
Regulation 19 Consultation Representations

Elmbridge Local Plan



June 2023



Elmbridge
Borough Council
... bridging the communities ...



Introduction

This document lists all representations the Council received during the Regulation 19 public consultation on the Draft Elmbridge Local Plan that took place between 17 June and 19 July 2022.

All the responses received to the Regulation 19 consultation are also available [online](#).

Name	Ian Ailes
User ID	40865665
Organisation	
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No It does not properly consider its objectives.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Walton town is suffering from over development and a disproportionate amount of public sector housing. there is also an over supply of flats, in particular for older residents. many of these are unsustainable due to their excessive service charges. The shopping area has shrunk and can no longer serve the number of people in the locality. it is time the other towns in the borough took more of the demand for additional housing. new development needs to be nearer to stations such as Hersham, Cobham and Esher.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y]

	Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	No account has been taken of the size Walton town is already nor of the high amount of social housing in the area. it needs to be redistributed. Much new housing is in marginal locations and of poor construction effectively building tomorrow's housing problems.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination.
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Robert Allvey
User ID	24296577
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: [Y]</p> <p>Justified: []</p> <p>Consistent with national policy: []</p> <p>The plan is generally competent, however it lacks basic common sense in its execution. Elmbridge encourage electric car charging, cycling and discourage driving however there is nothing to provide the necessary infrastructure that is discussed in the report. The vision of a car free utopia with clean air will not happen unless local or national government make it happen. Developments may discourage cars by not providing parking spaces but people will still have cars and these will be forced to park in other parts of the borough and drive them.</p>

	<p>The report seem to be suggesting a lot of commercial sites and car parks are abandoned in favour of housing and this will inevitably lead to traffic, congestion and poor air pollution. I assume the rail network and doctors surgeries can accommodate the thousands more people who will become residents.</p> <p>This questionnaire is written by a local council beaucrocat, it seeks to pigeon hole peoples responses into a box ticking exercise based on councils procedure rather than the contents of the report.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Some real answers to the questions you raise would help.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Peter Almond
User ID	36396577
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>While the concept of brownfield sites only for development is appealing, it means much shoe-horning housing into small, inappropriate sites. That 1,215 housing units (17.9% of the total) must be provided for Esher, for instance, is ridiculous.</p> <p>In order to do this the plan calls for the removal of libraries in Esher and Weybridge, for the Civic Centre to be removed for 400 houses, even for 33 units to be built at Grace Lodge in Hinchley Wood. This is a tiny site on the corner of a very busy intersection of the A309 and Manor Road N and S where a proposal for just that many flats was easily rejected by the council some time ago. Ditto the plans for the old Cafe Rouge at Portsmouth Rd and Station Rd, Esher. 20-plus units there are better than the original 30-plus, rejected plans, but still inappropriate.</p> <p>Better to take a single large chunk of 'Green Belt' which is little used: for instance Princes Coverts, Oxshott, which is 864 acres of little-accessed land owned by the Crown Estate to provide logging value for the Crown. I'm a Royalist, but recognise that Her Majesty already owns too much land.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: []

	<p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>See my previous response. The unit numbers are plucked from the air. I understand why they are done but I think it is wrong to flatly reject all 'Green Belt' land. I am a regular walker with the U3A, who has spent many hours walking through Surrey's woods and can confirm that you can easily get lost in them. A 'no Green Belt Policy" is not justified.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	See above. Revised wording could be: "and where there is little or no impact on public access or enjoyment, to include some carefully-selected areas of Green Belt."
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Alpass
User ID	24379361
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Penny Alpass
User ID	41158689
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ian Anderson
User ID	41170913
Organisation	Lichfields
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Para 2.1 should emphasise the important role of making provision for business, supporting enterprise and promoting business adaption
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] NPPF21 et al notes the importance of supporting and making provision for business, supporting enterprise and promoting business adaption. The Plan should recognise this in its key themes, not just support Town Centre / employment area development. This underscores the requirement for adaptability.

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Ref in para 2.1 insert 'Supporting and making provision for business, supporting enterprise and promoting business adaption'
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ian Anderson
User ID	41170913
Organisation	Lichfields
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No SS2 should refer to the need to provide a wider range of leisure and recreational uses, easily accessible within the Borough
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No SS2 should refer to the need to provide a wider range of leisure and recreational uses, easily accessible within the Borough
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] NPPF para 93 / 98 supports the provision of a range of sports and recreation facilities to meet the needs of residents and communities. This is an important 'strategic reference' to the need to provide facilities and should be included within SS2

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	SS2 (d) Providing access to wide ranging opportunities for sport and physical activity to support the health and well-being of communities
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ian Anderson
User ID	41170913
Organisation	Lichfields
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Policy SS3 should provide provision for sports as well as wider leisure.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Policy SS3 should provide provision for sports as well as wider leisure.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] NPPF paras 93 and 98 note the importance of making provision for sports and recreation use. Whilst SS3 has reference to leisure, it appears to be in the form of town centre uses, rather than wider uses and does not appear to extend to sport.

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	SS3 3(e) support the provision of wider recreation and sports-leisure development within the borough to meet the needs of residents and wider communities.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ian Anderson
User ID	41170913
Organisation	Lichfields
Policy / Evidence base/ part of plan:	ENV4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Policy ENV4, and its supporting text, fails to adequately explain: 1. what is considered 'appropriate' development in the Green Belt 2. The role of limited infilling or complete redevelopment of previously developed land, whether redundant or in continuing use, subject to this not having a greater impact on the openness of the Green Belt. Simple ref to the NPPF in our view does not explain fully, nor help explain to non technical reviewers of the Plan The Policy should be reviewed against NPPF21 notably paras 147-151.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [] Consistent with national policy: [Y]

	<p>see earlier comments: Simple ref to the NPPF in our view does not explain fully, nor help explain to non technical reviewers of the Plan Policy ENV4, and its supporting text, fails to adequately explain: 1. what is considered 'appropriate' development in the Green Belt 2. The role of limited infilling or complete redevelopment of previously developed land, whether redundant or in continuing use, subject to this not having a greater impact on the openness of the Green Belt. The Policy should be reviewed against NPPF21 notably paras 147-151.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	see above comments
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ian Anderson
User ID	41170913
Organisation	Lichfields
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The allocations part of the Plan makes no provision for leisure and sports development, to meet needs.</p> <p>The David Lloyd Club helps meets such provision and should be recognised as an appropriate location for additional leisure and outdoor recreation development.</p> <p>Whilst the site falls within the Green Belt, it is our view, given the largely previously developed nature of most of the site, that it adds little to the key purposes of maintaining land within the Green Belt and that its removal and recognition through allocation for leisure and sports / recreation use is legitimate.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: [Y]</p>

	<p>The should consider an make provision for leisure, sports, health and wellbeing and recreation development, to meet needs.</p> <p>The David Lloyd Club helps meets such provision within the Borough and is a major destination for health, racquets and other sports and recreation use and should be recognised as an appropriate location for additional leisure and outdoor recreation development.</p> <p>Whilst the site falls within the Green Belt, it is our view, given the largely previously developed nature of most of the site, that it adds little to the key purposes of maintaining land within the Green Belt and that its removal and recognition through allocation for leisure and sports / recreation use is legitimate.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Removal of Green Belt designations across the David Lloyd site and re-allocation for health and fitness / leisure purposes.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Tim Armitage
User ID	16335777
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes The plan looks to have considered all aspects from a solid legal basis
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes The council have approached the plan with due consideration to the views of local residents and the councillors and council officers have clearly worked hard to represent such views for which I am grateful.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Clive Atkinson
User ID	24541857
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes This development strategy is appropriate in relation to the number of homes and the location on brownfield sites. This plan is the most appropriate for Claygate and Elmbridge as a whole since it recognises that in developing new sustainable homes, the green belt must be protected - in my view against any development. We have a climate emergency and the environment, green spaces, landscapes, trees and woodlands should be protected at all costs. A brownfield approach is therefore the right approach.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	CC1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	CC2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	CC3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	CC4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	CC5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes It is well thought out and represents an honest approach to providing housing over the next 15 years
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes It is a considered piece of work and is realistic.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	ENV1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	ENV2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
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Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	ENV3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

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Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	ENV4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	ENV5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	ENV6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	ENV7
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	ENV8
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	ENV9
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	ENV10
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	ENV11
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	HOU3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	HOU4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	HOU5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	HOU6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	HOU7
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	HOU8
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	ECO1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	ECO2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	ECO3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	ECO4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	ECO5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	INF1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	INF2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	INF3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	INF4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	INF5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	INF6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	Monitoring
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Baker
User ID	24433697
Organisation	
Policy / Evidence base/ part of plan:	Appendices
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I support the Council's chosen approach to retain the character of the area by safeguarding Green Belt, open spaces etc. and avoiding areas unsuitable for new development. If the last two years have taught us anything, it is the importance of Green Belt and open spaces that bring the community together. Efficient use of brownfield sites where much of the necessary infrastructure is already in place will should help to provide suitable dwellings without significantly changing the character of the area.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes The 5 Principles outlined in the Draft Local Plan are completely sound in my opinion. In particular it is essential to deliver housing in a highly sustainable way whilst maintaining strong and thriving communities.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>In my opinion the Draft Local Plan gets the right balance between growth and protection of Green Belt, open spaces, ancient woodland and heritage assets. It will retain the underlying character of an area and lead to sustainable places where people will want to live whilst at the same time taking into account measures to minimise climate change. The Plan makes best use of existing developed land in places that are or can readily be well served by suitable facilities and infrastructure and avoids overdevelopment and prevents neighbouring towns from merging with one another. The Plan identifies a proportionate level of development for each settlement which fairly corresponds with its existing size and sustainability and will deliver the type of homes needed in the most suitable and sustainable locations. Green Belt defines the character of Claygate where I live as well as playing an important part of other areas in Elmbridge and the Council's evidence database demonstrates that the exceptional circumstances necessary to enable the release of Green Belt has not been demonstrated. The Plan provides an appropriate approach to achieve sustainable development that is consistent with national policy.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.

	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	CC1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	CC2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes In my opinion it is essential to provide sustainable development that is energy efficient with an emphasis on sustainable transport and effectively manages flood risk
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	CC3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	CC4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	CC5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes There is plenty of evidence to support the Local Plan. It represents a comprehensive, sound, fair, proportionate and sustainable solution to Elmbridge's needs.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	ENV1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	ENV2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	ENV3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes The last two years have demonstrated the importance of retaining green space that serve as a vital part of a vibrant and healthy community
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	ENV4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I support the council placing great importance on protecting Green Belt as it serves as a buffer to neighbouring area, preserves the open countryside as well as the integral character of individual areas..
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	ENV5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	ENV6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	ENV7
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	ENV8
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	ENV9
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	ENV10
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	ENV11
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I support the principle of protecting and enhancing the environment as set out in policies ENV1 - ENV11. These policies lend themselves to a sustainable environment that preserves the character of each area of Elmbridge.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I support the Housing Delivery Plan especially the requirement for a minimum of 30% affordable homes.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I support optimisation of sites in order to preserve the character of the local area whilst providing additional housing that meets local needs
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	HOU3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes In my opinion the Local Plan is designed to provide the appropriate mix of housing that meets local needs whilst maintaining the character of an area as best as practical.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	HOU4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	HOU5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes In my opinion the Housing Standards Policy will deliver appropriate functional, adaptable and accessible new homes.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	HOU6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	HOU7
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I support this Policy for the delivery of Gypsy, Roma and Traveller pitches and Travelling Showpeople's plots. In particular I support the requirements for provision of on-site services such as water supply, sewage disposal and power supply and landscaping compatible with the visual character of the area and amenities of neighbouring uses.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	HOU8
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	ECO1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I support the policy of protecting employment land and encouraging its innovative re-use in ways that better meet the needs of the market.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	ECO2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I support the safeguarding of Strategic Employment Land for employment uses to support and retain employment opportunities in locations attractive to businesses in order to maintain thriving communities.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	ECO3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I commend the support of identified retail, office, residential, community, cultural and leisure uses in the borough's town, district and local centres in order to retain thriving communities.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	ECO4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	ECO5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	INF1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I support the Council working in partnership with providers of infrastructure and services to facilitate the timely provision of infrastructure necessary to support sustainable development in the borough, and in addressing pressures from cross boundary development.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	INF2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes In my opinion social and community infrastructure plays an essential role in providing good quality of life, stimulating and supporting social cohesion and interaction, as well as developing strong and inclusive communities and healthy lifestyles.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	INF3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes In my opinion it is very important to promote the health and wellbeing of residents, workers, and visitors that involves shaping the built and natural environment
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	INF4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I support the need to provide space and/or access to suitable play and informal recreation space and accessible routes for children and young people, that enable them to play and move around safely and independently. In my opinion the young people help to retain the vibrancy of a local environment.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	INF5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	INF6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes The identified sites provide an opportunity for sustainable development without too adversely impacting the character of the local area.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	Monitoring
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I support the indicators assigned to each Principle.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Bamford
User ID	23635745
Organisation	
Policy / Evidence base/ part of plan:	Appendices
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes In my opinion, the Policies are sound, fair and proportionate.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sean Barrett
User ID	41153761
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Brampton Gardens open space used by local children daily should not be vulnerable and should be ring fenced from any development.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Leave Brampton Garden's green space alone

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	No

Name	A Barry
User ID	41250753
Organisation	Molesey Road Land Limited
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>These representations to the Regulation 19 Draft Elmbridge Local Plan 2037 (June 2022) have been prepared by Union4 and are submitted on behalf of Molesey Road Land Limited. The comments and objections made with the aim of helping to achieve a Local Plan that is soundly based, and which meets the needs of the Borough over the Plan Period in a sustainable manner.</p> <p>We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.</p> <p>Overview – ELP Vision and Key Principles Any objective assessment of the Regulation 19 Draft Elmbridge Local Plan (ELP) must conclude that it clearly and substantially fails the test of soundness. In our view, it is so substantially flawed that it should not progress to Examination without substantial modification. Conspicuous in its absence, is any commitment to seek to meet the needs of community over the Local Plan period. Although the ‘Vision’ for Elmbridge (page 16) includes a commitment that ‘Residents, existing and new, will have the choice of a range of housing types’, this statement and the related ‘Principle 3’ fail to commit to the NPPF requirement of seeking to meet housing need.</p>

While the Council are understandably concerned to ensure the protection of the environment of the Borough, they have taken a what is essentially a political decision to oppose the principle of Green Belt release, irrespective of the benefits that a selective and considered approach to such release would bring in terms of the boost to the supply of new homes and a high-quality environment for existing and future residents.

The local plan acknowledges (ELP para 2.7) that Elmbridge is one of the most expensive areas in the country to live. It acknowledges that too many young people and families are moving out of the borough to have a realistic prospect of owning or renting their own home. Older residents are struggling to affordably downsize in a way that will enable them to continue to live independently or with care packages and remain in their local community. It also acknowledges that this creates problems for the wider economy. The high cost of housing and reliance on people travelling into the borough is also making it difficult for local businesses and services to attract and retain employees.

Although the Council prioritises the efficient use of land and optimisation of development, it readily accepts (ELP, para 1.15) that the Plan does not set out to meet needs. Indeed, nowhere does the ELP aspire to do so. The ELP states that they have chosen this approach in response to the need to balance growth with protecting and continuing to conserve and enhance what is important to residents and helps shape communities.

It is clear however, that the Council's decision not to meet need is based on an 'in principle' view that all Green Belt should be protected at all costs and an unwillingness to consider the release of any Green Belt land, no matter what the benefits of doing so would achieve. This is evidenced in the withdrawal, prior to committee debate, of a report from the Local Plans Working Group on a Draft Local Plan in 2021 which sought to do exactly that.

While National Planning Policy may be in a state of flux in some respects, this is no reason to delay or not to meet identified needs.

It is a key requirement that local planning policies should be effective in achieving sustainable development. This means, among other things, meeting the needs of present and future

	<p>generations. In choosing not to meet these needs in the ELP, the Council fails both present and future generations.</p> <p>The ELP fails the present test of soundness and may be summarised as:</p> <p>a) Positively prepared – the ELP is not positively prepared. It deliberately sets out a strategy that fails, as a minimum, seek to meet the Borough’s objectively assessed needs. Further, it is not informed by any agreements with other authorities (or indeed joint studies or evidence of cross border working) so that unmet need is accommodated where it is practical to do so.</p> <p>b) Justified – there is a lack of objective evidence to support the Council’s decision not to meet housing needs in particular and hence there is no real basis to conclude the ELP sets out an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence;</p> <p>c) Effective – hence it is clear that the ELP will not be effective in meeting the needs of the community or achieving sustainable development over the plan period, and no evidence that there has been or will be effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred;</p> <p>d) Consistent with national policy – it is clear that the ELP is inconsistent with the duty to achieve sustainable development enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.</p> <p>It is clear on the basis of the evidence provided (summarised at ELP para 3.30), that the Council have, in preparing the ELP, failed to deliver on the duty to cooperate with adjoining authorities in meeting housing needs. While the Council have engaged with a wide range of partners as part of their duty to co-operate, there is no real evidence of joint work and no positive outcomes. There is no joint evidence or comparison on constraints and opportunities which are part of a rigorous assessment of alternative strategies and options.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No

	see above
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>see above</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>The Plan should be fundamentally recast to achieve the objectives of sustainable development, meet identified housing need and consider a revised spatial strategy that includes the release of Green Belt land in sustainable locations to meet the needs of the community over the Plan period.</p> <p>https://consult.elmbridge.gov.uk/gf2.ti/af/1205954/557508/PDF/-/220728%20Representations%20for%20Molesey%20Land.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	<p>We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.</p>

Name	A Barry
User ID	41250753
Organisation	Molesey Road Land Limited
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>Sustainable Place Making Objection</p> <p>The policy fails to set out the positive presumption in favour of sustainable development or set out to meet objectively assessed needs and is clearly at odds with paragraph 11 of the NPPF. As set out in paragraph 7 of the NPPF, this means meeting the needs of the present generation without compromising the ability of future generations to meet their own needs.</p> <p>As such, it does not comply with the legal requirement (Planning and Compulsory Purchase Act 2004, s39) on the Council to exercise its planning functions with the objective of contributing to the achievement of sustainable development.</p> <p>In failing to seek to meet the need for new homes over the plan period, the ELP fails to meet the needs of the present generation and substantially compromises the ability of future generations to meet their needs. It increases and perpetuates the growing disparity between need and supply, between those that have access to housing and those that don't.</p> <p>The explanation (at ELP para 3.13 and 3.17) falls short of an explanation for the departure from national policy and the legal commitment set by the Act to seek to deliver sustainable development. this by definition means meeting the needs of the present. The evidence base supporting the ELP falls far short of the threshold required if these needs are not to be met, set out in para 11 part (b) of the NPPF.</p> <p>While the adjoining authorities within Surrey, which are of a similar character and situation, have all tackled the hard decisions necessary in meeting housing and other needs while reconciling this with the objectives of Green Belt policy and other recognised constraints, the Council in this case have taken an in-principle judgement that such constraints provide a de facto rationale for not meeting housing and other needs.</p>

	This does not meet the requirement of the NPPF to meet need unless i) the application of policies in the Framework that protect areas or assets of particular importance provide a strong reason for restricting the overall scale, type or distribution of development in the area; or ii) the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No see above
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] see above
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Proposed Modifications to make the ELP sound: Policy SS2 should be modified to reflect the commitment to meeting the need for housing and other development and adopting a sustainable spatial strategy in accordance with paragraph 11 of the NPPF.

	220728 Representations for Molesey Land.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	<p>We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.</p>

Name	A Barry
User ID	41250753
Organisation	Molesey Road Land Limited
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>SS3 - Scale and location of good growth Objection</p> <p>The policy is both unsound and is not justified by the evidence. It will not be effective in achieving sustainable development.</p> <p>The policy proposes a requirement of 6,785 homes over the plan period, of which a target of 30% will be affordable. This equates to 452 new homes a year and is substantially below the level of need for housing within the Borough over the period and, by definition, also fails to meet the affordable housing need.</p> <p>As the Council acknowledge (ELP para 3.19) the local housing needs assessment using the standard method result in a housing need of at least 9,705 homes, equal to 647 new homes a year. The proposed trajectory underpinning SS3 proposes a shortfall therefore, of 2,902 homes over the plan period or 195 homes a year.</p> <p>There is also a serious shortfall in the delivery of affordable housing. The backlog of affordable housing need is 1,434 and on the basis of the evidence, a further 59 existing households are likely to fall into needs each year. This is likely to represent circa 269 affordable homes needed each year. yet the evidence shows that delivery of affordable housing achieved only around 54 homes a year over the last ten years, adding to the cumulative shortfall and this is not addressed in the level of provision proposed in the ELP.</p> <p>While part 2) of the policy also commits to a 'brownfield first' approach, in effect the ELP does not allow development outside of the urban area and effectively limits development almost exclusively to previously developed land in the urban area, including no greenfield allocations outside the urban area.</p> <p>In considering the potential for development involving Green Belt land, the Council concluded that 'exceptional circumstances have not been fully evidenced and justified to make changes to</p>

the Green Belt boundaries in the borough'. It is not clear on what basis this judgement was made.

It is clear that the Council had previously concluded the opposite, that 'exceptional circumstances' did exist that justified the release of Green Belt land to meet housing need. This was set out in the previous Reg 18 consultation stages.

It is also clear that before the current Reg 19 Draft ELP, officers were also still of the view that exceptional circumstances did indeed exist and justified Green Belt release. This had been discussed at the Local Plan Working Group of councillors. A draft ELP was presented to members of that Group in June 2021. The content of the plan and the agenda papers have not been published. However, the Cabinet member for Planning is recorded at the time as stating that councillors asked officers to look again and '.... considered that the officer recommended draft Plan and the proposed release of Green Belt was not supported by the exceptional circumstances as set out in the evidence base documents'.

There is no substantive evidence for the change of heart which appears to be a wholly political decision contrary to previous officer advice and represents an 'in principle' judgement not to countenance the release of Green Belt land to meet a proportion of housing need, no matter what the benefits or merits of the case.

The purposes of the Green Belt are well understood and set out in the NPPF at paragraph 138. The extent of Green Belt in Elmbridge has been established for many years and has not changed significantly in the period since its designation. It covers all of the land outside the defined urban areas. The NPPF makes clear that their extent and detailed boundaries should only be altered exceptional circumstances, and expressly provides for this through the local plan process. The NPPF sets three key requirements (para 141) which need to be met before concluding exceptional circumstances exist. These are: maximising the use of brownfield sites; optimising the density of development and determining whether unmet need can be met by neighbouring authorities. It is clear that in Elmbridge, these tests are clearly met.

Further it is also clear that there is substantial unmet need. The ELP acknowledges it cannot meet need from the three sources noted in para 141. It further acknowledges that there is an existing unmet need and that this will increase every year through the plan period. This need affects market homes and is compounded by the failure to meet the need for affordable homes. The affordability ratio is one of the worst in England and comparable to some of the highest priced central London Boroughs and is worsening over time. It is acknowledged that this is

affecting life chances and equality by limiting access to decent homes and adversely impacting employment and the local economy, as people cannot afford to live in the Borough.

Topic Paper 1 identifies unmet needs in the surrounding areas of the South East and London. This reinforces the need for Elmbridge to do its utmost to meet its own needs and consider contributing to meeting those wider needs. It is relevant in this regard that the adjoining London Borough's have capacity driven housing targets because of the nature of the urban area and the level of unmet need has been a substantial concern for the GLA and Secretary of State that must be tackled in the next review of the Plan and is an issue for adjoining authorities.

The old Core Strategy was based on the SE Plan, which was not a needs based assessment for Elmbridge. It relied on the regional spatial strategy which sought to balance need and supply across the wider region. The core strategy figure for Elmbridge was consequently below the level of need within the Borough, as evidenced in the more recent needs assessments and the worsening affordability position over many years.

The position is worse than identified in this Topic Paper however, and the HBF have identified that the actual housing need in Elmbridge using the standard method and including what the Government consider to be the full amount necessary to address past shortfalls in delivery is 859 dwellings each year. This is over 200 homes more each year than the capped figure and itself indicates that the need for homes in Elmbridge.

The Council have based an assessment of exceptional circumstances on the tests set out in the Calverton case and considered:

1. the acuteness / intensity of the objectively assessed need in Elmbridge and neighbouring authorities;
2. inherent constraints on supply of land suitable for sustainable development;
3. the consequent difficulties in achieving sustainable development without impinging on the Green Belt;
4. the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and
5. the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.

While the conclusions of the ARUP Green Belt Review provide information on the assessment of largescale parcels of land and the degree to which they meet the purposes of including land within the Green Belt, this is capable of a finer grained analysis as would be necessary in

considering individual proposals and their impact on the Green Belt and overall spatial strategy. On the basis of the original evidence, the Council had previously considered exceptional circumstances exist and it is clear therefore, that this then needs to be considered at a detailed, site specific level to be able to form a reasoned judgement over whether these circumstances are met in any individual case, which may justify the release of Green Belt in light of the relevant planning considerations.

Indeed, it is clear from the work on SANGs, that the deficiencies in supply of alternative green space can only reasonably be met by corresponding Green Belt release to enable the provision of sufficient SANG for the wider Borough. This benefits development in accordance with the overall spatial strategy, supporting densification and development in the urban areas within the 5km and 7km SPA zones. These and other environmental and biodiversity benefits could be derived by taking a more pro-active view of Green Belt release as an agent for positive change which can maximise the benefits to the community and environment over the plan period.

In this regard, it is clear from the evidence base that:

1. When considering housing need in Elmbridge it is acute.
2. There are inherent constraints on supply that mean that housing needs cannot be met from within the existing urban areas or land sustainably located outside the Green Belt. The legal requirement to pursue sustainable development means that sustainable patterns of development, with accessibility to the main centres of population and transport accessibility, providing goods and services within balanced, accessible communities, need to be overlain over any assessment of Green Belt. this favours those locations on the edge of the main urban areas and accessible to rail and other transport modes.
3. It is evident that sustainable development cannot be achieved, indeed needs would not be met which impact on the economy, social equity and the environment, without consideration of Green Belt release. Access to decent housing is a priority and the socio-economic impacts of not meeting need have not been properly weighted in the Sustainability Appraisal that accompanies the ELP.
4. It is evident that the extent of Green Belt release can be limited both in quantum and in the nature of proposed release. It is clear from the assessments previously carried out in the plan process and from considering the example of the Land east of the Molesey Road as an example, that targeted Green Belt release can achieve significant benefits and minimise the impact of development on the openness of the Green Belt.

	5. It is also evident the consequences for the Green Belt can include local enhancements to both accessibility an
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No see attached representations
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>The policy is both unsound and is not justified by the evidence. It will not be effective in achieving sustainable development.</p> <p>The policy proposes a requirement of 6,785 homes over the plan period, of which a target of 30% will be affordable. This equates to 452 new homes a year and is substantially below the level of need for housing within the Borough over the period and, by definition, also fails to meet the affordable housing need.</p> <p>As the Council acknowledge (ELP para 3.19) the local housing needs assessment using the standard method result in a housing need of at least 9,705 homes, equal to 647 new homes a year. The proposed trajectory underpinning SS3 proposes a shortfall therefore, of 2,902 homes over the plan period or 195 homes a year.</p> <p>There is also a serious shortfall in the delivery of affordable housing. The backlog of affordable housing need is 1,434 and on the basis of the evidence, a further 59 existing households are likely to fall into needs each year. This is likely to represent circa 269 affordable homes needed each year. yet the evidence shows that delivery of affordable housing achieved only around 54</p>

homes a year over the last ten years, adding to the cumulative shortfall and this is not addressed in the level of provision proposed in the ELP.

While part 2) of the policy also commits to a 'brownfield first' approach, in effect the ELP does not allow development outside of the urban area and effectively limits development almost exclusively to previously developed land in the urban area, including no greenfield allocations outside the urban area.

In considering the potential for development involving Green Belt land, the Council concluded that 'exceptional circumstances have not been fully evidenced and justified to make changes to the Green Belt boundaries in the borough'. It is not clear on what basis this judgement was made.

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It is also clear that before the current Reg 19 Draft ELP, officers were also still of the view that exceptional circumstances did indeed exist and justified Green Belt release. This had been discussed at the Local Plan Working Group of councillors. A draft ELP was presented to members of that Group in June 2021. The content of the plan and the agenda papers have not been published. However, the Cabinet member for Planning is recorded at the time as stating that councillors asked officers to look again and '.... considered that the officer recommended draft Plan and the proposed release of Green Belt was not supported by the exceptional circumstances as set out in the evidence base documents'.

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the density of development and determining whether unmet need can be met by neighbouring authorities. It is clear that in Elmbridge, these tests are clearly met.

Further it is also clear that there is substantial unmet need. The ELP acknowledges it cannot meet need from the three sources noted in para 141. It further acknowledges that there is an existing unmet need and that this will increase every year through the plan period. This need affects market homes and is compounded by the failure to meet the need for affordable homes. The affordability ratio is one of the worst in England and comparable to some of the highest priced central London Boroughs and is worsening over time. It is acknowledged that this is affecting life chances and equality by limiting access to decent homes and adversely impacting employment and the local economy, as people cannot afford to live in the Borough.

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2. inherent constraints on supply of land suitable for sustainable development;
3. the consequent difficulties in achieving sustainable development without impinging on the

	<p>Green Belt;</p> <p>4. the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and</p> <p>5. the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.</p> <p>While the conclusions of the ARUP Green Belt Review provide information on the assessment of largescale parcels of land and the degree to which they meet the purposes of including land within the Green Belt, this is capable of a finer grained analysis as would be necessary in considering individual proposals and their impact on the Green Belt and overall spatial strategy. On the basis of the original evidence, the Council had previously considered exceptional circumstances exist and it is clear therefore, that this then needs to be considered at a detailed, site specific level to be able to form a reasoned judgement over whether these circumstances are met in any individual case, which may justify the release of Green Belt in light of the relevant planning considerations.</p> <p>Indeed, it is clear from the work on SANGs, that the deficiencies in supply of alternative green space can only reasonably be met by corresponding Green Belt release to enable the provision of sufficient SANG for the wider Borough. This benefits development in accordance with the overall spatial strategy, supporting densification and development in the urban areas within the 5km and 7km SPA zones. These and other environmental and biodiversity benefits could be derived by taking a more pro-active view of Green Belt release as an agent for positive change which can maximise the benefits to the community and environment over the plan period.</p> <p>In this regard, it is clear from the evidence base that:</p> <ol style="list-style-type: none"> 1. When considering housing need in Elmbridge it is acute. 2. There are inherent constraints on supply that mean that housing needs cannot be met from within the existing urban areas or land sustainably located outside the Green Belt. The legal requirement to pursue sustainable development means that sustainable patterns of development, with accessibility to the main centres of population and transport accessibility, providing goods and services within balanced, accessible communities, need to be overlain over any assessment of Green Belt. this favours those locations on the edge of the main urban areas and accessible to rail and other transport modes. 3. It is evident that sustainable development cannot be achieved, indeed needs would not be met which impact on the economy, social equity and the environment, without consideration of Green
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	<p>Belt release. Access to decent housing is a priority and the socio-economic impacts of not meeting need have not been properly weighted in the Sustainability Appraisal that accompanies the ELP.</p> <p>4. It is evident that the extent of Green Belt release can be limited both in quantum and in the nature of proposed release. It is clear from the assessments previously carried out in the plan process and from considering the example of the Land east of the Molesey Road as an example, that targeted Green Belt release can achieve significant benefits and minimise the impact of development on the openness of the Green Belt.</p> <p>5. It is also evident the consequences for the Green Belt can include local enhancements to both accessibility and the function of the Green Belt in respect of its</p>
<p>Question 4</p>	<p>Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.</p>
	<p>Proposed Modifications to make the ELP sound:</p> <p>The scale and locations of growth should be increased to meet the objectively assessed need of a minimum of 9,705 homes over the plan period, at least 647 each year over the period. This should adopt a housing trajectory that prioritises early delivery, to address the substantial pre-existing unmet need arising from persistent under delivery and spiralling house price inequality.</p> <p>The proposed policy should accept that exceptional circumstances exist that justify the release of Green Belt land for housing in principle and should proceed to consider whether exceptional circumstances exist to justify the release of individual sites and bring these forward as modifications to the plan.</p> <p>The second part of the proposed policy proceeds to identify the broad locations for growth and the corresponding number and percentage of overall housing provision for each settlement. This should have express regard to para 142 of the NPPF which requires</p> <p>220728 Representations for Molesey Land.pdf</p>

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.

Name	A Barry
User ID	41250753
Organisation	Molesey Road Land Limited
Policy / Evidence base/ part of plan:	CC1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	A Barry
User ID	41250753
Organisation	Molesey Road Land Limited
Policy / Evidence base/ part of plan:	CC4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>While we support the objectives of the policy, it should also form part of the considerations for the spatial distribution of development and prioritise areas for growth and potential Green Belt release, where they are accessible to a wide range of population and have good access to train, bus, pedestrian and cycle connections. As this is not apparent in the consideration of development options and spatial strategy, it is not compliant.</p> <p>It is not clear how this policy has been taken into account in determining the spatial strategy for the Borough, the key locations for growth should relate well to the main urban centres and transport nodes, reducing the need to travel and tackling the spread of development to less accessible locations on the edge of the Borough that are reliant on car borne journeys.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>see above</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p>

	<p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>see above</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	The spatial strategy should be amended to take account of sustainable patterns of development in the consideration of the release of Green Belt to meet housing needs.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.

