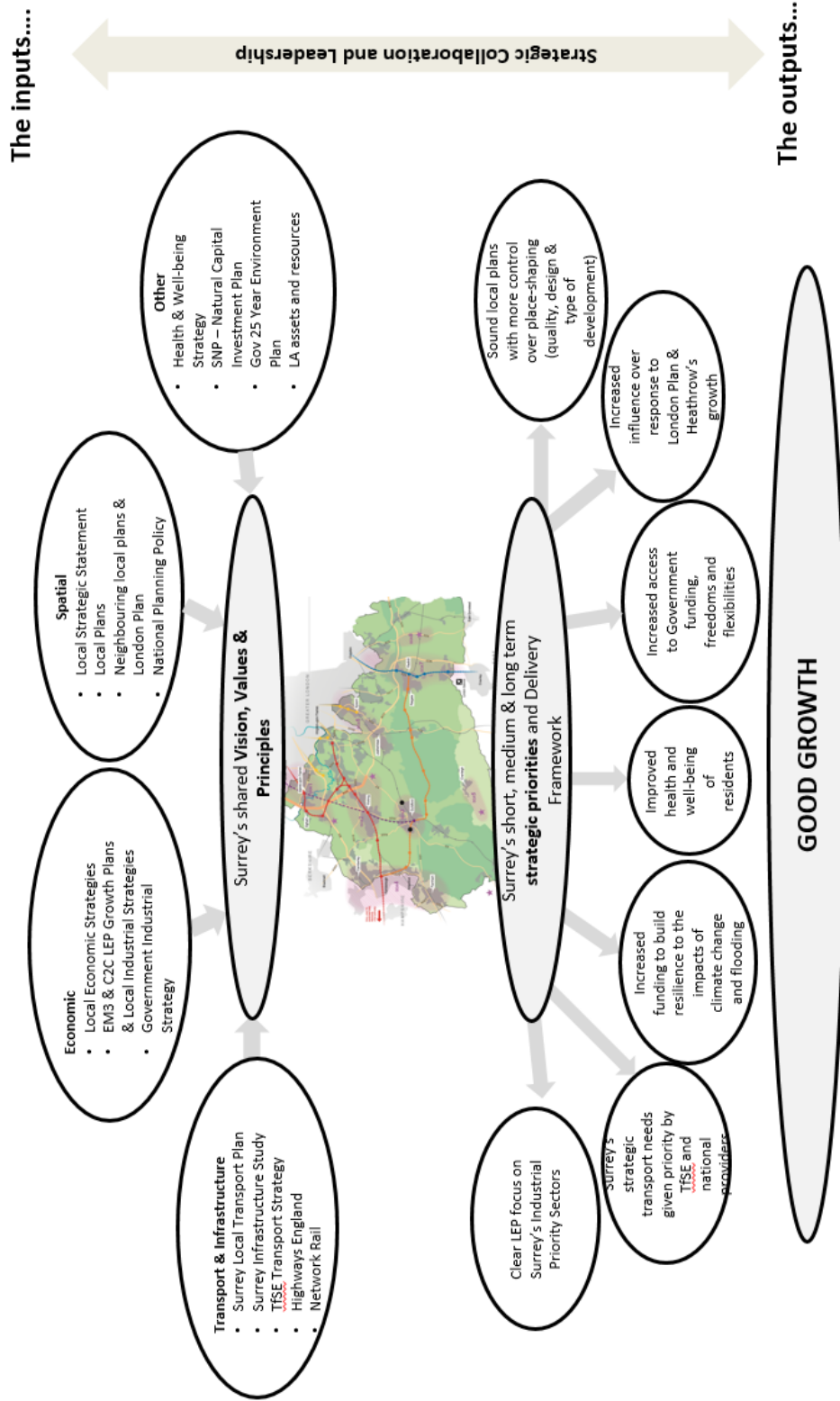
Key Influencers

- 2.3 In addition to our shared Vision, Principles and Values, our 2050 Place Ambition has been shaped by a number of **spatial, infrastructure, economic and other influencers** at the local, sub-national and national levels (see Annex 1). The focus, however, is on the things that we can realistically influence, where there is a shared view about drivers of change and the desired outcomes.
- 2.4 We recognise that our level of influence depends on how robust, coherent and deliverable our Place Ambition is seen to be and how compelling our place offer is considered by others. In both, we have major advantages; Surrey is strategically one of the most connected places both nationally and internationally in the United Kingdom which, combined with our high productivity (and potential to increase this) and our outstanding environmental assets, offers a highly attractive and competitive

investment proposition. We must capitalise on this in securing and delivering good growth for our communities by providing clear strategic leadership and direction, influencing the priorities of other relevant organisations at a local, regional and national level, and ensuring that delivery happens on the ground.



Surrey's Place Ambition



OUR STRATEGIC PRIORITIES

- 3.1 Our three **Strategic Priorities** for delivering the 2050 Place Ambition have been shaped by our shared Vision, Values and Principles, together with the key influencers, recognising that there is a need to align priorities both from the local to the national level, and across different organisations within Surrey. The Priorities are based around improving connectivity both within Surrey and with strategically important hubs, enhancing the place value of Surrey's towns, and maximising the potential of our key economic assets. By committing to deliver on all three, our aim is that Surrey will be a place that is resilient and responsive to future changes and external impacts, with a flexible approach to development which delivers high quality places, healthy people and a strong economic offer.
- 3.2 The three Strategic Priorities are not mutually exclusive and should therefore be considered together. For example, although some of the Strategic Opportunity Areas (SOAs) proposed in Strategic Priority 3 cover large geographical areas, the focus for investment will be the existing urban areas within each area and the main connecting transport corridors, as set out in Strategic Priorities 1 and 2. Equally, although some urban areas are not within any of the proposed SOAs, investment will continue to be directed to improve urban areas overall, as set out in Strategic Priority 2.

Strategic Priority 1: Improve connectivity both within Surrey and between strategically important hubs

- 3.3 As availability of public sector funding for infrastructure continues to decline nationally, it is vital that we have a clear and agreed set of shared strategic infrastructure priorities which offer the best opportunity to improve movement within and between our existing urban centres, and between Surrey and other key national and international destinations. It is also vital that these shared priorities help address changing mobility and the long term impacts of climate change. Our first priority will therefore be to work together with our partners to develop a coherent long term infrastructure investment strategy which aims to:
- Ensure that investment in strategic infrastructure is focused in areas where it can unlock development opportunities or support better connectivity between Surrey's main economic centres and key hubs, and between Surrey and other key destinations within the wider South East and nationally.

- Ensure a more reciprocal relationship with London on common interests, recognising that Surrey's proximity to the Capital will remain one of its greatest economic assets.
- Significantly boost Surrey's connectivity value by securing transformational rail infrastructure investment through Southern Rail access from Heathrow Airport to Surrey and beyond, and improving road connectivity within the M25 South West Quadrant.
- Improve rail connectivity between Surrey's main towns and other key economic centres, including London, by securing investment in the North Downs Line, Crossrail 2, Woking Station and two new rail stations in Guildford.
- Enhance overall quality of services to existing stations within Surrey, for example through use of digitalised signalling, better timetabling and improved infrastructure.
- Secure improvements and additional capacity along our strategic movement corridors and junctions, including the Major Road Network, and key transport hubs by developing new and innovative infrastructure funding solutions and ensuring that we are in the strongest position to compete for new infrastructure funding and investment opportunities, and maximising the opportunities provided by technological advances in mobility.
- Build on the potential for digital technology to enhance connectivity, helping to reduce congestion on our roads and the existing over-dependence on commuting to London, improve the vitality and economic contribution made by our towns and rural areas and increase our ability to address the impacts of climate change and improve the overall health and well-being of our residents.

Strategic Priority 2: Enhance the place offer of Surrey's towns

3.4 Our urban areas will continue to be where most of Surrey's homes, services and jobs are located and therefore offer the most effective and efficient way of meeting our future needs. Focusing growth in these areas will provide the greatest opportunity to support access to services and cultivate changes in the way that we travel, both within urban areas and between different places.

- 3.5 Surrey has a large number of town centres, each with different roles and housing, employment and retail offers. These will continue to play a significant part in supporting growth in the next 30 years, although they will have to adapt if they are to be 'liveable' centres, providing a healthy and safe environment to live and work in, and respond to external impacts on their role and vitality. The larger centres of Guildford, Reigate/Redhill, Staines and Woking, in particular, will continue to provide the greatest potential for delivering a strong residential and economic offer, and will be key in enhancing Surrey's transport connectivity.
- 3.6 It is recognised that given Surrey's close proximity to London there are no options for delivering sustainable development and large new settlements of the same scale that is possible in other parts of the country, without compromising some of our most valuable assets or redirecting investment away from the main urban areas. However, there are some opportunities to deliver some completely new settlements to help meet housing needs and support our economic priorities between now and 2050. Four new communities have therefore been proposed across Surrey in the following locations:
- Dunsfold
 - Longcross
 - South Godstone
 - Wisley
- 3.7 This is why our second priority is to maximise the potential of our existing and new urban areas by making sure land is used in the most efficient and versatile way, and meets our identified needs, as far as possible. It is vital that, in focusing growth in these areas, the overall place value is enhanced through high quality development, provision of green spaces and access to a wide choice in services, leisure, culture, jobs, housing and travel options, meeting the different needs across all generations.
- 3.8 We will therefore develop an approach to unlocking the potential of Surrey's towns which aims to:
- Enhance the built environment by ensuring that all new development and the redevelopment of existing buildings contribute positively to the overall place value of urban areas in terms of building design and quality, impact on health, well-being and safety, net environmental gain and improvements to infrastructure (including green infrastructure) and services.
 - Increase the overall provision and choice of new homes offered, with the emphasis on diversifying the types of new homes provided to meet our

needs, including more affordable homes and homes to meet our ageing population.

- Maximise the opportunities to deliver a diverse range of housing to meet different needs through the local planning system, working proactively with housebuilders and through effective management of our public sector land and assets.
- Focus transport investment in ways that reduce the demands for travelling by private car, improving overall mobility and accessibility within and between our urban areas.
- Safeguard our valuable economic assets, particularly employment land and premises within town centres and close to sustainable modes of transport, ensuring that there continues to be a flexible supply to meet changing economic needs.
- Manage and dispose of public sector land and assets in a way that contributes to meeting identified needs and improving overall quality of place.
- Maximise the contribution Surrey's natural capital makes to securing 'clean' growth, by improving the overall quality and accessibility of our green and blue infrastructure within and between our urban areas, through the proactive management of Biodiversity Opportunity Areas, securing additional provision through development contributions and making better use of non-operational land.
- Place Surrey in the best position to respond to and mitigate against the impact of climate change, by anticipating the risks in the way we plan and deliver services in future.
- Improve flood resilience into our towns, working with key bodies such as the Environment Agency to open up new opportunities for development with less risk attached.

Strategic Priority 3: Maximise the potential of our strategic economic assets

3.9 The greatest long term potential for delivering 'good growth' across Surrey will be by investing in areas that offer opportunities to boost productivity and maximise the

value of our strategic assets (e.g. universities, transport hubs and strategic employment sites). Our third priority will therefore be to focus strategic interventions in eight Strategic Opportunity Areas (SOAs) that have been identified as areas that can support our priority industrial sectors⁶ and improvements to connectivity both within Surrey and between other strategically important economic areas. Our investment strategy will be as much about addressing existing deficiencies in these areas as it will be about opening up new opportunities to support long term prosperity. Our eight Strategic Opportunity Areas are (see Annex 2 for a description of each SOA):

- *SOA 1: Longcross-Staines-Heathrow Corridor*
- *SOA 2: Woking Hub*
- *SOA 3: Guildford Hub*
- *SOA 4: Blackwater Valley Corridor*
- *SOA 5: Cranleigh-Dunsfold Corridor*
- *SOA 6: Epsom-Leatherhead Corridor*
- *SOA 7: M23- Gatwick Corridor*
- *SOA 8: South Godstone*

3.10 Although most of the Strategic Opportunity Areas are focused on existing urban areas, particularly the larger urban centres within Surrey, some reflect the significance of key transport corridors where there is priority being given regionally and nationally to long term investment and improvements. In most cases the areas cross over the boundary into neighbouring authorities and will require strong collaboration to ensure the priorities for each can be delivered.

3.11 For each of the Strategic Opportunity Areas, a number of transformational projects will be delivered over the next 10, 20 and 30 years to enhance their strategic economic status and boost their investment profile and credentials. These will be developed within a common framework which aims to:

- Support our priority industrial sectors by ensuring that the right type of premises and land is readily available, by improving the links between these sectors and the skills, education and training opportunities available in Surrey to ensure a productive and agile workforce, and by supporting and nurturing our key economic assets.

⁶ Priority industrial sectors for Surrey are professional & business services, life sciences, ICT, aerospace & defence, 5G, satellite and cyber security. These are being assessed through the LEPs' emerging Local Industrial Strategies.

- Focus the right interventions, such as investment in infrastructure, to unlock strategic sites and improve movement and connectivity between key hubs and along strategic movement corridors.
- Prioritise these areas in our own plans and strategies for strategic investment decisions, asset management and land disposal.
- Protect strategically important land and premises, particularly within town centres that are well served by public transport, taking into account what the potential future needs may be to maintain a flexible and adaptable land supply and ensure resilience in the ongoing health of these important locations.
- Highlight the importance of these areas regionally and nationally through our work with partners and Government to support a proactive approach to growth and maximise all investment and funding opportunities
- Ensure that all development has a core focus on the education and skills needed to build a high value, high growth economy, working with employers and the education sector (schools, FE, HE, private training providers), to nurture and support the needs of our future workforce.
- Support the delivery of a diverse supply of new homes to meet the needs of a changing workforce and help boost productivity.
- Support a small number of carefully planned urban extensions and new communities within these strategic corridors to boost the supply of new homes and employment land.
- Explore how future business models which aim to boost productivity will impact on the type and supply of land and premises needed in future, to ensure a flexible and responsive approach to market demands, as well as the type of business support needed and the role of the Universities and their research priorities.

DELIVERING OUR 2050 PLACE AMBITION

- 4.1 Delivering 'good growth' requires long term commitment and investment. Our strategic priorities are therefore likely to remain the same as our Place Ambition is delivered over the next 30 years. However, the way in which these are delivered will evolve during this period, largely in response to external factors and influences to ensure that our priorities are delivered. Our delivery framework will therefore be implemented in 10 year phases, supported by a robust monitoring framework, with agreed indicators to highlight where different responses may be needed, for example, to address funding issues, or changing markets, technology or national policy.



- 4.2 Some initial delivery workstreams have been identified and will be taken forward jointly by the local authorities and strategic partners as part of the **Implementation Framework**. These are:

Workstream (1): Strategic Governance and Engagement

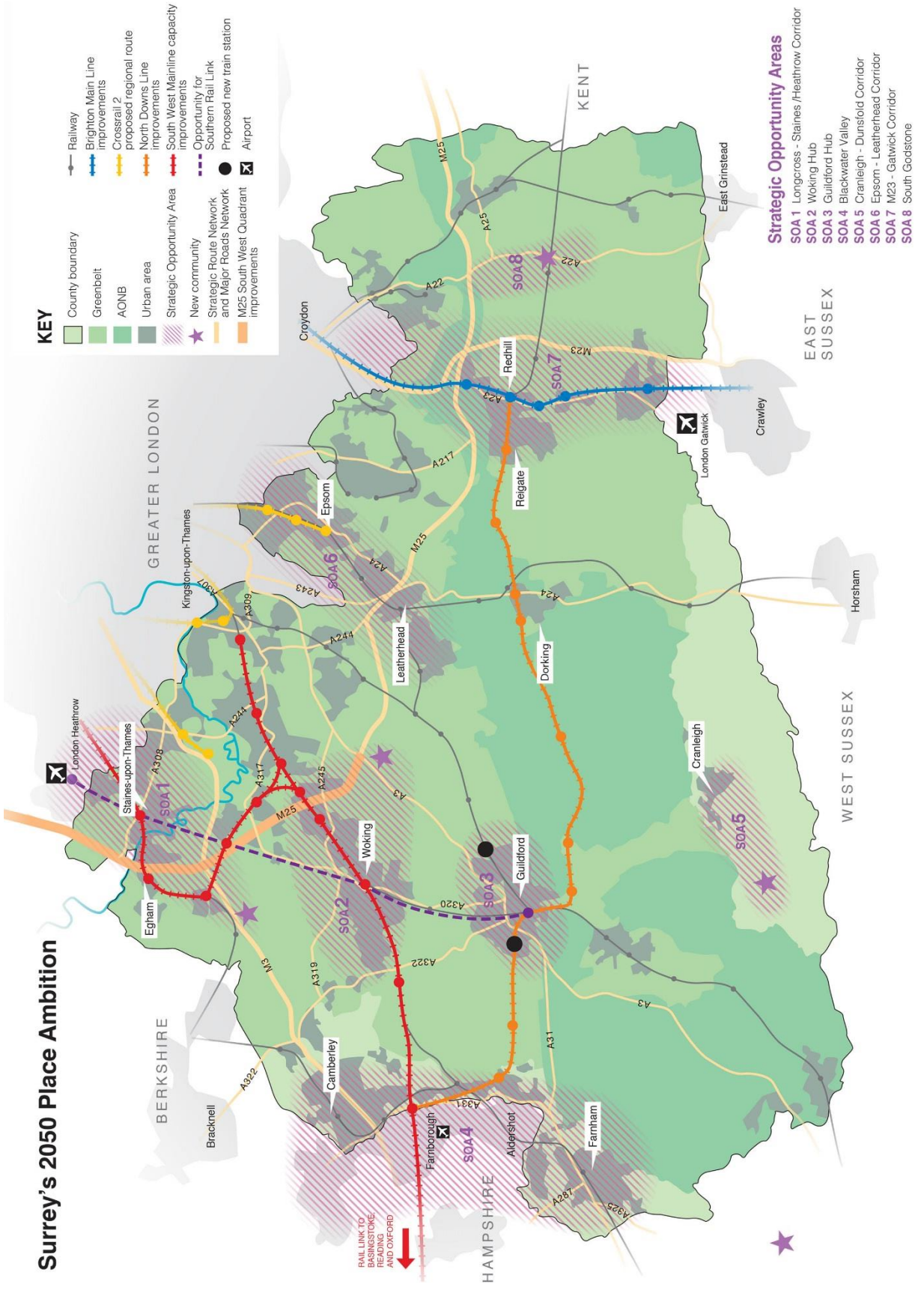
Workstream (2): Strategic Priority 1 – Improving Surrey's Connectivity

Workstream (3): Strategic Priority 2 – Enhancing Surrey's Towns

Workstream (4): Strategic Priority 3 – Realising the potential of our Economic Assets

- 4.3 For each of these workstreams there will be a period of evidence gathering and development and then a series of proposals specifically aimed at delivery in the first 10 year period through the Place Ambition **Investment and Delivery Plan**. Similar to the development of the Place Ambition itself, there is already a significant amount of existing evidence that will inform implementation, particularly evidence used to inform local plan preparation, the strategic economic plans and the emerging local industrial strategies and South East Transport Strategy.
- 4.4 The Implementation Framework and subsequent Investment and Delivery Plan will therefore be developed through collaboration with many different strategic stakeholders and partnerships who have the knowledge and capacity to support the local authorities in different specialist areas.
- 4.5 There will, however, be gaps in evidence which will have to be filled. The first phase of implementation will therefore focus on establishing what evidence exists (including whether it is sufficiently up-to-date) and where any potential gaps are and how these will be filled, working with the wide number of partnerships across Surrey and the wider area. It will also look at examples of 'good practice' from elsewhere to ensure that it is building on the best available experience and expertise across the country.