Name	A Barry
User ID	41250753
Organisation	Molesey Road Land Limited
Policy / Evidence base/ part of plan:	ENV1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No While we support the provision of good quality green and blue infrastructure in the Borough, close to where people live, this should be an objective of the spatial strategy, in using new development (and the potential release of Green Belt land) to maximise the benefits of change to the environment and community.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] While we support the provision of good quality green and blue infrastructure in the Borough, close to where people live, this should be an objective of the spatial strategy, in using new

	development (and the potential release of Green Belt land) to maximise the benefits of change to the environment and community.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	The objective should be a key part of the spatial strategy for the Borough that helps guide future development that can deliver positive change in green and blue infrastructure.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.

Name	A Barry
User ID	41250753
Organisation	Molesey Road Land Limited
Policy / Evidence base/ part of plan:	ENV4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No see below
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Objection For the reasons set out in respect of SS3 and HOU1, it is considered that exceptional circumstances exist that justify a review of the Green Belt and the release of selected sites from the Green Belt to meet the need for housing over the plan period. In summary, it is clear from the evidence base that: 1. When considering housing need in Elmbridge it is acute. 2. There are inherent constraints on supply that mean that housing needs cannot be met from within the existing urban areas or land sustainably located outside the Green Belt. 3. It is evident that sustainable development cannot be achieved, indeed needs would not be met which impact on the economy, social equity and the environment, without consideration of Green Belt release. 4. It is evident that the extent of Green Belt release can be limited both in quantum and in the nature of proposed release. 5. It is also evident the consequences for the Green Belt can include local enhancements to both accessibility and the function of the Green Belt in respect of its key purposes that minimise the overall effect of such release.

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>Objection For the reasons set out in respect of SS3 and HOU1, it is considered that exceptional circumstances exist that justify a review of the Green Belt and the release of selected sites from the Green Belt to meet the need for housing over the plan period. In summary, it is clear from the evidence base that:</p> <ol style="list-style-type: none"> 1. When considering housing need in Elmbridge it is acute. 2. There are inherent constraints on supply that mean that housing needs cannot be met from within the existing urban areas or land sustainably located outside the Green Belt. 3. It is evident that sustainable development cannot be achieved, indeed needs would not be met which impact on the economy, social equity and the environment, without consideration of Green Belt release. 4. It is evident that the extent of Green Belt release can be limited both in quantum and in the nature of proposed release. 5. It is also evident the consequences for the Green Belt can include local enhancements to both accessibility and the function of the Green Belt in respect of its key purposes that minimise the overall effect of such release.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Proposed Modifications to make the ELP sound:

	<p>The review of Green Belt boundaries and bringing forward of modifications to release land from the Green Belt sufficient to meet at least the minimum level of objectively assessed housing need.</p> <p>Specifically, the identification of land east of the Molesey Road, Walton on Thames should be released from the Green Belt and identified for housing led mixed use development, as set out in the attached proposal. In conjunction with the proposed land identified for development, it is proposed to create a substantial area of SANG as publicly accessible greenspace, as one of the largest areas of accessible greenspace in the Borough, close to the main centres of population.</p> <p>210909~1.PDF</p> <p>MAMOLE~1.PDF</p> <p>220728 Representations for Molesey Land.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	<p>We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.</p>

Name	A Barry
User ID	41250753
Organisation	Molesey Road Land Limited
Policy / Evidence base/ part of plan:	ENV5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>Objection While the approach of the policy to the protection of the Thames Basin Heaths SPA is recognised and supported, it is clear that additional SANG capacity is required alongside any additional housing proposed to meet the objectively assessed need. Without this, the ELP fails to meet the requirements of the Habitats Regulations and the Sustainability Appraisal is flawed. The SANG Options Study (May 22) identified that there will only be enough SANG capacity for the first 10 years of the plan. This is clearly inadequate, and it cannot meet the test of soundness for the latter period of the plan to be left uncertain. It notes that ‘Years 11 to 15 will require an additional 7.5ha of land for SANG provision in order to ensure that the integrity of the SPA is protected.’</p> <p>Hence the policy should identify additional SANG capacity as part of the ELP and should not delegate this to the TBH SPA Delivery Framework and mitigation strategy. Unless this is included as an express part of the local plan, it is not clear how the legal obligations to protect the Thames Basin Heaths can be certain of secured.</p> <p>The land proposed for the release from the Green Belt for housing led mixed use development east of the Molesey Road, Walton on Thames is outside of the zones A, B and C for protection of the SPA and hence would not impact on them. Further, the proposal is capable of providing one of the largest areas of publicly accessible green space within easy walking and cycling distance of the major urban centres and the areas of visitor pressure and is hence the most appropriate and suitable area for new SANG provision. The proposals would result in up to 40ha of new SANG informal public open space with areas for recreation and nature, a preliminary design for which has been prepared as part of the earlier SANG call for sites. this accompanies a proposal</p>

	<p>for up to 10ha of residential development, close to Hersham Station and the Molesey Road services. Its release as part of the proposed allocation, would help to serve the informal recreational needs of a large swathe of the urban population and help deflect pressure from the SPA heathland.</p> <p>The SANG Options Study concluded that the land East of the Molesey Road that overall, this site has the potential to meet all of the essential criteria and all five of the desirable criteria could potentially be met. As such, this site was recommended for further consideration.</p> <p>The only reason it was discounted was because: 'Members of the Local Plan Working Group, at their meeting held on the 13 January 2022, confirmed that an urban only strategy will be presented to Cabinet and full Council in the Spring 2022. Therefore, Hersham Golf Course and Land East of Molesey Road are now discounted as they rely on residential development in the Green Belt in order to deliver SANG.'</p> <p>However, this leaves no viable option identified in the Local Plan for the essential SANG to support the housing trajectory. This would worsen, were additional housing be identified (as we suggest) to meet objectively assessed housing need.</p> <ul style="list-style-type: none"> • Littleworth Common does not have a car park and is poorly located with the zones of influence. The site is also designated as a Site of Nature Conservation Importance, and the attraction of additional visitors to the site (in order to draw them away from the SPA) would potentially conflict with conservation objectives. • The remaining sites are currently in agricultural use and are of agricultural value and suffer from a significant risk of flooding and are poorly located in terms of area/population coverage. • The only remaining option for a SANG site within the borough is to extend SANG at Esher Common (Site B Oxshott Heath) which would conflict with its designation as a SSSI.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>see above</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.

	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>see above and attached</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Proposed Modifications to make the ELP sound: The bringing forward of modifications to increase the area of available SANG at a level to correspond with the increased delivery of housing to meet objectively assessed need and the proposed allocation as part of these modifications, of land east of the Molesey Road to provide a SANG alongside the proposed mixed use residential led development.</p> <p>Site Masterplan.pdf</p> <p>210909~1.PDF</p> <p>MAMOLE~1.PDF</p> <p>220728 Representations for Molesey Land.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	<p>We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.</p>

Name	A Barry
User ID	41250753
Organisation	Molesey Road Land Limited
Policy / Evidence base/ part of plan:	ENV6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No see below
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No While the approach of the policy towards the protection and enhancement of biodiversity is supported, the list of sites to which it applies, as set out in the (unnumbered) table after para 5.24 is out of date. The Field Common/ Hersham Pits SNCI was de-designated following the restoration of the former flooded gravel pits to equestrian use and loss of the previous wetland and wildfowl interest that had been the basis of the original designation. This was confirmed in correspondence at the time of the de-designation in 2017.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y]

	see above
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Proposed Modifications to make the ELP sound: Deletion of the Field Common/ Hersham Pits SNCI from the Land East of the Molesey Road to reflect the de-designation of the previously infilled gravel pits
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.

Name	A Barry
User ID	41250753
Organisation	Molesey Road Land Limited
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>We raise objection to the substantial under provision targeted in the proposed housing requirement in HOU1 and the corresponding housing trajectory.</p> <p>The proposed ELP requirement of a minimum of 452 homes each year is substantially below the actual number of homes needed by the local community.</p> <p>Although the problems of undersupply are acknowledged, the further consequences of deliberately not meeting local needs are not spelled out in the Local Plan. These include:</p> <ol style="list-style-type: none"> 1. an ever increasing, cumulative under provision between the community's need for homes and the available supply; 2. further increases in house prices and worsening affordability ratios which affects lower and even average wage earners who can no longer afford to live in the Borough; 3. further shortfalls in affordable housing provision; 4. life chances are frustrated as access to decent housing is effectively rationed; 5. adverse impacts on economic growth as recruitment suffers; 6. the wider impact on adjoining authorities is exacerbated as unmet need is displaced. <p>It is important to understand that these are not randomly imposed targets, but are a reflection of the real need for more homes in the South East and in Elmbridge in particular. These needs arise from the local community, and it is the community that suffer the consequences of a deliberate under-supply.</p> <p>The level of new housing required is identified in the standard methodology as 647 homes each year and should be the minimum level that should be provided for in the Local Plan. This includes population and household change and market signals. The latest assessment indicates a particular need for smaller homes from studios to 3 beds to meet the needs of smaller households including first time buyers and those on average and lower incomes. This includes</p>

	<p>key workers and others that are an essential part of the community and the ability to effectively run local services.</p> <p>The standard method however, caps housing needs where plans are out of date, as is the case for Elmbridge, at 40% above the average annual household growth or current housing requirement, whichever is higher. The actual level of need therefore, is likely to be significantly more. The HBF have identified this as 859 new homes each year.</p> <p>Elmbridge has been a Borough where there has been a persistent and substantial under-delivery of new homes when compared with local need.</p> <p>This has resulted in some of the least affordable housing in England.</p> <p>The Housing Delivery Test records Elmbridge as consistently underperforming, achieving only 70% of the requirement over the last 3 years, a performance that reflects the previous years' results. The Borough delivered just 1133 new homes in the three preceding years against a requirement of 1618 homes.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>see above and attached</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>see above and attached</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>The scale and locations of growth should be increased to meet the objectively assessed need of a minimum of 9,705 homes over the plan period, at least 647 each year over the period. This should adopt a housing trajectory that prioritises early delivery, to address the substantial pre-existing unmet need arising from persistent under delivery and spiralling house price inequality. The second part of the proposed policy proceeds to identify the broad locations for growth and the corresponding number and percentage of overall housing provision for each settlement. This should be revised to include additional sites to meet housing need and that this should be reflected in a revised spatial distribution. A sustainable strategy should also be weighted to favour the most sustainable locations for growth, close to the main urban centres of Walton on Thames, Hershams and the Moleseys and Lower Green, where the benefits of growth can achieve the greatest benefit to existing and future residents</p> <p>220728 Representations for Molesey Land.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	<p>We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan</p>

Name	A Barry
User ID	41250753
Organisation	Molesey Road Land Limited
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>Objection</p> <p>While we support the objectives of the policy, the optimisation of development options should apply irrespective of whether the site is within the urban area or lies outside of this as part of a Green Belt release or previously developed land. The emphasis on increasing density and smaller homes supply near to train stations and other accessible locations is supported and is a key aim of sustainable place making.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>see above</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p>

	see above
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	The policy should be amended to apply generally, within and outside the urban area, promoting efficient design and optimisation of delivery in sustainable locations. This should be fully considered in the review of Green Belt and spatial strategy recommended in our response to SS2/3 and HOU1.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.

Name	A Barry
User ID	41250753
Organisation	Molesey Road Land Limited
Policy / Evidence base/ part of plan:	HOU4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No see below, it fails to deliver the primary objective of sustainable development by failing to meet need.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No While the aims of the policy are supported, it is not considered that the policy will be effective since it fails to tackle the underlying undersupply that is driving up house prices through constrained supply. The overall supply of homes should be increased in line with need and the policy brought into line with the NPPF.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] as attached statement

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Proposed Modifications to make the ELP sound: Increase the overall provision for housing in the ELP and consequently the level of affordable homes delivered.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.

Name	A Barry
User ID	41250753
Organisation	Molesey Road Land Limited
Policy / Evidence base/ part of plan:	HOU5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Objection</p> <p>The aims of the policy are broadly supported, but the policy itself imposes a rigid and unduly prescriptive requirement on design issues that are normally the subject of design guidance that should be interpreted flexibly to take account of site circumstances. The policy will be ineffective and is not supported by national standards or evidence as set out below.</p> <p>Parts 4 and 5 of the policy express a rigid requirement that does not reflect the relevant guidance or effective design. This is notably the case in respect of daylight requirements and in the requirement for 100% dual aspect dwellings, which precludes optimisation of site capacity and is not a pre-requisite of good quality housing. Such circumstances are not exceptional and are a feature of many sites and developments that provide good quality accommodation. This is especially a constraint on apartment building design, where some element of single aspect dwellings are both inevitable and appropriate and can provide good quality accommodation. Both are relevant considerations but should not be imposed as rigid requirements. they would in effect restrict site optimisation, design solutions and the number of homes delivered.</p> <p>This is particularly important in the context of the need to optimise development density as a result of the under-delivery proposed in the ELP.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.

	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>see above and attached</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	The policy should be expressed as guidance (e.g. to optimise the number of dual aspect dwellings but not preclude single aspect other than single aspect north facing) and should allow detailed design and site specific circumstances to consider the most appropriate response. Part 5 should 'wherever possible seek to' achieve the daylight levels set out and not require that as an absolute. It should be consistent with national guidance.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey

	Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.
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Name	A Barry
User ID	41250753
Organisation	Molesey Road Land Limited
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>In accordance with our comments in respect of SS2, SS3 and HOU1 and ENV4 and ENV5, the ELP is considered unsound and does not accord with the legal requirement to promote Sustainable Development or the Habitats Regulations or the NPPF.</p> <p>As such, major modifications should be brought forward to include additional allocations to meet both housing need and the deficiency in SANG provision. This should include the land East of the Molesey Road, Walton on Thames, close to Hershams Station, identified in the representations by Molesey Road Land Ltd (see attached).</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>see above</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p>

	see above and attached.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>As such, major modifications should be brought forward to include additional allocations to meet both housing need and the deficiency in SANG provision. This should include the land East of the Molesey Road, Walton on Thames, close to Hershams Station, identified in the representations by Molesey Road Land Ltd (see attached).</p> <p>Site Masterplan.pdf</p> <p>220728 Representations for Molesey Land.pdf</p> <p>210909~1.PDF</p> <p>200308 Reprs Vision for Elmbridge Land East of Molesey Rd.pdf</p> <p>MAMOLE~1.PDF</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and

	deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.
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Name	Paul Bartlett
User ID	23684289
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>I have no reason to believe that the Draft Local Plan is not legally compliant, but as I have no legal nor planning background, I cannot attest to this.</p> <p>I do support the Draft Local Plan and what it means for the borough. More comments below.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>I am supporting Elmbridge's Draft Local Plan 2037, as I value the fact that Elmbridge has taken the stance to protect and preserve the borough's Green Belt land.</p> <p>I fully support the vision statement and hope that the council is given the opportunity to achieve their objectives.</p> <p>Responding to the climate emergency and addressing issues of sustainability shows that Elmbridge is taking a reasonable, mature and appropriate attitude to key issues which impact its residents. This is a proper Local Plan and not simply a 'housing delivery plan'.</p> <p>I would like to encourage the Planning Inspector to view this Draft Local Plan not simply from a facts and figures perspective, but to ask herself or himself whether he or she would like to live in a borough with this vision, this aspiration and this approach to place-making. I do, which is why I am supporting this Draft Local Plan.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: []

	<p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Paul Bartlett
User ID	20794913
Organisation	Long Ditton Residents Association
Policy / Evidence base/ part of plan:	Appendices
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>The Long Ditton Residents' Association (LDRA) does not have any legal or planning experience, so is unable to make an assessment as to the legal compliance.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>Please see Chapter 5 (ENV3) comments around extending the One Tree Hill Local Green Space designation.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Patrick Bateman
User ID	41045441
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I am in support of the Spatial Strategy strategy which offers reasonable, responsible, sustainable solutions to complex and the often competing demands.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Francis Bealin-Kelly
User ID	41259393
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No The plan P23 3.11 (d) (ii) states that it seeks to "make it easy and attractive to walk, cycle and use public transport". YET IT SEEKS TO ELIMINATE PUBLIC PARKING AT TRAIN STATIONS yet it claims that with low unemployment in the area must of the workforce commute including using the trains. These are not compatible Removing the car parks will reduce the accessibility for those that either live to far away to be unable to walk. In addition the Walton Park car park is used to drop kids to Cardinal Newman primary school and this will lead to them dropping children off on the Hershams road and is most likely to cause fatalities over time when a car park is a reasonably safe option
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y]

	<p>Consistent with national policy: []</p> <p>removing car parking at trains is counter to the national plan to increase public transport usage</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Remove public car parking as a source of brown field sites from the plans.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	It is not possible to provide sufficient feed back in this online format

Name	Miss Beckett
User ID	24626433
Organisation	Savills (obo Crown Estate)
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Chapter 2: Elmbridge 2037 Elmbridge 2037 - Support</p> <p>The Elmbridge 2037 objectives are sound, and justified. It is the application of the meaning of policy and allocations that is questioned in these representations.</p> <p>The first chapter sets out Elmbridge's Vision and Principles over the plan period. TCE is in general support of the ELP Vision. This representation sets out how the sites within TCE ownership accord with the draft Plan's five guiding principles and will help to realise the vision for Elmbridge.</p> <p>The Elmbridge 2037 objectives are sound, and justified. It is the application of the meaning of policy and allocations that is questioned in these representations.</p> <p>Significantly, TCE is in full support of EBC's five guiding principles currently set out in the draft Local Plan, attesting to how the TCE's sites will enable the realisation of the Local Plan Vision. In particular, TCE raises the following comments on the draft Vision;</p> <ul style="list-style-type: none"> • Tackling climate change and moving towards a low / zero carbon economy; • Protecting and enhancing the natural environment; • Delivering more homes supported by the necessary infrastructure; • Delivering more affordable homes; • Supporting local recovery from Covid-19; and • Supporting our town, local and district centres and employment areas.

	<p>Whilst TCE is in general support of the Vision and guiding principles of the draft ELP, they are mindful of Paragraph 16 of NPPF which sets out that “[Plans should] be prepared positively, in a way that is aspirational but deliverable.” In accordance with this, it is imperative that EBC is realistic with what can be delivered through the draft ELP and it’s also crucial to be aware of the challenges that often arise from Brownfield development such as viability which can impact main of the goals listed in the vision. It is important to ensure that the principles are balanced appropriately to facilitate sustainable development.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>220729 The Crown Estate EBC Reg 19 Local Plan Representation FINAL.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	In our representations, a number of concerns (objections) were noted, so TCE would like to be present at the relevant Matters to contribute and further explain the points raised.

Name	Miss Beckett
User ID	24626433
Organisation	Savills (obo Crown Estate)
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Policy SS2: Sustainable place-making – TCE do not object to the principles of this policy, however they question if EBC should be considering how the objectives under this policy can be achieved and delivered, in the context of the requirement for a positively prepared plan – i.e. by allocating land to deliver these principles.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [] Consistent with national policy: [] Draft Policy SS2: Sustainable place-making – Object The draft policy is ineffective and not positively prepared. TCE do not object to the principles of this draft policy, however, they question if EBC should be considering how the objectives under this policy can be achieved, in the context of an overall

	<p>requirement for a positively prepared plan. For example, it would be best practice if the plan were to assert how it intended to meet its policy requirements, by allocating a sufficient range of land to deliver these principles, justified by evidence of delivery. National policy also requires that the function of a local plan is not solely to make housing allocations. Where the plan has focused on a Brownfield approach, this will mean that the majority of these sites will not have the space or capacity to deliver green infrastructure, increasing the need for wider networks of greenspaces.</p> <p>In addition a Brownfield only approach, risks an unbalanced spatial strategy, reliant on narrow development typologies, for example, higher density Brownfield development would focus on smaller dwelling types, and is typically, owing to existing land values, unable to provide as much affordable housing as Greenfield sites. TCE has further comments on affordable housing delivery, noted in the comments on the site allocations below.</p> <p>It should also be noted that there are opportunities to strengthen and reinforce Green Belt boundaries through appropriate Green Infrastructure enhancements, incorporating landscaping and buffers which can be secured in perpetuity, at the edge of any sustainable urban extensions or modest settlement extensions. TCE pose that a change is made to the draft ELP allocating a better range of suitable land to meet its policy requirements of including green and blue infrastructure, enhanced sustainable transport routes (walking and cycling), enhancing biodiversity and encouraging sustainability. All delivered via the value released from proportionate development. TCE wish for it to be noted that they have land available to assist with the principles noted in this draft policy should it be required.</p>
<p>Question 4</p>	<p>Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.</p>
	<p>220729 The Crown Estate EBC Reg 19 Local Plan Representation FINAL.pdf</p>

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	In our representations, a number of concerns (objections) were noted, so TCE would like to be present at the relevant Matters to contribute and further explain the points raised.

Name	Miss Beckett
User ID	24626433
Organisation	Savills (obo Crown Estate)
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Policy SS3: Scale and location of good growth – TCE note that EBC is planning for at least 6,785 net additional homes although the standard method requirement is at least 9,705 homes, which is a shortfall of 2,902 homes over the proposed plan period (2022-2037). TCE question if the Green Belt Exceptional Circumstances tests should be reviewed in more detail in order to determine if there are any suitable, deliverable and sustainable sites which could be allocated.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>Draft Policy SS3: Scale and location of good growth – Object</p>

The policy as worded is unjustified and inconsistent with the NPPF and it is not positively prepared.

TCE note that EBC is planning for at least 6,785 net additional homes, despite the standard method requirement which is at least 9,705 homes, a shortfall of 2,902 homes over the proposed plan period. TCE question if the Green Belt Exceptional Circumstances tests should be reviewed in more detail in order to determine if there are any suitable, deliverable and sustainable sites which could be allocated. TCE have commented in more detail on the evidence base section (Section 4) on the fact that the Land Availability Assessments (LAA) 2021 and 2022 and the Sustainability Appraisal 2022 (SA) should have considered all sites that have been noted as available in order to ensure a full and comprehensive assessment. There is presently a significant gap in the emerging ELP evidence base. This evidence is required to enable full scrutiny of EBC's Exceptional Circumstances case for not meeting the housing needs in full.

TCE note the number of units apportioned to Claygate (320, 4.7%) and Cobham & Oxshott, Stoke D'Abernon and Downside (870, 12.8%). However, TCE question if all sustainable options have been considered and if there is scope to increase the delivery in these settlements through the allocation of additional sites. It appears that the most proficient way of making additional allocations would be through sustainable, Greenfield, medium scale development sites, which strive to make the most efficient use of land. From discussions with EBC Officers and review of Local Plan Working Group minutes it is clear that Officers felt that exceptional circumstances could be demonstrated to release select areas from the Green Belt. It is also clear from Option 5a in the SA (paragraphs 6.65 and 6.66) that EBC did consider 12 Green Belt sites for release. Land south of Hare Lane was one of these, listed as, SA-41: Loseberry Farm, Claygate (part allocation). The fact that Officers were looking at these sites for potential Green Belt release implies that through production of the emerging ELP, it was being recognised that the tests of paragraph 141 of the NPPF had been exhausted. TCE are not sure why the political decision was not to pursue these sites. TCE question why there is not a site by site assessment in the SA and at least some of the 12 sites are not identified in the LAA 2021 or 2022. This evidence should be published, particularly as it should be put before an Inspector at the forthcoming Local Plan Examination. This is important, to ensure that the emerging Local Plan is an effective and justified strategy, and whether the reasonable alternatives (which include for example making circa 12 Green Belt allocations) are a more

	<p>reasonable and sustainable strategy. It is likely to be the case the plan is adopted end of next year, so it would only have circa 14 years to run (which is not the full 15 years+ required by the NPPF). EBC may wish to have a response prepared with additional allocations if a longer plan period is required by an Inspector, for example to 2038 or 2039. An additional circa 1,000 dwellings may need to be positively planned for in this scenario.</p> <p>Whilst TCE support EBC's approach of exploring Brownfield land options in the first instance and that most efficient use of land is appropriate, there is a risk that the existing town centres become monopolised by high and bulky apartment blocks; delivery stalls owing to technical constraints to delivery and affordable housing compromised. The result would be a change to the character and appearance of these towns. In summary, TCE question the approach taken by EBC as it is not positively prepared or consistent with the NPPF as per Paragraph 35. It is plainly unjustified, as the evidence base (in Green Belt, SA and technical terms) exists to justify a more balanced strategy. In order to ensure that local housing needs are met EBC should be seeking to explore all options including sustainable Green Belt release. This would be positively prepared, and would result in the fulfilment of other emerging ELP delivery objectives.</p>
<p>Question 4</p>	<p>Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.</p>
	<p>TCE own four parcels of land at the villages of Claygate and Oxshott which they consider would be suitable to deliver the ambitions of the new TCE strategy. These four sites could be delivered as climate resilient housing allocations with supporting open space which focuses on natural capital and biodiversity net gain.</p> <p>A summary of the sites is included below. TCE's submissions on the sites below with the exception of Land at South of Hare Lane, Claygate are the same as that submitted within TCE's Reg 18 representations from September 2019, however for completeness the information on these sites is included again in order to demonstrate that TCE's position their availability remains. Whilst TCE are aware EBC are not making Green Belt allocations, TCE wish to note their sites as available should a Government appointed Inspector indicate more sites are required at Examination, or should EBC reconsider the deliverability of the present draft ELP.</p> <p>-see paragraphs 2.6 to 2.9 & appendices</p>

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Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	In our representations, a number of concerns (objections) were noted, so TCE would like to be present at the relevant Matters to contribute and further explain the points raised.

Name	Miss Beckett
User ID	24626433
Organisation	Savills (obo Crown Estate)
Policy / Evidence base/ part of plan:	ENV1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No ENV1 - Green and blue infrastructure – TCE support the objectives of this policy, however TCE consider that EBC has not, through a negative approach, sought to achieve the aims of this policy, as land has not been allocated to deliver the infrastructure and there is an absence of a positively prepared intent to make the most the assets of the borough.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [] Justified: [Y] Consistent with national policy: [] Draft Policy ENV4: Development in the Green Belt – Object TCE do not have an issue with the policy wording itself however, EBC may want to consider Green Belt release in order to ensure that the plan is justified, positively prepared and consistent with the NPPF. Thus, the objection is associated with retaining the extent of the present Green

	<p>Belt without modification. This is because Exceptional Circumstances for Green Belt release are capable of being demonstrated.</p> <p>TCE has no objection to Policy ENV4 per se, however, the Green Belt boundaries should be reviewed in sustainable locations to ensure that land weakly performing against the Green Belt purposes and appropriate for development is release and allocated. As mentioned in Section 4, it is clear from Topic Paper 1 Green Belt release was considered by Officers, noting the 12 sites identified in paragraph 6.66.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>220729 The Crown Estate EBC Reg 19 Local Plan Representation FINAL.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	In our representations, a number of concerns (objections) were noted, so TCE would like to be present at the relevant Matters to contribute and further explain the points raised.

Name	Miss Beckett
User ID	24626433
Organisation	Savills (obo Crown Estate)
Policy / Evidence base/ part of plan:	ENV4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Policy ENV4: Development in the Green Belt – no objection to the policy per se, however, the Green Belt boundaries should be reviewed in sustainable locations to ensure that land that weakly meets the defined Green Belt purposes and appropriate for development is released and allocated for a combination of development with associated (and deliverable) Green Infrastructure enhancements.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p> <p>Draft Policy ENV4: Development in the Green Belt – Object TCE do not have an issue with the policy wording itself however, EBC may want to consider Green Belt release in order to ensure that the plan is justified, positively prepared and consistent</p>

	<p>with the NPPF. Thus, the objection is associated with retaining the extent of the present Green Belt without modification. This is because Exceptional Circumstances for Green Belt release are capable of being demonstrated. TCE has no objection to Policy ENV4 per se, however, the Green Belt boundaries should be reviewed in sustainable locations to ensure that land weakly performing against the Green Belt purposes and appropriate for development is release and allocated. As mentioned in Section 4, it is clear from Topic Paper 1 Green Belt release was considered by Officers, noting the 12 sites identified in paragraph 6.66. TCE question why the evidence supporting the identification of these sites has not been published. TCE do not consider the information included in the Topic Paper 1 to be sufficient enough to explain the conclusions reached.</p> <p>It is noted that no updated Green Belt evidence has been published with this consultation, owing to the fact that no Green Belt allocations have been made. Given the EBC's most up to date evidence on this remains as the 2018/19 work, TCE would like to highlight that their comments on this work in their Reg 18 representations stand, and they wish to withstand the right to comment further should any new evidence be published.</p> <p>Overall, TCE do not object to the policy, rather the extent of retaining the present Green Belt without further review and/or amendment. Thus, TCE question the earlier approach taken which had clearly considered Green Belt release and then did not follow through with this in terms of making allocations. Should an Inspector require EBC to investigate Green Belt sites for potential allocation, TCE would like to highlight their sites as available (see Appendices 1-5 and X).</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>220729 The Crown Estate EBC Reg 19 Local Plan Representation FINAL.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	In our representations, a number of concerns (objections) were noted, so TCE would like to be present at the relevant Matters to contribute and further explain the points raised.

Name	Miss Beckett
User ID	24626433
Organisation	Savills (obo Crown Estate)
Policy / Evidence base/ part of plan:	ENV11
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Policy ENV11: Strategic views – Land off Blundell Lane and Land off Danes Way, Oxshott are both partly considered strategic views. In order to be fully justified, consideration should be provided to the landscape evidence prepared in Appendix 5. This justifies why it can be concluded that residential development could be achieved on each site without significant harm to strategic views. A positively prepared approach to strategic views, should be one of managed protection, noting opportunities to re-enforce, improve and respect Green Infrastructure, and maintain/ enhance landscape character.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>Draft Policy ENV11: Strategic views – Object</p>

	<p>The policy is unjustified, and requires amendment should the potential omission sites be allocated for development.</p> <p>Land off Blundell Lane and Land off Danes Way, Oxshott are both partly considered strategic views. In order to be fully justified, consideration should be provided to the landscape evidence prepared in Appendix 5. This justifies why It can be concluded that residential development could be achieved on each site without significant harm to strategic views. A positively prepared approach to strategic views, should be one of managed protection, noting opportunities to re-enforce, improve and respect Green Infrastructure, and maintain/ enhance landscape character.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>220729 The Crown Estate EBC Reg 19 Local Plan Representation FINAL.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	In our representations, a number of concerns (objections) were noted, so TCE would like to be present at the relevant Matters to contribute and further explain the points raised.

Name	Miss Beckett
User ID	24626433
Organisation	Savills (obo Crown Estate)
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Policy HOU1: Housing delivery - deliver a minimum of 452 homes per annum over the plan period. TCE objects to this emerging policy in the context of the objection to emerging policy SS3.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [] Draft Policy HOU1: Housing delivery – Object The policy as worded is unjustified, ineffective and not positively prepared. The first line of the policy says: “Opportunities for housing growth in Elmbridge will be optimised to deliver a minimum of 452 homes per annum over the plan period.”

The issues surrounding this are explained in detail under TCE comments and objections to draft Policy SS3. Based on the standard methodology figure this policy should be amended to include a “minimum of 647 homes per annum over the plan period” in replacement of 452. The policy as worded means that there is a shortfall of at least 2,902 homes over the plan period. EBC do not appear to have provided substantiated evidence to justify why this is the case, as they are required to demonstrate exceptional circumstances for not meeting identified housing need in full.

Given the number of smaller sites allocated (fewer than 9 units) and the number of brownfield sites which often under deliver on affordable homes owing to viability, this target under 3) of the policy to deliver a minimum of 30% seems like it may be unachievable. In order to bolster the provision more Greenfield sites which are required to deliver 40% affordable homes should be considered.

Part 5) of the policy says that “The council will support infill* housing developments” “*inclusive of development proposals involving the complete or partial redevelopment of backland and/or residential garden land.” This policy has the potential to have damaging impacts on the existing residential areas, in terms of over-crowding, overshadowing and a loss of important private amenity space.

TCE support this element of part 5) “ensure the efficient use of land by requiring all new residential and mixed-use development to demonstrate that it represents the optimal use of land and density, positively responding to the location and the appearance of the surrounding area.” However, raise the concerns that on Brownfield town centre sites this may result in tall developments, at heights greater than the towns present characteristics.

Broad commentary on the Duty to Cooperate is provided in Section 4 of these representations. In summary, this policy is unjustified, ineffective and not positively prepared as it has not sought to address the housing need in full. In the allocations that have been made, this policy encourages higher density development, which could lead to uncharacteristic heights and massing and also backland and residential garden development which can have negative impacts on the existing residential areas and towns. To address this, sustainable Greenfield and Green Belt sites could be

	considered which can provide greater unit numbers and will minimise impacts on the existing towns. These medium to large scale development sites also offer a greater opportunity for infrastructure delivery, benefitting the locality and potentially borough wide.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	220729 The Crown Estate EBC Reg 19 Local Plan Representation FINAL.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	In our representations, a number of concerns (objections) were noted, so TCE would like to be present at the relevant Matters to contribute and further explain the points raised.