Surrey's 2050 Place Ambition



Annex 1: Surrey Place Ambition Influencers

LOCAL/ COUNTYWIDE INFLUENCERS (on strategic priorities)	
Local Plans	
Elmbridge	https://www.elmbridge.gov.uk/planning/local-plan/
Epsom & Ewell	https://www.epsom-ewell.gov.uk/residents/planning/planning-policy/epsom-and-ewell-local-plan
Guildford	https://www.guildford.gov.uk/newlocalplan/16116
Mole Valley	http://www.molevalley.gov.uk/localplans
Reigate & Banstead	https://localpl.reigate-banstead.gov.uk/
Runnymede	https://www.runnymede.gov.uk/planningpolicy
Spelthorne	https://spelthorne.gov.uk/localplan
Surrey Heath	https://www.surreyheath.gov.uk/residents/planning/planning-policy/draft-local-plan-2016-2032
Tandridge	www.tandridge.gov.uk/localplan
Waverley	https://www.waverley.gov.uk/localplan
Woking	http://www.woking2027.info/developmentplan
Interim Local Strategic Statement for Surrey 2016-2031	
https://www.surreycc.gov.uk/land-planning-and-development/planning/introduction-to-planning/strategic-development-policy	
Surrey Local Transport Plan	
https://www.surreycc.gov.uk/roads-and-transport/policies-plans-consultations/transport-plan	
Surrey Infrastructure Study	
Surrey Infrastructure Study: https://www.surreycc.gov.uk/land-planning-and-development/development/surrey-future/surrey-infrastructure-study	
Surrey Future priorities: https://www.surreycc.gov.uk/land-planning-and-development/development/surrey-future	
Surrey Employment and Skills Board	
https://www.surreycc.gov.uk/business-and-consumers/employment-and-skills-board	
Surrey Rail Strategy	
https://www.surreycc.gov.uk/land-planning-and-development/development/surrey-future/the-surrey-rail-strategy	
Local Economic Strategies and Priorities	
Elmbridge	http://mygov.elmbridge.gov.uk/documents/s21859/Appendix%20B%20-%20Draft%20Economic%20Strategy%202019-2023.pdf
Epsom & Ewell	https://www.epsom-ewell.gov.uk/business/economic-development/economic-development-strategy

Guildford	https://www.guildford.gov.uk/ruraleconomy http://www2.guildford.gov.uk/councilmeetings/documents/s13352/Ite m%2006%201%20-%20Innovation%20Strategy%20-%20App%201%20-%20Innovation%20Strategy%202019-20.pdf (Innovation Strategy)
Mole Valley	http://www.molevalley.gov.uk/index.cfm?articleid=36613
Reigate & Banstead	http://www.reigate-banstead.gov.uk/info/20334/the_local_economy/373/economic_policy
Runnymede	https://www.runnymede.gov.uk/article/14622/Strategies-and-plans
Spelthorne	https://www.spelthorne.gov.uk/econstrat
Surrey Heath	https://www.surreyheath.gov.uk/business/economic-development/economic-development-strategy
Tandridge	https://www.tandridge.gov.uk/Portals/0/Documents/Planning%20and%20building/Planning%20strategies%20and%20policies/Local%20plan/Local%20plan%202033/Examination%20library/ECONOMY%20%26%20RETAIL/ECRT6-Tandridge-Economic-Proposition-Delivery-Plan-2018-2019.pdf https://www.tandridge.gov.uk/Portals/0/Documents/Planning%20and%20building/Planning%20strategies%20and%20policies/Local%20plan/Local%20plan%202033/Economic-Proposition-Profile-2017.pdf
Waverley	https://www.waverley.gov.uk/downloads/file/2240/economic_development_strategy_2007-2012
Woking	https://www.wokingworks.com/why_woking/economic_strategy
Surrey Nature Partnership: Natural Capital Investment Plan	
https://surreynaturepartnership.files.wordpress.com/2018/03/natural-capital-investment-plan-for-surrey.pdf	
Surrey Health and Wellbeing Strategy	
https://www.healthysurrey.org.uk/about/strategy	
SUB-NATIONAL INFLUENCERS	
Enterprise M3 Local Enterprise Partnership	
Strategic Economic Plan	https://www.enterprisem3.org.uk/strategy
Innovation South Strategy	https://www.enterprisem3.org.uk/innovation-south-sia
Coast to Capital Local Enterprise Partnership	
Strategic Economic Plan	https://www.coast2capital.org.uk/strategy/
Gatwick Diamond	
http://www.gatwickdiamond.co.uk/	
Local Strategic Statement 2016	https://www.surreycc.gov.uk/_data/assets/pdf_file/0006/173148/Gatwick-Diamond-LSS-Refresh-2016.pdf
(Emerging) Heathrow Sub-regional Joint Strategic Planning Framework	
https://spelthorne-render.storm50.com/article/16269/Updates-on-Heathrow-expansion	

Transport for the South East – emerging Transport Strategy	
https://transportforthesoutheast.org.uk/strategy/ecr/	
London Mayor’s Strategies	
Transport Strategy	https://www.london.gov.uk/what-we-do/transport/our-vision-transport/mayors-transport-strategy-2018
London Plan	https://www.london.gov.uk/what-we-do/planning/london-plan
NATIONAL INFLUENCERS	
National Planning Policy Framework (NPPF)	
https://www.gov.uk/government/publications/national-planning-policy-framework--2	
The UK Industrial Strategy	
https://www.gov.uk/government/publications/industrial-strategy-building-a-britain-fit-for-the-future	
Clean Growth Strategy (2018)	
https://www.gov.uk/government/publications/clean-growth-strategy	
A Green Future: Our 25 Year Plan to Improve the Environment (2018)	
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf	
Draft Clean Air Strategy (2018)	
https://consult.defra.gov.uk/environmental-quality/clean-air-strategy-consultation/	
National Infrastructure Assessment	
https://www.nic.org.uk/assessment/national-infrastructure-assessment/	
Highways England Road Investment Strategy	
https://highwaysengland.co.uk/roads/	
Network Rail Strategic Business Plan	
https://www.networkrail.co.uk/who-we-are/publications-resources/strategicbusinessplan/	

Annex 2

Summary of the Strategic Opportunity Areas (SOAs)

Strategic Opportunity Area (SOA) 1 -

Longcross-Staines-Heathrow Corridor

The Longcross-Staines-Heathrow Corridor is a key corridor with the M3 and M25 Motorways running through it connecting Heathrow Airport at one end and the proposed new community of Longcross at the other.

Heathrow Airport is a major international gateway and economic hub of national importance, with significant growth in activity currently being planned for in the area, as well as expansion of the Airport itself.

The Sunbury-Staines-Egham 'conurbation' of small established towns offer significant opportunity to support Heathrow's role as an economic hub but are also major economic assets in their own right, with their contribution to the Creative Industries (e.g. Shepperton Studios and Royal Holloway University's key part in film industry) and research and development (e.g. Royal Holloway University's role in Innovation South). Regeneration to deliver improved commercial, retail and residential opportunities to support sub-regional role of Staines is a priority of Enterprise M3 LEP.

The proposed new community at Longcross will provide a minimum of 1,700 new homes as well as significant new employment opportunities, including through the new Enterprise Zone promoted by the Enterprise M3 LEP. The site already has an established reputation for inward investment and innovation, leveraging Government resources but will expand to include stronger ties with education through links with Royal Holloway University and to support priority sectors identified through the EM3 LEP Local Industrial Strategy. The proposed new development is reliant on the necessary improvements to road access, particularly access from the A320 to the M25.

Strategic Opportunity Area (SOA) 2: Woking Hub

Woking is one of three strategic transport hubs within Surrey recognising its high (rail) connectivity to London and the rest of the South East, including both Gatwick and Heathrow Airport Hubs. Significant investment is already planned for Woking Rail Station but further improvements will be necessary, particularly to improve its rail connectivity with Heathrow Airport.

Woking and the surrounding area already make a significant contribution to priority industrial sectors, such as advanced engineering (e.g. McLaren Technology Centre) and offers the potential for significant employment opportunities through the redevelopment of Woking Town Centre and the potential expansion of Brooklands Business Park which has been identified by EM3 LEP as sub-regional strategic employment area.

Improvements to transport accessibility and links with nearby towns of Woking and Weybridge will be required to open up opportunities for expansion of major asset.

Brooklands Further Education College (Weybridge campus) provides a valuable source of technical skills required for future economic growth.

Significant new housing development is proposed in Woking, particularly in the Town Centre, and through the proposed new community at Wisley, which includes 2,000 new homes.

Strategic Opportunity Area (SOA) 3: Guildford Hub

Guildford is Surrey's largest town with an economy worth of £5.5bn GVA and is set to grow even further over the next 20 years with two urban extensions proposed at Blackwell Farm (1,500 homes) and Gosden Hill Farm (1,800 homes), major redevelopment site at Slyfield Industrial Estate (1,000 homes) and within the Town Centre.

Significant investment in the boroughs infrastructure is required to deliver the new houses needed to ensure that proportionate growth is sustainable and to consolidate and enhance its attractiveness as an important location for priority industrial sectors and for a centre for corporate HQ's.

Guildford is a highly successful University town, hosting both the University of Surrey and University of Law, both contributing to the local economy through technology innovation, academic capital and developing a highly attractive talent pool for the local economy.

Significant transport improvements are already planned, improving accessibility and realising the potential for additional capacity to generate prosperity and high quality jobs.

These include improvements to the road network in and around Guildford, improvements to Guildford Railway Station, two new stations at Park Barn (Guildford West) and Merrow (Guildford East) and improvements to the North Downs Railway Line to facilitate better connectivity between Guildford and East Surrey/ Gatwick and between Surrey and the major hubs of Reading and Oxford.

Strategic Opportunity Area (SOA) 4: Blackwater Valley Corridor

The Blackwater Valley comprises a number of inter-connected towns in both Surrey and Hampshire running along the A331, with the M3 Motorway and Camberley, which is identified by the EM3 LEP as a 'Step-Up' town, to the north of the area and the A31 and Farnham to the south. The A325 connects the corridor to the new community at Whitehill and Bordon and then to the coast.

The area has already experienced significant growth over the last 30 years, with more planned in Surrey (and Hampshire) to support its economic potential, particularly in Camberley Town Centre. The Military have played a long time economic role in this area and still have a large presence, particularly in Aldershot and at Sandhurst Royal Military Academy. As a result, many of the development opportunities offered are on land owned by the Ministry of Defence, such as the proposed new village at Deepcut and Wellesley, an urban extension to Aldershot.

The area is characterised by a buoyant economy and a diverse economic base, with high technology industries strongly represented alongside traditional and advance manufacturing. The economy benefits from access to Farnborough airport, and the area includes a hub for defence and aerospace related industries.