Name	Miss Beckett
User ID	24626433
Organisation	Savills (obo Crown Estate)
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Policy HOU2: Optimisation of sites – the draft policy references sites within or on the edge of town, district and local centres and sites adjacent to train stations as key sites to deliver additional homes. TCE suggest that in order to ensure this policy is effective, in practice, consideration of the more sustainable Greenfield sites which meet this criteria should be considered.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: [] Draft Policy HOU2: Optimisation of sites – Comment The draft policy references sites within or on the edge of town, district and local centres and sites adjacent to train stations as key sites to deliver additional homes. TCE suggest that in order to ensure this policy

	works effectively Greenfield sites which meet this criteria should be considered. In summary, sites which meet this criteria, such as, Land south of Hare Lane should be considered for allocation in order to assist the borough in delivering sustainable sites.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	220729 The Crown Estate EBC Reg 19 Local Plan Representation FINAL.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	In our representations, a number of concerns (objections) were noted, so TCE would like to be present at the relevant Matters to contribute and further explain the points raised.

Name	Miss Beckett
User ID	24626433
Organisation	Savills (obo Crown Estate)
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Draft Site Allocations – Comment</p> <p>The plan could be considered to not meet the requirements of paragraph 35 of the NPPF on the basis of the draft allocations it has made on the basis of the broad deliverability of the housing trajectory. Though, TCE does not object to any of the proposed site allocations.</p> <p>Whilst TCE agree that the Brownfield first approach is appropriate, they question the almost wholly Brownfield approach, which appears to include a number of car parks, community and retail facilities. This approach may significantly impact the existing towns and villages appearance and sustainable Greenfield sites may have been appropriate to consider instead of, or in addition to. In addition, the allocated sites are predominantly a large number of very small sites, which may have implications. The volume of applications that EBC will need to consider, assuming they all come forward will likely cause delay in delivery. Owing to the number of sites there is also limited information included within the plan itself such as site specific requirements an exact red line.</p> <p>TCE is acutely aware of the affordability issues in the borough, and thus there is an undeniable need for affordable homes to be delivered. This is further evidenced in the EBC Authority Monitoring Reports, which outline affordable homes delivered on an annual basis. The HOU4 - Affordable housing policy only requires</p>

the provision of 20% affordable homes for 9 or less units which is a concern given the number of small unit allocations in the emerging plan. Approximately 90 of the allocations are 9 units or less. In addition, there will likely be viability cases submitted with a lot of the Brownfield sites owing to the nature of a Brownfield site, such as land demolition, remediation, recycling materials and regeneration. Whilst TCE endorses this sustainable approach to delivering homes, it will unlikely address the affordable homes issue. This issue is coupled with the fact that very few greenfield sites have been allocated, so there will be a small number of sites delivering the 40% affordable homes outlines in 1b) of the draft policy HOU4 - Affordable housing.

On basis of submitted plan, TCE wishes to re-emphasise to EBC their various land holdings which are available to deliver a significant number of homes, see the approximate unit numbers within the masterplans in Appendices 1-4. Should EBC decide to reconsult on the Regulation 19 version of the plan before submission or should a Government appointed Inspector decide more sites are required, TCE wishes for it to be noted that there land is available to assist. In addition to this, TCE are keen to utilise any development opportunity to strive to meet their long-term sustainability, social, economic and environmental goals, which strongly align with EBC's. This could involve the delivery of required community uses, Biodiversity Net Gain offsetting, carbon sync and other natural capital opportunities, in association with residential development on any of the Sites.

TCE question whether the approach taken with the present suite of allocations is sound, on the basis of the potentially unbalanced spatial strategy. EBC has an opportunity to investigate if there are any other more suitable sites for allocation prior to submission to an Inspector. However, if EBC or an Inspector consider TCE sites to be suitable then TCE would like to confirm the sites as available.

LAA

All sites for completeness should be included allocated or not. This can be completed between the end of the consultation and submission of the draft ELP for Examination. This would assist the Inspector in understanding the potential development capacity in the borough, and is a fundamental aspect of the evidence base.

	In order for EBC to justify the exceptional circumstances for not meeting housing needs in full, a complete understanding of the theoretical development capacity of the borough is required.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	220729 The Crown Estate EBC Reg 19 Local Plan Representation FINAL.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	In our representations, a number of concerns (objections) were noted, so TCE would like to be present at the relevant Matters to contribute and further explain the points raised.

Name	Mark Behrendt
User ID	24566657
Organisation	HBF
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No See attached letter
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No See attached letter
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] See attached letter

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	See attached letter HBF rep EBC Reg 19 July 22.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	To set out ours and our members concerns with regard to the Elmbridge Local Plan.

Name	Andrew Bennett
User ID	41237665
Organisation	Burhill Developments Limited
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No This part of the Plan is not legally compliant because it does not comply with national policy.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No This part of the Plan is unsound because it is not positively prepared, not justified, and inconsistent with national policy.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [] Justified: [Y] Consistent with national policy: [Y] We object to this policy. The Council has made a policy decision not to release land from the Green Belt on the basis that the “exceptional circumstances” case is not strong enough to do so, despite satisfying itself through its evidence base that the relevant tests have been met. The decision-making process behind this is not transparent. This is then compounded by the Plan’s

failure to accommodate the borough's full objectively assessed housing need as part of its preferred strategy to allocate only urban brownfield sites. The policy is therefore unsound because it is not positively prepared, not justified, and inconsistent with national policy. The starting point for the consideration of Green Belt release is paragraph 11 of the NPPF. It states, inter alia, that:

Plans should apply the presumption in favour of sustainable development. For plan-making this means that:

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁷.

Footnote 7 to paragraph 11 states, inter alia, that the policies referred to are those in the NPPF relating to land the subject of several designations, including Green Belt.

NPPF paragraph 140 states that "once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans". Paragraph 141 states that "before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development". These include, inter alia, making as much use of suitable brownfield sites, optimising the density of development, and whether neighbouring authorities could accommodate unmet need. Paragraph 142 states that "when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary."

Lack of transparency means the policy is not justified.

The Council has satisfied itself that Policy SS3 meets the expectations of NPPF paragraph 141, in that it makes as much use as possible of suitable brownfield sites and underutilised land, optimises the density of development, and has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development. But despite this, the Council considers that exceptional circumstances for the release of Green Belt land are not demonstrated. The Exceptional Circumstances Case (produced in January 2022) underpinning the Council's decision not to release Green Belt land is a key piece of evidence in this respect and has been kept confidential – this is confirmed in Topic Paper 1: How the Spatial Strategy Was Formed. This substantive lack of transparency means that it is not possible for the Council to demonstrate that its choice not to release Green Belt land is justified.

A reduction in the quantum of growth means the policy is not positively prepared.

In the absence of Green Belt release the Council considers that reducing the level of growth to correspond with the available brownfield land is an appropriate strategy. Policy SS3 seeks to meet only approximately 70% of the Borough's objectively assessed housing need, a circa 3,000 dwelling shortfall against need. The proposed housing figure equates to the identified optimised capacity of previously developed sites in the urban areas. The release of Green Belt land to accommodate objectively assessed need would be a NPPF compliant alternative strategy, but Policy SS3 does not seek to deliver this, and is therefore not justified.

NPPF paragraph 11 requires strategic policies as a minimum to provide for objectively assessed needs unless protective policies such as Green Belt provide a strong reason for restricting the overall scale of development in the plan area. The Green Belt washes over Elmbridge Borough; there are no areas of countryside within the Borough that fall outside of the Green Belt, so there are no alternative ways of accommodating growth on greenfield land in a manner that does not affect the Green Belt. Similarly, the absolute constraints to development (such as statutory designated sites or flood zone) only cover part of the Green Belt and many sustainable locations are free from absolute constraint. This is demonstrated in the site assessment to parcel LA-20 including Chippings Farm (relevant extracts from that document are attached at Appendix 1 of this representation), which shows that a large proportion of the assessment area is free from absolute constraint, including all of the land at Chippings Farm. It is therefore possible for growth

to be accommodated using Green Belt land in this location. The presence of Green Belt in the borough per se does not provide a “strong” reason, as defined by NPPF paragraph 11, for restricting the overall scale of development in the plan area, because Green Belt release clearly offers a NPPF complaint alternative to the proposed strategy.

The policy is not supported by the evidence.

Policy SS3 is not supported by the evidence. NPPF paragraph 31 is clear that the chosen spatial strategy cannot run contrary to the evidence. It states:

The operation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned.

The Green Belt Boundary Review (produced in June 2019) identifies several areas within the Green Belt as weakly performing and that LA-20 (which contains the Land at Chippings Farm) as conducive to large-scale development. It is therefore not possible for the Council to properly justify its choice not to release Green Belt land contrary to its own evidence base, particularly because the selected strategy, Policy SS3, does not seek to meet the borough’s identified housing need. This is contrary to national policy.

The impact of the policy choice underpinning Policy SS3 is made particularly clear in light of the Plan’s accompanying Sustainability Appraisal (SA) (a relevant extract from which is attached at Appendix 2 of this representation), which rightly identifies in its conclusion that the Policy would be “unlikely to provide the mix of housing types required and that this would be expected to cause significant negative sustainability impacts”. The SA identifies that “there is no mitigation plan for this”, which compounds the issue further because the Borough does not have large urban sites available to provide the amount and mix of housing required. The threats to Cobham as identified in the Settlement Assessment SWOT analysis (prepared in 2020), including the district centre becoming too expensive and exclusive, and lack of housing mix and affordability pushing smaller families out of the settlement would all go unmitigated.

Taking account of the above, Policy SS3 is not justified because the lack of transparency in decision-making means that it is not possible for the policy to be justified. Policy SS3 is demonstrably contrary to the available evidence, which shows that suitable spatial approaches exist, including Green Belt release, to enable the delivery of full objectively assessed housing need in the borough. The SA identifies the policy’s lack of mitigation plan. The evidence identifies

	<p>the suitability of Chippings Farm for the delivery of residential led development in a manner that would contribute to a sustainable pattern of development.</p> <p>For these reasons policy SS3 is unsound.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>To become sound, Policy SS3 needs to plan for full objectively assessed need and, in the absence of intensifying urban sites to maximise their delivery, the policy should recognise the need for Green Belt release in the Borough to accommodate this. The Council needs to be transparent and use its existing evidence base to allocate weakly performing Green Belt sites for residential development, including Chippings Farm, Cobham, which is available now. This would contribute to a sustainable pattern of development, contribute towards meeting objectively assessed housing need, and therefore be in accordance with the NPPF.</p> <p>Response to Elmbridge Draft Local Plan - Bidwells on behalf of Burhill Developments Limited.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	This is because our objections to the Plan go to the heart of the proposed strategy and therefore require discussion in an open forum.

Name	Andrew Bennett
User ID	41237665
Organisation	Burhill Developments Limited
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>No. The Local Plan is not legally compliant because it does not comply with national planning policy. Our reasons for this are explained in response to the questions below.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>No. The Local Plan is not sound because it is not positively prepared, not justified, and not consistent with national policy.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>The Plan fails the tests of soundness as set out within paragraph 35 of the National Planning Policy Framework (NPPF) because:</p>

	<ul style="list-style-type: none"> ● It is not positively prepared – because it does not seek to meet the area’s objectively assessed housing needs as part of the preferred strategic approach. Reasonable options including the release of Green Belt land offer the opportunity to achieve this, or at least get closer towards meeting needs than the selected option, but the Council has chosen not to take forward such options. ● It is not justified – because it is not based on the evidence. The chosen strategy is demonstrably contrary to the available evidence base; and crucial evidence guiding the Council’s strategic approach towards “exceptional circumstances” suppressing the release of Green Belt land has been kept confidential by the Council. It is therefore not possible for the Plan to demonstrate that it is justified. In light of this, the Plan is also not an appropriate strategy taking account of the reasonable alternatives including Green Belt release. ● It is not consistent with national policy – because the chosen strategic approach to protect the Green Belt, whilst taking forward a preferred strategy that fails to meet objectively assessed housing need, does not enable the delivery of sustainable development. The Plan is therefore unsound.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>The Plan needs to be amended so that it:</p> <ul style="list-style-type: none"> ● Meets its full objectively assessed housing need. The Borough is not subject to such a level of constraint that it cannot meet this need. The evidence base and Sustainability Appraisal demonstrate this. ● In the absence of a desire to intensify development sites within urban areas, the Plan needs to recognise the need for Green Belt release, releasing the weakly performing parcels of Green Belt land for residential led development, as identified in the evidence base. <p>Response to Elmbridge Draft Local Plan - Bidwells on behalf of Burhill Developments Limited.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	This is because our objections to the Plan go to the heart of the proposed strategy and therefore require discussion in an open forum.

Name	Andrew Bennett
User ID	41237665
Organisation	Burhill Developments Limited
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No This policy is not legally compliant because it is not compliant with national policy.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No This policy is not positively prepared and is therefore inconsistent with national policy.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: [Y] We object to this policy because its proposals to optimise the delivery of a minimum of 452 homes per annum over the Plan period falls short of the objectively assessed housing need which equates to 647 dwellings per annum over the Plan period. This is a substantial shortfall of approximately 3,000 homes, which equates to 30% against the identified need. The Plan's failure to accommodate this extent of shortfall, contrary to the evidence and in the face of reasonable

	<p>alternatives that include Green Belt release, demonstrates that the Plan has not been positively prepared and is therefore inconsistent with national policy. By extension, we also object to the policy because it does not propose the allocation of Green Belt sites for residential uses, including Land at Chippings Farm, Cobham.</p> <p>The policy's failure lies in the ability of alternative options to deliver a greater sum of development (in some cases the full objectively assessed housing need) in a way that is supported by the evidence base. These options include the release of Green Belt land including Chippings Farm which could deliver up to approximately 700 new dwellings early within the Plan period.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>The policy needs to accommodate the delivery of a minimum of 647 new homes per year over the Plan period. The 30% of new homes not currently accommodated by the policy needs to be delivered through the release of Green Belt land. This should include Chippings Farm, Cobham.</p> <p>Response to Elmbridge Draft Local Plan - Bidwells on behalf of Burhill Developments Limited.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	This is because our objection to this policy go to the heart of the proposed strategy and therefore require discussion in an open forum.

Name	Andrew Bennett
User ID	41237665
Organisation	Burhill Developments Limited
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>The Plan does not allocate sufficient sites for development to meet the Borough's housing need and is therefore not compliant with national policy.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The Plan does not allocate sufficient sites for development to meet the Borough's housing need and is therefore not compliant with national policy. Additionally, the policy does not propose the allocation of Land at Chippings Farm for residential development.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: [Y]</p> <p>We object to this policy because it does not propose the allocation of land at Chippings Farm for residential development.</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>The policy needs to allocate Land at Chippings Farm for residential development. PLEASE REFER TO ACCOMPANYING REPORT FOR DETAILS.</p> <p>Response to Elmbridge Draft Local Plan - Bidwells on behalf of Burhill Developments Limited.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Our objections to the Plan go to the heart of the proposed strategy and therefore require discussion in an open forum.

Name	Abigail Bettinson
User ID	41247585
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>As a resident of Claygate and looking at the proposed sites in Claygate I do not believe it is sound as it is disproportionately targeting the car parks in Claygate, in particular a number that are in close proximity to each other namely- Claygate Station Car Park, Hare Lane Car Park and Torrington Car Park. I believe this will increase congestion at the heart of the village and also force people to park on the local roads legally and illegally, impacting on the quality of life for the residents in the village.</p> <p>People will still need to use cars even if the number is reduced so this could actually be worse for green policies which I am very much in favour of, if insufficient parking is provided as this could increase pollution with the increased congestion.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: <input type="checkbox"/> [Y]</p> <p>Effective: <input type="checkbox"/> []</p> <p>Justified: <input type="checkbox"/> []</p>

	Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Address the issues of parking if parking sites are removed within Claygate village
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ann Biggs
User ID	41230017
Organisation	Spelthorne Borough Council
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: [Y]
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	See letter Elmbridge Reg 19 response from Spelthorne Borough Council.pdf

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Helen Binns
User ID	39405921
Organisation	Walsingham Planning obo Green King Brewing and Retailing Ltd
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No See accompanying letter
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No See accompanying letter
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] See accompanying letter
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	See accompanying letter

	Schedule.pdf AL(0) 016 Proposed Site Plan G.pdf AL(0) 002 Site Constraints Diagram.pdf 01-10-2018 Elmbridge Borough Council SHLAA submission.pdf 11-12-2020 Suzanne Parkes Elmbridge Council.pdf AL(0) 015 Proposed Site Plan F.pdf AL(0) 001 Site Location.pdf Call for Sites Proforma.pdf 26-07-2022 Elmbridge Council.pdf AL(0) 014 Proposed Site Plan E.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	To be able to make a case directly to the Inspector and participate in the debate.

Name	Julian Bishop
User ID	41228513
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Andrew Black
User ID	24340385
Organisation	Andrew Black Consulting obo Esher Rugby Club
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Please refer to separate representations
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please refer to separate representations
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please refer to separate representations
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please refer to separate representations

	Regulation 19 Reps - ERFC - Compressed.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	<p>Esher Rugby Club has been working with the council for sometime on the local plan process.</p> <p>There are crucial elements of the plan where the club would like to provide evidence to the inspector on including the following:</p> <ul style="list-style-type: none"> - Spatial Strategy - Housing Target - Five Year Housing Land Supply - Affordable Housing - Sustainability Appraisal - Green Belt - Site Selection Process - All Site Allocations

Name	Martin Bone
User ID	24395329
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes I have taken part in the whole consultation process and believe it to have been carried out correctly in accordance with requirements.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes The latest plan has taken on board the results of previous consultations and I believe it to be sound and reflect as far as possible the views and needs of residents.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Vanya Bowman
User ID	41142145
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>Hersham Library should not be included in the local plan campaign - it is a valuable asset to the whole community and should be preserved. The library is a trusted space for many, particularly the most vulnerable, as well as a source of education, knowledge and culture.</p> <p>To re-iterate, I strongly believe that Hersham Library should be removed from the Local Plan.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Hersham Library should not be included in the local plan campaign - it is a valuable asset to the whole community and should be preserved. The library is a trusted space for many, particularly the most vulnerable, as well as a source of education, knowledge and culture.</p> <p>To re-iterate, I strongly believe that Hersham Library should be removed from the Local Plan.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p>

	<p>Hersham Library should not be included in the local plan campaign - it is a valuable asset to the whole community and should be preserved. The library is a trusted space for many, particularly the most vulnerable, as well as a source of education, knowledge and culture.</p> <p>To re-iterate, I strongly believe that Hersham Library should be removed from the Local Plan.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Hersham Library should not be included in the local plan campaign - it is a valuable asset to the whole community and should be preserved. The library is a trusted space for many, particularly the most vulnerable, as well as a source of education, knowledge and culture.</p> <p>To re-iterate, I strongly believe that Hersham Library should be removed from the Local Plan.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Rodney Brack
User ID	16389249
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I think the plan offers a good balance between providing development opportunities while safeguarding important green spaces. I support the draft Plan in its entirety.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Victor Bradley
User ID	23785633
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No A number of indicators are missing to accurately reflect the compliance with various policies stated. eg 1. ENV3 – Local Green Spaces and ENV4 – Development in the Green Belt - No indicator to state no development has taken place on these areas. 2. ENV6 – Protecting, enhancing and recovering biodiversity - No indicator to reflect to state that no nett loss of biodiversity has occurred.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	N/A

Name	Victor Bradley
User ID	23785633
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No I am not legally qualified to confirm this.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Under Principle 3 it states:"Improving housing choice and delivering well-designed high-quality homes that we need in a highly sustainable way." There is an implication that 'improving housing choice' could favour smaller dwellings. This may not be consistent with the character of a particular area and may allow unsuitable development (eg back garden development, conversion of larger properties into flats). I suggest the words " Improving housing choice in selected areas....."
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [] Justified: [Y] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Stephen Braham
User ID	7950529
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes I support the Spatial Strategy in the proposed Draft local Plan. I also support the continued protection of the green belt and agree with the council's justification for doing so
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Roland Brass
User ID	41226561
Organisation	Knight Frank obo Landowners of Land East of Blundel Lane
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>Policy SS3 sets out the Council's aspiration to deliver at least 6,785 net additional homes (30% affordable) between 2021 and 2037. This target falls short of EDC's objectively assessed housing need, which equates to 9,705 homes over the plan period (647 per annum).</p> <p>Whilst we appreciate EBC's commitment to adopting a "brownfield-first approach", we note that there is a projected shortfall of 1,902 homes over the plan period, with it being "highly unlikely [that] there will be any significant opportunities during the plan period to accommodate need outside of the borough boundary" (Supporting Text Paragraph 3.30).</p> <p>On this basis, and given the severity of the projected shortfall, we question the Council's conclusion that "exceptional circumstances have not been fully evidenced and justified to make changes to the Green Belt boundaries in the Borough" (Supporting Text Paragraph 3.31). Owing to constraints in land supply faced by EBC, amendments to the Green Belt Boundary offers the only way of substantially increasing the supply of sustainable sites.</p> <p>As highlighted by ARUP'S Green Belt Review (2019), there are clearly areas of the Green Belt that do not contribute to the purposes of the Green Belt (i.e. their development would not result in urban sprawl; prevent towns merging; result in substantial encroachment; would not adversely impact historic areas; or undermine aspirations of urban regeneration). Indeed, there are clear discrepancies between ARUP's conclusions, and the Council's own conclusions and recommendations.</p>

	In consideration of the above, we contend that the housing requirement identified within Policy SS3 is unsound and ineffective, insofar that it will result in a substantial shortfall against EDC's objectively assessed housing need.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No As above.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] As above.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	In the first instance, we recommend that this minimum housing target of 6,785 is increased, to reflect need. Based on the Supporting Text to Policy SS3, and the evidence base underpinning the Draft Local Plan, it is clear that amendments to the Green Belt boundary are required in order to accommodate unmet housing needs. If there are available, suitable and deliverable sites across EDC's Green Belt, such as Land East of Blundel Lane, these should be considered for future development, in order to plan forward and contribute to increasing demand for housing.

	<p>The opportunity to release Green Belt land (alongside urban intensification) offers the best opportunity of meeting housing needs; whilst facilitating the creation of large, high-quality developments that masterplan-led and able to meet the needs of different sectors within the community. The site to which this representation relates can make a positive contribution to this directive and should therefore be considered positively.</p> <p>Land east of Blundel Lane - 220727 - Reg. 19 Representations - Issue.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	See Letter of Representation.

Name	Roland Brass
User ID	41226561
Organisation	Knight Frank obo Landowners of Land East of Blundel Lane
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Policy HOU1 confirms that “Opportunities for housing growth in Elmbridge will be optimised to deliver a minimum of 452 homes per annum over the plan period”. To achieve this, the Council will “adopt a requirement in line with the Elmbridge Housing Trajectory”.</p> <p>As set out above in relation to Policy SS3, this per annum target of 452 is contrary to the Council’s objectively assessed need of 647 homes per annum. Policy HOU1 confirms that “Opportunities for housing growth in Elmbridge will be optimised to deliver a minimum of 452 homes per annum over the plan period”. To achieve this, the Council will “adopt a requirement in line with the Elmbridge Housing Trajectory”.</p> <p>As set out above in relation to Policy SS3, this per annum target of 452 is contrary to the Council’s objectively assessed need of 647 homes per annum.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>As above.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p>

	<p>Consistent with national policy: [Y]</p> <p>As above.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>We recommend that the housing figures set out in Policy HOU1 are increased to reflect need. At present, the policy reads as if the delivery of 452 per year would reflect the “Elmbridge Housing Trajectory”, which is not the case.</p> <p>Land east of Blundel Lane - 220727 - Reg. 19 Representations - Issue.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	See Letter of Representations.

Name	Roland Brass
User ID	41226561
Organisation	Knight Frank obo Landowners of Land East of Blundel Lane
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>Policy HOU2 sets out the Council’s ambition of optimising sites to make efficient use of land. Policy HOU2(2) specifically references the requirement for Sites “within or on the edge of town, district and local centres and sites adjacent to train stations” to provide “higher density housing such as flats and terraced homes, rather than demi-detached and detached homes”.</p> <p>Policy HOU3 adds that “within town, district and local centres as defined on the Policies Map and near train stations ... development shall be predominantly one- and two- bedroom homes”.</p> <p>Whilst we support the principle of optimising and making the most efficient use of land, this policy highlights the pressure the Council are under to deliver additional housing units on brownfield land, with insufficient brownfield land available. There are numerous issues with this approach. Firstly, there is a real risk that, owing to pressures to meet housing need, the Council will focus on the quantity of units that can be delivered on such brownfield sites, rather than the quality. Secondly, it is very likely that this overconcentration of predominately one- and two-bedroom homes in such locations will lead to an undersupply of larger family-sized homes, undermining efforts to deliver a true housing mix (as promoted under Draft Local Plan Policy HOU3); meet housing needs (as required under Draft Local Plan Policy SS3) and deliver mixed and balanced communities (as required by Paragraph 63 of the NPPF).</p> <p>Only through the allocation of larger, available and suitable Green Belt sites, will the Council be able to deliver larger units (i.e. 3+ bedroom properties) (that are typically more suited towards families), with gardens, car parking and sufficient open space.</p>

	In consideration of the above, we consider that the Council will struggle to meet housing needs on brownfield sites alone.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No As above.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] As above.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	As set out above, we recommend the allocation of suitable and sustainable sites within the Green Belt, to ensure that there is a sufficient mix of housing (to meet needs) across the District. We recommend that suitable and available sites within the Green Belt, such as Land East of Bundel Lane, are seriously considered for residential-led development. This site specifically could help to deliver high-quality housing in a well-connected and sustainable location, and thus align with some of the fundamental principles and objectives of the emerging Local Plan. The development of the Site would contribute to sustainable patterns of development, alongside other clusters of development in the vicinity. The Site could address housing needs, deliver much needed affordable housing, provide a varied housing mix (including family homes, bungalows,

	<p>senior living accommodation) (as need dictates). Furthermore, the site is equipped with its own SANG.</p> <p>Land east of Blundel Lane - 220727 - Reg. 19 Representations - Issue.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Please see Letter of Representation.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I have read the Topic Paper No 1 How The Spatial Strategy Was Formed - 2022" and support absolutely the arguments supporting the chosen Spatial Strategy.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	CC1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	CC2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	CC3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	CC4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	CC5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I have read the "Topic Paper No 1 - How The Spatial Strategy was Formed - 2022" - from cover to cover - and support the argumentation used there in support of the chosen Spatial Strategy absolutely.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	ENV1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	ENV2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	ENV3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	ENV4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	ENV5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	ENV6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	ENV7
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	ENV8
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	ENV9
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	ENV10
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	ENV11
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	HOU3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	HOU4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	HOU5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	HOU6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	HOU7
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	HOU8
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	ECO1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	ECO2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	ECO3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	ECO4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	ECO5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	INF1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	INF2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	INF3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	INF4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	INF5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	INF6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	Monitoring
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gil Bray
User ID	24480161
Organisation	
Policy / Evidence base/ part of plan:	Appendices
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Brett
User ID	24418305
Organisation	
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Brett
User ID	24418305
Organisation	
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Martin Brett
User ID	24418305
Organisation	
Policy / Evidence base/ part of plan:	CC2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Nigel Brockwell
User ID	16469633
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alison Brooks
User ID	24411489
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	James Buckley
User ID	40954081
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Tamsin Bury
User ID	41036929
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Steven Butler
User ID	41017569
Organisation	Bidwells obo Burhill Developments Limited
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	-

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	-

Name	Alan Byrne
User ID	7940321
Organisation	Historic England (South East Region)
Policy / Evidence base/ part of plan:	ENV10
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>Letter dated 26 July 2022.</p> <p>Previous comments in the regulation 18 consultations have been addressed and are now not likely to affect the soundness of the Local Plan.</p> <p>We welcome the inclusion of policies for the historic environment in the local plan that meet the obligation for preparing the positive strategy required by the NPPF. The key test of the soundness of the plan and the achievement of sustainable development as defined in the NPPF in respect of the elements that relate to the historic environment, in our view, have been met.</p> <p>We should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals including those that are allocated sites, which may subsequently arise when we consider that these would have an adverse effect upon the historic environment. In particular we note the inclusion of site COS1 Cedar House, Mill Road, Cobham, for conversion to 7 residential units; we have previously objected strongly to the conversion of this Grade II* listed building for fewer units, and consider the amount of alteration that would arise from development of this number of units as likely to be harmful to the significance of the heritage asset.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.

	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Gwen C
User ID	16336961
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>It does list principles for planning but so far the observations show that you are only concentrating on principle 3- creating houses. Have you think about the demand on facilities and infrastructure associated with these new dwellings?</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>It does list principles for planning but so far the observations show that you are only concentrating on principle 3- creating houses. Have you think about the demand on facilities and infrastructure associated with these new dwellings?</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p>

	No consideration on the local community needs and the pressure already on facilities and infrastructure.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>This is about what you put into consideration when preparing this plan, this is about how to develop the local area to make it a better place to live while encouraging economic growth, not just meeting your housing target by swamping any empty land in the area with houses/ flats.</p> <p>9A61BD0E-B03A-43B1-9E77-2DC138C49285.jpeg</p> <p>EFB503E3-7F60-4702-AFDD-C6B644F8E181.jpeg</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Frances Cahill
User ID	24558241
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Frances Cahill
User ID	24558241
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>I welcome and congratulate the council overall on the careful drafting after extensive consultation of the local plan - and particularly on its emphasis and recognition on the need to preserve the character of Oxshott, Stoke d'Abernon and Cobham (the areas with which I am familiar) through protecting its Green Belt against damaging development.</p> <p>I would however endorse the views of local residents as expressed by Fedora and the Waverley Road residents' group) that some potentially harmful inaccuracies need to be corrected: in particular in the Ove Arup report, which could be amended by footnote.</p> <ol style="list-style-type: none"> 1. This report states that the Waverley Road/Blundel road site, (Site SA-11) is bound on two sides by housing developments. This is incorrect: to the West it is bounded by a single row of some five houses and cottages dating back 100 or so years. The report also fails to acknowledge the unspoilt, outstanding natural beauty of the site, with its stunning views of the Surrey hills, footpaths and sweeping slopes - used for farmland and enjoyed by hundreds of walkers and residents. Within this part of the borough the site is one of the most important, if not the most important, of the green areas that hold and preserve the special character of this ancient part of the borough. 2. The plan should include as supporting evidence the Landscape Character Assessment, commissioned by Surrey Council Council from Hankinson Duckett Associates; and 3. The plan should include as supporting evidence the Green Infrastructure Map. <p>Thank you for hearing our concerns: our Green Belt is precious both for communities now and even more importantly, for future generations - for health, welfare and well-being - physically and spiritually. Once taken, such areas of land with their ancient trees can never be replaced. If</p>

	further housing has to be provided in Elmbridge, already an intensely-housed borough, then as the plan suggests, unused building sites close to stations or existing built-up estates could surely be utilised.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes See comments above.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Richard Campo
User ID	41213505
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Richard Carr
User ID	9431713
Organisation	Transport for London
Policy / Evidence base/ part of plan:	CC4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Although Surrey County Council is the Highway Authority for Elmbridge, proposals in the Local Plan will have an impact on road networks in adjoining London boroughs such as Kingston and Richmond, particularly where growth is proposed close to the borough boundaries. As well as TfL's role in managing the Transport for London Road Network, we also provide cross boundary bus services including routes K3, 467 and 411. Train connections from Surbiton to Central London are quick so there is demand for residents in Elmbridge to travel to Surbiton by bus to catch the train. Where there are cross boundary transport impacts, developer contributions may be required to provide improved public transport or active travel connectivity or increased capacity.</p> <p>Given that a high proportion of Elmbridge's working population commute out of the borough to London, the location and design of major development should aim to ensure that cross boundary trips are sustainable. In the light of proximity to London, we would be grateful, if you would consider extending some of the Mayor's strategic transport policy objectives set out in the Mayor's Transport Strategy and London Plan to the borough including the promotion of Healthy Streets, rebalancing the transport system towards walking, cycling and public transport, improving air quality and reducing road danger.</p> <p>TfL is also working with Department for Transport and Network Rail on the Crossrail 2 project. Crossrail 2 proposals would pass through Elmbridge serving stations on the South West Main Line branches of the exiting suburban rail network including Hampton Court and Thames Ditton. TfL is in discussion with Department for Transport on the question of formally safeguarding the latest Crossrail 2 scheme design. However, at present no decisions have been made. TfL</p>

	continues to work with stakeholders whose developments are affected by safeguarding so that we can continue to protect the route until such time as the railway can be progressed. Given the current lack of a viable funding package for the scheme at the moment, TfL is not in a position to confirm when work on seeking consent can restart. The Mayor and TfL are of the view Crossrail 2 will still be needed in future to support future growth and have clearly demonstrated the case for the scheme. The project has been put in good order, ready to be restarted when the time is right.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	caroline cartwright
User ID	24434113
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I support spatial strategy.I support the protection of the green belt.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Nigel Cartwright
User ID	24435009
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I support spatial strategy. I support the preservation of the green belt.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Casey
User ID	41151809
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>The plan was drafted without the benefit of an assessment of the needs of liveaboard boaters and which was not completed until February 2022. This assessment was withheld from the boaters and their legal teams ,even during a planning appeal hearing on 15 March 2022. This withholding of such a vital document from us and the planning Inspector shows the contempt EBC holds for the due process of law. Also the plan fails to address the specific housing requirements of Boat Dwellers contrary to para 60 NPPF. The approach is in clear breach of para 62 NPPF which states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. .The Plan was prepared without proper regard to those who live on boats on the River Thames and fails to address the needs of those known to be living on boats in the EBC area. The northern boundary of Elmbridge Borough is formed by the River Thames This ORS survey uses phrases and descriptions which do not exist e.g licenced moorings, there are no such thing as a licenced mooring..</p> <p>It uses EBC terminology e.g unauthorised and illegal moorings giving the impression that all boats moored in the Borough of EBC are unconsented or illegal. This, of course, is very inaccurate. It also fails to mention that many boats are moored to land where the boaters(including ourselves) are legally asserting their ownership of the Land. This was explained to ORS by the boaters but has not been included.</p>

	The plan is in clear breach of para 62 NPPF which states that the size ,type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The plan is not positively prepared in so far as it fails to consider, let alone address, the needs of Boat Dwellers.</p> <p>The Council has known that boats are occupied on the River Thames and are exercising their legal right under the Thames conservancy act 1932 to moor their boats to their land under riparian rights as we do.</p> <p>It is very obvious to us who live on the River, that there are many more liveaboard boats in the EBC area than ORS was unable to contact.</p> <p>It was pointed out to the Council at the March 2022 appeal hearings, there is no specific policy for livaboard boaters in national planning policy. Section 5 NPPF is concerned with ‘Delivering a sufficient supply of homes’. This is unchanged from the July 2018 and 2019 versions. Paragraph 62 NPPF 2021 states as follows</p> <p>‘Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).</p> <p>This also remains unchanged since 2018</p> <p>The Local Plan Evidence Base had not identified a need for houseboat dwellers because no study had been commissioned to address this. The 2017 GTAA by ORS was only required to address the needs of Gypsy-Travellers and did not interview or include the needs of those living on boats on the river. There is no policy in the current Local Plan to address the needs of house boat dwellers nor is there a policy in the pre submission Local Plan. It is far from clear what wider corporate commitments’ would help meet the need. There is no evidence that Officers have reviewed Policy DM 13 or how that would assist in addressing the issue of residential moorings</p>

On 8 Aug 2019, the compliance team issued 9 enforcement notices for a number of moorings located north west of Cherry Orchard Gardens and adjacent to the tow path. The Notice failed to explain what purpose the moorings were being used for (ie storage, recreational, residential) but it was clear the concern was with the residential use made of the boats. Some Notices claimed there was land based development where there was none. The Plans attached so some Notices failed to identify the correct location of the moorings. Although the Notices were appealed the Planning Inspectorate determined that the owner/occupiers of the boats had no right of appeal as the bank of the river was unregistered land. The notices came into effect on the 9th September and required the cessation of the use of the land for the permanent mooring of boat/s and the removal of any structures, fencing or enclosures, which have been erected in association with the use of the land for the permanent mooring of boat/s, within one month from the date of which the notice takes effect.