Farnham, England's Craft Town, is home to the University of the Creative Arts and this acts as a catalyst for the creative industries, linking the town with the gaming and digital hubs of Guildford and Aldershot.

Strategic Opportunity Area (SOA) 5: Cranleigh-Dunsfold Corridor

Dunsfold Village is a proposed new community on the existing Dunsfold Aerodrome site comprising of an allocated 2,600 new homes (Local Plan 2013-32), additional employment space and supporting services and infrastructure. It is already home to Dunsfold Business Park which currently accommodates over 100 businesses, mainly aviation related industries and 900 jobs.

Together with nearby Cranleigh, this part of south Surrey has significant potential to become a strategic economic asset in its own right, with the right infrastructure development, but also with opportunities to support the Guildford Strategic Opportunity Area (SOA 3) and other economic hubs such as Gatwick and neighbouring Horsham in the long term.

Strategic Opportunity Area (SOA) 6: Epsom-Leatherhead Corridor

The Epsom to Leatherhead Corridor contains Epsom in the north and Leatherhead in the south, connected by the A24 and a railway line. Significant road transport investment is needed to improve movement through the main centres, and to enhance connectivity between the main centres and with the M25 (Junction 9). Most of the development opportunities planned are within Epsom and Leatherhead Town Centres with significant regeneration programmes in development or already underway to transform these areas over the next 20 years.

The University of Creative Arts in Epsom provides a hub for creative industries, fashion, art, and design, together with specialisms in business and marketing for the sector. Also, the North East Surrey College of Technology (NESCOT) has strong industry links for technical education and apprenticeships.

The role of this area as a strategic economic asset is likely to be enhanced considerably in future with the delivery of Crossrail 2 and other strategic rail improvements (northward) to improve service frequency, speed and capacity into central London.

Strategic Opportunity Area (SOA) 7: M23-Gatwick Corridor

The London-Gatwick-Brighton Corridor is considered nationally as a key economic corridor. It is highlighted in both the London Mayor's Transport Strategy and (emerging) London Plan as a priority for investment. It is also identified as a high priority strategic investment corridor by Transport for the South East.

Gatwick Airport sits just over the border in Sussex but plays a critical role in the economy of East Surrey and beyond. The Coast to Capital Strategic Economic Plan recognises that the economy of the whole LEP area is predominantly driven by the M23 corridor running from Gatwick to Croydon, and that the economic future of the area will be centred around the airport.

The area contains the educational campus of East Surrey College (part of the Orbital South Colleges), offering core skills, technical and professional qualifications, including a full range of apprenticeships from entry to degree level qualifications.

In Surrey, growth along the A23/M23 corridor is focused on Redhill, Reigate and Horley. In Redhill, major regeneration of the town centre is underway, with urban extensions planned to the east of the town. Adjacent to Redhill, Reigate is a desirable business location and whilst development capacity in the town centre is limited, Reigate continues to grow via planned urban extensions to the south west. In Horley, the development of the town's two new neighbourhoods is well progressed, with considerable (and ongoing) investment in community facilities and environmental improvements for the town. The proposed Horley Business Park will play an important role, offering two million sq ft of high quality new business space and complementary facilities in a prime strategic location next to Gatwick Airport.

Continued investment in infrastructure across this area - including in and around Redhill, Reigate and Horley - will be critical to unlocking future growth opportunities, securing reliable and resilient access to Gatwick Airport and to supporting the continued economic productivity of the area.

Strategic Opportunity Area (SOA) 8: South Godstone

Strategic Opportunity Area 8 is located centrally within Tandridge District, the most easterly district in Surrey and an area that has a history of constrained development due to its rural nature and high percentage of Green Belt.

The strategic transport conduits of the M25, A22, A25 meet within the SOA and serve as fundamental access points for Surrey from neighbouring Sussex, Kent and Greater London to the north. These three strategic roads are well utilised by all modes of road transportation with vehicles often using it as an alternative route to Crawley, Gatwick, East Grinstead, Redhill and Reigate, especially when junctions further along the M25 are congested. Such capacity issues present an obstacle to growth not just for Tandridge, but for Surrey as a whole and the wider South East limiting freedom of movement for businesses and residents. In order to overcome some of these issues a bid for more than £50 million was recently submitted to government by Surrey County Council, for Housing Infrastructure Funding (HIF) that would enable large scale strategic road improvements.

In order to try and address increasing needs for housing and infrastructure improvements the Council has set out planning policies to support a new community of 4,000 homes, strategic green infrastructure of over 100ha, employment provision and associated infrastructure at South Godstone. South Godstone Garden Community lies centrally in the district, on the A22, south of Junction 6 of the M25 and on the Tonbridge to Redhill train line. The new community is estimated an economic benefit of circa £127M and can open up a new, more affordable, market sector for the area.

A key strategic employment area at Lambs Business Park is in western remit of the SOA and has an established reputation as a successful industrial area. Future plans for the site are innovative and provide a key opportunity for the IT sector with plans for a data centre complex which would be powered by sustainable energy from waste facilities in accordance with the waste allocation proposed by Surrey County as the Waste Authority and contribute to the well-established economic profile of the County.



SURREY'S 2050 PLACE AMBITION

**Surrey's Spatial Framework:
A Strategic Vision for Place Leadership,
Infrastructure & Good Growth**

Draft Version 2



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Preface

The Surrey Place Ambition sets out a clear and coherent narrative about what Surrey's strategic partners want to collectively achieve over the next 30 years in terms of "good growth" but never have the challenges to deliver this been so great.

The county is home to some of the UK's most prosperous and economically successful places, but it also contains communities in need of support. Many of the challenges in these places are longstanding but the Covid-19 pandemic has brought these sharply into focus.

The need for a productive economy is important for Surrey's local communities. The county is also an important growth, innovation and exporting powerhouse for the UK and investment in Surrey is critical if the county is to maximise its contribution to the country's economic recovery and long-term sustainable growth. There is a need to address the existing infrastructure deficit which places significant limits on Surrey's investment opportunities and therefore its potential in contributing to national growth. The UK cannot have a levelled up north without a functioning south, there is a need for a redistribution of funding opportunities across the country.

Urgent global action is needed to address the impact of climate change. If we are to achieve net zero carbon emission targets by 2050, a big step change in how we think about, plan and deliver growth across Surrey, with the right type and level of supporting development and infrastructure, is needed now.

Despite these challenges, there are real opportunities for Surrey to grow and become even more attractive for residents and businesses alike. Across the county there is a deeply held ambition for the future which defines our approach to "good growth". This recognises the need to change the way we think about growth, placing the health and wellbeing of our environment and communities at the heart of our economic objectives. Vitaly, there is a shared determination to deliver this with all partners contributing proactively.

The Place Ambition provides a framework for this to happen in an integrated way but this requires strong leadership at a political level and a willingness to take difficult decisions in the interests of ensuring that long term prosperity and overall success is secured for Surrey. All our partners are therefore fully committed to continue to work together to recover from the Covid-19 pandemic, respond to the challenges of climate change and deliver long term "good growth" for all our communities.



Rob Moran,

Chair, Surrey Future Steering Board

Introduction

- 1.1 The Surrey local authorities and their strategic partners¹ have a track record of working together to achieve shared objectives. In 2017, Surrey’s local authorities agreed an Interim Local Strategic Statement² to facilitate cooperation on key strategic planning issues. In 2019, this evolved into Surrey’s 2050 Place Ambition which provides a framework to deliver our long-term ambition to support good growth across the county. Since 2019, however, we have had to deal with the impact of the Covid-19 pandemic on our communities and economy, and the urgency in responding to climate change has been escalated. Whilst our overall ambition and strategic priorities remain largely the same, some of the interventions needed to deliver these have changed.
- 1.2 This document refreshes Surrey’s 2050 Place Ambition and considers the impact of the Covid pandemic, actions needed to support a zero-carbon future and new policy documents and other strategic work currently being undertaken across Surrey. We will continue to work together to ensure that Surrey plays a full part in the economic success of the country over the next 30 years, as a key driver of growth and an excellent place where people can live, work and learn. To do this we will continue to take an ambitious approach to facilitate delivery of “good growth”.

Good Growth for Surrey ...

- Is proportionate and sustainable, focusing on the places where people both live and work.
 - Supports overall improvements to the physical and mental health and well-being of our residents.
 - Is supported by the necessary infrastructure investment - including green infrastructure.
 - Delivers high quality design in our buildings and public realm.
 - Increases resilience and flexibility in the local economy.
 - Delivers buildings and infrastructure ready for a zero-carbon future and builds resilience to the impacts of climate change and flooding.
 - Is planned and delivered at a local level while recognising that this will inevitably extend at times across administrative boundaries.
- 1.3 Building on our existing partnerships and collaborations is central to our approach, particularly on strategic planning and infrastructure priorities. Our shared ambition will help us deliver growth in the most effective way, maximising private sector investment and government funding opportunities and delivering efficiencies of scale. This will be underpinned by four shared strategic priorities that will inform and

¹ The eleven Surrey Districts and Boroughs and Surrey County Council are working together under the auspices of the [Surrey Future Steering Board](#). Partners include Coast to Capital and Enterprise M3 Local Enterprise Partnerships, Gatwick Diamond Initiative and Surrey Nature Partnership -

² [Interim Local Strategic Statement for Surrey 2016-2031](#) (PDF, 1.8KB)

support targeted delivery at a local level, within the context of our shared growth vision, principles, and values.

1.4 The purpose of the Place Ambition is to:

- outline a vision and spatial priorities for growth
- provide a framework to shape the future of communities and places across Surrey
- emphasise the need for an integrated, systemic approach to delivering good growth.

1.5 The benefits of the Place Ambition are:

- to promote a long term and co-ordinated approach to growth and infrastructure planning
- demonstrate a firm commitment to future growth
- demonstrate collaborative working
- enable cross boundary solutions for meeting development needs
- link to the longer timescales needed for infrastructure investment and effective delivery of infrastructure priorities
- increase investor confidence through long term clarity about growth.

1.6 The Place Ambition has been developed to provide us with the opportunities to proactively manage growth while at the same time investing in the right infrastructure and assets and enhancing the character of the natural environment that makes Surrey the unique and attractive place it is for residents, businesses and visitors alike. It will help underpin the local plans developed and implemented by boroughs and districts across Surrey and align these with infrastructure priorities of the county council and those of other strategic infrastructure providers, for example in areas such as transport, education and utilities.

1.7 Key to our ambitious approach will be making full use of our own existing assets, plans and strategies. But we will need the help of our strategic partnerships across Surrey and support from our wider sub-national partners and Government, particularly in relation to accessing additional funding and investment opportunities. We will also need to work with our local communities, making sure that there is wide ranging choice in housing, services and jobs across Surrey, and that our places are distinctive, attractive, well designed, full of character and are of the highest quality. Underlying all of this will be our ambition to improve the overall quality of health and well-being across Surrey, recognising that healthy places and people are a key factor in our long-term prosperity.

1.8 We cannot be complacent about the opportunities and challenges ahead and the need to tackle the wider issues that will be fundamental to the success of our approach, particularly mitigating and adapting to the impacts of climate change, supporting the health and well-being of our residents and addressing disparities across the county. To do this we need strong strategic leadership at a political level

and a willingness to take difficult decisions in the interests of ensuring that long term prosperity and overall success – good growth - is secured for Surrey.

Context

Understanding the County

- 2.1 Surrey's unique strategic position with its proximity to London and to Heathrow and Gatwick airports, access to the South Coast, its excellent road and rail connectivity, its highly skilled workforce, diverse and increasingly digital business base, its world class education facilities, and its excellent quality environment are all valuable assets which will be used to grow our businesses and talent base year on year. However, the very assets that make Surrey such an attractive place to locate to and visit are the ones that need proactive management to ensure that existing challenges are addressed and that they receive the right level of investment to enhance Surrey's offer for existing and future generations.
- 2.2 Urgent global action is needed to avoid dangerous climate change. This has been recognised through Surrey councils declaring climate emergencies. County and local climate change strategies set out how carbon emission reductions will be achieved, which includes reducing carbon from transport, promoting energy efficiency improvements, and supporting the creation of green technologies.
- 2.3 Surrey's population of nearly 1.2 million is forecast to grow significantly by 2043, including a 25% increase in those aged over 65. Surrey is largely an affluent county, but there are pockets of deprivation both in larger towns and rural areas. In 2019, an estimated 23,000 children in Surrey were living in poverty and Covid-19 is likely to have worsened this situation.
- 2.4 Most people in Surrey lead healthier lives than the average UK citizen. However, this strong average performance masks areas of underperformance. 22% of all adults and 13% of all children in Surrey are obese with obesity and excess weight rates being 13.5% higher in deprived wards than the average Surrey ward. An estimated 10,600 5- to 15-year-olds in Surrey have a mental health disorder³. The Surrey Health and Wellbeing Strategy sets out priorities for helping people to lead healthy lives which includes ensuring that everyone lives in good and appropriate housing and improving environmental factors that impact people's health and wellbeing.
- 2.5 Surrey covers an area of 1,663 km², with 87% urban and 13% rural and 74% of the land is covered by national and international designations such as Metropolitan Green Belt and Areas of Outstanding Natural Beauty (AONB). The county benefits from having many different landscape habitats including rivers and areas of woodland, heathland, and chalk grassland, some of which are nationally/internationally rare. Effective planning is needed to make best use of land to protect and conserve the county's natural environment. This green infrastructure is also a resource which offers opportunities to help mitigate climate change and contribute

³ Statistics from the Surrey Health and Wellbeing Strategy, 2019

to health and wellbeing. Access to green space and countryside is essential for both good physical and mental health and leads to an improved quality of life.

- 2.6 Surrey has a very strong, productive, and innovative economy, contributing over £40 billion per year to the national economy. The workforce is highly skilled and attracted to live in the area by Surrey's rich natural environment and high-quality services. Our key assets include a strong business base and three universities - University of Surrey, Royal Holloway, University of London and University for the Creative Arts. Surrey's economy does not rely on one dominant sector, but has strengths in several high-value, knowledge-based and innovative sectors. Nevertheless, the economy is expected to take time to adjust to the impacts of covid-19. Some sectors, such as aviation, have been particularly severely impacted and changes in working patterns may lead to longer term adjustments in commuting and the use of our town centres.

Key Influencers

- 2.7 Our 2050 Place Ambition has been shaped by a number of **climate and environment, economic, spatial, infrastructure and health and wellbeing influencers** at the local, county, regional and national levels. These include district/borough local plans, Surrey Climate Change Strategy, Surrey County Council's emerging Local Transport Plan (LTP4), One Surrey Growth Board's Surrey's Economic Future – Towards 2030, the Surrey Health and Wellbeing Strategy, Transport for the South East's emerging Transport Strategy and the National Planning Policy Framework. Our focus, however, is on what we can realistically influence where there is a shared view about drivers of change and desired outcomes.
- 2.8 We recognise that our level of influence depends on how robust, coherent and deliverable our Place Ambition is seen to be and how compelling our place offer is considered by others. In both, we have major advantages; Surrey is strategically one of the most connected places both nationally and internationally in the UK which, combined with our high productivity (and potential to increase this) and our outstanding environmental assets, offers a highly attractive and competitive investment proposition. We must capitalise on this in securing and delivering good growth for our communities by providing clear strategic leadership and direction, influencing the priorities of other relevant organisations at a local, regional and national level, and ensuring that delivery happens on the ground.

Surrey in Facts and Figures

Surrey's People

- Surrey is one of the most densely populated shire counties in England with a population of 1.2 million. This is set to grow by 38,000 people by 2043 (3% increase). In the year to June 2020 about a third of the moves into the county were by people leaving London.
- One in five of Surrey's population is aged 65+ and this group is expected to grow by 90,000 by 2043, which will present significant challenges for future care provision across the county.
- Although Surrey has one of the highest life expectancies in the country there are considerable challenges around maintaining and improving health and well-being. In 2019, 10.7% of all households in Surrey were at or below the relative poverty line, with some areas of the county reaching as high as 26% of residents.

Surrey's Economy

- Surrey's GVA in 2019 was £46 billion, contributing 16% to the South East's GVA. However, the rate of growth is low and is expected to continue to be low or negative. New businesses in Surrey have been created at a lower rate than the national average. GVA per person has also grown more slowly than in the rest of the country over the last 20 years. The pandemic has highlighted the risk of taking our economic success for granted. For some sectors, particularly aviation, the changes have been severe and the ongoing decline of retail on the high street was also accelerated by the changes during 2020 and 2021.
- The average annual household income across Surrey in 2017/18 was £38,678 which was £3,301 higher than the average across the South East. The figure after housing costs falls to £34,263 but is still £2,906 higher than the South East average.
- More than 1 in 3 of the population are educated to NVQ4+ (equivalent to degree level or above). In 2018, 54.6% of the population aged 25-64 were educated to NVQ4+ which compares to 46.7% for the South East and 43.2% for England.
- Over half of the residents in Surrey are in high-skilled professional occupations, a figure which is higher than for the South East as a whole. 52.0% of people in employment in Surrey work in managerial, professional, or associate professional occupations. The figure for the South East is 44.8% and for England is 41.1%.

Surrey in Facts and Figures (continued)

Surrey's Environment

- Surrey has many different landscape habitats. The Surrey Hills Area of Outstanding Natural Beauty (AONB) stretches across a quarter of the county to include the chalk slopes of the North Downs and extending south to the Greensand Hills which rise in Haslemere. A small section of the High Weald AONB occupies the south-east corner of Surrey. The county also has habitat that is nationally and internationally rare such as the Thames Basin Heaths Special Protection Area, which covers significant parts of north and west Surrey.
- The county is the most wooded in Great Britain with 22% of the area being woodland, compared to a national average of 12%. 25.3% of people in Surrey live within 500 metres of an accessible woodland area, compared to 16.8% in England.
- On average, Surrey's air quality is better than the national average, with an index of accessibility to air quality score in 2018 of 26.1 compared to 26.8 nationally. However, there are over 30 Air Quality Management Areas (AQMAs) identified across Surrey and particulate emissions were estimated to account for 5.7% of mortality in Surrey in 2018.
- Surrey's carbon emissions are falling, but not quick enough to meet net zero emissions targets by 2050. Currently, 46% of Surrey's emissions come from the transport sector, with housing responsible for 28% of emissions, public/commercial buildings 15%, and industry 11%.
- Surrey is a county at high risk of flooding with in excess of 30,000 properties at risk from fluvial and surface water sources. It has experienced several major flooding incidents in the last ten years, with much of this occurring in the floodplain of the lower River Thames and its tributaries. There are also many localised areas prone to surface and ground water flooding or the emergence of groundwater.

Surrey as a Place

- The county is characterised by a polycentric settlement pattern of large and small towns but with no one dominant city or conurbation. Guildford is the most significant urban settlement and county town. Other major towns are Camberley, Epsom, Redhill, Staines-upon-Thames and Woking. Some 87% of the population live in urban areas.
- Government calculates that over 6,300 new homes a year are needed in Surrey. An 80% increase on the number of new homes required in current local plan housing targets and an increase on current levels of housing completions (3,100 per year).

Surrey in Facts and Figures (continued)

- Adding to these challenges, will be pressures on Surrey's infrastructure arising from its proximity to London, which is expected to deliver 65,000 new homes each year, many of which are expected to be built in neighbouring outer London boroughs, such as Kingston upon Thames and Croydon.
- Significant growth is also being planned and delivered in neighbouring areas in Hampshire and Sussex, including a new community of 4,000 homes at Whitehill/ Bordon and 2,750 homes in North Horsham.
- Surrey has some of the most expensive places to live in the country with housing affordability (ratio of median house price to median gross annual residence-based earnings) in 2020 of 11.48 compared to 9.57 for the South East of England.

Surrey's Infrastructure

- Although Surrey's transport connections are a key strength, they also have limitations and constraints. Before Covid-19, high traffic levels on Surrey's main roads led to unreliable journey times and congestion, that was estimated to cost businesses £550 million per year. Traffic levels are now returning to pre Covid-19 volumes.
- Rail services experienced overloading before Covid-19. About 131,000 of Surrey residents (19% of the working population) commuted into London, leading to significant crowding on peak services. It is not yet clear whether these levels of demand will return post Covid-19, but it is likely that some employees will commute less frequently.
- Car ownership in Surrey is 86% compared to the national average of 73% and continues to rise. Electronic vehicle uptake has increased in the UK and Surrey. There is a relatively high concentration of charge points in Surrey with over 200 charge points in 60 locations. This is set to increase going forward.
- Surrey has over 98.0 % coverage of superfast broadband (>24 Mbps) which is slightly higher than the coverage for England which is 96.3% (June 2019). Only 25% of residential and business premises were able to access Gigabit speeds (October 2021), relative to a UK average of 50%. Nearly 40% of Surrey's employed residents worked from home in April 2020.
- Estimated infrastructure costs in 2017 to support planned growth were £5.5 billion with a funding gap of £2.5bn.