In June 2020 planning applications were however submitted and validated for 5 moorings at West Molesey. These applications were refused for a variety of reasons including different reasons to those cited in the enforcement notices. With the exception of one mooring ,the appeals were dismissed. Permission was granted for one mooring on part of a pre-existing wharf for a family with a young child in March 2022.

This was the councils aim from the beginning, they had promised their residents in their election pamphlets that they would do this.

Even during our planning applications process, 2 council leaders and the chief executive of EBC wrote to the chief executive of the EA stating 'I am writing to you as a last resort to seek your intervention to resolve a seemingly intractable problem of illegally moored boats along the Thames in Elmbridge'.

Of course we have never been illegally moored.

this unethical and outrageous behaviour was designed to get us moved off of the land which we are legally asserting our ownership of by means of adverse possession.

The whole purpose of the enforcement notices etc is to make the land we are leally occupying unusable, that is why EBC has acted as it has.

1 Not letting the appeal hearing know that they had the ORS study in their possession at that time

2 Not consulting with anybody until it was too late to be included in the local plan

3 Putting on the pretense of trying to find land for residential boaters but not contact us who can supply such land on existing moorings.

While they actively block all applications for residential moorings.

A boat is a chattel not a building and boats add to the ambience and character of any river EBC or the EA have no residential moorings on any of this extensive riverbank that forms the norther boundary of EBC

It is clear Elmbridge Council understands the process. What is unclear is why they failed to follow their own advice and prepared and consulted on the new local plan without first establishing the evidence base which would confirm the need for more permanent residential moorings.

NPPF makes clear that the development plan is supposed to be the starting point for decision making and the planning system should be genuinely plan led, providing a framework for addressing housing needs. Yet in July 2020, the Leader of Elmbridge Council and the Chief Executive of the Council contacted the Chief Executive of the EA saying

'I am writing to you as a last resort to seek your intervention to resolve a seemingly intractable problem of illegally moored boats along the Thames in Elmbridge'.

At this stage Elmbridge Council had still failed to commission a houseboat survey or attempted to address the issue, other than take enforcement action in an attempt to rid themselves of the problem.

The Council were clearly aware of the existence of river boats occupied residentially a full 2 years before the Reg19 stage of this Local Plan.

This issue is not unique to Elmbridge. During October 2019, Friends, Families and Travellers carried out a survey of 356 people from the Liveaboard Boater community using the Survey Monkey platform to ascertain experiences of healthcare services, and the challenges faced when accessing care. The study noted that it was difficult to ascertain the population of Liveaboard Boaters in the UK. Information from the Residential Boat Owners Association highlights suggested that at least 15,000 people live afloat in Great Britain but FFT noted that it was unclear how this figure had been calculated. The National Bargee Travellers Association estimate that over 50,000 or more people are currently living on boats.

In 2021 EBC commissioned ORS to undertake the first survey of liveaboard boaters in the district.

51.... I am told that the Council is now currently undertaking a needs assessment. However, this is not currently in the public domain and so there is no evidence before me on the level of

	<p>demand for permanent residential moorings and whether this would be addressed or met through a future development plan examination process or by some other means, and the timescales for doing so.</p> <p>The Local Plan EIP will be the first opportunity for the findings to be examined. The study provides some useful information but omits any assessment of the existing availability of existing residential or leisure moorings</p> <p>The remedy is simple, EBC should now fulfill their legal obligation by encouraging permanent residential moorings.</p> <p>But as you can see below their current online posts are still showing EBC is intent on removing all residential moorers and are using terms like illegal and Unconsented for boaters that of course are neither illegal or unconsented but in fact are moored to their own land</p> <p>A long-term solution is needed to the issue of illegal moorings. In 2019, Elmbridge Borough Council led a stakeholder consultation to seek a long-term solution to manage the ongoing issues of illegal moorings, very aware of the unreasonable and persistent nature of mooring without consent which can have a detrimental effect on those living in the locality.</p> <p>One of the outcomes of the consultation was that the Environment Agency appointed an enforcement team to patrol the River Thames, which did happen and in May 2022, the Environment Agency confirmed that all mooring compliance and enforcement activities on Environment Agency owned land and moorings would be undertaken by Environment Agency teams. All Environment Agency remote sites will be monitored by the local teams via routine foot and boat patrols.</p> <p>What else can be done?</p> <p>Aware of the impact unauthorised moorings has on local communities, we have reviewed the option of taking on the ownership and management of the riverbank in Elmbridge. The reality is that with ever decreasing budgets, coupled with ever increasing demand on services, we are not in a position to take on the costs and liabilities associated with full riverbank ownership.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: []

	<p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>Not effective, as there is no evidence policy approach either by EBC or neighbouring councils to deal with the issue of residential river boats</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Not justified the plan is not drafted to address the matters or issues relied on at the March 2022 appeal hearings for boaters at West Molesey It highlights EBCs determination to remove all liveaboards from the borough as they have promised their residents they would</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Our (my wife and myself) future living accommodation and lifestyle could very well be affected by this.

Name	Joe Chambers
User ID	23314625
Organisation	
Policy / Evidence base/ part of plan:	Appendices
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No I do not believe, at this juncture, sufficient detail is shared as to how the local infrastructure will be able to meet the growing number of houses that will be occupied. When set against the quantum of LAA, the lack of parking, lack of scalable local thoroughfares, and environmentally the lack of charge points for EV's leaves a glaring gap in the plan.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Chapman
User ID	24403489
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes I have confidence that the draft Local Plan is legally compliant
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I have reviewed it and consider it to be thoroughly sound.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Keith Chapple
User ID	24223041
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I support the spatial strategy proposed in the draft local plan and express support for it. I also support continued protection of the Green Belt and agree with the council's justification.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Heather Chatwin
User ID	16462177
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Simon Cherry
User ID	8246881
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Zoe Chick
User ID	41168801
Organisation	River Thames Scheme-Surrey County Council
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>Regulation 19 Draft Elmbridge Local Plan 2037 Introduction</p> <p>Please find enclosed representations to the Regulation 19 Draft Elmbridge Local Plan 2037 on behalf of the River Thames Scheme (RTS). In addition to this letter, we have also translated the representations made in this letter to the relevant sections of the online questionnaire for the Regulation 19 Draft Elmbridge Local Plan 2037.</p> <p>Our detailed comments are provided below, following the general order of the topics presented in the Regulation 19 Draft Elmbridge Local Plan 2037 document. We note that only representations on the soundness and legal compliance of the Plan can be made and it must be targeted to a specific policy or paragraph in the Draft Plan. Consultees are asked to respond to questionnaires linked to each chapter on the consultation webpage. Each questionnaire focuses on the same two questions across the Draft Plan:</p> <ol style="list-style-type: none"> 1. Do you consider this part of the draft Local Plan to be legally compliant? 2. Do you consider this part of the draft Local Plan to be sound? <p>The RTS does not consider, for the sections we have made representations on, that there is anything that is not legally compliant. We also consider these sections of the Draft Plan to be sound.</p>

Where we wish to see policies strengthened, we have outlined the additional content we would like included in the form of recommendations that would benefit the RTS project. We have also referenced the relevant sections and policy numbers for ease of navigating our response.

RTS Background

The RTS is being led by the Environment Agency and Surrey County Council, in a partnership which includes Elmbridge Borough Council. It is the first flood project designated as a Nationally Significant Infrastructure Project (NSIP), reflecting the scale and ambition of the scheme. NSIPs require development consent, known as a 'Development Consent Order' (DCO) and we are currently in the pre-application stage.

The RTS project is designed to significantly reduce the risk of flooding by creating two new river channels totalling over 8.5 miles alongside the Thames in Runnymede and Spelthorne, as well as increasing capacity at Sunbury, Molesey and Teddington weirs. These new channels will increase the capacity of the Thames through Surrey and south west London, reducing the risk of flooding to over 11,000 homes and 1,600 businesses. Please see Figure 1 on submitted letter.

Alongside the channels there will be large areas of green open space, new foot and cycle paths, and improved wildlife habitats. The flood channels will also provide opportunities for fishing, boating and canoeing bringing health benefits to communities as well as opportunities for tourism, recreation and leisure.

The principle of the River Thames Scheme was consulted on in 2009 and is supported by the Environment Agency's Lower Thames Flood Risk Management Strategy 2010. There was a subsequent public consultation in 2016. At this point it was anticipated the River Thames Scheme would comprise of several Town and County Planning Act applications and would have included an additional flood relief channel in the Royal Borough of Windsor and Maidenhead, which is no longer in scope.

The full scope and design of the project is yet to be determined. It will be shaped by technical, environmental and economic factors alongside stakeholder engagement and public consultation feedback.

The River Thames Scheme, although an NSIP, it does not benefit from a National Policy Statement and will therefore rely on Development Plan policy to support the needs case.

Chapter 1 – Introduction

‘What is good growth?’ (Supporting text paragraph 1.10)

The penultimate bullet point states that good growth ‘builds resilience to the impacts of climate change and flooding’. As a flood alleviation project, the RTS will make a significant contribution to this objective of the Plan, by reducing the risk of flooding for over 11,000 homes and 1,600 businesses across its length.

The RTS also acknowledges and is supportive of the other aspects of good growth referenced in this paragraph, such as improvements to health and wellbeing of residents and investment in green and blue infrastructure (bullet points two and three) providing opportunities for tourism, recreation and leisure. The RTS would also create large areas of green open space and improve habitats.

Recommended action: For information only, no action required.

‘How are we going to respond to our needs?’ (Supporting text paragraph 1.15)

Paragraph 1.15 outlines:

‘The council, whilst recognising that this efficient use of land will help to respond to demand, it will not meet all of it. The council has chosen this approach in response to the need to balance growth with protecting and continuing to conserve and enhance what is important to our residents and helps shape our places and communities. This includes the Green Belt and our open spaces, as well as safeguarding other areas of recognised importance such as ancient

woodland, habitat sites and heritage assets of international and national importance and avoiding areas unsuitable for new development for example, where they are at high risk from flooding.'

The RTS supports this paragraph, however, would like to acknowledge that a flood alleviation scheme by definition needs to be in an area of high flood risk.

Recommended action: For information only, no action required.

Chapter 2 – Elmbridge 2037

'The challenges' (Supporting text paragraph 2.1)

The first bullet point of this paragraph focusses on 'tackling climate change and moving towards a low/ zero carbon economy' as one of the ways the Local Plan needs to respond to some of the challenges over the plan period. We recommend that you also insert 'and the effects of climate change (including the impact of flooding)', after 'tackling climate change'. This is because large parts of the borough are impacted by flood risk, which with climate change, may increase and therefore tackling this should be a key part of the local plan.

Recommended action: The wording of the first bullet point could be updated to the following: 'Tackling climate change and the effects of climate change (including the impact of flooding) and moving towards a low / zero carbon economy;'

'Principles' (Principle 1: Tackling Climate Change)

Principle 1: Tackling Climate Change states:

'To adapt to, and mitigate, the effects of climate change; to reduce carbon dioxide emissions, minimise energy use; improve air quality and protect and enhance our natural environment.

To improve the borough's resilience to climate change.'

The RTS welcomes and supports this principle. We recommend that this principle includes ‘to reduce flood risk’ after ‘the effects of climate change’. This is because it is likely that flood risk will increase with the effects of climate change.

Recommended action: The wording could be updated to the following: ‘To adapt to, and mitigate, the effects of climate change (including reducing flood risk); to reduce carbon dioxide emissions, minimise energy use; improve air quality and protect and enhance our natural environment. To improve the borough’s resilience to climate change’

Chapter 3 – Spatial Strategy and Delivery

Policy SS1 – Responding to the climate emergency (Main policy)

The RTS supports this policy, particularly part ‘2. Mitigating and adapting to the impacts of climate change: a) Conserving water resources and minimising vulnerability to flooding.’

Recommended action: For information only, no action required.

Policy SS1 – Responding to the climate emergency (Supporting text paragraph 3.9)

Paragraph 3.9 states, ‘Some of the necessary actions for tackling climate change, such as improving energy efficiency and the provision of green and blue infrastructure, could also have direct benefits for biodiversity and residents, businesses and visitors by reducing energy bills and providing a higher quality environment.’ Whilst we agree with this statement, we would suggest the addition of wording to cover flood risk mitigation and climate resilience be added to this paragraph to support earlier sections and paragraphs of the Draft Plan.

Recommend action: The wording of this paragraph could be amended to: ‘Some of the necessary actions for tackling climate change, such as flood risk mitigation, improving energy efficiency and the provision of green and blue infrastructure, could also have direct benefits for biodiversity and residents, businesses and visitors by reducing energy bills and providing a higher quality and more climate resilient environment.’

Policy SS2 – Sustainable place-making (Main Policy)

	<p>Part 2(a)ii) states: '2. All development proposals will be assessed taking into account the following criteria: (a) Protecting and enhancing our natural, historic and built environment by: ii) conserving and enhancing biodiversity'</p> <p>Whilst we support this policy, particular reference to enhancing biodiversity water dependent habitat would be beneficial.</p> <p>Recommended action: The policy wording be amended to:</p> <p>'2. All development proposals will be assessed taking into account the following criteria: (a) Protecting and enhancing our natural, historic and built environment by: ii) conserving and enhancing biodiversity, through biodiversity net gain and creation of high-quality terrestrial and water dependent habitats'</p> <p>'Quantum and spatial distribution of development' (Supporting text paragraph 3.28) We would like to bring to your attention that there appears to be an error in the 'Key Diagram' figure reference within this paragraph and numbering of the figure itself. Paragraph 3.28 refers to 'Key Diagram shown at Figure 1', however the actual figure is labelled Figure 3: Key Diagram.</p> <p>Recommended action: Review potential formatting error.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>We are pleased to see the RTS on the Key Diagram. However, the extent of the RTS shown in this figure is much greater than is proposed. The RTS would like this figure to represent the indicative RTS boundary and we will send you the shapefile so that this figure can be updated on the Key Diagram and the policies map. Recommended action: Figure and policies map to be updated with the indicative RTS boundary, which the RTS will provide.</p>

At present, this figure is the first reference to the RTS project in the Draft Plan. To introduce the scheme in this section would be beneficial, particularly to support earlier sections of the Draft Plan which highlight the need to tackle climate change as a key issue. We note that preceding paragraphs 3.17 – 3.27 focus on issues of housing and economy, however there is nothing on the environment and climate change. We would encourage you to add a paragraph(s) before 3.28 to concentrate on the environment and climate change. We have provided some suggested text below.

Recommended action: The following supporting text paragraph could be added to introduce the RTS: 'Like other boroughs, Elmbridge needs to ensure it is able to plan development that responds to the climate emergency. One of the biggest risks to the borough is flooding from the River Thames and this risk will only grow with climate change. The section of the River Thames that runs through the borough makes up one of the largest areas of un-defended flood plain in England. The RTS (as shown on the Key diagram Figure) is a project designed to significantly reduce the risk of flooding by creating two new river channels totalling over 8.5 miles alongside the Thames in Runnymede and Spelthorne, as well as increasing capacity at Sunbury, Molesey and Teddington weirs. These new channels will increase the capacity of the Thames through Surrey and south west London, reducing the risk of flooding to over 11,000 homes and 1,600 businesses. Alongside the channels there will be large areas of green open space, new foot and cycle paths, and habitat creation. The flood channels will also provide opportunities for fishing, boating and canoeing bringing health benefits to communities as well as opportunities for tourism, recreation and leisure.'

Chapter 4 – Tackling Climate Change

'Principle 1 – Tackling climate change' (Supporting text paragraph 4.5)

We welcome your stance in reducing carbon dioxide emissions and supporting the transition to a low/zero carbon future as stated in paragraph 4.5. We would like to see more support and encourage developments to be net zero carbon.

Recommended action: For information only, no action required

Policy CC4 – Sustainable transport (Main policy)

The RTS project supports this policy. The RTS acknowledges the need for sustainable transport initiatives at all stages of the development process, including construction and operation.

Recommended action: For information only, no action required

Policy CC5 – Managing flood risk (Supporting text paragraph 4.27)

We suggest that supporting text is added under Policy CC5 which outlines the council's support of the RTS and its recognition of the RTS as an important project providing flood resilience alongside biodiversity, public open space, and active travel improvements. This is so that the support for the RTS is in line with the approach Runnymede Borough Council have taken in their Adopted Local Plan.

Recommended action: We suggest adding additional wording to the supporting paragraph 4.27 to provide support for the RTS. The supporting text could be amended to:

"4.27 Elmbridge is a borough with a significant flood context, with the River Thames forming its northern boundary, and the Rivers Mole, Wey and Rytte and the Dead River all running through it. Flooding is one of the most immediate and visible consequences of extreme weather conditions and climate change. Large parts of the borough are at risk from flooding and there has been a long history of flood events which have caused significant damage, distress and disruption to communities, businesses and the borough's infrastructure network. The council supports proposals for strategic flood alleviation measures (and associated enabling works), including the emerging flood alleviation measures at Desborough Island and Sunbury Lock as part of the wider River Thames Scheme. The council recognises it as an important project providing flood resilience, alongside biodiversity, public open space, and active travel improvements."

Chapter 5 - Principle 2 - Protecting and enhancing our environment

Policy ENV1 – Green and Blue Infrastructure (Supporting text paragraphs 5.3, 5.4 and 5.8)

We are pleased to see that the value of green and blue infrastructure is recognised and is included as a separate policy. As part of the RTS, we will be creating new blue and green infrastructure to provide wider benefits and enhancements to the environment and local communities.

In supporting paragraph 5.4, we consider the text could be strengthened with a reference the benefits to carbon sequestration of habitat creation and/or tree planting.

Recommended action: To include a reference of the benefits to carbon sequestration of habitat creation and/or tree planting.

Paragraph 5.8 makes reference to the Green and Blue Infrastructure Study (2020). The RTS is a case study within this document for Opportunity 10 (Objective 1) and the River Thames is also identified as key blue and green infrastructure in Weybridge. The Green and Blue Infrastructure Study also highlights the importance of the RTS in improving flood risk (page 56). Paragraph 5.8

of the Regulation 19 Local Plan could include reference to the RTS case study referenced in the Green and Blue Infrastructure Study.

Recommended action: The wording of this paragraph could be amended to say the following (the Green and Blue Infrastructure Study has been updated to the current 2022 reference):
 'The Green and Blue Infrastructure Study (2022) sets out both borough-wide and settlement-specific opportunities to contribute towards Elmbridge's network of green and blue spaces. The Study sets out case studies that will help to achieve the identified opportunities, such as the River Thames Scheme which will implement biodiversity and flood adaptation and mitigation solutions. Development will also need to have regard to the requirements set out in the forthcoming Elmbridge Design Code.

Policy ENV6 - Protecting, enhancing and recovering biodiversity (Main Policy and Supporting Text Paragraphs 5.25 and 5.27)

The RTS supports Policy ENV6. In terms of the supporting paragraphs, we support paragraph 5.25 which states all new development is required to contribute to biodiversity net gain with a minimum gain of 10% on all sites.

Paragraph 5.27 states '...Net gain must be quantified using an appropriate metric applied by a suitably qualified professional. The biodiversity metric calculation tool produced by Natural England must be used...' We recommend that this paragraph should make reference to the principles set out in the Defra metric, in particular that Principle 6 which states that decisions should be guided by expert ecological advice and not just biodiversity outputs of the metric.

Recommended action: Paragraph 5.27 should include more specific reference to the Defra metric.

Chapter 8 – Principle 5 - Providing infrastructure and connectivity

Policy INF1 – Infrastructure Delivery (Main Policy)

We are supportive of this policy and are pleased to see the RTS included in the Infrastructure Delivery Plan.

Recommended action: For information only, no action required.

Policy INF6 – Rivers (Main Policy and supporting text paragraphs 8.32 and 8.33)

We are pleased to see support for the RTS in part 3 of this policy which states, 'The council supports proposals for the wider River Thames Scheme and will work proactively with partners to deliver improvements. Land at Desborough Island will be safeguarded for the creation of new habitat.'

	<p>We would like to see additional policy wording added to an existing point or as a new standalone point which supports the creation and/or enhancement of water dependent habitat.</p> <p>Recommended action: Additional policy point could be included which states: 'Opportunities to create and/or enhance water dependent habitats to improve rivers will be supported.'</p> <p>Supporting text paragraph 8.32 states that '...Over 15,000 homes and numerous businesses are at risk from flooding.' To reflect the current RTS proposals, it would be more accurate to reference the figures that apply to the stretch of the Thames between Egham and Teddington. The RTS would protect over 11,000 homes and 1,600 businesses in this stretch. We also request similar references are updated if applicable to other sections of the draft plan.</p> <p>Recommended action: The wording of this paragraph could be amended to say: The River Thames between Egham and Teddington has the largest area of developed flood plain in England without flood defences. Over 11,000 homes and 1,600 businesses are at risk from flooding. The council is working with the Environment Agency and other partners to bring forward the River Thames Scheme. This is a programme of projects and investments with the aim of reducing flood risk in communities.</p> <p>Paragraph 8.33 states 'The rivers and watercourses in the borough provide an important habitat and natural corridor to allow the movement of species between suitable habitats and promote the expansion of biodiversity. Through the provision of movement may help wildlife adapt to climate change by providing a migration corridor.'</p> <p>We would like to see the wording of this paragraph amended to express support for development which improves the movement of terrestrial and aquatic species between habitats.</p> <p>Recommended action: We recommend you amend the wording of supporting text paragraph 8.33 to reflect the above statement.</p> <p>We hope that our comments are useful.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p>

	<p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ricky Ching
User ID	41256417
Organisation	NHS Surrey Heartlands
Policy / Evidence base/ part of plan:	INF1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p> <p>INF1 - Infrastructure delivery The National Planning Policy Framework 2021 is clear that ‘Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for infrastructure and community facilities (such as health).’ Paragraph 34 goes onto state that ‘Plans should set out the contributions expected from development.’ Alongside this, they should include the levels and type of infrastructure required over the plan period.</p>

	<p>Large residential developments often have very significant impacts in terms of the need for additional healthcare provision for future residents, meaning that a planning obligation requiring that the development delivers a new healthcare facility is often necessary. Furthermore, the significant cumulative impacts of smaller residential developments and their need for mitigation should also be recognised.</p> <p>The NHS, Council and other partners must work together to plan the infrastructure and necessary funding required to support the projected housing development and related population growth across the borough. A vital part of this is ensuring that the NHS has the resources required to develop additional healthcare infrastructure where necessary. NHS Surrey Heartlands and Epsom and St Hiller Trust support the Council's approach in INF1 which sets out that new developments must contribute towards the provision of infrastructure and services, including health. This will help to ensure that developments provide adequate contributions to mitigate their impacts on the health care infrastructure.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>NHS Surrey Heartlands and Epsom and St Helier Trust welcome further partnership working with the Council on the provision of infrastructure to support sustainable development in the borough. We suggest that policies and processes explicitly identify and provide assurances that the funding of health care infrastructure through developer contributions will be provided. The updates to the Infrastructure Delivery Plan, and the capital allocation process for the Elmbridge Community Infrastructure Levy must support funding allocations towards health care infrastructure in order to ensure the Council meets the objectives of Principle 5, and the Local Plan as a whole.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ricky Ching
User ID	41256417
Organisation	NHS Surrey Heartlands
Policy / Evidence base/ part of plan:	INF2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p> <p>Reviews of the NHS estate are aimed at improving the provision of health care services by increasing efficiencies, including through the repurposing of unneeded and unsuitable buildings. This means that potential disposal of repurposed buildings, as well as the related revenue spending that is saved, can be used to improve NHS facilities and services. Flexibility should be accorded to NHS sites, or that of key infrastructure providers, in relation to the policies aimed at preventing the loss or change of use of social and community facilities and assets. Where such policies are overly restrictive, the repurposing of unneeded and unsuitable</p>

	health care facilities may be prevented or delayed. Most surplus health care facilities are purpose-built and when at the end of their useful lives, are highly unlikely to be viable or, are suitable for other uses.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	NHS Surrey Heartlands and Epsom and St Helier Trust recommend that Policy INF2 (3) should set out exceptions and offers positive support for infrastructure providers through flexibility or a streamlined process to facilitate repurposing and reinvestment of capital towards modern and fit-for purpose infrastructure facilities. The loss of existing social and community infrastructure (including health) that forms part of a wider estate plan that will support health should not be subject to any restrictions.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Penny Clarke
User ID	24476161
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Tom Clarke
User ID	7958017
Organisation	Theatres Trust
Policy / Evidence base/ part of plan:	INF2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes We consider this policy to provide strong protection for the borough's valued facilities, helping to guard against unnecessary loss in accordance with paragraph 93 of the NPPF (2021).
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Katia Clarke
User ID	40339073
Organisation	Planning Potential obo Aldi Stores Ltd.
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No See below
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No See below
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] These representation comments relate to site D7 – 47 Portsmouth Road, Thames Ditton, KT7 0TA which is proposed in the draft Local Plan for a residential allocation to provide 25 dwellings. In the first instance and to be clear, we are not aware that this site has been included as a potential allocation within any previous draft of the emerging plan, which has been subject of consultation to date, and therefore this is the first opportunity we, and indeed others, have been

given to comment on the proposed allocation. As such, we would question whether this proposed allocation is legally compliant or sound.

As the Council are aware, the site in question is owned by Aldi Stores Ltd. who have in the past few years been formulating plans to redevelop the site to deliver a medium foodstore development to serve Thames Ditton. Pre-application discussions were initiated in early 2021, and a full planning application was submitted in November 2021. This remains a live application, however, is well progressed in discussions with the Council.

At present Thames Ditton and the wider urban area is not well served by convenience retail, resulting in a lack of choice locally, with no opportunity at present to undertake a main food shopping trip (i.e. visit a supermarket). This means to undertake such a trip, should they wish to, residents of Thames Ditton need to travel further afield.

Indeed, this is reflected within the Council's own evidence base (The Elmbridge Retail Assessment 2016), which demonstrates that the majority of convenience trade is leaving Thames Ditton. It is clear that the area would benefit from additional convenience provision to enhance the local retail offer and provide additional choice and competition while reducing the need for local residents to travel for their shopping. However, site opportunities to deliver such development are limited. There are no existing allocated retail sites, and the Draft Local Plan does not seek to make any new site allocations for retail development of this nature. Elmbridge Officers have confirmed this position, that they are not aware of any suitable and available sites for retail development. As such, there are no locations to bring forward these new facilities.

The Portsmouth Road site offers the potential for a retail facility to be delivered on an existing brownfield and long-standing commercial site to secure continued commercial use of the site to provide a foodstore in an accessible location for Thames Ditton Centre and surrounding residential areas in response to demand.

The site is clearly a commercial site, having been in such use for many years as a car dealership. As such, the principle of a commercial use at the site is long established. The closure of the Guy Salmon dealership in 2020 provides the opportunity to bring a prominent vacant commercial site back into continued economic use, including through making more efficient use of the site to bring forward a more intensive use.

In this respect, Paragraph 81 of the NPPF is clear that "significant weight should be placed on the need to support economic growth and productivity, taking in account both local business needs and wider opportunities for development".

The site has historically provided an employment generating use and existing policy and indeed other policies within the Council's Draft Local Plan point towards retention of such uses and continued use of commercial sites. For example, Emerging Policy ECO1 (Supporting the economy) seeks to avoid the loss of floorspace providing employment-generating uses. The proposed allocation to provide residential on this existing commercial site is therefore at odds with other policies in the plan and the NPPF, which encourages sustainable economic development without delay. Once the site is developed for residential, any potential for economic use of the site and job creation is largely lost for good.

Paragraph 122 of the NPPF is clear that "planning policies and decisions need to reflect changes in the demand for land" (Para. 122). This includes at Para. 122b) that where plans are being updated, that applications for alternative uses on land should be supported in the interim period, "where the proposed use would contribute to meeting an unmet need for development in the area". This need for additional convenience floorspace has been identified.

In this respect, whilst the delivery of housing is clearly an important consideration, so is the need to provide the necessary infrastructure and supporting facilities. Other needs such as shops for people to visit and places for people to work simply cannot be ignored when securing healthy and sustainable communities. Indeed, Paragraph 93a) recognises that planning policies and decisions should "plan positively for the provision and use of ...community facilities (such as local shops...) and other local services to enhance the sustainability of communities and residential environments". Part e goes on to stipulate the need to "ensure an integrated approach to considering the location of housing, economic uses and community facilities and services".

This is reflected elsewhere within the Draft Local Plan. For example, the Vision sets out that "good growth will be supported by the delivery of the right infrastructure in the right place, at the right time". This is also reflected at draft Policy SS2 (Sustainable Place Making), which is clear when talking about housing growth that there is also a need to incorporate a range of amenities and facilities to meet local needs.

It should also be highlighted that the site has a number of development constraints, being partially located within Flood Zone 2 and in close proximity to FZ 3 and with a culvert running across the site, as well as adjacent to a listed building, which ultimately will impact on the deliverability of residential development. Given the size of the site, to provide the indicative capacity of 25 dwellings, this would require several storeys, resulting in an overbearing development which would appear out of character with the surrounding area and introduce

	<p>greater potential for loss of light and privacy for surrounding residents. The imposition of the proposed allocation may therefore further delay a beneficial development coming forward on the site, resulting in an extended period of vacancy. This is at odds with NPPF advice at Paragraph 16 which follows that plans should be prepared positively and be deliverable.</p> <p>It is therefore respectfully submitted that the proposed allocation should be altered to better reflect the sites history as a commercial site and opportunity to deliver other commercial uses such as retail. This would enable continuation of the existing commercial use in line with other policies in the draft plan, whilst enabling provision of a supporting facility for surrounding existing residential areas as well as any future housing development which may come forward on other sites in the area.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>As covered above, it is considered that the proposed allocation should be altered to allow the site in question (Site ref: D7 - 47 Portsmouth Road) to be developed for continued commercial use, reflecting the site ownership, commercial history, opportunity to deliver beneficial development, and development constraints.</p> <p>As set out, there is potential for the site to deliver a medium sized foodstore development to meet an identified need in an accessible location, enhancing retail choice and competition in the area to support surrounding residential uses. The proposed residential allocation does not address the current identified need for additional convenience retail provision in the area and would instead deliver additional dwellings without convenient access to supporting infrastructure and facilities.</p> <p>2022.07_Reps to Reg 19 Elmbridge Local Plan_5662N.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Malcolm Clements
User ID	16187713
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Malcolm Clements
User ID	16187713
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Malcolm Clements
User ID	16187713
Organisation	
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Malcolm Clements
User ID	16187713
Organisation	
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Malcolm Clements
User ID	16187713
Organisation	
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>If you are looking to minimise transport emissions, including those created by the delivery services caused by on line shopping, and increase the amount of walking and cycling, it is imperative that residents can source basic household items from all of the boroughs commercial areas. Attention will need to be given to separating cycles from motorised traffic and to the developing of neighbourhoods with all the facilities necessary for meeting day to day commercial, educational, medical, social and recreational day to day needs locally.</p> <p>I cannot see where the proposed housing development for the borough is to be located without sacrificing large swathes of amenity land.</p> <p>For my area of residence, Long Ditton, Thames Ditton, Hinchley Wood and Weston Green does not have space for 635 residential units without radically altering the character of the district. If the development is to be located on brown field sites or by the demolition of existing properties such as is occurring in Manor Road North and is proposed for Sugden Road then the new properties are unlikely to be on a scale to properly and effectively provide for the space and equipment needs of modern family living.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: []

	<p>Effective: [Y]</p> <p>Justified: []</p> <p>Consistent with national policy: []</p> <p>The force of necessity makes it inconsistent with achieving Principle 2: Protecting and enhancing the quality of the environment.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Although the number of housing units to be accepted by the borough has been reduced from those originally conceived, there are still too many for Principle 2 to be maintained. This is a national issue rather than one which Elmbridge can solve. There are too many people living and wanting to live in southern England for us to enjoy the standard of life to which we aspire and which we have hitherto enjoyed.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Malcolm Clements
User ID	16187713
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Chris Cole
User ID	16263745
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <ul style="list-style-type: none"> • There is an inherent contradiction between a stated commitment to managing the effects of climate change and any meaningful strategy to reduce the impact of increased traffic. • The impact on Elmbridge of the large Wisley housing development represents an important omission. • There are fundamental errors in the reports assessing the performance of Green Belt sites. Most importantly, site SA-11 next to Waverley Road and Blundel Lane has been incorrectly assessed. • There is no recognition of the need for densification of urban areas such as Oxshott to be progressive and avoid the character of areas of comparatively low density being damaged by individual high-density schemes. • While areas close to local centres and train stations are targeted for flats and infill development, the converse should apply so that the character of other areas (such as most of residential Oxshott) is protected. • There are no design codes available to provide protection for local character and ensure excellent buildings. • Calculations of developer contributions for affordable housing continue to be based on flawed methodology that has been subject to continual abuse. • The Infrastructure Delivery Plan is weak with heavy reliance on a document that has not yet been produced by Surrey CC. Key to successful development must be the recognition that

	infrastructure must precede development. A noteworthy omission is the lack of commitment to install cycle lanes alongside trunk roads thereby promoting road safety and improving traffic flow.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Chris Colloff
User ID	41202881
Organisation	Thames Water Utilities Limited
Policy / Evidence base/ part of plan:	CC1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No The requirement in part 5 of the policy for ensuring the highest standards of water efficiency in existing developments through retrofitting is supported although as the policy relates to energy it is not certain that the requirement will be effective.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [] Consistent with national policy: [] As the policy relates to energy it is not clear that the inclusion of water efficiency requirements under this policy will be effective.

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	As the policy is focused on energy the references to retrofitting to improve water efficiency may be more appropriately included under Policy CC3.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Chris Colloff
User ID	41202881
Organisation	Thames Water Utilities Limited
Policy / Evidence base/ part of plan:	CC3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The requirement for all residential development to meet a minimum water efficiency standard of 110 l/p/d as set out in the Building Regulations is supported. This will help to ensure that new development uses water more efficiently reducing the impacts on water resources. The requirement is justified given the whole of the Borough is in an area defined as being water stressed.</p> <p>While the policy is supported it is essential that the requirements are implemented through future planning applications to ensure that the policy is effective. To ensure that the policy is effective a planning condition will need to be attached to all permissions for residential development requiring the optional standard in Part H of the Building Regulations to be met. Without such a condition there would not be a requirement through the Building Regulations for the optional standard to be applied.</p> <p>With regard to Part (f) of the policy the application of BREEAM 'Excellent' to all non-residential development is considered to be overly onerous and would not be appropriate or effective for certain forms of development. It is also not consistent with Part (e) of the policy which relates only to major residential development. For water and wastewater infrastructure, development will often consist of the provision of plant and machinery for which it would not be possible to achieve BREEAM ratings. Some plant and machinery may be contained within an enclosure or building to protect the equipment from the elements. The application of BREEAM ratings to such unoccupied enclosures or buildings in such instances may not be appropriate.</p>

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: [Y]</p> <p>Justified: []</p> <p>Consistent with national policy: []</p> <p>As set out above.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>To help ensure that such conditions are applied and the policy is therefore effective it is suggested that the supporting text from section 6.47 is provided under Policy CC3 where it would be more appropriate. The text should also be amended as follows:</p> <p>'Elmbridge is located within an area of water-stress and the evidence requires the inclusion of the higher Building Regulations water efficiency standard to be applied to new developments. Planning conditions requiring the optional standard to be met as a minimum will be applied to all approvals for new residential development. Water consumption must become as sustainable as possible and resilience measures will be required in all new residential developments.'</p> <p>In relation to Part (f) of the policy, the requirement should be revised to apply to major developments with a threshold of new buildings of 1000m² being specified in the policy.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Chris Colloff
User ID	41202881
Organisation	Thames Water Utilities Limited
Policy / Evidence base/ part of plan:	CC5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No The principle of Policy CC5 is supported however, it is considered that the wording of the policy could be amended to ensure it is more effective in addressing flood risk from all forms of flooding including surface water flooding and sewer flooding. As a result of their subterranean nature, basement developments that are connected to the sewerage network can be at risk of sewer flooding from surcharge of the sewers should sewers become overloaded. As a result additional text should be added to the policy in relation to basement flooding.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [] Consistent with national policy: []

	<p>Amendments are needed to ensure that the policy is effective in addressing flood risk from all sources, particularly in relation to sewer flooding and surface water flooding.</p> <p>With regard to Parts 4 and 5 of the policy on surface water and SuDS it is considered that the policy could be more ambitious in relation to its requirements which would make the policy more effective at reducing the risk of surface water flooding, particularly given potential issues of more intense rainfall events occurring as a result of climate change.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>To ensure that the policy is effective at reducing the risk of flooding from all forms of flooding it is considered the policy should be revised to state 'To reduce the overall and local risk of all forms of flooding...'. While this issue is considered further in section 4.28 it is considered that the additional wording in the policy would increase the clarity and effectiveness of the policy.</p> <p>To ensure that basements are protected from this risk it is considered that an additional requirement is added to the policy to state: "6. Any basement development connected to the sewerage network shall be fitted with a positive pumped device to protect the basement from sewer flooding."</p> <p>In relation to surface water, the policy could be revised to include a requirement for developments to aim to achieve greenfield run-off rates and to provide a drainage hierarchy. Similar requirements are included in Policy SI13 of the London Plan.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Chris Colloff
User ID	41202881
Organisation	Thames Water Utilities Limited
Policy / Evidence base/ part of plan:	ENV7
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No The policy as drafted will not ensure that mitigation measures can be used to address issues relating to noise, odour, vibration and light to protect amenity of existing and future occupiers. It is therefore not effective or sound.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [] Consistent with national policy: [] Part a of the policy focuses on zoning to ensure existing or future occupiers are not subject to unacceptable levels of odour, noise, vibration or light. Mitigation measures may be possible to ensure that development can be located close to sources of odour, noise, vibration or light helping to make the most efficient use of land. While section b of the policy makes reference to

	mitigating impacts, this section of the policy only applies to noise. As such the policy is not considered to be fully consistent with paragraph 187 of the NPPF as it would not ensure that mitigation measures could be secured to address issues of light, odour or vibration as well as noise.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	To address the above concern it is suggested that parts a and b of the policy could be combined to state: a) Incorporate site zoning of pollution sources and receptors, or secure appropriate mitigation measures, to ensure that existing and future occupiers are not subject to unacceptable level of odour pollution, noise, vibration or light disturbance, both within buildings and externally;
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Chris Colloff
User ID	41202881
Organisation	Thames Water Utilities Limited
Policy / Evidence base/ part of plan:	INF1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The aims of Policy INF1 are supported. For water and wastewater network infrastructure improvements that may be necessary to avoid risks of sewer flooding and/or pollution of land and watercourse or issues of low/no water pressure, there may be a requirement for development to be phased so that the relevant phase of development is not occupied until the necessary infrastructure is in place.</p> <p>While infrastructure will be delivered by infrastructure providers and funded through the infrastructure charge for new properties connected to the water and wastewater networks. It is not practical to commit to delivery until there is certainty that development will come forward. Given the potential timescales for delivery of network upgrades which can take 18 months to 3 years to design and deliver, this may result in a requirement for planning conditions to be applied to any development to phase and co-ordinate development and infrastructure.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: [Y]</p>

	<p>Justified: []</p> <p>Consistent with national policy: []</p> <p>As above, the ability to use conditions to align development and infrastructure delivery are required to ensure the policy is effective and sound.</p> <p>It is also noted that text is included in Section 9.4 in relation to site allocations stating that “Pre-application advice prior to the submission of a planning application is encouraged as well as engagement with infrastructure providers at the earliest opportunity.”. While this text is supported, engagement should be encouraged for all development and not just for development on allocated sites.</p> <p>While this text is supported, engagement should be encouraged for all development and not just for development on allocated sites. It is therefore considered that this text would be more beneficial in support of Policy INF1. Early engagement will help to align the development and infrastructure delivery processes and minimise the risk of phasing conditions being required to ensure development is not occupied ahead of the delivery of infrastructure.</p>
<p>Question 4</p>	<p>Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.</p>
	<p>To ensure conditions can be used for this it is considered that the text in Section 8.7 should be revised as set out below.</p> <p>‘The delivery of infrastructure will be funded through a combination of existing public funding, developer-led provision, infrastructure providers and through the use of the Community Infrastructure Levy (CIL). The council’s Charging Schedule and updated Development Contributions Supplementary Planning Document (SPD) should also be referred to. Where necessary conditions of S106 agreements will be used to secure and co-ordinate development and infrastructure delivery.’</p> <p>The text from Section 9.4 stating that “Pre-application advice prior to the submission of a planning application is encouraged as well as engagement with infrastructure providers at the earliest opportunity.” should be included in support of Policy INF1 to encourage engagement on all development proposals.</p>

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Chris Colloff
User ID	41202881
Organisation	Thames Water Utilities Limited
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>In relation to the proposed site allocations, it is noted that the spatial strategy does not propose the release of Green Belt land and results in under delivery of housing compared with the objectively assessed needs for the Borough. The Council's justif</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>We have previously provided high level comments on water and wastewater infrastructure capacity to serve potential site allocations. As set out above and advised in the draft Local Plan developers are encouraged to engage with Thames Water at an early stage to discuss the infrastructure requirements for their schemes. It is not clear whether the proposed housing provision targets will be found to be sound. In the event that it is not found to be sound we would need to consider the impacts of any increase in housing numbers on water and wastewater infrastructure to help ensure growth and infrastructure are aligned.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: [Y]</p> <p>Justified: []</p>

Consistent with national policy: []

The Local Plan will not deliver the OAN for housing for the borough and it is not clear if this approach will be found to be justified. Previous sites put forward for potential development which may become surplus to requirements have been excluded due to their location in the Green Belt and it is not clear that this approach is justified as minor changes could assist with delivering housing without significant impacts on the Green Belt.

In the event that additional sites are required to reduce the shortfall in housing against the objectively assessed need, or for additional land for commercial use, Thames Water have extensive landholdings within the Borough and there may be potential for land to be released for development. Three areas were previously identified around the Queen Elizabeth II Reservoir which have potential to accommodate housing. These were put forward in representations in 2019. In addition there is land that can potentially be made available for development at Esher Sewage Treatment Works.

Within the 2016 Green Belt Boundary Review the three parcels of land were included in Local Parcel 69. The assessment of this parcel of land indicated that parcel serves a purpose in relation to checking the unrestricted sprawl of large built up areas and preventing neighbouring towns from merging and to a lesser extent in safeguarding the countryside from encroachment. This assessment looked at the parcel as a whole. The vast majority of the land parcel consists of the Queen Elizabeth II Reservoir. The three sites identified with potential for release are located around the periphery of the reservoir adjacent to existing built up areas and minor adjustments to the Green Belt boundary to remove these sites from the Green Belt could assist with delivering growth within the district with minimal impacts on the Green Belt as the reservoir and its embankments would remain providing a strong and robust Green Belt boundary and would minimise any harm to the wider Green Belt.

Land at Esher STW was included within RSA-40 with the 2018 Green Belt Boundary Sub-division Report concluding that the area performed weakly against NPPF Green Belt purposes and that the area should be considered further. It is considered that the land owned by Thames Water has potential to assist with delivery of commercial development requirements subject to a review of the Green Belt boundary. Plans of all the sites referred to are appended. In the event a review of the Green Belt boundaries is undertaken, consideration should also be given to removal of Esher

	STW from the Green Belt given it is a major developed infrastructure site on the edge of the settlement boundary.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Should consideration be given to making amendments to the Green Belt to increase housing or commercial development land. Thames Water have significant land holdings in the borough and there are areas where land can potentially be made available for development including the sites appended.</p> <p> 22.07 Esher STW.pdf Elmbridge - Site A - Thames Water.pdf Elmbridge - Site B - Thames Water.pdf Elmbridge - Site C - Thames Water.pdf </p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	n

Name	Michael Collon
User ID	24505089
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes Overall Yes, though I think it is risky to propose such a low proportion of the total housing required.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes It is particularly encouraging that the Green Belt is left untouched.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Peter Conley
User ID	24510305
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes The local plan has been well thought out and consulted upon. Local authorities are best placed to make planning decisions, they understand the needs of the local community. Elmbridge is a unique and wonderful borough surrounded by Green Belt land that stops the spread of greater London and it is vital that the Green Belt is protected. The pandemic has shown us how important green spaces are to our physical and mental health. In understanding this, the plan makes the most of existing spaces identified for development whilst protecting open spaces and Green Belt so in my opinion totally fulfills the needs of residents in the borough and should be approved.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Susan Conley
User ID	24290017
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Elmbridge's local plan has been well thought out, written and consulted upon. I believe Local Authorities are best placed to make decisions about the borough as they understand the needs of people and businesses in the borough. Elmbridge is a unique and wonderful borough surrounded by Green Belt that stops the spread of Greater London and makes it a lovely place to live. The pandemic has shown everyone how important open spaces are for both our physical and mental health. In understanding this the plan makes the most of re-purposing and using existing spaces identified for development while protecting the Green belt - which is vital. The plan fulfills the needs of residents in the borough, provides additional housing, protects the Green Belt and open spaces and should be approved.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: []

	Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Graham Cooke
User ID	7953537
Organisation	Thames Ditton & Weston Green Residents' Association
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	We note that the draft plan does not incorporate a detailed map of the Thames Ditton settlement area. We would seek reassurance that the final map is prepared in the same way as the Walton Map in terms of designation, including Natural Green Spaces.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Graham Cooke
User ID	34238625
Organisation	
Policy / Evidence base/ part of plan:	ENV1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>Whilst we consider the Plan to be broadly sound, and we support it, there are some minor amendments/additions we believe should be made, in the interests of consistency and utilising residents' local knowledge.</p> <p>We note that the draft plan does not incorporate a detailed map of the Thames Ditton settlement area. We would seek reassurance that the final map is prepared in the same way as the Walton Map in terms of designation, including Natural Green Spaces</p> <p>.....</p> <p>We feel that the proposed ENV1 and ENV5 do not sufficiently recognise the national importance of the River Thames corridor and its tributaries when compared with the present CS12 policy and the importance of the partnership with Thames Landscape Strategy</p> <p>The Council should, as at present adopt 'a co-ordinated partnership approach to the future of the waterways in order to' :</p> <ul style="list-style-type: none"> * Maintain and enhance the landscape and waterscape * Conserve and enhance bio-diversity... *Support opportunities to improve public access...
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.

	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Graham Cooke
User ID	7953537
Organisation	Thames Ditton & Weston Green Residents' Association
Policy / Evidence base/ part of plan:	ENV1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>We feel that the proposed ENV1 and ENV5 do not sufficiently recognise the national importance of the River Thames corridor and its tributaries when compared with the present CS12 policy and the importance of the partnership with Thames Landscape Strategy. The Council should, as at present adopt 'a co-ordinated partnership approach to the future of the waterways in order to' :</p> <ul style="list-style-type: none"> * Maintain and enhance the landscape and waterscape * Conserve and enhance bio-diversity... *Support opportunities to improve public access...
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Graham Cooke
User ID	7953537
Organisation	Thames Ditton & Weston Green Residents' Association
Policy / Evidence base/ part of plan:	ENV3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>We believe that 4 of the sites that were considered (and rated), but not designated, as Local Green Space should be included for the following reasons.</p> <p>1/ Esher College - We see no reason why the Esher College site should be treated differently to the Tiffins' Sports Grounds - They are both are in close proximity to each other and both abut the Hampton Court Way. The Esher College site has historic significance being part of what was the old Weston Manor Farm dating back to the Domesday Book.</p> <p>2/ Ditton Marina - We disagree with the low assessments given in terms of recreational value, tranquillity and wildlife - we believe that an overall assessment of at least 14 would be appropriate to this site on the banks of the River Thames. Public access to the various facilities on the site are widely used.</p> <p>3/ Ditton Field and Fieldsave - We believe that these two sites should be considered together as they form one contiguous piece of land which provides the setting for Grade 1 listed Hampton Court Palace. The site also provides an important part of the protected strategic views from Hampton Court Palace to the Surrey Hills.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p>

	<p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Graham Cooke
User ID	34238625
Organisation	
Policy / Evidence base/ part of plan:	ENV11
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Whilst we consider the Plan to be sound, we are concerned to note that Strategic Views 2 and 3 (From Hampton Court Palace to the Surrey Hills and to Thames Ditton Marina and Surrey Water Works) are no longer in the Local Plan, based on the recommendation of ARUP. We can see no reason why these important views should be downgraded and why the protection they currently have through the Local Plan should be removed
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Graham Cooke
User ID	7953537
Organisation	Thames Ditton & Weston Green Residents' Association
Policy / Evidence base/ part of plan:	ENV11
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Finally, we are concerned to note that Strategic Views 2 and 3 (From Hampton Court Palace to the Surrey Hills and to Thames Ditton Marina and Surrey Water Works) are no longer in the Local Plan, based on the recommendation of ARUP. We can see no reason why these important views should be downgraded and why the protection they currently have through the Local Plan should be removed.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	David Corner
User ID	16322465
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ann Cowap
User ID	41047233
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Having read the document, but not being legally qualified I am sure that if it was put to the test, it would fail.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Local business owners have not been consulted about their inclusion on the plan, and there is a clear contradiction of this on the draft local plan EBC web page
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [] Justified: [] Consistent with national policy: [] See previous comment

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Local business owners must have been consulted about their inclusion on the plan, and consent given for their inclusion.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Bill Cowap
User ID	41233025
Organisation	Hersham Residents Association (the HRA)
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>We would point out that the consultation arrangements have not been robust in that: It was conducted at a time of year when it is more difficult to engage due to summer holidays. The consultation period was cut down from the usual expected 6 week period due to a delay in launching the consultation.</p> <p>At the start of the consultation period the website was not working properly. During the latter part of the consultation the local plan consultation was not highlighted very clearly on the Elmbridge website.</p> <p>This electronic submission form does not provide enough space in the textbooks for each answer, and is awkward and difficult to use.</p> <p>The consultation questions were framed in such a way as to put off all but the most determined consultee. The wording for example includes reference to whether the plan complied with national guidelines – ordinary members of the public would not be aware of this and were hence be put off completing the consultation and submitting it.</p> <p>Some elements of the consultation in relation to the boundary of land under consideration were not clear. In particular the area covered by the Hersham Green shopping Centre has been described as just the car park and then as the whole site. This could create confusion as to what the housing target numbers refer to – which could be exploited by those who would wish to suggest the target for the whole site just applied to the car park. There was also confusion about the inclusion of the Barley Mow within the triangle of land proposed for housing in that area (even though the Barley Mow has a grade II listing status protecting it from development). There was also confusion in describing a building on that site as Trinity Court even though local people don't recognise this name.</p>

	Overall (rightly or wrongly) we might draw the conclusion that the council were not really serious about inviting comments at this stage, and instead wanted a way of 'rubber stamping' the consultation process to (erroneously) claim full engagement with the public.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>On careful consideration it was felt that the plan is not sound for the following reasons: - Consultation issues referred to above Identification of community facilities for housing use which is not supported by the public and will almost inevitably over the lifespan of the plan irreversibly eliminate certain currently much valued community facilities. With particular reference to Hersham we would highlight the following: The Hersham Green Shopping Centre (H3) The Village Hall (H6) Hersham Day Centre (Centre for the Community) (H6) Hersham Sport and Social Club (H8) Hersham Library (H15) The ex-United Reform Church site at 63 Queen's Road (H1) All Saints Church Hall (H13) Trinity Hall the ex Hersham Bowling Green and Barley Mow (H11) The Royal George Pub (H10) In more detail : - This form does NOT ALLOW ANYTHING LIKE ENOUGH space for all our comments in this section to be submitted electronically in – therefore please refer to the emailed copy of our submission for the detail for this part.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p>

	<p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>If you do not consider the draft local plan to be sound, please select which test for test of soundness this relates to:-</p> <ul style="list-style-type: none"> - positively prepared No <p>Please note the lack of proper public engagement and lack of communication with landowners noted in the case of the comrades club - cited elsewhere in this response. There has also been a lack of clarity about some of the boundaries of land referred to in the plan, particularly with reference to the Hersham Green shopping Centre and Car Park and also the 'Barley Mow / Laithwaites site. At this site the building described as 'Trinity Hall' is not recognised by local people.</p> <ul style="list-style-type: none"> - effective No <p>Please note the loss of community assets and the detrimental effect this would have on the current and future residents in the Hersham area - see earlier references in emailed version of this response to specific sites affected.</p> <ul style="list-style-type: none"> - justified No <p>The increase in population over the lifetime of the plan – does not justify a loss of community assets as set out in the plan, in fact an increase in population should be accompanied by an increase in community assets, not a reduction.</p> <p>The reduction in car parking spaces is also counter intuitive and unjustified when compared to the increase in population and the likely need for more parking capacity, particularly spaces with electrical recharging points.</p> <p>We also feel that it is unreasonable and hence unjustified to not take account of the recently achieved targets for Hersham of the Three Rivers development which has only just been completed – providing 269 units of housing accommodation.</p> <ul style="list-style-type: none"> - Consistent with National policy. No comment
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	<p>Once community facilities are lost they are very unlikely to be replaced and the local area and community becomes impoverished as a less well served, and less interesting area to live in. Once community facilities are lost they are very unlikely to be replaced and the local area and community becomes impoverished as a less well served, and less interesting area to live in. Therefore, to take away any doubt about the future of the key community facilities highlighted in our response must be 'protected' from developers by having their status as an area for housing in the local plan removed.</p> <p>NOT ENOUGH SPACE was available in this submission box for our response – so please also refer to our text emailed to tplan@elmbridge.gov.uk</p> <p>This has now been uploaded at question 4a.</p> <p>HRA response to local plan consultation.docx</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We feel this consultation process does not adequately provide a opportunity to clearly put over the strength of feeling behind our comments. The opportunity to take part in the oral hearing would also allow any confusion or lack of detail in the consultation to be clarified. Because this is such an important plan which sets the direction for Hersham for many years to come, we feel our voice should be heard.

Name	Bill Cowap
User ID	24544577
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>Whether it is legally compliant or not is beyond my knowledge and will beyond the knowledge of many of the residents of Hersham. It is unfair to request that anyone without a legal background is able to comment. The questionnaire is unduly lengthy and complicated particularly as the respondent has to give planning reasons why they disagree with each proposal.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>It appears to ignore several matters that affect Hersham residents such as the effect of the loss of community facilities, employment and the enjoyment of the village of Hersham. There are other factors that are not addressed.</p> <ol style="list-style-type: none"> 1. The Green Belt is made sacrosanct and this in itself creates a major problem in that of Hersham's 1,029 Hectares, 64% is green belt and green spaces which confines any future developments to a already fully developed area. There is no viable area for development apart from H12 US435 which provides 62 residential units on and existing car park. 2. There is one general aspect that needs to be considered in that there are a number of businesses and social outlets that provide employment and amenities to the population of Hersham such as: <ul style="list-style-type: none"> H3 US379 Hersham Shopping Area - This is a vital area that is central to Hersham's existence and the development of this area will ruin the enjoyment of Hersham village for many of the local populace. H8 US389 Hersham Sports and Social Club. Following enquiries the owner has not been informed of this inclusion in the Local Plan. It is constantly busy and provides a variety of events

	<p>throughout the year that is enjoyed by many of Hersham's residents and employs several staff who will loose their jobs</p> <p>H9 US375 The loss of this business will result in the loss of jobs which will affect other local businesses.</p> <p>H10 US390 The Royal George is a very popular pub enjoyed by many.</p> <p>H11 & H14, US376 & US43. This encompasses Laithwaites Wine, Little Limes Day Nursery, the Barley Mow which is a Listed Building, Hersham Technology Park which provides offices facilities & local employment and a Thames Water Pumping Station, all providing a mixture of facilities some of which are essential valued amenities and services.</p> <p>H13 US378 All Saints Catholic Church hall. Used by many as a meeting place and markets which is important for the community.</p> <p>H15 US374 Hersham Library. This building comes up every time a plan is proposed and each time through campaigns by local population, who make good use of the facility, the proposal is defeated. It needs to remain as a very useful and popular local amenity.</p> <p>3. If all of the details of the Local Plan are examined it may reliably be concluded that Hersham is 'Full Up'</p> <p>4. The inclusion of all of the proposals in the Local Plan may, if accepted, rubber stamp the planning process so that a developer could cite on appeal that a proposed development being in the Local Plan overrides a planning refusal.</p> <p>5. I would question if the whole process is fundamentally flawed as it is apparently based on an algorithm which considering that 1 million people have left the UK since Brexit, is it out of date and needs to be re-appraised?</p>
<p>Question 3</p>	<p>If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.</p>
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p>

	<p>Consistent with national policy: [Y]</p> <p>I am of the opinion that National Policy should be carefully reconsidered on a Borough by Borough basis rather than what appears to be a one size fits all policy</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	I am not legally qualified and it is unfair that the local population is being asked to answer this question.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	As a Chartered Surveyor working for several years in Elmbridge and Westminster I have experience of planning issues and how difficult the process has been made.

Name	Duncan Crane
User ID	16654561
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>I am not qualified to answer this question and recommend the council get independent legal advice on this matter. For this reason, I also believe this question is inappropriate for a general audience and responses given may be misleading as a result. Unfortunately, I have not been given the option to say 'I don't know'.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The planning policies in general seem well thought out and should provide a positive contribution to Elmbridge and its communities.</p> <p>However there is a lot of potential for conflict of interest between policies and it is not clear how precedence would be established should such a conflict arise. It would be desirable to have a general policy that, where there is a change in use of land (for example the infill of garden for residential development) that a mitigation plan for all other affected policies should be agreed before the proposal is accepted. For example, where gardens are to be infilled for residential development a mitigation plan should be provided for maintaining wildlife corridors or bio-diversity that might otherwise be lost.</p> <p>In my local area, Cobham, many of the sites earmarked for development represent such a change of use. There should not be a presumption of acceptance of such a change of use unless there is a mitigation plan in place for other affected policies such as environment, employment, infrastructure etc which will be lost due to the change of use.</p> <p>I couldn't see, in the main plan, what alternatives were considered, what trade-offs each alternative would result in, and why the proposed alternative was preferred. In addition, under</p>

	<p>what circumstances might the council change between preferred options, should the plan not produced the desired outcomes or the projections of need on which it is based should turn out to be incorrect.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>Comparison of alternatives is ineffective. Conflicts between different objectives could make elements of plan undeliverable Change of use in some areas may lead to unsustainable development Monitoring framework does not focus sufficiently on measurable outcomes with specific time based measurable targets. It currently focuses almost entirely on inputs and outputs which aren't related to specific policies.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>There needs to be a general policy providing for effective mitigation plans for all affected policies where there is a change of use proposed, to be agreed before planning consent can be given. The plan should set out the measurable and quantified triggers which might lead to it's formal review should planning forecasts be incorrect or outcomes not achieved Specific statement of outcomes with related measures and time based target provided at the policy level for the purposes of monitoring. An annual performance report supported by corrective plans if necessary should be published and sent to every resident in the borough along with their council tax invoice.</p>

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Stuart Crickett
User ID	41434785
Organisation	Boyer Planning obo Antler Homes PLC
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>3. POLICY SS3 – THE SCALE & LOCATION OF GROWTH</p> <p>The Plan Period</p> <p>The Plan is unsound.</p> <p>3.1 The DLP addresses a Plan-period between 2021 and 2037, and is anticipated by the Council to be adopted in the Summer of 2023.</p> <p>3.2 The NPPF (paragraph 22) includes an express requirement for strategic policies to look ahead over a minimum 15-year period from adoption. If the DLP is to be adopted on the programme anticipated by the Council, and set out on page 7 of the DLP, in the Summer of 2023 the plan period ending in 2037 will only be looking forward over a 14-year period. This clearly being in conflict with the NPPF.</p> <p>3.3 To redress this shortcoming, we recommend the Plan-period should be extended by at least 12 months ending in 2038. And with additional sites identified to meet the additional year's supply (in full) requirement.</p> <p>3.4 Furthermore, there are recent examples where the duration of time between the Submission of an emerging local plan, the commencement of the Examination in Public, undertaking of the Main Modification consultation before finally then achieving Adoption of a new local plan exceeds the Council's anticipated timings. Page 7 of the DLP sets out this process is expected to occur between the Autumn 2022 – and Summer 2023. A duration of approximately 12- months.</p> <p>3.5 However, in our opinion, given the contentious nature of the DLP's spatial strategy and planned level of delivery, matters we will address further in this representation, we consider the</p>

Examination to Adoption time period may very easily become extended by the requirement to undertake significant main modifications to the DLP, including the need for identification and agreement on further sites (including appropriate release of Green Belt land) to be allocated to ensure the Borough's minimum housing needs are met. In this context, even a small delay of 6-months to the Examination period will result in the DLP's adoption extending to an overall duration of 18-months from submission, resulting in adoption in the Spring 2024. Thus, the DLP's Plan-period will effectively be reduced to just 13 years.

3.6 In order to ensure this issue does not arise, we suggest the plan period should be extended by at least two years from that proposed by the DLP. And with additional sites identified to meet the additional years supply (in full) requirements.

3.7 As a final comment on the Plan-period, we would question the appropriateness of the DLP commencing in 2021, some 2 years prior to its intended adoption. The Standard Method for assessing minimum housing need is presently based on the affordability ratio for 2022 and is a forward-looking assessment. It therefore seems at odds to have a Plan-period commencing prior to the point at which the local housing needs assessment is undertaken.

The Proposed Housing Target

The Plan is unsound. It is not positively prepared, justified, effective or consistent with national policy

3.8 The NPPF explains (paragraph 60) that the minimum number of homes needed should be informed by a Local Housing Needs Assessment. The Planning Practice Guidance (PPG) clarifies that housing need is the unconstrained assessment of the number of homes needed in the area. It goes on to state that it is the first step in the process of deciding the number of new homes to be planned for¹.

3.9 The NPPF (paragraph 61) states the Standard Method (as per the PPG) is to be used in determining the minimum number of homes required, unless exceptional circumstances justify an alternative approach.

3.10 The Council's evidence base, specifically the document Establishing Local Housing Need (ELHN) (May 2022), confirms no exceptional circumstances have been identified that justify using an alternative approach to the Standard Method (SM) in the Borough.

3.11 Accordingly, the ELHN, Topic Paper 1 and the DLP itself acknowledges that the Borough's minimum Local Housing Need (calculated using the SM in accordance with national policy and guidance) is that derived by the SM at 647 net new homes per annum.

	<p>3.12 It is important to remember that, as the Planning Practice Guidance (PPG)2 makes clear, the SM does not provide a housing requirement figure for a Local Plan, merely the minimum figure from which this requirement is to be calculated.</p> <p>3.13 Notwithstanding, Policy SS3 sets out that over the DLP’s plan period at least 6,785 net new homes are planned to be delivered. Equating to an annual average of 452 homes per annum. This is significantly short of the minimum new homes that the SM’s objectively assessed need for the Borough requires. The SM3 over the plan period actually identifying the need to deliver a minimum of 647 new homes per annum.</p> <p>3.14 At 6,785 net new homes, the DLP is therefore proposing to meet just 70% of the Borough’s objectively assessed minimum housing need. An actual shortfall of 2,920 homes.</p> <p>3.15 The supporting paragraphs to Policy SS3 in the DLP and the published evidence base documents explain that the basis upon which the DLP’s housing target has been arrived at results from a brownfield field land first approach and seeking to make efficient use of such available land. Paragraph 3.31 of the DLP clearly states that the Council have considered making changes to the existing Green Belt boundary to accommodate further growth however, it has been concluded that exceptional circumstances for this have not been fully evidenced and justified to make changes to the Borough’s Green Belt.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p> <p>Green Belt as justification for proposed housing delivery approach</p> <p>3.16 In respect of Green Belt, the NPPF confirms that Green Belt boundaries can be altered, and that Local Plans are an appropriate vehicle for doing so. The NPPF states that such alterations</p>

should be made only where exceptional circumstances are fully evidenced and justified (paragraph 136).