Our Vision, Principles and Values

- 3.1 Our **Vision** is for a county of well-functioning and connected places, with healthy communities and a high quality of life. Surrey recognises its important role in the wider South East economy and will build on its strengths while retaining the qualities which give the county its distinctive character. Through collaborative working, local authorities and partner agencies will seek positive and innovative solutions to shared challenges to meet the need for new homes, secure greater economic prosperity and infrastructure improvements and to maintain and enhance the natural and built environment and tackle climate change.
- 3.2 Our shared **Principles and Values** will guide the strategic priorities developed through our 2050 Place Ambition, helping to mitigate any negative impacts and maximise the benefits for our local communities. We aim to do this by:
- Taking an ambitious place-based approach that reflects functional relationships and not necessarily administrative boundaries.
 - Leveraging our unique location, skills base and strategic transport connectivity to secure “good growth”.
 - Focusing growth and infrastructure investment in areas that, with the right interventions, offer the greatest potential to support long term sustainable growth and increased productivity, including through enhanced connectivity.
 - Addressing the significant challenge of housing affordability across Surrey and the resulting lack of housing for essential workers, by building more, well-designed affordable homes.
 - Supporting a strong economy through the retention and expansion of existing local businesses and increasing opportunities for growth sectors and new businesses to locate and invest in Surrey.
 - Maximising opportunities to enhance the health and wellbeing of Surrey’s residents by improving air quality, mitigating the impacts of climate change on our environment, improving access to high quality green spaces and ensuring that new development contributes positively to community amenities and infrastructure to help create high quality and healthy places where people want to live and work.
 - Safeguarding, investing in, restoring and creating new natural habitats which support biodiversity.
 - Ensuring that all development is high quality and well-designed and ready for a zero-carbon future, with local authorities leading by example in delivering

development that contributes positively to the value of our places and is resilient and adaptable to meet current and future needs.

- Using our own resources and assets to directly drive, influence and support growth across Surrey and specifically, to facilitate a more equitable access to homes and wider choice of housing to meet local needs.
- Taking a positive, proactive and responsive stance towards the opportunities for growth across Surrey to help demonstrate our individual and collective place leadership roles in overcoming and responding to the challenges ahead. We will ensure that this approach is embedded in our organisational cultures and in our local plans, policies and strategies.
- Capitalising on the opportunities provided by enhanced digital connectivity and associated transformation of business processes to maximise value from our assets and enhance the quality of the public service offer in both urban and rural areas.

Our Strategic Priorities

- 4.1 Our four **Strategic Priorities** for delivering the 2050 Place Ambition have been shaped by our shared Vision, Values and Principles, together with the key influencers, recognising that there is a need to align priorities from the local to the national level and across different organisations within Surrey. The priorities are based around improving connectivity both within Surrey and with strategically important hubs, enhancing the place value of Surrey's towns, maximising the potential of our strategic opportunity areas and investing in natural capital and delivering nature recovery. By committing to deliver on all four, our aim is that Surrey will be a place that is resilient and responsive to future changes and external impacts, with a flexible approach to development which delivers high quality places, a strong economic offer and improves health and well-being.
- 4.2 The four Strategic Priorities are not mutually exclusive and should therefore be considered together. For example, although some of the Strategic Opportunity Areas (SOAs) proposed in Strategic Priority 3 are broadly defined on the map (p.24), the focus for investment will be the existing and proposed new urban areas within each area and the main connecting transport corridors, as set out in Strategic Priorities 1 and 2. Equally, although some urban areas are not within any of the proposed SOAs, investment will continue to be directed to improve urban areas overall both strategic and local, as set out in Strategic Priority 2.

Strategic Priority 1: Improve connectivity both within Surrey and between strategically important hubs

- 4.3 With investment focused on levelling up, it is vital that we have a clear and agreed set of shared strategic infrastructure priorities which offer the best opportunity to improve connectivity within and between our existing urban centres, and between Surrey and other key national and international destinations. Covid-19 restrictions affected the nature of the relationship between London and Surrey, with many people who worked in London working from home. Going forward, the full impact on travel patterns is unknown but with an anticipated increase in 'hybrid working' there is likely to be less frequent commuting and a renewed emphasis on creating compact places in which most of people's daily needs can be met within a short walk or cycle and a need for greater investment in active travel and new transport technologies. This will help deliver the actions needed to support a low carbon economy. We are working together with our partners to develop a coherent long term infrastructure investment strategy through the Surrey Infrastructure Plan. We will continue to review infrastructure priorities to:
- Ensure that investment in strategic infrastructure is focused in areas where it can unlock development opportunities or support better connectivity between

Surrey's main economic centres and key hubs, and between Surrey and other key destinations within the wider South East and nationally.

- Ensure a more reciprocal relationship with London on common interests, recognising that Surrey's proximity to the capital will remain one of its greatest economic assets and continue to work with the Mayor of London, Transport for the South East and partners across the Wider South East to address regional challenges and deliver strategic infrastructure priorities.
- Build on existing measures and develop new measures that align with the "avoid, shift, improve" approach of LTP4.
- Improve rail connectivity between Surrey's main towns and other key economic centres by securing investment in the North Downs Line, capacity improvements at Woking and Guildford Stations and Southern Rail access from Heathrow Airport to Surrey and beyond.
- Focus on improving stations within Surrey so they benefit local communities and support sustainable local economic growth. Develop stations by improving access to them by public transport and active modes and enhance overall quality of services, for example through use of digitalised signalling and better timetabling.
- Enhance the quality of bus services through investing in infrastructure to allow faster journeys by bus, improving the coverage of the network, providing more coordinated bus services which integrate with other transport modes and improving service frequencies, reliability, fares and customer experience.
- Support the provision of a high-quality network to increase walking/cycling uptake. The network would serve and link urban and rural built-up areas to public transport connections. Where possible this would involve the development of active travel and green corridors and making improvements to rights of way.
- Promote the operational efficiency (and in some cases safety) of our transport network through securing improvements along our strategic movement corridors and junctions, including the Strategic Route Network, the Major Road Network, and key transport hubs. Develop new and innovative infrastructure funding solutions and ensure that we are in the strongest position to compete for new infrastructure funding and investment opportunities. Maximise the opportunities provided by technological advances in mobility.
- Develop county-wide digital infrastructure through working with commercial and public sector partners to enable access to fibre and gigabit capable services.
- Build on the potential for digital technology to enhance connectivity, helping to reduce congestion on our roads and improve the vitality of our urban areas

including those rural communities that face the greatest connectivity challenges. This will increase our ability to address the impacts of climate change and improve the overall health and well-being of our residents.

Strategic Priority 2: Enhance the place offer of Surrey's towns

- 4.4 Our urban areas will continue to be where most of Surrey's homes, services and jobs are located. Focusing growth in these areas will provide the greatest opportunity to support access to services and cultivate changes in the way that we travel, both within urban areas and between different places. With three quarters of the land in Surrey being covered by Green Belt and national and international environmental designations there is a need to make effective use of our urban areas.
- 4.5 Surrey has a large number of town centres, with varying roles and different housing, employment and retail offers. These will continue to play a significant part in supporting growth in the next 30 years, although they will have to adapt if they are to be 'liveable' centres, providing a healthy and safe environment to live and work in, and respond to external impacts on their roles and vitality. The larger centres of Guildford, Reigate/Redhill, Staines and Woking in particular, will continue to provide the greatest potential for delivering a strong residential and economic offer, and will be key in enhancing Surrey's transport connectivity.
- 4.6 Surrey has a greater number of medium-sized towns than neighbouring areas and, so far, these have proved to be more resilient to Covid-19 than many larger towns and cities. Investment in active transport and public transportation will make them healthier, more attractive places to live.
- 4.7 An analysis of population and employment data, information on the function and location of towns and future growth plans has been used to identify towns of strategic significance. This analysis is also informed by the hierarchies of town centres that local planning authorities identify within their local plans, but as a county wide assessment it is intended to illustrate the roles that individual towns play when considered as part of a Surrey network. It is important to recognise that it does not replace any local proposals and priorities but is intended to supplement and assist local plan development.
- 4.8 These towns will often be the focus for investment to unlock sites, improve movement and connectivity, support economic development and create sustainable places. In a number of the towns such as Farnham, Horley, Staines and Weybridge place based collaborative working is already underway, involving a range of partners. The identified towns will also be the focus for monitoring work to understand how they are developing and changing. Monitoring will include changes in land use including the impact of the expansion of permitted development rights (PDR).
- 4.9 Within Surrey there are 25 towns of strategic significance. Nine of these are primary centres that serve the wider regional economy and are a focus for development in

Local Plans and emerging plans and often the subject of masterplanning activities. A number are also a focus for LEP activity, given their strategic role. These centres are:

- Guildford
- Woking
- Epsom
- Reigate
- Redhill
- Staines-upon-Thames
- Farnham
- Egham
- Camberley (including Frimley)

4.10 16 Surrey towns can be classed as secondary centres that play a significant function but serve a less extensive catchment. The growth potential of these towns is set out in the local plans and many of the centres have the potential to accommodate growth which will enable residents to meet many of their retail and leisure needs without having to travel to larger neighbouring centres. These centres are:

- Leatherhead
- Walton-on-Thames
- Caterham
- Dorking
- Godalming
- West Byfleet
- Haslemere
- Banstead
- Chertsey
- Horley
- Addlestone
- Weybridge
- Oxted
- Cranleigh
- Cobham
- Esher

4.11 Surrey's key centres include market towns steeped in history and high streets with a mix of independent and national shops and restaurants. Covid-19 has accelerated a number of trends that were bringing about changes to Surrey's high streets. There are vacant units across Surrey's towns and a need for new visions/strategies to revitalise them. We are seeing a new focus on revitalising high streets and using public sector assets to deliver multi-functional space and the co-location of different services.