3.17 Whilst exceptional circumstances are intentionally not defined, there is case law which provides a framework for the consideration of the issue. In particular, the judgments in Calverton⁴ and Compton⁵. Calverton considered the issue of exceptional circumstances and came to the view that planning judgments over exceptional circumstances should involve consideration of:

- The scale and acuteness of the objectively assessed need;
- The inherent constraints on supply/availability of land prima facia with the potential to accommodate sustainable development;
- Consequent difficulties in achieving sustainable development without impinging on the Green Belt;
- The nature and extent of the harm to the Green Belt (or the parts of it which would be lost if boundaries were reviewed); and
- The extent to which impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practical level.

3.18 Compton also clarified that the general planning needs, such as ordinary housing, are not precluded from the scope of exceptional circumstances. Furthermore, it clearly established that meeting ordinary housing needs is often part of the necessary judgement that exceptional circumstances exist. The phrase exceptional circumstance in this context is therefore not limited to an unusual form of housing nor is it particular to a specific intensity of need.

3.19 The Council have presented in the evidence base, specifically Topic Paper 1 (TP1), positions regarding the headline matters set out by Calverton which we consider below.

The scale and acuteness of the housing needs

3.20 With regard to acuteness of need, the Borough's SM OAN of 647 homes per annum, or 9,705 homes over the plan period, represents a significant step change from the adopted Core Strategy target of 225dpa, and the net new dwellings delivered in the Borough since 2011 (presented in Table 5 of TP1) – at 330 per annum. This delivery rate having achieved approximately 70% of the SM OAN. In addition there is significant unmet need arising across the neighbouring and housing market authorities. The council's own 'best estimate' being that alongside the DLP there would be an unmet need of circa 11,500 homes generated over the fifteen-year period. Yet despite these facts, the Council consider it is undesirable for the DLP

to deliver more than 70% of the SM OAN given this will require amendment to the Green Belt to provide sufficient land. Furthermore, the Council have set out they do not consider their local housing need to be any more intense/acute when compared to neighbouring Local Planning Authorities.

3.21 We consider this aspect of the Council's rationale perplexing. The presented evidence on delivery demonstrates that the Borough's ability to achieve its minimum housing needs within the existing urban areas is limited – capable of achieving 70% of today's local housing needs. This therefore demonstrates that in order to meet the minimum need in full there is clear justification to look to amendments to the Green Belt to release and safeguard sufficient land for the Borough to meet its minimum needs in full. Specifically given the level of unmet that is otherwise generated during the DLP plan period by the needs of the Borough itself and the unmet needs of neighbouring authorities where these might be capable in some part of being accommodated within the Borough.

3.22 The Council's position that the Borough's housing need is not more intense or acute when compared with other neighbouring LPAs, and that this in some way demonstrates a lack of intensity and acuteness as paragraph 6.28 of TP1 seems to state, is confusing. Especially when it is noted that across these comparable LPAs there is clear evidence that minimum housing needs are not being met through adopted and emerging local plan reviews. Conversely, we are firmly of the opinion that in the context that presently the best estimate is that over the DLP plan period there will be unmet needs of circa 11,500 homes resulting it is evident that across the neighbouring LPAs there is clearly an intensity and acuteness of need. Need which needs to be met. Or at least significantly reduced by each LPA through local plan reviews individually and or collectively through a strategic level solution.

3.23 The current undersupply of homes and consequences of this are also evident in the worsening affordability in the Borough. The latest affordability ratios demonstrate that affordability continues to worsen. The current median affordability ratio stands at 17.78 having risen from 6.44 in 1997. This is striking when compared to the average ratio in England which stands at 9.1. Indeed, TP1 at paragraph 6.41 acknowledges that the Borough has one of the highest average house prices in the South East and that affordability levels are amongst the highest in Surrey.

3.24 Notwithstanding, paragraph 6.43 of TP1 states '...the Council consider the Government has incorrectly assumed that delivering more homes within the borough will improve affordability'. Citing research published by Reading University in 2011 for this conclusion TP1 sets out that

delivering the DLP's unmet '2,918 homes' will not have any material effect on reducing either the average house price in the Borough or the unaffordability levels. We have been unable to identify any such evidence in the DLP's evidence base which quantifiably demonstrates that this position is indeed correct, i.e. an updated SHMA, bespoke topic paper, etc.

3.25 Whilst we agree for there to be a reduction in house prices there needs to be a large uplift in supply rates across London and the South East, and that increasing supply alone will not automatically improve affordability, it is self-evident that restricting supply in the Borough, across the HMA and the wider adjoining LPAs will certainly ensure affordability continues to worsen across the same areas. The DLP must therefore seek to meet more if not all of its own minimum housing needs toward improving the Borough's affordability issues. Issues which the Council accepts include the Borough having the highest average house prices in the South East and affordability levels that are amongst the highest in Surrey.

3.26 The Council's Topic Paper 1 is also entirely silent on the fact the Borough has an acute shortage of affordable homes delivery. The 2016 published SHMA identifies a minimum need for net new affordable homes of 332dpa. This need itself comprises 78% of the DLP's proposed annual housing target. Clearly it is not reasonable to expect or require the DLP to meet such a high level of affordable need in full. However, it is clear the DLP's proposals to secure between 30% – 40% of all new homes as affordable housing will fall somewhat short of providing a sufficient supply of affordable homes during the plan period against the need for these homes. As a simple exercise, assuming 35% of the DLP's proposed 6,785 new homes are delivered as affordable will secure 2,375 homes over the plan period. Providing an average of 158dpa – meeting just 48% of the Borough's affordable needs. We return to this matter in Section 4 under the sub-heading Overall Housing Land Supply.

3.27 It is also evident delivery of affordable homes in the Borough going back to 2011/12 has been poor⁷ achieving an average of just 66 homes per annum. One of the primary reasons for this is that delivery of new homes has essentially been contained to previously developed sites coming forward. Such sites inherently exhibit higher existing use values reducing the ability to deliver affordable homes. The DLP's strategy seeks to maintain this approach and therefore it is highly questionable whether Policy HOU4 will be capable of achieving a meaningful impact to affordable housing delivery during the plan period. Whereas a strategy which seeks to meet minimum housing needs in full and one where Green Belt boundaries are amended to support delivery of further housing sites will be more likely to increase the delivery of much needed

	<p>affordable homes during the plan period. And at the least facilitate a meaningful step change in the Borough's affordable housing delivery performance. *see paragraphs 3.28 - 3.53 in attached letter.</p> <p>8. LAND AT BLUNDEL LANE, OXSHOTT The Opportunity</p> <p>8.1 The land at Blundel Lane comprises approximately 1.0ha of land providing the opportunity to deliver up to 32 much needed new homes. A site location plan is included at Appendix 1.</p> <p>8.2 Development of the site will provide a mix of housing in line with national and local policy. A range of house types, sizes and tenures are envisaged in order to maximise the effective and efficient use of the site and to meet the accommodation needs of a variety of household types.</p> <p>8.3 The site was identified by the Council at the Regulation 18 stage of the DLP as one of the potential small sites capable of being released from the Green Belt for the purpose of allocation to deliver residential development.</p> <p>8.4 The site-specific assessment presented in the 2018 GBBR Supplementary Work report¹⁵ identified the site as SA-9 (and RSA-7) where in it was correctly assessed that given the site's size and physical / visual separation from the wider Green Belt it plays a considerably lesser role than the much wider local area (LA10) within which it is situated. That in terms of preventing urban sprawl and merging it offers a nil value: and encroachment performance is of middle value (moderate). The assessment goes on to identify that the site's release for development '...would result in a stronger and more readily recognisable boundary for the Green Belt' and recommended it be considered further for release.</p> <p>8.5 This evidence, presented in the DLP's published documents, demonstrates development of the site would have very little impact upon the strategic and local performance and value of the Borough's Green Belt. Accordingly, the site can and should be released.</p> <p>8.6 The site is in the control of Antler Homes and, if allocated, is envisaged would be capable of delivering sustainable development within the first 5-years of the DLP's plan period.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	-see letter

	220727 Elmbridge Reg19 Representations obo Antler Homes.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Should the DLP be submitted for examination, Antler Homes would welcome the opportunity to participate in the Examination Hearings in order to ensure our concerns with the DLP are presented to the appointed Inspector(s) in person

Name	Stuart Crickett
User ID	41434785
Organisation	Boyer Planning obo Antler Homes PLC
Policy / Evidence base/ part of plan:	CC4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>Policy CC4 The Policy is unsound as it is not consistent with national policy 7.1 Part 5 of Policy CC4 requires all new development to provide cycle and vehicle parking and associated facilities, including electric vehicle charging points in line with standards set out in the Parking supplementary Document (SPD). As the Council will be aware policy cannot be set within an SPD and as currently worded part 5 of CC4 effectively brings the SPD into the policy requirement itself.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: [Y]</p> <p>Policy CC4</p>

	<p>The Policy is unsound as it is not consistent with national policy</p> <p>7.1 Part 5 of Policy CC4 requires all new development to provide cycle and vehicle parking and associated facilities, including electric vehicle charging points in line with standards set out in the Parking supplementary Document (SPD). As the Council will be aware policy cannot be set within an SPD and as currently worded part 5 of CC4 effectively brings the SPD into the policy requirement itself.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Policy CC4</p> <p>7.2 The Council will either need to include the necessary standards set out in the SPD into the policy wording itself (alongside including appropriate evidence for the standards to be set out); or amend the wording to require developers to have regard to the standards in the SPD, or set out it will be the Council's expectation that the standards set out in the SPD should be achieved, or similar such wording.</p> <p>220727 Elmbridge Reg19 Representations obo Antler Homes.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Should the DLP be submitted for examination, Antler Homes would welcome the opportunity to participate in the Examination Hearings in order to ensure our concerns with the DLP are presented to the appointed Inspector(s) in person.

Name	Stuart Crickett
User ID	41434785
Organisation	Boyer Planning obo Antler Homes PLC
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>Duty to Cooperate - see letter</p> <p>2. DUTY TO COOPERATE</p> <p>2.1 Section 33a of the Planning and Compulsory Purchase Act 2004 requires a Local Planning Authority (LPA) to cooperate with other LPAs, the County Council and prescribed bodies (as relevant) in relation to the preparation of a Local Plan. This requires the LPA to engage constructively, actively and on an on-going basis in the preparation of the Local Plan insofar as it relates to a strategic matter. A strategic matter includes the sustainable development and use of land that has or would have a significant impact on at least two planning areas.</p> <p>2.2 A fundamental requirement of a Local Plan is to meet the area's development needs as well as any needs that cannot be met within neighbouring areas unless there are policies in the Framework that protect areas or assets, or adverse impacts of doing so would significantly and demonstrably outweigh the benefits taken as a whole (NPPF, Paragraph 11). Indeed, Paragraph 35 of the NPPF notes that this is an express requirement of a sound Local Plan.</p> <p>2.3 Paragraph 24 of the NPPF is clear that LPAs have a duty to cooperate (DtC) with each other and with other prescribed bodies, on strategic matters that cross administrative boundaries. The NPPF goes on to note that "...joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere" (Paragraph 26).</p> <p>2.4 The NPPF is clear that the DtC is not simply a bureaucratic exercise but one which should ensure Local Plans are effective and positively prepared. Cooperation is therefore about maximising the effectiveness of Local Plan preparation.</p> <p>2.5 The NPPF requires LPAs to demonstrate effective and on-going joint working, and requires that strategic policy-making authorities should prepare and maintain one or more statements of</p>

common ground, documenting the cross-boundary matters being addressed and progressed. It requires that this should be produced using the approach set out in the national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.

2.6 Importantly, the requirement is to ‘cooperate’, rather than to just ‘communicate’, although it is accepted that the DtC is not de facto a duty to agree. There is however an expectation that neighbouring authorities will work together to collectively address strategic matters, including meeting housing need.

2.7 The Oxford English Dictionary (OED) definition of cooperate is to ‘work together to achieve something’, whereas the OED definition of communication is to ‘share or exchange information’. There is a fundamental difference between the two, with the emphasis in cooperation being to achieve something. Engagement alone is therefore insufficient to comply with the DtC.

2.8 Failure of Elmbridge Borough Council (EBC) to properly co-operate with neighbouring authorities and other bodies to meet development needs will therefore result in a Plan being found unsound. It is essential therefore that EBC fully cooperates with other LPAs to meet their collective housing needs.

2.9 EBC’s Duty to Cooperate Statement of Compliance (June 2022) notes that the LPA identified 14 strategic issues including inter alia housing (including affordable housing) and that in its view, has met the DtC in the preparation of the DLP.

2.10 EBC’s neighbouring authorities include Spelthorne BC, Runnymede BC, Woking BC, Guildford BC, Mole Valley DC, RB Kingston-upon-Thames and LB Richmond-upon-Thames. However, the Statement notes that EBC have tailored their activities towards including other authorities that are outside of the Borough’s Housing Market Area (HMA) which includes Epsom & Ewell BC and Mole Valley DC.

2.11 In addition, EBC note their engagement with Surrey County Council, the Greater London Authority, Transport for London, Environment Agency, Natural England, National Highways, Historic England and Surrey Heartlands Health and Care Partnership Integrated Care System.

2.12 EBC also note in the DtC Statement of Compliance (Paragraph 2.19) other organisations and bodies that they have engaged with which is wide ranging.

2.13 Whilst it is essential that EBC satisfactorily cooperates with authorities and other organisations and bodies on all strategic matters, our representation relates primarily to the requirement to cooperate to meet housing need.

2.14 The DtC Statement of Compliance notes that authorities are preparing their Local Plans against different timescales and not wanting to delay the preparation of the DLP, have looked to authorities beyond the HMA to 'enquire' as to whether they can assist in meeting any potential unmet housing need in advance of the position of some HMA Partners being confirmed as part of their own fully evidenced draft Local Plan (Paragraph 4.20).

2.15 The DtC Statement of Compliance notes that EBC have found that it has limited ability to influence the preparation of more advanced local plans and discuss the possibility of that authority meeting some of EBC's (potential) unmet housing need. In Antler's view, the progress of other local plans is inadequate justification for failing to effectively cooperate. Indeed, each LPA has a DtC.

2.16 The DtC Statement of Compliance also notes that it has 'engaged' other authorities in the wider South East Region to explore the possibility of them being able to accommodate any potential unmet housing need within the existing urban areas (Paragraph 4.24). Again, it is Antler's view that engagement alone is inadequate as there is an expectation to find a solution to meeting minimum housing need across administrative boundaries.

2.17 As part of the DtC process, the DtC Statement of Compliance states that EBC have '...asked on more than one occasion if another LPA can assist in meeting the (potential) unmet housing need in Elmbridge Borough' (Paragraph 4.26). In our view, 'asking', even if more than once, does not fulfil the requirement to effectively cooperate with neighbouring authorities as required by the Act and the NPPF.

2.18 The DtC Statement of Compliance outlines the history of collaborative working and engagement with other LPAs and bodies at both an Officer and Member level. It notes that this includes various working groups and partnerships.

2.19 The DtC Statement of Compliance comprehensively sets out the engagement that has taken place with neighbouring LPAs, and LPAs both within and outside the HMA. It also notes that like EBC, many other authorities were of the view that they would be unable to meet their own housing need in full and would be exploring cross-boundary options under the DtC. The following is of particular note:

- Epsom & Ewell BC – yet to reach a conclusion on whether they are able to meet their own housing need but it was highly unlikely that they would be able to do so:

- Mole Valley DC – only intending to meet 79% of its housing need in the emerging Local Plan which is currently at Examination. Mole Valley DC also haven't reached agreement with other authorities on meeting unmet need and therefore also potentially fail the DtC;
- RB Kingston upon Thames – unable to meet its own housing need and has enquired whether EBC can meet its unmet housing need;
- Guildford BC – adopted a Local Plan (Part 1) in 2019 and working towards their Local Plan Part 2. Any surplus housing from Guildford BC (and Waverley BC) would be required to assist Woking BC in meeting their unmet need, rather than that arising from elsewhere (i.e. Elmbridge).
- Woking BC – adopted Core Strategy in 2012 and Site Allocations Development Plan in 2021. Guildford BC and Waverley BC may address unmet need arising from Woking, but are not in a position to assist EBC;
- Runnymede BC – adopted Local Plan 2020 and although intend to start an immediate review, it was impossible for Runnymede BC to be able to assist in meeting any of EBC's unmet need as any potential over supply would, in the first instance, go towards assisting Spelthorne BC in meeting its unmet need;
- Spelthorne BC – preparing their emerging Local Plan and looking to Runnymede BC to meet some of its unmet need; and
- LB Richmond upon Thames – adopted their Local Plan in 2018 and 2020 and have started to prepare a new Local Plan. LB Richmond upon Thames have advised that they are unable to assist EBC in meeting any potential unmet need and that any over provision within LB Richmond upon Thames would account towards exceeding their targets, as opposed to meeting another Borough's unmet need.

2.20 Antler accept that EBC have sought to actively communicate over an extended period, although are concerned that there's no evidence of any meaningful engagement regarding working toward identifying a strategic solution (short through to the longer term) to meeting cross-boundary unmet housing needs. It is Antler's view that many of the authorities have taken a similar approach by suggesting that they cannot meet their own need, largely due to constraints imposed by Green Belt, and call on other authorities to help meet their own need. The risk and consequence of this approach is that they fail the DtC and more importantly, fail to meet housing need across the wider area accordingly.

2.21 The DtC Compliance Statement concludes that '...it is highly unlikely that other neighbouring LPAs will be able to assist in meeting any unmet need arising from Elmbridge

Borough and / or will not be in a position to confirm until too late in the preparation of our Local Plan process; putting the Council at risk of not having an up to date [Plan] by December 2023” (Page 101).

2.22 This is reiterated in the DLP which states that it is clear that it is highly unlikely there will be any significant opportunities during the Plan period to accommodate need outside of the Borough boundary (Paragraph 3.30). It goes on to consider making changes to the Green Belt boundary to meet housing need, but states that ‘...exceptional circumstances have not been fully evidenced and justified to make changes to the Green Belt boundaries in the Borough’. Antler dispute this. In the event that EBC are unable to meet their housing need outside of the Borough boundaries, then exceptional circumstances can be evidenced to justify Green Belt release to meet housing need. We return specifically to this matter in Section 3 of this statement.

2.23 The DLP identifies a housing need of 9,705 homes during the Plan period, equating to 647 dwellings per annum (dpa). Notwithstanding, Policy HOU1 seeks opportunities to only deliver a minimum of 452 dpa over the Plan period, representing a shortfall of around 30% against housing need.

2.24 EBC therefore propose to fail to meet the housing needs of the Borough in the DLP, does not propose to meet any unmet housing need from its neighbouring authorities, and fails to ensure that its unmet housing need can be accommodated elsewhere nor provides any evidence that a (strategic) solution for this has been or is being explored/progressed. The result is a Local Plan which fails under the DtC and is therefore contrary to the NPPF.

2.25 There are clear parallels in respect of the approach and process employed by EBC for the DLP and the Sevenoaks District and Tonbridge and Malling Borough Local Plans in this respect, both of which failed at Examination due to the clear DtC failings.

2.26 Concluding the Tonbridge and Malling Borough Local Plan had failed the DtC, and referring to the unmet housing need in Sevenoaks District, the Inspector stated:

‘[the neighbouring area’s unmet housing need] should have led to [Tonbridge and Malling Borough Council] engaging constructively, actively and on an ongoing basis with [Sevenoaks District Council] on unmet housing needs, regardless of whether this was a precise figure or a range, or indeed whether the Council felt it may not be able to accommodate the unmet need in full or in part. The requirement of the Act is for authorities to actively engage to maximise the effectiveness of the plan preparation.’

2.27 The Inspector's Report on the Tonbridge and Malling Local Plan also made very clear the particular importance of seeking to resolve the problem of unmet housing need through the DtC: '...whilst resolution to the problem of unmet housing needs is not a prerequisite to the Council being able to demonstrate compliance with the DtC, earlier, constructive, active and on-going engagement, in line with the Act and national policy as articulated in the Framework and PPG, would have been much more likely to result in an effective strategy for meeting SDC's need, whether within the SDC area or elsewhere.'

2.28 As in the case of the Tonbridge and Malling Local Plan, there has been failure by EBC to take positive steps in the preparation of the DLP to seek to resolve the Borough's own unmet needs, the unmet needs in the wider HMA and the unmet needs of adjoining LPAs through co-operation with neighbouring authorities. There is evidently a risk that, like Sevenoaks and Tonbridge and Malling Local Plans, the Elmbridge DLP will be deemed to have failed the DtC unless action is taken to address the issue, prior to Submission of the DLP.

Sustainability Appraisal - see letter

5. SUSTAINABILITY APPRAISAL

5.1 As indicated elsewhere within the representation, Antler Homes has significant concerns regarding the proposed spatial strategy and approach to housing delivery, as matters of soundness. This section considers the Sustainability Appraisal (SA) and hence focuses on matters of legal compliance, although there are areas of overlap with the tests of soundness.

5.2 With respect to legislation, the Planning and Compulsory Purchase Act 2004 (at Section 19) requires the LPA to undertake a Sustainability Appraisal of proposals put forward in a Plan. The Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No.1633) ('the SEA Regulations') also set out the requirements in relation to the preparation of environmental reports that support Plan-making. The SA should therefore incorporate and address the requirements of the SEA Regulations.

5.3 The Council will be aware that the robustness of SAs has been an issue that a number of LPA's have encountered difficulties with in recent years, in respect of Plan-making, resulting in a number of Plans being quashed (or quashed in-part) following High Court challenges. Other Plans have failed at the early stages of Examination, as a consequence of shortcomings in their respective SAs.

5.4 It is problematic then that the SA which accompanies the DLP raises a number of concerns in relation to legal compliance and (more broadly) soundness.

Consideration of Reasonable Alternatives

5.5 Regulation 12(2) of the SEA Regulations requires the SA to identify, describe, and evaluate the likely significant effects on the environment of proposed options, as well as those of reasonable alternatives. The reasonable alternatives are to be identified ‘...taking into account the objectives and the geographical scope of the plan or program’ (SEA Regulation 12(2)).

5.6 The Courts have considered the scope of reasonable alternatives. Specifically, ‘R (Friends of the Earth) v Welsh Ministers [2015] EWHC 776 (Admin)’ confirmed the definition of ‘reasonable alternatives’ is bounded and does not mean ‘all possible alternatives’.

5.7 Rather, whether an alternative is ‘reasonable’ is dependent on whether it could achieve the objective being sought. This is indicated at paragraph 88 of the ruling;
“Article 5(1) refers to “reasonable alternatives taking into account the objectives... of the plan or programme... ‘Reasonableness’ in this context is informed by the objectives sought to be achieved. An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a ‘reasonable alternative’. An option which will, or sensibly may, achieve the objectives is a ‘reasonable alternative’.”

5.8 The Judgment in *Heard v Broadland DC, South Norfolk DC & Norwich City Council* [2012] EWHC 344 (Admin) further confirms the need to consider reasonable alternatives through SA, and to do so to the same level of detail as the preferred option.

5.9 In this case, the DLP and SA does not appear to have evaluated all of the reasonable alternatives that might realistically be said to exist. For example, a reasonable alternative might include an option for helping to meet the unmet needs of adjoining Local Authorities. Another alternative could have considered setting a higher housing requirement (above the minimum Standard Method LHN) to facilitate higher levels of affordable housing provision, thereby helping to address widespread and severe unaffordability, and its socio-economic consequences.

5.10 As explained at paragraph 3.63 of the SA, Option 4a ‘Urban Area Only’ (the Council’s preferred option) was created in 2021, because Option 4 (the previously preferred option) was supported by 85% of respondents to the 2019 Options Consultation. However, Option 4 was then assessed as ‘no longer reasonable’ as it does not meet housing need. This led to the creation of Option 4a. In our view, Option 4a is simply a thinly veiled reimagining of Option 4. It rejects Green Belt release and instead identifies a somewhat higher level of housing provision. The

	<p>newly found housing capacity in Option 4a, is identified through questionable windfall supply assumptions and an equally dubious reliance on sites within the urban area, as identified in the LAA. As explained in Sections 3 and 4 of these representations, we do not consider the Council's strategy to be robust.</p> <p>5.11 The problem with this approach to the consideration of alternatives, is that Option 4a (like its predecessor, Option 4) presents a false dichotomy between meeting housing and other needs in full, by suggesting that housing needs can only be met to the extent that this can be achieved on previously developed land / urban land. The SA appears to argue (at paragraph 3.56) that this is justified because this is the only approach that the community would support. This is plainly an inadequate basis for the selection of a preferred option (which translates inter-alia, into the DLP's strategy for meeting housing and other needs), particularly when this option is not highly ranked in the SA, nor justified, positively prepared or likely to be effective, in the context of the tests of soundness.</p> <p>5.12 The option that performs most highly (Option 5), would require urban development alongside relatively modest levels of Green Belt release. Yet, Option 5 which appears to represent the most highly scoring option (because it fully meets housing need), was then superseded by Option 5a. This is a similar option, which requires Green Belt release. Yet, it provides fewer homes and doesn't fully meet the identified LHN, as is scored negatively as a consequence. This is a somewhat incredulous assessment, given that Option 5a could simply have included additional sites (beyond the 12 identified), up to the level where housing needs were fully met, and therefore have scored more highly.</p> <p>5.13 -5.21 see letter for the rest of the response</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p>

Justified: []

Consistent with national policy: []

see letter - for Duty to Cooperate and Sustainability Appraisal comments

9. SUMMARY AND CONCLUSION

9.1 It is considered the DLP has a host of defects relating to soundness, legal compliance and the Duty to co-operate

9.2 Such concerns can be summarised as:

- Failure to take positive steps through the Duty to Co-operate to seek to resolve the unmet development needs of the Borough through co-operation with neighbouring authorities
- Failure to take positive steps through the DtC to seek to resolve the unmet development needs arising across the HMA and adjoining authorities
- Concern the plan will not provide strategic policies to address a period of at least 15-years from the likely adoption date of the DLP
- Failure to meet the Borough's minimum housing needs in accordance with national policy and guidance
- Failure to recognise the very clear exceptional circumstances in the Borough and to accordingly undertake and review the existing Green Belt boundaries to ensure at least minimum housing development needs are met in full
- Failure to offer a justified and clearly evidenced basis for the proposed housing allocations, and concerns that the DLP will not be effective in meeting even the lower housing requirement identified by the Council
- Failure to propose an effective strategy capable of meeting specialist accommodation needs
- Failure to adequately consider reasonable alternatives in the SA and the selection of a preferred option which does not perform well
- Likelihood that the DLP as currently proposed will necessitate review of the Green Belt boundaries before the end of the plan period, undermining one of the essential characteristics of the Gren Belt – its permanence.

	<p>9.3 It is important to recognise that the Council should only submit a plan for examination once it considers it to be sound. This includes the requirement to have robust evidence to support the strategy being proposed by the submitted plan.</p> <p>9.4 In our view, the council cannot reasonably claim that it considers the DLP and its evidence base to be sound. Particularly once the issues raised within our representation (and doubtless the representation of others) have been taken into account and objectively considered.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>9.5 We would encourage the Council to seek to address the issues we have raised and to reconsider its current direction of travel regarding the DLP. And not to submit this plan for Examination.</p> <p>9.6 Antler would welcome the opportunity to discuss the Land at Blundel Lane with the Council and its ability to contribute towards the Borough achieving a sound Plan.</p> <p>220727 Elmbridge Reg19 Representations obo Antler Homes.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Should the DLP be submitted for examination, Antler Homes would welcome the opportunity to participate in the Examination Hearings in order to ensure our concerns with the DLP are presented to the appointed Inspector(s) in person.

Name	Stuart Crickett
User ID	41434785
Organisation	Boyer Planning obo Antler Homes PLC
Policy / Evidence base/ part of plan:	ENV1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Policy ENV1</p> <p>The Policy is unsound as it is not consistent with national policy</p> <p>7.3 Part 8 of the policy states 'There will be a presumption against granting permission for proposals to develop areas of existing open space, but such application will be determined in accordance with national planning policy and guidance.'</p> <p>7.4 Whilst 'open space' is defined in the 'A2 Glossary' section of the DLP the use of the term in Policy CC4 appears entirely misleading and open to misinterpretation by decision-makers and more likely members of the general public. We also note the term open space is mentioned in supporting policy text to a number of policies within the DLP which can easily reinforce misinterpretation.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p>

	<p>Consistent with national policy: [Y]</p> <p>7.3 Part 8 of the policy states ‘There will be a presumption against granting permission for proposals to develop areas of existing open space, but such application will be determined in accordance with national planning policy and guidance.’</p> <p>7.4 Whilst ‘open space’ is defined in the ‘A2 Glossary’ section of the DLP the use of the term in Policy CC4 appears entirely misleading and open to misinterpretation by decision-makers and more likely members of the general public. We also note the term open space is mentioned in supporting policy text to a number of policies within the DLP which can easily reinforce misinterpretation.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>7.5 Given Part 8 confirms that applications for development proposals will be determined in accordance with national planning policy and guidance it is considered Part 8 is an unnecessary inclusion in the policy wording and should be deleted in full.</p> <p>220727 Elmbridge Reg19 Representations obo Antler Homes.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Should the DLP be submitted for examination, Antler Homes would welcome the opportunity to participate in the Examination Hearings in order to ensure our concerns with the DLP are presented to the appointed Inspector(s) in person.

Name	Stuart Crickett
User ID	41434785
Organisation	Boyer Planning obo Antler Homes PLC
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>see letter Policy HOU1 The policy is unsound as it is not consistent with national policy 7.6 As set out in Section 3 of this Statement, of itself we do not consider the Council's decision not to meet the borough's own minimum housing needs in full to be consistent with national policy 7.7 In addition, having reviewed the published LAA it is evident a number of the sites included in the DLP's land supply are reliant on evidence of stated availability of a site from a landowner(s)/developers dating back in some instances more than 4 years old. Given the importance of site availability to the delivery of the DLP's proposed housing target it is essential that the Council provide updated supporting evidence demonstrating each proposed site remains deliverable or developable at the point in time anticipated by the DLP. 7.8 Without this evidence the Council will not be able to demonstrate to a reasonable extent the DLP's ability to establish and retain a rolling 5-years supply of housing land as required by the NPPF.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: []

	<p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: [Y]</p> <p>see letter Windfall Contribution</p> <p>The Plan is unsound. It is not justified or effective.</p> <p>4.15 The Land Availability Assessment (LAA) indicates that a windfall allowance is to be assumed as a source of supply within the housing trajectory for the DLP Plan-period. The LAA (at pages 15 – 16) identifies average rates of windfall provision over the 10-year period July 2011 to March 2022. The Council considers windfall sites to be those providing 1 to 4 net dwellings, and assumes this source will provide an average of 88 dwellings annually, albeit with the discounting of small sites that are currently under construction.</p> <p>4.16 However, no evidence has been provided to indicate whether the Council have assessed and considered whether there is a consistent supply of such sites/rate of delivery moving into the DLP Plan-period. It is unclear whether the Council have considered whether the supply of windfall sites may diminish over the course of the new Plan, especially noting its focus upon identifying and allocating existing brownfield land for planned residential development.</p> <p>4.17 Indeed, as indicated at DLP Chapter 9, the Council seeks to allocate a large number of small sites, many of which would qualify as small windfall developments of 1 to 4 dwellings. The Core Strategy did not pursue the same approach, in that it did not allocate a plethora of small sites. Therefore, a retrospective analysis of the previous Plan-period simply cannot provide a reasoned justification for applying the same windfall rates going forward.</p> <p>4.18 In this context, the LAA's reliance on a simple retrospective analysis is insufficient to justify the projected supply of windfall homes. In view of the allocations proposed in the DLP, there is an obvious risk of double counting, which risks undermining the delivery of housing and therefore the effectiveness of the Plan. The approach fails the 'compelling evidence' test at NPPF paragraph 71 and is not sound.</p> <p>Overall Housing Land Supply</p>
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The Plan is unsound. It is not positively prepared, justified, effective or consistent with national policy.

4.19 Average rates of housing completions in Elmbridge Borough, since 2011, have been 330 annually (as set out in Table 5 of TP1). The Annual Monitoring Report (AMR, 2021), confirms that the current supply of new homes within the Borough comes overwhelmingly from previously developed sites located within the urban areas (i.e., outside of the Green Belt), which is essentially the same main source of supply identified for the DLP.

4.20 Noting this, and when taking account of our comments on the allocations envisaged at DLP Chapter 9, there are no compelling reasons to expect that completions from the same sources of supply will somehow deliver substantively more homes than the 330 dwellings achieved on average each year. Even if the Council's generous proposed windfall allowance is added to this figure (notwithstanding our stated concerns regarding this claimed source of supply), completion rates will still fall short of 452 dpa, which is the Council's proposed annual requirement (i.e., 6,758 / 15).