- 4.12 For all our town centres there is a need to promote planning of service provision and land use to support significant localisation of activity in attractive local communities, supported by high quality connectivity based on provision for public/shared/active travel. The potential of our high streets will be developed through engaging with people to drive creative thinking, test new ideas and ensure that outcomes are locally owned and tailored. We will ensure that we deliver resilient high streets which are adaptable to long term changes. There will be a move away from an over reliance on retail and exploration around opportunities linked to commerce, council and health service provision, community uses, the location of more homes and people in town centres and experiential opportunities.
- 4.13 Changes to permitted development rights that allow the change of use from commercial, business and service uses (class E) to residential use (C3) came into force on 1st August 2021. The government intends for the expansion of the PDR regime support the creation of homes whilst also giving high streets a new lease of life.
- 4.14 PDR can have a positive effect on local commercial property markets by removing poor quality, unoccupied space which no longer meets business requirements as well as providing a much needed supply of housing. However, given the constraints on development opportunities in Surrey there are some town centres where higher quality office space has been lost as a result of PDR and in others there is significant pressure for residential development in established office locations. The permanent removal of office stock which could have been refurbished in the future represents a real risk to the long-term economic growth of these places. This is an issue which is having implications across the whole of Surrey and future work will compile evidence to report on the situation county wide.
- 4.15 It is recognised that given Surrey's close proximity to London there are no options for delivering sustainable development and large new settlements of the same scale that is possible in other parts of the country, without compromising some of our most valuable assets or redirecting investment away from the main urban areas. However, there are a number of opportunities to deliver some completely new settlements to help meet housing needs and support our economic priorities between now and 2050. Four new communities have therefore been proposed across Surrey in the following locations:
- Dunsfold
 - Longcross
 - South Godstone
 - Wisley
- 4.16 Strategic Priority 2 is to maximise the potential of our existing and new urban areas by making sure land is used in the most efficient and versatile way, and meets our identified needs, as far as possible. It is vital that, in focusing growth in these areas, the overall place value is enhanced through high quality development, provision of

green spaces and access to a wide choice in services, leisure, culture, jobs, housing and travel options, meeting the different needs across all generations.

4.17 Therefore, we will continue to develop an approach to unlocking the potential of all Surrey's towns – of strategic and local significance; established and new - which aims to:

- Enhance the built environment by ensuring that all new development and the redevelopment of existing buildings contribute positively to the overall place value of urban areas in terms of building design and quality including the conservation and reuse of heritage assets and street design that focuses on a Healthy Streets approach creating streets that are pleasant, safe and attractive.
- Promote healthy, inclusive, and safe places which contribute positively to people's wellbeing by ensuring all new development and the redevelopment of existing buildings allow for active travel, enhance walkability, build complete and compact places, enhance connectivity with safe and efficient infrastructure and provide access to and engagement with the natural environment.
- Increase the overall provision and choice of new homes offered, with the emphasis on diversifying the types of new homes provided to meet our needs, including more affordable homes and homes to meet our ageing population. Work proactively with developers and consider the role of a residential offering as part of town centre revitalisation.
- Safeguard our valuable economic assets, particularly employment land and premises within town centres and close to sustainable modes of transport, ensuring that there continues to be a flexible supply to meet changing economic needs, catering for established, growing and start-up businesses and attracting new employers.
- Depending on the specific details and locations of development, allow the removal of poor-quality stock from the employment land supply where sites are poorly located.
- Manage and dispose of public sector land and assets in a way that contributes to meeting identified needs and improving overall quality of place.
- Promote high street revitalisation through diversification and encouraging the development of multi-functional space and the co-location of different services.
- Maximise the contribution Surrey's natural capital makes to securing 'clean' growth, by improving the overall quality and accessibility of our green and blue infrastructure within and between our urban areas, through the proactive management of Biodiversity Opportunity Areas, securing additional provision

through development contributions and making better use of non-operational land.

- Place Surrey in the best position to respond to and mitigate against the impact of climate change, by anticipating the risks in the way we plan and deliver services in future and ensuring new buildings and infrastructure are ready for a zero-carbon future.
- Improve flood resilience in our towns, working with key bodies such as the Environment Agency to open up new opportunities for development.
- Focus transport investment in active transport and public transportation, improving overall mobility and accessibility within and between our urban areas.
- Monitor and report on the towns of strategic significance particularly to consider changes in land use as a result of new permitted development rights.

Strategic Priority 3: Maximise the potential of our Strategic Opportunity Areas

4.18 The greatest long term potential for delivering “good growth” across Surrey will be by investing in places that offer opportunities to boost productivity by maximising the value of strategic assets such as universities, transport hubs and strategic employment sites/centres to support our economic strengths and priority industrial sectors⁴. Our third priority will therefore be to focus strategic interventions in eight Strategic Opportunity Areas (SOAs) that have been identified as areas to support long term prosperity. This includes investment in new strategic infrastructure and to address existing infrastructure deficiencies and improving connectivity both within Surrey and between other strategically important economic areas.

4.19 Our eight Strategic Opportunity Areas are (see the separate implementation framework for a profile of each SOA):

- SOA 1: Longcross-Staines-Heathrow Corridor
- SOA 2: Woking Hub
- SOA 3: Guildford Hub
- SOA 4: Blackwater Valley Corridor
- SOA 5: Cranleigh-Dunsfold Corridor
- SOA 6: Epsom-Leatherhead Corridor

⁴ Surrey’s economic strengths are outlined in Surrey’s Economic Future – Forward to 2030: Our Economic Strategy published in November 2020. They include nationally significant innovation and R&D assets, a strong presence in industrial research and development and an extensive stock of international corporates. Priority industrial sectors for Surrey are professional & business services, life sciences, ICT, aerospace & defence, 5G, satellite and cyber security.

- SOA 7: M23- Gatwick Corridor
- SOA 8: M25 J6/A22 South Godstone

4.20 Although most of the SOAs are centred on existing and proposed new urban areas (which will be the main focus for investment), particularly the larger urban centres within Surrey, some reflect the significance of key transport corridors where there is priority being given regionally to long term investment and improvements. In many cases the areas cross over the boundary into neighbouring authorities and will require strong collaboration to ensure priority outcomes can be delivered.

4.21 For each of the SOAs, a number of strategic interventions will be delivered over the next 10, 20 and 30 years. These will be developed within a common framework which aims to:

- Support the delivery of a diverse supply of new homes to meet housing needs including those of a changing workforce and help boost productivity.
- Support a small number of carefully planned urban extensions and new communities to boost the supply of new homes and employment land.
- Focus the right interventions, such as investment in infrastructure, to unlock sites and improve movement and connectivity between key hubs and along strategic movement corridors.
- Support our economic strengths and priority industrial sectors by ensuring that the right type of premises and land is readily available, by attracting inward investment, by improving the links between priority sectors and the skills, education and training opportunities (schools, FE, HE, private training providers) available in Surrey to ensure a productive and agile workforce.
- Protect strategically important land and premises, particularly within town centres that are well served by public transport, taking into account what the potential future needs may be to maintain a flexible and adaptable land supply, provide flexible workspace and multi-functional space and ensure resilience in the ongoing health of these important locations.
- Reflect these areas in our own plans and strategies for strategic investment decisions, asset management and land disposal and highlight the importance of these areas through our work with partners and Government to support a proactive approach to growth and maximise all investment and funding opportunities.
- Explore how future business models which aim to boost productivity will impact on the type and supply of land and premises needed in future, to ensure a flexible and responsive approach to market demands, as well as the type of

business support needed and the role of the Universities and their research priorities.

- Support the development of new collaborative working arrangements and the coordination and sharing of best practice across the SOAs.

Strategic Priority 4: Invest in natural capital and deliver nature recovery

4.22 Surrey has a wealth of environmental assets ranging from those with international and national status, to those of local importance. However, according to the 2017 State of Surrey's Nature report, Surrey also has one of the fastest declining wildlife populations of any county in England. Nature is being increasingly confined to small, fragmented areas with little or no connectivity.

4.23 The Government's 25 Year Environment Plan sets out a natural capital approach, giving the environment its due regard as a key contributor to the overall economy. Legally binding targets for Biodiversity Net Gain and Local Recovery Networks are being introduced and will focus activities on environmental improvements in the coming years.