4.21 Indeed, the shortfall will be even more significant when either a 5% (474 dpa), 10% (497 dpa) or 20% buffer (542 dpa), is applied for the purposes of calculating the rolling 5YHLS position, as per NPPF paragraph 74. For the avoidance of doubt, it is entirely reasonable to assume the application of a 20% buffer, when taking account of patterns of previous under-delivery in the Borough. Consequently, there are no credible reasons to assume that the Plan will be able to sustain a 5YHLS throughout the Plan-period, even when assessed against the Council's reduced target. The level of housing supply would evidently be far lower again, if measured against the 647 dpa LHN figure identified through the Standard Method (or 776 dpa, when a 20% buffer is applied).

4.22 With reference to our comments on Policy SS3 (in Section 3 of these representations), it is also clear that the supply of much needed affordable homes will be undermined by the reliance on sites that fall below the threshold for on-site affordable housing (as identified in Policy HOU4). Indeed, the proposed allocations identified at DLP Chapter 9 suggest that 3,473 dwellings will be provided on sites of 10 units or greater¹⁰. If 30% of these dwellings are provided as affordable homes, then just 1,042 affordable units would be secured (69 dpa). If 40% provision were achieved this would still only equate to 1,389 affordable dwellings (92 dpa). It is therefore doubtful that the Plan's proposed target of 30% affordable provision overall (around 2,035 homes) will be met.

	<p>4.23 It is noted of course that the DLP will require developments of fewer than 10 dwellings to make a financial contribution equivalent to 20% affordable units, in-lieu of on-site provision. However, this proposal is simply a continuation of a current policy and one that appears to have had only a limited impact on the overall delivery of affordable homes. Indeed, in 2020/21 just 45 new affordable homes were completed across the Borough, down from 126 dwellings in 2019/20. Likewise, over the period 2011/12 to 2020/21, an average of 66 affordable dwellings were delivered annually.</p> <p>4.24 Furthermore, whilst we acknowledge the findings of the ‘Local Plan & Community Infrastructure Levy Scoping Viability Assessment’ (2022), which suggest that a 30% affordable housing requirement may be generally viable on PDL sites, it must be remembered that the vast majority of the identified housing supply (in the DLP) is from PDL sites. It should therefore be assumed that (even if most remain viable and policy compliant) a significant proportion of these sites will still be subject to abnormal costs. In turn, this is likely to further diminish the quantum of affordable housing delivered overall.</p> <p>4.25 Indeed, at paragraph 1.3.5 of the Viability Assessment it is stated that; “...approximately 58% of schemes currently comply with existing policy requirements for affordable housing. A further 30% are not compliant and have not made any contributions to affordable housing. However, approximately 12% have provided a reduced level of contribution through the submission of a viability assessment and subsequent independent assessment and negotiation”.</p> <p>4.26 In other words, 42% of schemes in the Borough currently fail to provide affordable housing at the proscribed level. Even if compliance with the new requirement set out at DLP Policy HOU4 were markedly improved, say (for example) to 80% full compliance and 20% zerocontributions, the impact on affordable housing provision will still be significant. In this example, the on-site provision of affordable housing, on sites of 10 units or greater (as identified in Chapter 9), would be reduced from 1,042 to 833 dwellings over the proposed 15- year Plan-period, which equates to 56 dpa.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	see letter

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Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Should the DLP be submitted for examination, Antler Homes would welcome the opportunity to participate in the Examination Hearings in order to ensure our concerns with the DLP are presented to the appointed Inspector(s) in person.

Name	Stuart Crickett
User ID	41434785
Organisation	Boyer Planning obo Antler Homes PLC
Policy / Evidence base/ part of plan:	HOU3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Policy HOU3 The policy is unsound. It is not effective.</p> <p>7.9 Antler Homes is concerned by the wording and inclusion of Part 3 of the policy stating where the internal layout of a one, two or three bedroom home appears designed to circumvent Policy HOU3 by facilitating subsequent subdivision of large rooms, planning permission may be refused.</p> <p>7.10 Firstly, the definition of 'rooms' needs to be very clearly presented within the policy and or its supporting text. As presently written, this could be applied to any room, i.e. living room, dining room, etc.</p> <p>7.11 Secondly, this approach will most likely unfairly penalise and impact development viability for housebuilders delivering new homes on smaller sites and in locations where demand and need for smaller homes does not align to the Borough wide area.</p> <p>7.12 For the same reasoning, it is also recommended the wording of Part 2 of the policy be amended to reflect that, whilst emphasis in residential development proposals is to be placed on one, two and three bedroom homes, proposals that come forward can and should also include a mix of homes appropriate to a site's context.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.

	Positively prepared: [] Effective: [Y] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	7.12 For the same reasoning, it is also recommended the wording of Part 2 of the policy be amended to reflect that, whilst emphasis in residential development proposals is to be placed on one, two and three bedroom homes, proposals that come forward can and should also include a mix of homes appropriate to a site's context. 220727 Elmbridge Reg19 Representations obo Antler Homes.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Should the DLP be submitted for examination, Antler Homes would welcome the opportunity to participate in the Examination Hearings in order to ensure our concerns with the DLP are presented to the appointed Inspector(s) in person.

Name	Stuart Crickett
User ID	41434785
Organisation	Boyer Planning obo Antler Homes PLC
Policy / Evidence base/ part of plan:	HOU4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Policy HOU4 The policy is unsound. It is not consistent with national policy.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: [Y] Policy HOU4 The policy is unsound. It is not consistent with national policy. 7.13 Part 1(c) of Policy HOU4 requires developments on sites of 9 or less units to provide a financial contribution equivalent to the provision of 20% affordable housing of the gross number of dwellings.

	<p>7.14 Firstly, should such a contribution be justified, we consider any such contribution should be based on the net number of dwellings and not the gross number. The same applies to Parts 1(a) and 1(b) in this regard. 7.15 Secondly, the evidence we have seen presented to justify non-major residential development sites making provision is the acute need for affordable housing in the Borough: combined with the delivery of many of the Borough’s new homes coming forward on small sites. It is fully agreed that there is an acute need for affordable homes. However, it is not agreed that in the absence of the Council making the sensible and reasonable choice to allocate more land for housing to better address this need, that it is appropriate to require a financial contribution from developers of small sites.</p> <p>7.16 Paragraph 64 of the NPPF makes very clear the provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas. The purpose for this policy’s inclusion in the NPPF acknowledges the disproportionate burden that developer contributions have upon small and medium scale housebuilders and developers. It is widely recognised that the planning system and other regulatory requirements, combined with accessibility to project financing, has resulted to a substantial reduction to the total number of SME house builders over the last 40-years. The Government have clearly stated this is a situation they wish to see challenged in order to support the ongoing existence of SME housebuilders. And to encourage and support new start-up SMEs moving forward.</p> <p>7.17 By placing the requirement on SME housebuilders to make a contribution to delivery of affordable housing on non-major development when the Council are themselves not seeking to deliver enough new homes and allocated sufficient sites to deliver a more meaningful correction to the supply of affordable new homes (and affordability in general, etc.) over the DLP is at odds with this initiative. And at odds with national policy.</p> <p>7.18 With regard to Part 7 of the Policy, we would question the appropriateness of seeking affordable housing provision from self and custom build residential developments. We have not been able to identify the Council’s evidence justifying that this is an appropriate and reasonable requirement from this source of future housing development.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

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Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Should the DLP be submitted for examination, Antler Homes would welcome the opportunity to participate in the Examination Hearings in order to ensure our concerns with the DLP are presented to the appointed Inspector(s) in person.

Name	Stuart Crickett
User ID	41434785
Organisation	Boyer Planning obo Antler Homes PLC
Policy / Evidence base/ part of plan:	HOU6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>6. SPECIALIST HOUSING NEEDS The plan is unsound. It is not positively prepared, effective or consistent with national policy.</p> <p>6.1 The NPPF makes clear (at paragraph 62) that Local Plans need to consider more than the overall number of new homes that will be needed. They also need to consider the size, type and tenure of housing needs for different groups in the community, including inter alia older people.</p> <p>6.2 The PPG12 confirms the need to recognise the multitude of different types of specialist housing designed to meet the diverse needs of older people, and that needs cannot be met simply through extra-care or sheltered housing. It notes that specialist housing for older people includes age-restricted general market housing.</p> <p>6.3 Furthermore, the PPG13 makes clear the need to provide housing for older people is of critical importance. And that plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people¹⁴</p> <p>6.4 The DLP recognises the importance for the Plan to deliver suitable specialist forms of accommodation. At paragraph 6.50 it states: 'By 2037 the number of those aged 65 or over in Elmbridge is projected to be 35,500. This represents a 37% increase on 2020 figures, with the expected rate of increase of the 75 or over and 85 or over groups in the population projected to be higher, at 46% and 80% respectively. The Plan seeks to ensure that additions to the future housing stock reflect local need and provide housing choice...'</p>

6.5 The Council's evidence base includes very limited evidence demonstrating an up to date understanding of the Borough's specialist housing needs. The only document we've been able to identify is the 2016 dated SHMA which suggested (Table 9.4a of the SHMA) the following need for various forms of accommodation designed to meet the needs of older people in the Borough 2015 – 2035:

Accommodation Number of Units Required

Sheltered housing for rent 624

Sheltered for lease / ownership 351

Enhanced sheltered 156

Extra Care 195

Total 1,326

6.6 The above equates to a total requirement across all typologies of 66 additional units per annum.

6.7 The DLP's proposed approach to meeting specialist housing needs is set out by Policy HOU6. This states permission for specialist accommodation, including older person's housing will only be permitted where there is clear and robust evidence demonstrating a local need and the type and level of care proposed does not result in overprovision of that particular type of accommodation and care within the Borough. Part 4 of the Policy states the council will support the long-term ambition to expand the almshouses and care provision in Whiteley Village. With a long-term development aspiration to be delivered via a masterplan working in partnership with the Trust.

6.8 In addition to Policy HOU6 the DLP includes three proposed site allocations (COS26 for 24 care home units for delivery between years 11 – 15 of the DLP: MOL20 for 60 care home units delivery between years 11 – 15 the DLP: and, WOT15 for 18 care home units for delivery between years 6 – 10 of the DLP) with a combined 100 'care home units' planned for delivery over the plan period. This equates to 7 additional units per annum.

6.9 There are a number of shortcomings with the council's approach to specialist housing. Firstly, the DLP is essentially entirely reactive in omission of otherwise positively seeking to address identified needs. Moreover, it places the emphasis on a site-by-site basis for future applicants to demonstrate at the application and/or appeal stage evidence demonstrating to the decision maker that there is clear and robust evidence. This approach is neither effective nor consistent

	<p>with national policy, given its call for planning to address the needs of all members of the community.</p> <p>6.10 Secondly, whilst the DLP includes named site allocations with the sites identified on the Proposals Maps there is no specific policy wording for each site allocation. Instead Chapter 9 of the DLP refers to the need to cross reference to the IDP and the published SLAA for further details to establish the council's requirements for development on these sites to come forward through the future application stages. The DLP approach therefore fails to provide a clear written policy for the site allocations within an adopted development plan document.</p> <p>6.11 Thirdly, the site allocations text in the DLP states these sites are to deliver 'care home units'. The type, form and level of care expected to be delivered by development of the proposed allocations is therefore unclear.</p> <p>6.12 We consider in order to ensure specialist accommodation needs are met it will be necessary to identify and allocate specific sites through which such accommodation is deliverable. We do not consider that it is appropriate or effective of the DLP to take a passive approach to the issue. Even more so when the DLP's spatial strategy is principally one of maximising the existing urban areas to meet housing needs which in itself indicates the likelihood that windfall sites for meeting specialist housing needs in the future will almost certainly become more constrained in availability.</p> <p>6.13 It is also relevant to note that specialist providers are often unable to compete with those seeking to develop general open market housing. The DLP needs to take positive action to ensure these needs are met, and the DLP as currently drafted fails to do so.</p> <p>Policy HOU6 The policy is unsound. It is not effective</p> <p>7.19 Our comments on Policy HOU6 are set out in Section 6 of this Statement.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: []</p>

	<p>Consistent with national policy: [Y]</p> <p>see letter</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>see letter</p> <p>220727 Elmbridge Reg19 Representations obo Antler Homes.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Should the DLP be submitted for examination, Antler Homes would welcome the opportunity to participate in the Examination Hearings in order to ensure our concerns with the DLP are presented to the appointed Inspector(s) in person.

Name	Stuart Crickett
User ID	41434785
Organisation	Boyer Planning obo Antler Homes PLC
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No 4. MEETING THE HOUSING TARGET Site Allocations The Plan is unsound. It is not justified, effective or consistent with national planning policy.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] see letter section 4
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	<p>4.14 We strongly urge the Council to reconsider its approach to the allocation of sites, as DLP Chapter 9 does not offer a justified or well-evidenced basis for delivering new housing and other forms of development. The lack of information and the absence of detailed site-specific policies (even for larger sites) is a fatal shortcoming, which signals that this aspect of the Plan is not positively prepared, nor likely to be effective. Many of the sites identified also fail to meet the definitions of deliverable or developable, as set out in the Glossary to the NPPF, and their inclusion is therefore inconsistent with national policies.</p> <p>220727 Elmbridge Reg19 Representations obo Antler Homes.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Should the DLP be submitted for examination, Antler Homes would welcome the opportunity to participate in the Examination Hearings in order to ensure our concerns with the DLP are presented to the appointed Inspector(s) in person.

Name	Alison Crosby-Atkinson
User ID	16423009
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes These housing plans needs to be met from brown field sites and Green Field sites must be preserved. We are facing an environmental catastrophe and so Green Field sites cannot be used for further building. We need to preserve them at all costs.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Steven Cross
User ID	41174433
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>The plan Completely fails boat dwellers on moorings and live aboard boats with no regard to their rights to do so to para 60 NPPF. EBC agreed to back in 2019 that the need for house boat's should be assessed and was not completed until 2022 and was not put to the public until March 2022 . The approach taken by EBC lacks fairness transparency and proper engagement.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>No positive plan for the need's of boat dwellers the EBC have known about occupied boats on the river at least 5 years. The housing act sec 8 1985 places a requirement on local authorities to carry out annual housing needs to understand people residing to their district. S124 of the housing act 2016 includes a duty under section 8 of the housing act that cover's for periodic review of housing needs resorting to residing in to their district on water ways house boats as a place to live. March 2016 Government DCLG published a draft guidance on the need to include house boat's and people living in different circumstances caravan house boat . There is no established method to determine needs with a 14 step process based on the model DCLG 2007 Gy -Travellers. March 2022 appeals for 5 moorings west molesey section 5NPPF delivering a sufficient supply of homes this is unchanged since 2018 and 2019 the need for affordable housing this still remains unchanged 2018.</p>

	<p>5 June 2019 to seek approval to commence on a solution to manage issues on river Thames illegal moorings at the Elmbridge Runnymede Spelthorne Council's we're considering options along a specific area of the Thames to have a approved residential mooring's.</p> <p>Elmbridge has at least 50 to 80 boats moored along the river molesey has a large community of boats where I reside on my boat cherry orchard road the was recently featured on BBC1 inside out 2019.</p> <p>This statement is misleading it has not identified a need for house boat dwellers no study has been found to address this 2017 GTAA by ORS was only required to Gypsy travellers not house boats on the river.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>You need to include people who live on boats house boat's and come up with a decisive plan to address this issue people on boat's are here and we are here to stay and not be pushed to the wayside.</p> <p>EBC should consider residential moorings for boats and come up with a plan .</p>

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	I would like to attend as my wellness and settlement will be detrimental. I'm also In a legal process with EBC on Planning policies.

Name	Clare Cross
User ID	24605409
Organisation	
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>D7 I strongly believe that this is the wrong position for a supermarket. It will have an adverse impact on the area and to local shops. It is more suitable for housing which would be of more benefit to the area.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Redvers Cunningham
User ID	16477377
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes There was a huge amount of constructive feedback provided by residents to the original draft which this replaces. EBC has done a really good job of taking the views of residents into account, making substantial changes addressing the biggest concerns, whilst still achieving the objectives of them.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Joseph Daniels
User ID	39478049
Organisation	Savills
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Catherine Davies
User ID	23414689
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>The draft Local Plan is legally compliant as it sets out the areas for land use and development whilst safeguarding those areas of the Borough which should be preserved for the benefit of local residents and visitors to the area.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>It makes provision for housing development in appropriate locations without affecting very valuable Greenbelt sites which are so important for the health and well-being of residents, wildlife and biodiversity.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Roger Davies
User ID	24268065
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>As a retired solicitor and indeed former Acting Borough Solicitor at Elmbridge Borough Council I have considered the documentation in detail and consider this to be legally compliant and very well presented</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>Yes, very sound and what Elmbridge needs to take us forward over the next 15 years.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mark Davies
User ID	16252865
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>Elmbridge has consulted extensively with its residents at every stage of the Local Plan process and has conducted a thorough review of planning options</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>The Local Plan is based on 5 sound principles which are all absolutely crucial going forward namely: Tackling Climate Change Protecting and enhancing the quality of the environment Delivering homes Growing a prosperous economy Providing infrastructure and connectivity. Particularly important for residents is that the Plan supports a development future for the borough free from green belt release - the Green Belt plays such a important role within Elmbridge and must not be compromised in any way,</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p>

	<p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ann Davies
User ID	16171745
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>At every stage of the Local Plan process Elmbridge has consulted extensively with its residents. It has carried out a thorough review of planning options.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>The Local Plan is based on five sound principles which are all crucial: Protecting and enhancing the quality of the environment Tackling climate change Building homes Growing a prosperous economy Providing infrastructure and connectivity The fact that the Plan supports a development future for the borough without releasing Green Belt is particularly important for residents. The Green Belt plays such an important role within Elmbridge and must not be compromised in any way.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p>

	<p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Rachel Davies
User ID	41089281
Organisation	Lichfields obo Burwin Investments Ltd
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes Please see uploaded representations report
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please see uploaded representations report
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please see uploaded representations report
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please see uploaded representations report for required modifications.

	65216 Regulation 19 Representations 28.07.22.PDF
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	As set out in the uploaded representations report, on behalf of our client, we do not consider the plan, as currently drafted is sound. Our suggested modifications to the Plan require the selected spatial strategy to be revisited. We consider it is necessary to participate in the oral part of the examination to be able to respond to the Inspector's questions and, as necessary, understand the Council's position. If the Inspector agrees that the spatial strategy should be reviewed, our client's site is an important consideration as it is a deliverable and suitable site for release from the Green Belt. As set out in our representations we disagree with much of the evidence relied on within 'Topic Paper 1' and we wish to participate to engage in this further, as necessary.

Name	Peter Davis
User ID	41256897
Organisation	Turley obo Taylor Wimpey
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please see attached letter for full response.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] In our submission, and for the reasons we highlight above, drawn from the Council's own text, this is not a Local Plan which positively contributes to the achievement of sustainable development. In our submission, the Local Plan fails the four 'tests of soundness' at paragraph 35 of the NPPF.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	<p>See letter attached</p> <p>Elmbridge Reps obo Taylor Wimpey ISSUE organized.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Peter Davis
User ID	41256897
Organisation	Turley obo Taylor Wimpey
Policy / Evidence base/ part of plan:	CC1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Policy CC1 - Energy efficiency, renewable and low carbon energy Criterion 1 of this Policy states "To help tackle climate change, developments will be expected to achieve the highest levels of energy efficiency to mitigate the effects of climate change." That requirement is imprecise and unclear to readers of the Plan and should be clarified (and the wording then supported by evidence and viability appraisal).
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Peter Davis
User ID	41256897
Organisation	Turley obo Taylor Wimpey
Policy / Evidence base/ part of plan:	CC3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	As with Policy CC1, CC3 includes a series of requirements, but the wording means the LPA's actual expectations are unclear. The requirements should be clarified (and the wording then supported by evidence and viability appraisal).
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Peter Davis
User ID	41256897
Organisation	Turley obo Taylor Wimpey
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>The Duty to Cooperate</p> <p>We acknowledge the importance of the Duty to Cooperate, especially in circumstances such as this where the LPA is not planning to meet its needs, or those of neighbouring authorities and has been unable to establish a solution where its needs are addressed. In addition, we note that the June 2022 duty to Cooperate includes correspondence between EBC and other South East Authorities from October 2021 (Appendix 19). That letter of 18th October 2021 states: “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.”</p> <p>Whilst Taylor Wimpey reserves its position on the DtC until further material emerges (such as the promised Statements of Common Ground with other LPAs), it appears to us as though the most recent correspondence with other authorities pre-dates EBC’s decision not to address its Local Housing Need figure in full. That letter of 18th October 2021 does not state that the Council would not be meeting its needs (despite asking whether others would be able assist) and as such, this fundamentally undermines any suggestion that the DtC has been met.</p> <p>Access to Consultation Material</p>

	<p>The Council's consultation website⁵ provides access to the draft Local Plan, the Sustainability Appraisal - Non-Technical Summary, the Sustainability Appraisal for the Draft Local Plan, the Habitats Regulation Assessment Equalities Impact Assessment and Topic Paper 1: How the Spatial Strategy was formed. That is highly likely to suggest (especially to those who rarely engage with Plan-making) that those documents are the entirety of the material available. However, that is not the case and we note that the Council's website⁶ includes documents on a range of other topics. In our view this consultation is flawed because of those documents not being identified easily or at all in the consultation material.</p> <p>The Sustainability Appraisal</p> <p>We note the 'Sustainability appraisal for the draft local plan' dated June 2022. This concludes that Option 5a results in a negative score against the 'homes' objective (see Table 11a) because it would "would fall short of the LHN figure by over 500 units" – although the Option assessed 9,182 dwellings. In contrast we understand that the Local Plan is based on Option 4a as that Option is for 6,787 dwellings, despite that option scoring a double negative against the same objective. We question the extent to which EBC has rigorously tested Option 5a in order to achieve the housing requirement.</p> <p>We do not comment on the scoring and assessment of the preferred option (4a) as we consider that the process and selection of that option is flawed. The Sustainability Appraisal itself does not provide any clarity as to why that option was selected and explains that: "These three options have informed the strategy for the borough's housing and growth policy. Following the recommendations made at the Local Plan Working Group (LPWG) on 13 January 2022, a draft Local Plan, which is based on the intensification of the urban area (Option 4a) has been approved at Cabinet and Council in March and June 2022. Therefore, the SA report now considers a draft Local Plan based on option 4a, which is a preferred strategy based on the intensification of the urban area."</p> <p>That text from the Sustainability Appraisal appears to suggest that the selection of the preferred option has not been based on an objective analysis of the evidence and planning merits of each option.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The Plan-Period</p>

	<p>The Local Plan consultation is based on a Plan-period to 2037. Paragraph 22 of the NPPF explains that “Strategic policies should look ahead over a minimum 15 year period from adoption”. We can see no justification for a Plan which does not cover that period, but it is clear that even if the Plan were adopted in this financial year (2022/23), it would only cover 14 full years. If the Local Plan is adopted in 2023/24 (which we suggest is more likely) then it would only cover 13 full years.</p> <p>The Local Plan period should be extended so that it covers at least 15 years, with commensurate increases in the level of development proposed. If the Plan-period is not extended, we submit that it would fail the NPPF ‘tests of soundness’ as it would not be “Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant”¹.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: [Y]</p> <p>The Plan-Period</p> <p>The Local Plan consultation is based on a Plan-period to 2037. Paragraph 22 of the NPPF explains that “Strategic policies should look ahead over a minimum 15 year period from adoption”. We can see no justification for a Plan which does not cover that period, but it is clear that even if the Plan were adopted in this financial year (2022/23), it would only cover 14 full years. If the Local Plan is adopted in 2023/24 (which we suggest is more likely) then it would only cover 13 full years.</p> <p>The Local Plan period should be extended so that it covers at least 15 years, with commensurate increases in the level of development proposed. If the Plan-period is not extended, we submit</p>

	that it would fail the NPPF ‘tests of soundness’ as it would not be “Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant”1.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	See attached letter Elmbridge Reps obo Taylor Wimpey ISSUE organized.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We reserve the option to comment on the Sustainability Appraisal in greater detail depending on the option ultimately pursued by EBC.

Name	Peter Davis
User ID	41256897
Organisation	Turley obo Taylor Wimpey
Policy / Evidence base/ part of plan:	ENV6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>ENV6 - Protecting, enhancing and recovering biodiversity</p> <p>Criterion 4 of the Policy states “4. Development proposals must: a) Lead to a net gain in biodiversity of a minimum of 10% on all sites, unless an exemption applies. The achievement of net gain should be informed by an ecological assessment of the site’s existing features and development impacts and demonstrated using a net-gain calculator and biodiversity gain plan”. We assume that this requirement has its origins in the Environment Act 2021. However the Policy suggests that the net gain should be achieved “on all sites”, whereas the Act allows</p> <p>“Biodiversity gain objective</p> <p>2(1) The biodiversity gain objective is met in relation to development for which planning permission is granted if the biodiversity value attributable to the development exceeds the pre-development biodiversity value of the onsite habitat by at least the relevant percentage.</p> <p>(2) The biodiversity value attributable to the development is the total of—</p> <p>(a) the post-development biodiversity value of the onsite habitat,</p> <p>(b) the biodiversity value, in relation to the development, of any registered offsite biodiversity gain allocated to the development, and</p> <p>(c) the biodiversity value of any biodiversity credits purchased for the development.</p> <p>(3) The relevant percentage is 10%.</p> <p>(4) The Secretary of State may by regulations amend this paragraph so as to change the relevant percentage.” Our emphasis</p> <p>Accordingly, the Policy should be clarified in order to ensure that off-site net gains can be accounted for.</p>

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Peter Davis
User ID	41256897
Organisation	Turley obo Taylor Wimpey
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No See attached letter
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] See attached letter
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	See attached letter

	Elmbridge Reps obo Taylor Wimpey ISSUE_organized.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Nicholas Dawes
User ID	40935873
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Luke Dickson
User ID	41256065
Organisation	Mole Valley District Council
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes See response
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No See response
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [] Justified: [Y] Consistent with national policy: [] See letter
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	See letter

	2022.07.20 MVDC Response to EBC Reg 19 Submission LP.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes currently there is very little light and carbon emission pollution in and around Telegraph Hill. The suggestion to build 60 units on the green belt will not only affect the pollution levels, it will increase the risk of flooding. Infrastructure needed to service these units will be vastly detrimental to the aspect of the greenbelt.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	CC1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	CC2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes All attempts to build upon the greenbelt will be less green, less lean and less clean. Building on existing sites, replacing older less efficient structures when it comes to green efficiency is the way forward.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	CC3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	CC4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	CC5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes If the threat of removing greenbelt is carried out, I believe the environmental consequences will only add to the increase in climate change. Natural habitation fo animals will be destroyed, The ability of the land to cope with rainfall will be reduced causing increased flooding. The land around my property can barely cope with the increase in rainfall as it is, Building roads and removing green areas will only exacerbate the issue.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	ENV1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes The recreational facilities that the green belt offers beyond Telegraph Lane towards Telegraph hill is invaluable. The community utilises this green space for walking, running, dog walking. Having a sense of rural openness is what makes this area invaluable to the community. Allowing urban sprawl to desecrate this historic green space would be disastrous. There is, in my opinion, no good reason to build upon the green belt in Elmbridge and particularly in and around Telegraph Hill.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	ENV2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	ENV3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes The greenbelt, in which I live has a diverse number of birds who migrate to the fields each year, wild deer, rabbits, moles, all manner of insects, butterflies etc. These creatures would have their natural habitat destroyed if the greenbelt was re-classified.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	ENV4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	ENV5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	ENV6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	ENV7
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	ENV8
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	ENV9
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	ENV10
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	ENV11
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	HOU3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	HOU4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I agree that the council should make every attempt to deliver affordable houses to those that need them. However, not at the expense of the greenbelt. All efforts must be made to use brown sites, existing structures not currently used or those inefficiently used. Under no circumstances should the green belt be used to provide housing stock. The areas in which I live are utilised by many people in the local community to walk, run, walk their dogs etc. Destroying the greenbelt when there are alternative options is a very poor solution to the housing issue.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	HOU5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	HOU6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	HOU7
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	HOU8
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	ECO1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	ECO2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	ECO3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	ECO4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	ECO5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	INF1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	INF2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	INF3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	INF4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	INF5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	INF6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I agree to the proposals and under no circumstances do I think the greenbelt should be redeveloped.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	Monitoring
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes New infrastructure to service the increase in homes is obviously necessary but the green belt should remain untouched.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Dilworth
User ID	23780673
Organisation	Health at hand
Policy / Evidence base/ part of plan:	Appendices
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sarah Docherty
User ID	41440321
Organisation	Hersham Sports and Social Club
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>I would like to STRONGLY OBJECT to Elmbridge's Local Plan proposal of 8 residential units to be constructed at 128 Hersham Road, Hersham KT12 5QL - HERSHAM SPORTS & SOCIAL CLUB.</p> <p>Reasons for this is quite simply it is the HEART of Hersham, the COMMUNITY HUB of Hersham. Hersham Sports and Social Club (formally Hersham Comrades Club) was built in 1921 and has served the people of Hersham and its surrounding villages & towns ever since it opened its doors. It has and continues to provide a crucial service to its members and guests alike. We have a very strong members base in which a share of the said property and land are purchased when joining and becoming a member.</p> <p>The proposed development would result in a huge loss for the community and its use and would not be replaced by a better provision nor is there any justification that there would be an alternative community site built or why should there be when this club has served the community of Hersham since 1921.</p> <p>Would you please withdraw your proposal of the 8 residential units to the said property</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y]

	<p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Would you please withdraw your proposal of the 8 residential units to the said property
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Kel Donoghue
User ID	40813153
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes I have no specific knowledge of Law, and therefore cannot comment
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No The draft is talking about ruining local community hubs, educational hubs and greenbelt land! How about refurbishing existing sites to make them more suitable to the needs of residents?!
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [] I don't believe that privately owned sites should be put forward for as development, especially if they provide something for the community, and have NOT been even approached regarding sale. I also think that by destroying these lots, just to replace them with housing is going to create one

	giant housing estate, which I'd of no benefit to anyone other than the construction companies and the money grabbers in council.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	The plots mentioned need to be revised. The council should be thinking more about redeveloping existing residencies rather than selling off useful community plots to the highest bidder.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Amy Drago
User ID	24279233
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>The Draft Local Plan works to satisfy the requirements of UK government yet also working to preserve the Green Belt. The continued protection of the Green Belt is an important characteristic and aspect of Elmbridge and also works to answer climate change and sustainability issues. To focus on 'brown sites' rather than losing green belt.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>The spatial strategy outlined in the Draft Local Plan would work well for Elmbridge. the draft local plan does take in social issues such as affordability and the need for Gypsy/ Roma/Traveller pitches.</p> <p>The continued protection for the green belt also addresses the issue of flood plain and flood issues.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p>

	Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Brian Draper
User ID	16189921
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Susan Drew
User ID	24526689
Organisation	New Road Esher Limited
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>I don't believe the proposed local plan should only look at brownfield sites. There are existing greenfield sites which can be better utilised and also some green field sites which should be developed.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	<p>I don't believe the proposed local plan should only look at brownfield sites. There are existing greenfield sites which can be better utilised and also some green field sites which should be developed.</p> <p>The proposed local plan makes no attempt to assess the 2016 Green belt review which recognises the need for Green Belt release</p> <p>If this were the case then targeting roads like New Rd Esher KT10 9PG for multiple dwellings would not need to happen</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Angela Druckman
User ID	16406625
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes As a local resident I support the plan and consider it to be sound. Its positive aspects include climate change mitigation measures, such as encouraging a modal shift in transportation towards cycling, walking and use of public transport, and its protection of the Green Belt. Furthermore, the aspiration to increase connectivity between open spaces to protect wildlife is a beneficial aspect of the plan.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Will Durston
User ID	16431329
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	D E
User ID	24600705
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <ul style="list-style-type: none"> • There is an inherent contradiction between a stated commitment to managing the effects of climate change and any meaningful strategy to reduce the impact of increased traffic. • The impact on Elmbridge of the large Wisley housing development represents an important omission. • There is no recognition of the need for densification of urban areas such as Oxshott to be progressive and avoid the character of areas of comparatively low density being damaged by individual high-density schemes. • While areas close to local centres and train stations are targeted for flats and infill development, the converse should apply so that the character of other areas (such as most of residential Oxshott) is protected. • There are no design codes available to provide protection for local character and ensure excellent buildings. • Calculations of developer contributions for affordable housing continue to be based on flawed methodology that has been subject to continual abuse. • The Infrastructure Delivery Plan is weak with heavy reliance on a document that has not yet been produced by Surrey County Council. Key to successful development must be the recognition that infrastructure must precede development. A noteworthy omission is the lack of commitment to install cycle lanes alongside trunk roads thereby promoting road safety and improving traffic flow.