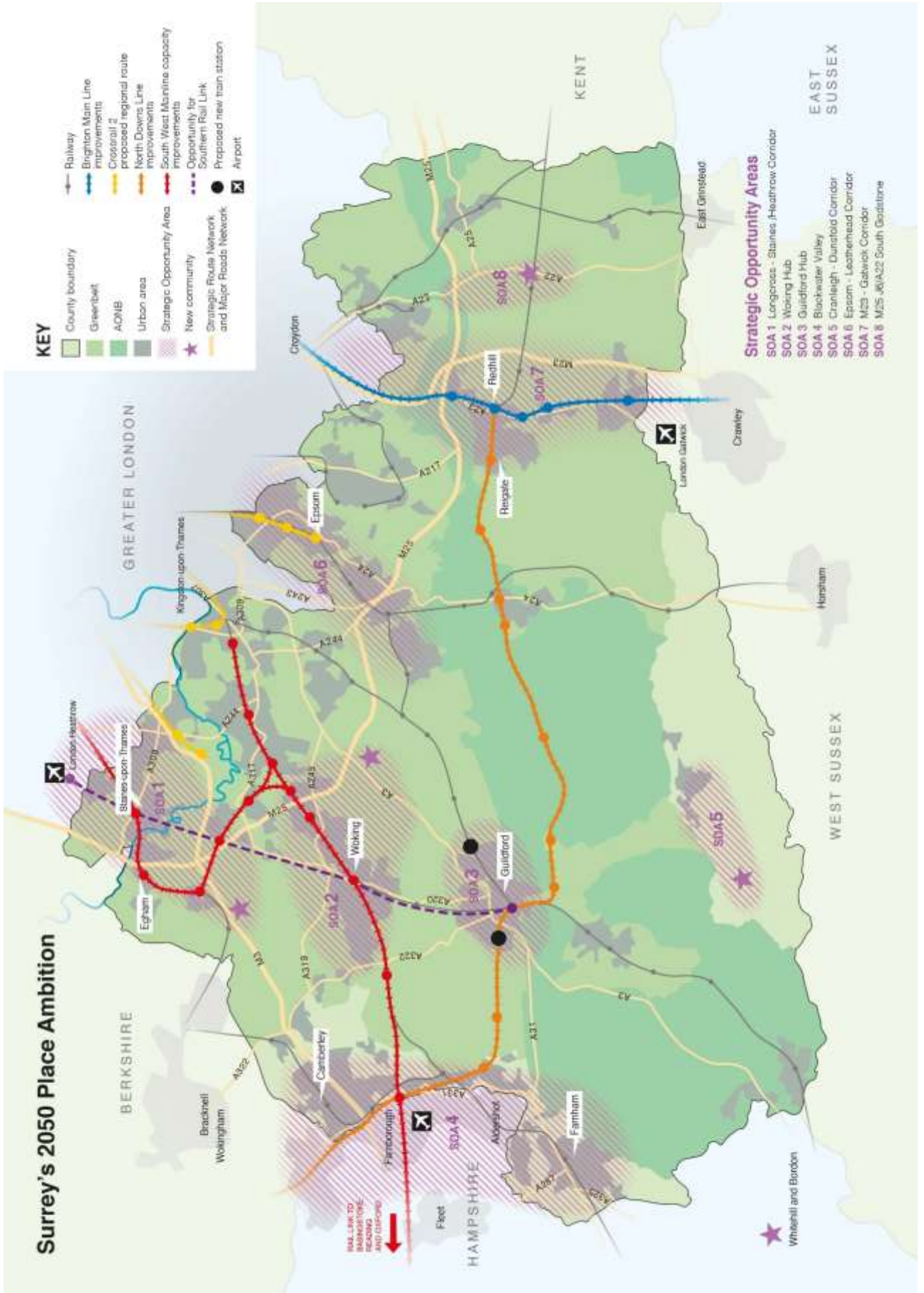
4.24 Within Surrey there will be increased focus on spatial strategies for nature guiding funding decisions and enabling the delivery of multi-functional benefits in prioritised areas. Surrey Wildlife Trust is already leading on innovative work to drive private investment in natural capital through the development of a Natural Capital Investment Fund.

4.25 Organisations such as Surrey County Council, Surrey Wildlife Trust and district and borough councils will continue to work together to avoid adverse effects on the environment, improve resilience to climate change and invest in natural capital by:

- Positively managing and improving the condition of internationally, nationally and locally designated sites of nature importance.
- Conserving and enhancing the distinctiveness of Surrey's landscapes and the natural beauty of the Surrey Hills AONB and High Weald AONB having regard to landscape character assessments and AONB Management Plans.
- Ensuring that land used for mineral working is restored to an appropriate future use and managed so that it brings value to the environment and local community.
- Recognising the importance of natural capital and the role of ecosystem services and pursuing opportunities for improving biodiversity and the air and water environment alongside new development.
- Articulating biodiversity improvement priorities, including the enhancement of the Biodiversity Opportunity Areas identified within the county.

- Creating a coherent connected network of accessible multi-functional greenspaces.
- Further developing the collective evidence base to include baseline natural capital accounts and mapping to identify enhancements for delivery of multiple benefits.
- Developing approaches for facilitating systemic investment in natural capital, including through a Natural Capital Investment Fund to trade biodiversity credits in a suite of habitat banks.
- Making use of public sector land for investment in natural capital.
- Providing Suitable Alternative Natural Greenspace to mitigate the impacts of new housing development on the SPAs which also delivers new accessible and good quality green infrastructure.

Surrey's 2050 Place Ambition



Delivering our 2050 Place Ambition

- 5.1 Delivering “good growth” requires long term commitment and investment and collaboration with many different stakeholders and partners. A detailed implementation framework, available as a separate document, has been produced that sets out how we propose to do this.

Appendix 18 – Summary of Local Plan positions of those authorities in the South East that did not respond to the Council’s Duty to Cooperate – Elmbridge’s Housing Need Letter, January 2020

Local Authority	Adopted Housing Target (date)	Standard Methodology Housing Requirement	Local Plan Position	Can the LPA meet their housing need without amendments to the GB (where applicable)	Is the LPA seeking other LPAs to assist in meeting their need	Is the LPA seeking to amend GB boundaries to meet need
Cherwell District Council	527	556	Local Plan Part 1: Adopted December 2016	Yes (paragraph B.258)	No	Review Commissioned – Land considered for employment use (Paragraph B259; Policy ESD 14); Paragraphs C.226 and C.230)
Crawley Borough Council	340 (2015)	752	Regulation 19 (Consultation ended 2 nd March 2020)	No	Yes	N/A
Dover District Council	700 (2010)	598	Core Strategy Adopted 2010 Regulation 18 Scheduled June 2020	N/A	Unknown at this stage	N/A
Folkestone & Hythe District Council/Shepway District Council	350	448	EIP (Main modifications received January 2020; Revisions sent to PINS March 2020)	Yes, but based on the target set in the previous Core Strategy	No	N/A
Gravesham Borough Council	342/343	325	Regulation 18 (Site allocations and Development Policies)	This is not stated explicitly but recurrent references to the need for a review of Green Belt boundaries and sites within it would suggest not	No	Unknown at this stage

Milton Keynes Council	1767	1768	Adopted 2019	The adopted plan meets the need in full, no GB release	Not in the adopted plan	No
Oxford City Council	533/534	743	Plan Submitted Main Modifications Consultation (Ended March 2020)	No	No	Yes
Royal Borough of Windsor and Maidenhead	712	768	Submitted to PINS	No	No	Yes, a number of sites of sites are being released from the Green Belt. A couple of these are PDL
Southampton City Council	815 (2015)	815/1000	Regulation 18: Issues and Options (Currently live ends 31 st May)	N/A	Unknown at this stage	N/A
Swale Borough Council	776 (2017)	766	Regulation 18 (November 2018)	N/A	Unknown at this stage	N/A
Tunbridge Wells Borough Council	290	688	Regulation 18	No (There are proposals to release some Green Belt land for housing and employment purposes)	No	Yes
West Berkshire Council	525 (2012)	551	Regulation 18 (Consultation Closed December 2018)	Yes - There is a proposal to build a new settlement in the east of the borough. It is unclear if this is covered by Green Belt designation	Not currently	Yes

Appendix 19 - Elmbridge Local Plan - Duty to Cooperate - Meeting Elmbridge's Housing Need, Letter to South East Authorities, October 2021.



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FAO: Chief Planning Officer /
Head of Service with the responsibility for
Planning

Sent via email

contact: Suzanne Parkes
Planning Policy & Strategy
Manager
direct line: 01372 474810
e-mail: sparkes@elmbridge.gov.uk
my ref: DtC October 2021
your ref:

18th October 2021

Dear Sir/Madam,

Elmbridge Borough Council Local Plan: Meeting housing need

Elmbridge Borough Council is currently preparing a new Local Plan that will set out its development strategy and detailed planning policies for the borough up to 2037. As with most Local Planning Authorities (LPAs) in the South East, one of our biggest challenges is meeting our housing need (as set by the Government's standard methodology) against a backdrop of environmental and planning constraints.

We appreciate that LPAs are at different plan-making stages and others will be in a similar position in terms of responding positively to the challenge of addressing housing need. It is also noted that when we engaged with you in January 2020 on the potential unmet need of Elmbridge Borough and whether this can be met elsewhere, it was stated that your authority was not in a position to meet any unmet need arising from our Borough.

We are of course proactively engaging with LPAs within our housing market area to establish whether they may be able to accommodate all or part of our unmet need. However, in the event that the position of your Local Plan has changed over the last eighteen months and you consider that your authority would realistically be in a position to assist in meeting any of Elmbridge's unmet housing need, we would be pleased to discuss this with you further.

If you would like to discuss the above please do not hesitate to contact Suzanne Parkes, Planning Policy and Strategy Manager on 01372 474810 / sparkes@elmbridge.gov.uk by 1st November 2021.

Yours faithfully,

Kim Tagliarini
Head of Planning Services

Appendix 20 – Letter sent to Surrey County Council & National Highways regarding the Elmbridge Local Plan Transport Assessment and M25 Junction 11 Mitigation



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Sent via email

contact: Suzanne Parkes
Planning Policy & Strategy
Manager
direct line: 01372 474810
e-mail: sparkes@elmbridge.gov.uk
my ref: DtC M25 J11
your ref:

18 October 2021

Elmbridge Local Plan – Transport Assessment – M25 Junction 11 Mitigation

As you are aware, Elmbridge Borough Council and our appointed consultants (WSP) are producing a Transport Assessment to inform and support the preparation of our new Local Plan which, in accordance with national policy and best practice, includes looking at the potential impacts of our intended growth strategy on the local and strategic road networks and the mitigation measures required to off-set these.

As part of our on-going discussions with both Surrey County Council (SCC) and National Highways (NH) on this project, it is understood that mitigation measures at Junction 11 of the M25 have been proposed as part of the Runnymede 2030 Local Plan (adopted July 2020). It is understood that those proposals include the full signalisation of the J11 roundabout junction, which is intended to regulate traffic flows from St. Peter's Way onto the M25 Motorway.

In seeking to understand the implications of various development scenarios for Elmbridge Borough and the mitigation required, WSP has previously requested on behalf of the Council the latest drawings and modelling for the mitigation measures at Junction 11 for inclusion in its traffic modelling. However, whilst provided with the latest design in February 2021 (attached for reference) and the Runnymede Local Plan: M25 Traffic Implications Assessment Note (May 2019), it is understood that there are no available detailed drawings and that the information provided at the time was still subject to change following discussions between yourselves and Runnymede Borough Council.

We are just about to embark on modelling a revised potential growth scenario for the borough and considering the resulting mitigation. To ensure this is based on the most up to date information available, I would be grateful if you could provide an update on the Junction 11 scheme including the latest detailed scheme drawings and a copy of the junction modelling.

Your input into the Assessment to date has been much appreciated and valued.

To assist us moving forward, I would be grateful for a response by **25 October 2021**.

I look forward to hearing for you.

Yours faithfully,

Suzanne Parkes,
Planning Policy & Strategy Manager

cc. Gerry Corrance, Technical Director, WSP