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Peter Edwards
User ID	23521121
Organisation	Carter Jonas
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>The Plan is not considered to be legally compliant for the following reasons: The Plan does not comply with national policy guidance - it has failed to identify how it can deliver Local Housing Needs in accordance with the Standard Method. It has failed to justify why delivering only 70% of local needs is acceptable. The Council is suggesting it can deliver 6,787 dwellings out of the 9,705 units identified using the standard method. Part of the evidence base that seeks to demonstrate how the 6,787 figure can be delivered is the Site Allocations list which is based on the latest Land Availability Assessment (2022) - having considered both it is evident that sites will not come forward and hence the the estimated capacity is considered undeliverable. The Council has not considered all available options to meet its LHN in that it has adopted a Brownfield first approach and not fully explored green belt release which is justified due to the exceptional circumstances surrounding the identified shortfall in the capacity of the urban areas.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>In light of the concerns regarding legal compliance we have reviewed the test of soundness and concluded that the plan fails the test listed below:</p> <ul style="list-style-type: none"> • Has the plan been positively prepared i.e. based on a strategy which seeks to meet objectively assessed requirements? NO • Is the plan justified? NO • Is it based on robust and credible evidence? NO • Is it the most appropriate strategy when considered against the alternatives? NO

	<ul style="list-style-type: none"> • Is the document effective? NO • Is it deliverable? NO • Is it flexible? NO • Will it be able to be monitored? Not considered • Is it consistent with national policy? NO
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>Positively prepared - to pass this test it is necessary to demonstrate that the Plan is based on a strategy which seeks to meet objectively assessed development - the strategy does not meet this requirement. The Council has not considered alternative options for meeting its LHN in full.</p> <p>Effective - the Plan will be unable to deliver its policy to deliver 6,787 units (which represents only 70% of LHHN) within the plan period. The flexibility does not exist to meet its LHN as the evidence base to the Plan acknowledges that the capacity of the urban areas cannot be increased without causing unacceptable harm. The only way the plan can deliver further capacity is through a review of green belt boundaries. the plan is not flexible enough to accommodate such a review - such a major change would require a formal review and public consultation.</p> <p>Justified - the strategic approach is based on a 'brownfield first approach' which only delivers 70% of LHN. This is not considered an appropriate strategy and is unlikely to be deliverable as the evidence base that forms the basis of the site allocations is flawed. The Land Availability Assessment has not been robustly considered whether the sites will realistically come forward, especially in the light of competing policies.</p>

	Consistent with national policy - the Plan is considered to be inconsistent with national policy for the reasons identified above.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>We identify below (see 4a) the modification we consider necessary to make the plan legally compliant and sound. Before setting out our proposed modifications it is however necessary to summarise our concerns to set the context or our proposed amendments.</p> <p>Summary of concerns</p> <p>The Council's Plan is based on only meeting 70% of local housing needs (LHN) over the Plan period, which is inconsistent with national policy, which states that local planning authorities should seek, as a minimum, to meet local needs.</p> <p>The shortfall in delivery of housing is further reduced when the housing allocations (upon which the Council is dependent in order to meet its 70% figure) is scrutinised. Our analysis of the Site Allocations (See Chapter 9 of the Plan) reveals that a significant number of sites identified for residential development are unlikely to come forward; meaning that over the plan period the Council will fail to deliver its strategic objective. This analysis will be presented to the EIP (A summary of this analysis is attached alongside the recommended changes to the plan -see 4a below)</p> <p>Furthermore, the Council has accepted that no exceptional circumstances exist to challenge the LHN figure generated by using the standard method and having considered options which include discounting further densification of its urban areas, and accepting that neighbouring authorities are not able to meet any of its shortfall, the Council maintains that its plan is 'sound' and can go forward to adoption.</p> <p>This objection has concluded that the plan fails to meet the tests of Soundness (as set out in the NPPF) in that the Plan:</p> <ul style="list-style-type: none"> • has not been 'properly prepared', as it fails to identify 'a strategy which, as a minimum, seeks to meet the areas objectively assessed needs', as required by the NPPF, • is not 'justified', as the evidence base fails to demonstrate that the strategy to deliver of only 70% of local housing need on brownfield sites only is appropriate' • is not 'effective' as it falls 30% short of meeting its LHN and analysis of the Site Allocations indicates that many sites identified are not deliverable.

	<ul style="list-style-type: none"> • Is not 'consistent' with national policy in terms of delivering sustainable development over the plan period. <p>The Council's failure to produce a sound plan is manifest in its decision to adopt a 'brownfield first' approach which can only deliver 70% of its LHN. Furthermore the Council has not fully explored all other options, e.g. the exceptional circumstances</p> <p>Given the failure of the plan to meet the assessed housing need in full, exceptional circumstances exist to assess the potential of Green Belt land to deliver the unmet need in a sustainable manner.</p> <p>Any such review should concentrate on land that is sustainably located and can be released for housing without undermining the integrity of the wider designation, or undermining the purposes of designating the green belt in the first place.</p> <p>In summary, we consider guidance requires the Council to consider green belt boundary reviews in order to meet its local housing need in full, this potential has not been fully explored as the Council decided to follow its strategy of concentrating future development in the existing urban areas only. This is inconsistent with the approach adopted by adjoining authorities which have released green belt sites where their urban areas have been unable to accommodate their local housing needs.</p> <p>On the basis that the Council's strategy is considered unsound and not legally compliant we would recommend the following changes to the Plan - see recommendations set out in 4a -</p> <p>Changes sought to the Reg 19 Draft Plan.pdf</p> <p>Regulation 19 draft LP- Site Allocations Assessment.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	The reasons why we wish to appear at the examination include:

To challenge the Council's Housing Strategy which grossly underprovides in terms of its identified LHN, an decision which the Plan fails to adequately justify. Such under provision will not meet the housing needs of the Borough and by concentrating of the urban areas may lead to a disproportionate housing mix which delivers too many flatted units and too few homes with gardens.

Concentrating on increasing the density of existing sites to increase the capacity of the urban areas could undermine the viability of some sites due to the increased costs of construction (e.g. the need to provide underground parking), this could have a consequential effect of reducing the quantum of affordable housing.

The Council has not demonstrated that the densities identified for individual sites allocated in the plan are acceptable/ deliverable in the context of prevailing densities.

We wish to challenge the Council's site allocations which we consider to be unrealistic as many sites are considered undeliverable - further evidence will be provided to the examination in this regard.

We wish to challenge how the Council's approach will continue to deliver too few affordable homes to meet its 30% target.

We wish to discuss how identifying the majority of council owned public car parks for residential development can be consistent with the Council's policy to preserve and enhance the vitality and viability of existing town and village centres. Concern is also raised in relation to the loss of station car parks.

We wish to present evidence in relation to the exceptional circumstances that justify a review of green- belt boundaries, which would enable the Council to meet its LHN without unacceptable harm to the green belt. This alternative strategy was not robustly explored by the Council at the plan preparation stage.

We invite the Inspector to open up a discussion on the Council's Green Belt Assessment and why green belt sites have not been considered given the severity of the Council's housing shortfall. In this context we would wish to explore whether the Council has any preferred green belt releases in the event that the Inspector recommends that the Council should consider green belt release in order to meet it LHN.

We wish to discuss a potential green belt site in a highly sustainable location which if released for development could increase housing delivery in the early part of the plan period by over 600 units and meet fully other policy requirements of the plan (excluding the existing green belt designation) which seek to deliver 'good growth', including being fully compliant with the plan's affordable housing policies.

We wish to discuss the issues surrounding the delivery of additional SANG, required to bring forward housing development on sites in the western part of the borough in circumstances where the Council's existing sites do not have adequate capacity and how any new strategic SANG will require enabling development if adequate provision is to be met.

We consider that we will not be alone in expressing concerns in relation to the Council's strategy and advocate that these issues need to be full aired at the examination.

We reserve the right to submit further representations to the Examination once the Inspector has been appointed and identified the issues to be addressed in public.

Name	Steve Elliott
User ID	41190593
Organisation	Kona Planning Consultancy Ltd obo Levanter Developments
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>See letter.</p> <p>As set out, it is not considered that the reduction in housing target as set out within this policy is in any way justified. The Council have not exhausted all options and have not demonstrated why exceptional circumstances have not been met. Both policies SS3 and HOU1 are not sound because the housing targets have not been robustly justified.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>See letter.</p>

	<p>The Regulation 19 Plan allocates land for only 6,785 net additional homes against a standard methodology requirement of 9,615 homes over the plan period. This is approximately 70% of the requirement.</p> <p>For the reasons set out within these representations it is considered that the amendments made to the plan following the Regulation 18 stage are unsound and not fully justified. The Council do not provide any sound or robust rationale for why this need cannot be met.</p> <p>For this reason, the draft Local Plan cannot be considered to be positively prepared or justified when assessed against paragraph 182 of the NPPF.</p> <p>In its current format, the Local Plan will not be considered to be sound and will fall at the first hurdle if submitted in its current format to the Secretary of State.</p> <p>The Council has a clear and pressing housing need with a substantial previous undersupply, as demonstrated by previous delivery rates. There has also been a severe under delivery of affordable housing for many years and a significant backlog remains.</p> <p>The Council previously demonstrated its ability to meet its housing need in full through the Regulation 18 version of the plan and there has been no plausible explanation on the part of the Council why this approach should not still be followed. The concerns of numerous residents and stakeholders are acknowledged but it is not considered that these in of themselves are reasons not to pursue what was previously considered to be a sound strategy. The representations demonstrate that the Council has not adequately considered the reasonable alternatives through a Sustainability Appraisal for meeting housing need in full.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>See letter.</p> <p>For the reasons previously set out, it is considered that the site at Wood Lark Farm, as previously identified in the Regulation 18 version of the plan, is a sound and justified site for housing delivery. Sites such as this have the ability to deliver a policy compliant mix of housing, including much needed affordable housing, in the early part of the plan period. Should Wood Lark Farm be removed from Green Belt, the proposed development will include a new public footpath to the Green Belt land to the east – the Hersham Riverside Park. This would be seen to provide a good benefit and compensatory improvement through public access whilst also strengthening the</p>

	<p>remaining Green Belt boundary. The site is developable and deliverable within the next 5 years, has been shortlisted as one of the 12 Green Belt sites shortlisted to Option 5A and is precisely the type of Green Belt location that the NPPF envisages could be released to meet specific development needs.</p> <p>Reg 19 Consultation - Levanter Developments.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We trust that these comments are useful at this stage. By way of this letter we reserve the right to comment on further rounds of consultation and attend the Examination in Public on behalf of our client.

Name	Steve Elliott
User ID	41190593
Organisation	Kona Planning Consultancy Ltd
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>As set out, it is not considered that the reduction in housing target as set out within this policy is in any way justified. The Council have not exhausted all options and have not demonstrated why exceptional circumstances have not been met. Both policies SS3 and HOU1 are not sound because the housing targets have not been robustly justified.</p> <p>Point 4 of HOU1 states that the Council will maximise opportunities to increase the supply of additional homes on unallocated suitable and available land. It is a concern that the Council are relying on non-allocated sites to meet a housing target that is well behind their OAN.</p> <p>What confidence is there that the Council will even meet these targets given they have only delivered 70% of a much lower target (386 dwellings per year) over the last three years) and are therefore already in special measures in that they are required by Government to prepare a HDT Action Plan.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: []

	<p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>As set out, it is not considered that the reduction in housing target as set out within this policy is in any way justified. The Council have not exhausted all options and have not demonstrated why exceptional circumstances have not been met. Both policies SS3 and HOU1 are not sound because the housing targets have not been robustly justified.</p> <p>Point 4 of HOU1 states that the Council will maximise opportunities to increase the supply of additional homes on unallocated suitable and available land. It is a concern that the Council are relying on non-allocated sites to meet a housing target that is well behind their OAN.</p> <p>What confidence is there that the Council will even meet these targets given they have only delivered 70% of a much lower target (386 dwellings per year) over the last three years) and are therefore already in special measures in that they are required by Government to prepare a HDT Action Plan.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>see letter.</p> <p>Reg 19 Consultation - Levanter Developments.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

	<p>We trust that these comments are useful at this stage. By way of this letter we reserve the right to comment on further rounds of consultation and attend the Examination in Public on behalf of our client.</p>
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Name	K Ernest
User ID	24595201
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes The document appears to cover areas that are required.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes The plan seems to accurately identify local issues, the need to preserve local centres and green spaces with amenity value and the green belt while taking into account the challenges presented by climate change and the need to have building standards and codes and new building that minimises CO2 production and re-use of embodied carbon, and provision of EV charging points. The plan seems to envisage a redevelopment of a lot of community facilities - libraries, hospitals, car parks and community centres to provide residential accomodation but the emphasis on supporting existing communities hopefully means that the functions offered by these facilities will not be lost to the communities served, and that additional facilities will be appropriately provided - e.g schools, services to the elderly.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: []

	Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	?
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	K Ernest
User ID	24595201
Organisation	
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>The plan seems to have been produced in line with legal requirements to consider bio-diversity, flood risk etc.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>The plan seems to accurately identify local issues, the need to preserve local centres and green spaces with amenity value and the green belt while taking into account the challenges presented by climate change and the need to have building standards and codes and new building that minimises CO2 production and re-use of embodied carbon, and provision of EV charging points. The plan seems to envisage a redevelopment of a lot of community facilities - libraries, hospitals, car parks and community centres to provide residential accomodation but the emphasis on supporting existing communities hopefully means that the functions offered by these facilities will not be lost to the communities served, and that additional facilities will be appropriately provided - e.g schools, services to the elderly.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p>

	<p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Michael Faulkner-Shotter
User ID	24287265
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>I find the Draft Local plan to be well prepared and comprehensive</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>I believe that more emphasis should be made of the developing trend for home working and more encouragement for developments which identify a specific provision. I feel this will be an integral part of our approach to reducing vehicle movement.</p> <p>I am pleased to see under Protecting the Environment a section -item 10 which hopefully will be instrumental in curbing the creeping trend for many large homes to become even greater through roof development. I believe will be a real problem in the future as densities are raised as a result but with no enhancement to existing infrastructure and services.</p> <p>It would be appropriate to make provision for the additional green space at the earliest stage rather than post development. This would allow new trees, plants and vegetation to be in place as the densities increase.</p> <p>I do not believe that the proposals will result in the provision of smaller homes as indicated unless these are commissioned by Elmbridge. There is currently a distinct shortage of smaller dwellings, particularly for the older person and for younger people, maybe as a result of economics for a developer, hence my thought for more involvement by the authority.</p> <p>Under the section titled Design Quality, the use of the word “beautiful” seems rather subjective in this context.</p>

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Steven Fidgett
User ID	24581601
Organisation	Union4 on behalf of Molesey Road Land Limited
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>SS2 Sustainable Place Making Objection</p> <p>The policy fails to set out the positive presumption in favour of sustainable development or set out to meet objectively assessed needs and is clearly at odds with paragraph 11 of the NPPF. As set out in paragraph 7 of the NPPF, this means meeting the needs of the present generation without compromising the ability of future generations to meet their own needs.</p> <p>As such, it does not comply with the legal requirement (Planning and Compulsory Purchase Act 2004, s39) on the Council to exercise its planning functions with the objective of contributing to the achievement of sustainable development.</p> <p>In failing to seek to meet the need for new homes over the plan period, the ELP fails to meet the needs of the present generation and substantially compromises the ability of future generations to meet their needs. It increases and perpetuates the growing disparity between need and supply, between those that have access to housing and those that don't.</p> <p>The explanation (at ELP para 3.13 and 3.17) falls short of an explanation for the departure from national policy and the legal commitment set by the Act to seek to deliver sustainable development. this by definition means meeting the needs of the present. The evidence base supporting the ELP falls far short of the threshold required if these needs are not to be met, set out in para 11 part (b) of the NPPF.</p> <p>While the adjoining authorities within Surrey, which are of a similar character and situation, have all tackled the hard decisions necessary in meeting housing and other needs while reconciling this with the objectives of Green Belt policy and other recognised constraints, the Council in this case have taken an in-principle judgement that such constraints provide a de facto rationale for not meeting housing and other needs.</p>

	<p>This does not meet the requirement of the NPPF to meet need unless i) the application of policies in the Framework that protect areas or assets of particular importance provide a strong reason for restricting the overall scale, type or distribution of development in the area; or ii) the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Overview – ELP Vision and Key Principles</p> <p>Any objective assessment of the Regulation 19 Draft Elmbridge Local Plan (ELP) must conclude that it clearly and substantially fails the test of soundness. In our view, it is so substantially flawed that it should not progress to Examination without substantial modification. Conspicuous in its absence, is any commitment to seek to meet the needs of community over the Local Plan period. Although the ‘Vision’ for Elmbridge (page 16) includes a commitment that ‘Residents, existing and new, will have the choice of a range of housing types’, this statement and the related ‘Principle 3’ fail to commit to the NPPF requirement of seeking to meet housing need.</p> <p>While the Council are understandably concerned to ensure the protection of the environment of the Borough, they have taken a what is essentially a political decision to oppose the principle of Green Belt release, irrespective of the benefits that a selective and considered approach to such release would bring in terms of the boost to the supply of new homes and a high-quality environment for existing and future residents.</p> <p>The local plan acknowledges (ELP para 2.7) that Elmbridge is one of the most expensive areas in the country to live. It acknowledges that too many young people and families are moving out of the borough to have a realistic prospect of owning or renting their own home. Older residents are struggling to affordably downsize in a way that will enable them to continue to live independently or with care packages and remain in their local community. It also acknowledges that this creates problems for the wider economy. The high cost of housing and reliance on people travelling into the borough is also making it difficult for local businesses and services to attract and retain employees.</p> <p>Although the Council prioritises the efficient use of land and optimisation of development, it readily accepts (ELP, para 1.15) that the Plan does not set out to meet needs. Indeed, nowhere</p>

does the ELP aspire to do so. The ELP states that they have chosen this approach in response to the need to balance growth with protecting and continuing to conserve and enhance what is important to residents and helps shape communities.

It is clear however, that the Council's decision not to meet need is based on an 'in principle' view that all Green Belt should be protected at all costs and an unwillingness to consider the release of any Green Belt land, no matter what the benefits of doing so would achieve. This is evidenced in the withdrawal, prior to committee debate, of a report from the Local Plans Working Group on a Draft Local Plan in 2021 which sought to do exactly that.

While National Planning Policy may be in a state of flux in some respects, this is no reason to delay or not to meet identified needs.

It is a key requirement that local planning policies should be effective in achieving sustainable development. This means, among other things, meeting the needs of present and future generations.

In choosing not to meet these needs in the ELP, the Council fails both present and future generations.

The ELP fails the present test of soundness and may be summarised as:

- a) Positively prepared – the ELP is not positively prepared. It deliberately sets out a strategy that fails, as a minimum, seek to meet the Borough's objectively assessed needs. Further, it is not informed by any agreements with other authorities (or indeed joint studies or evidence of cross border working) so that unmet need is accommodated where it is practical to do so.
- b) Justified – there is a lack of objective evidence to support the Council's decision not to meet housing needs in particular and hence there is no real basis to conclude the ELP sets out an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence;
- c) Effective – hence it is clear that the ELP will not be effective in meeting the needs of the community or achieving sustainable development over the plan period, and no evidence that there has been or will be effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred;
- d) Consistent with national policy – it is clear that the ELP is inconsistent with the duty to achieve sustainable development enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

	<p>It is clear on the basis of the evidence provided (summarised at ELP para 3.30), that the Council have, in preparing the ELP, failed to deliver on the duty to cooperate with adjoining authorities in meeting housing needs. While the Council have engaged with a wide range of partners as part of their duty to co-operate, there is no real evidence of joint work and no positive outcomes. There is no joint evidence or comparison on constraints and opportunities which are part of a rigorous assessment of alternative strategies and options.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>see above statement</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Proposed Modifications to make the ELP sound: Policy SS2 should be modified to reflect the commitment to meeting the need for housing and other development and adopting a sustainable spatial strategy in accordance with paragraph 11 of the NPPF.</p> <p>220720 Representations for Molesey Land.pdf</p>

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist.

Name	Steven Fidgett
User ID	24581601
Organisation	Union4 on behalf of Molesey Road Land Limited
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>SS3 - Scale and location of good growth Objection</p> <p>The policy is both unsound and is not justified by the evidence. It will not be effective in achieving sustainable development.</p> <p>The policy proposes a requirement of 6,785 homes over the plan period, of which a target of 30% will be affordable. This equates to 452 new homes a year and is substantially below the level of need for housing within the Borough over the period and, by definition, also fails to meet the affordable housing need.</p> <p>As the Council acknowledge (ELP para 3.19) the local housing needs assessment using the standard method result in a housing need of at least 9,705 homes, equal to 647 new homes a year. The proposed trajectory underpinning SS3 proposes a shortfall therefore, of 2,902 homes over the plan period or 195 homes a year.</p> <p>There is also a serious shortfall in the delivery of affordable housing. The backlog of affordable housing need is 1,434 and on the basis of the evidence, a further 59 existing households are likely to fall into needs each year. This is likely to represent circa 269 affordable homes needed each year. yet the evidence shows that delivery of affordable housing achieved only around 54 homes a year over the last ten years, adding to the cumulative shortfall and this is not addressed in the level of provision proposed in the ELP.</p> <p>While part 2) of the policy also commits to a 'brownfield first' approach, in effect the ELP does not allow development outside of the urban area and effectively limits development almost exclusively to previously developed land in the urban area, including no greenfield allocations outside the urban area.</p> <p>In considering the potential for development involving Green Belt land, the Council concluded that 'exceptional circumstances have not been fully evidenced and justified to make changes to</p>

the Green Belt boundaries in the borough'. It is not clear on what basis this judgement was made.

It is clear that the Council had previously concluded the opposite, that 'exceptional circumstances' did exist that justified the release of Green Belt land to meet housing need. This was set out in the previous Reg 18 consultation stages.

It is also clear that before the current Reg 19 Draft ELP, officers were also still of the view that exceptional circumstances did indeed exist and justified Green Belt release. This had been discussed at the Local Plan Working Group of councillors. A draft ELP was presented to members of that Group in June 2021. The content of the plan and the agenda papers have not been published. However, the Cabinet member for Planning is recorded at the time as stating that councillors asked officers to look again and '.... considered that the officer recommended draft Plan and the proposed release of Green Belt was not supported by the exceptional circumstances as set out in the evidence base documents'.

There is no substantive evidence for the change of heart which appears to be a wholly political decision contrary to previous officer advice and represents an 'in principle' judgement not to countenance the release of Green Belt land to meet a proportion of housing need, no matter what the benefits or merits of the case.

The purposes of the Green Belt are well understood and set out in the NPPF at paragraph 138. The extent of Green Belt in Elmbridge has been established for many years and has not changed significantly in the period since its designation. It covers all of the land outside the defined urban areas. The NPPF makes clear that their extent and detailed boundaries should only be altered exceptional circumstances, and expressly provides for this through the local plan process. The NPPF sets three key requirements (para 141) which need to be met before concluding exceptional circumstances exist. These are: maximising the use of brownfield sites; optimising the density of development and determining whether unmet need can be met by neighbouring authorities. It is clear that in Elmbridge, these tests are clearly met.

Further it is also clear that there is substantial unmet need. The ELP acknowledges it cannot meet need from the three sources noted in para 141. It further acknowledges that there is an existing unmet need and that this will increase every year through the plan period. This need affects market homes and is compounded by the failure to meet the need for affordable homes. The affordability ratio is one of the worst in England and comparable to some of the highest priced central London Boroughs and is worsening over time. It is acknowledged that this is

affecting life chances and equality by limiting access to decent homes and adversely impacting employment and the local economy, as people cannot afford to live in the Borough.

Topic Paper 1 identifies unmet needs in the surrounding areas of the South East and London. This reinforces the need for Elmbridge to do its utmost to meet its own needs and consider contributing to meeting those wider needs. It is relevant in this regard that the adjoining London Borough's have capacity driven housing targets because of the nature of the urban area and the level of unmet need has been a substantial concern for the GLA and Secretary of State that must be tackled in the next review of the Plan and is an issue for adjoining authorities.

The old Core Strategy was based on the SE Plan, which was not a needs based assessment for Elmbridge. It relied on the regional spatial strategy which sought to balance need and supply across the wider region. The core strategy figure for Elmbridge was consequently below the level of need within the Borough, as evidenced in the more recent needs assessments and the worsening affordability position over many years.

The position is worse than identified in this Topic Paper however, and the HBF have identified that the actual housing need in Elmbridge using the standard method and including what the Government consider to be the full amount necessary to address past shortfalls in delivery is 859 dwellings each year. This is over 200 homes more each year than the capped figure and itself indicates that the need for homes in Elmbridge.

The Council have based an assessment of exceptional circumstances on the tests set out in the Calverton case and considered:

1. the acuteness / intensity of the objectively assessed need in Elmbridge and neighbouring authorities;
2. inherent constraints on supply of land suitable for sustainable development;
3. the consequent difficulties in achieving sustainable development without impinging on the Green Belt;
4. the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and
5. the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.

While the conclusions of the ARUP Green Belt Review provide information on the assessment of largescale parcels of land and the degree to which they meet the purposes of including land

within the Green Belt, this is capable of a finer grained analysis as would be necessary in considering individual proposals and their impact on the Green Belt and overall spatial strategy. On the basis of the original evidence, the Council had previously considered exceptional circumstances exist and it is clear therefore, that this then needs to be considered at a detailed, site specific level to be able to form a reasoned judgement over whether these circumstances are met in any individual case, which may justify the release of Green Belt in light of the relevant planning considerations.

Indeed, it is clear from the work on SANGs, that the deficiencies in supply of alternative green space can only reasonably be met by corresponding Green Belt release to enable the provision of sufficient SANG for the wider Borough. This benefits development in accordance with the overall spatial strategy, supporting densification and development in the urban areas within the 5km and 7km SPA zones. These and other environmental and biodiversity benefits could be derived by taking a more pro-active view of Green Belt release as an agent for positive change which can maximise the benefits to the community and environment over the plan period.

In this regard, it is clear from the evidence base that:

1. When considering housing need in Elmbridge it is acute.
2. There are inherent constraints on supply that mean that housing needs cannot be met from within the existing urban areas or land sustainably located outside the Green Belt. The legal requirement to pursue sustainable development means that sustainable patterns of development, with accessibility to the main centres of population and transport accessibility, providing goods and services within balanced, accessible communities, need to be overlain over any assessment of Green Belt. this favours those locations on the edge of the main urban areas and accessible to rail and other transport modes.
3. It is evident that sustainable development cannot be achieved, indeed needs would not be met which impact on the economy, social equity and the environment, without consideration of Green Belt release. Access to decent housing is a priority and the socio-economic impacts of not meeting need have not been properly weighted in the Sustainability Appraisal that accompanies the ELP.
4. It is evident that the extent of Green Belt release can be limited both in quantum and in the nature of proposed release. It is clear from the assessments previously carried out in the plan process and from considering the example of the Land east of the Molesey Road as an example,

	<p>that targeted Green Belt release can achieve significant benefits and minimise the impact of development on the openness of the Green Belt.</p> <p>5. It is also evident the consequences for the Green Belt can include local enhancements to both accessibility an</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>see above response</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>see above response</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>The scale and locations of growth should be increased to meet the objectively assessed need of a minimum of 9,705 homes over the plan period, at least 647 each year over the period. This should adopt a housing trajectory that prioritises early delivery, to address the substantial pre-existing unmet need arising from persistent under delivery and spiralling house price inequality.</p> <p>The proposed policy should accept that exceptional circumstances exist that justify the release of Green Belt land for housing in principle and should proceed to consider whether exceptional</p>

	<p>circumstances exist to justify the release of individual sites and bring these forward as modifications to the plan.</p> <p>The second part of the proposed policy proceeds to identify the broad locations for growth and the corresponding number and percentage of overall housing provision for each settlement. See attached statement.</p> <p>220720 Representations for Molesey Land.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	<p>We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development.</p> <p>In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.</p>

Name	Steven Fidgett
User ID	24581601
Organisation	Union4 on behalf of Molesey Road Land Limited
Policy / Evidence base/ part of plan:	CC2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes see below
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No While we support the reduction of waste and optimal use of resources, it is not clear how some of the requirements in the policy will be applied in practical terms or what the implications are for applicants, to avoid this becoming simply a paper exercise.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] While we support the reduction of waste and optimal use of resources, it is not clear how some of the requirements in the policy will be applied in practical terms or what the implications are for applicants, to avoid this becoming simply a paper exercise.

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Proposed Modifications to make the ELP sound: The specific requirements of the policy should be clarified.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.

Name	Steven Fidgett
User ID	24581601
Organisation	Union4 on behalf of Molesey Road Land Limited
Policy / Evidence base/ part of plan:	ENV4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>ENV4 - Development in the Green Belt Objection</p> <p>For the reasons set out in respect of SS3 and HOU1, it is considered that exceptional circumstances exist that justify a review of the Green Belt and the release of selected sites from the Green Belt to meet the need for housing over the plan period.</p> <p>In summary, it is clear from the evidence base that:</p> <ol style="list-style-type: none"> 1. When considering housing need in Elmbridge it is acute. 2. There are inherent constraints on supply that mean that housing needs cannot be met from within the existing urban areas or land sustainably located outside the Green Belt. 3. It is evident that sustainable development cannot be achieved, indeed needs would not be met which impact on the economy, social equity and the environment, without consideration of Green Belt release. 4. It is evident that the extent of Green Belt release can be limited both in quantum and in the nature of proposed release. 5. It is also evident the consequences for the Green Belt can include local enhancements to both accessibility and the function of the Green Belt in respect of its key purposes that minimise the overall effect of such release.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>See above.</p>

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>See above and response to SS3 and HOU1.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Proposed Modifications to make the ELP sound:</p> <p>The review of Green Belt boundaries and bringing forward of modifications to release land from the Green Belt sufficient to meet at least the minimum level of objectively assessed housing need.</p> <p>Specifically, the identification of land east of the Molesey Road, Walton on Thames should be released from the Green Belt and identified for housing led mixed use development, as set out in the attached proposal. In conjunction with the proposed land identified for development, it is proposed to create a substantial area of SANG as publicly accessible greenspace, as one of the largest areas of accessible greenspace in the Borough, close to the main centres of population.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	<p>We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.</p>

Name	Steven Fidgett
User ID	24581601
Organisation	Union4 on behalf of Molesey Road Land Limited
Policy / Evidence base/ part of plan:	ENV5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>Objection While the approach of the policy to the protection of the Thames Basin Heaths SPA is recognised and supported, it is clear that additional SANG capacity is required alongside any additional housing proposed to meet the objectively assessed need. Without this, the ELP fails to meet the requirements of the Habitats Regulations and the Sustainability Appraisal is flawed. The SANG Options Study (May 22) identified that there will only be enough SANG capacity for the first 10 years of the plan. This is clearly inadequate, and it cannot meet the test of soundness for the latter period of the plan to be left uncertain. It notes that ‘Years 11 to 15 will require an additional 7.5ha of land for SANG provision in order to ensure that the integrity of the SPA is protected.’</p> <p>Hence the policy should identify additional SANG capacity as part of the ELP and should not delegate this to the TBH SPA Delivery Framework and mitigation strategy. Unless this is included as an express part of the local plan, it is not clear how the legal obligations to protect the Thames Basin Heaths can be certain of secured.</p> <p>The land proposed for the release from the Green Belt for housing led mixed use development east of the Molesey Road, Walton on Thames is outside of the zones A, B and C for protection of the SPA and hence would not impact on them. Further, the proposal is capable of providing one of the largest areas of publicly accessible green space within easy walking and cycling distance of the major urban centres and the areas of visitor pressure and is hence the most appropriate and suitable area for new SANG provision. The proposals would result in up to 40ha of new SANG informal public open space with areas for recreation and nature, a preliminary design for which has been prepared as part of the earlier SANG call for sites. this accompanies a proposal for up to 10ha of residential development, close to Hersham Station and the Molesey Road services. Its release as part of the proposed allocation, would help to serve the informal</p>

	<p>recreational needs of a large swathe of the urban population and help deflect pressure from the SPA heathland.</p> <p>The SANG Options Study concluded that the land East of the Molesey Road that overall, this site has the potential to meet all of the essential criteria and all five of the desirable criteria could potentially be met. As such, this site was recommended for further consideration.</p> <p>The only reason it was discounted was because:</p> <p>‘Members of the Local Plan Working Group, at their meeting held on the 13 January 2022, confirmed that an urban only strategy will be presented to Cabinet and full Council in the Spring 2022. Therefore, Hersham Golf Course and Land East of Molesey Road are now discounted as they rely on residential development in the Green Belt in order to deliver SANG.’</p> <p>However, this leaves no viable option identified in the Local Plan for the essential SANG to support the housing trajectory. This would worsen, were additional housing be identified (as we suggest) to meet objectively assessed housing need.</p> <ul style="list-style-type: none"> • Littleworth Common does not have a car park and is poorly located with the zones of influence. The site is also designated as a Site of Nature Conservation Importance, and the attraction of additional visitors to the site (in order to draw them away from the SPA) would potentially conflict with conservation objectives. • The remaining sites are currently in agricultural use and are of agricultural value and suffer from a significant risk of flooding and are poorly located in terms of area/population coverage. • The only remaining option for a SANG site within the borough is to extend SANG at Esher Common (Site B Oxshott Heath) which would conflict with its designation as a SSSI.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>See above</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p>

	<p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>see above and attached proposal for Land East of Molesey Road</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Proposed Modifications to make the ELP sound: The bringing forward of modifications to increase the area of available SANG at a level to correspond with the increased delivery of housing to meet objectively assessed need and the proposed allocation as part of these modifications, of land east of the Molesey Road to provide a SANG alongside the proposed mixed use residential led development. See SANG Landscape Masterplan.</p> <p>Site Masterplan.pdf</p> <p>210909~1.PDF</p> <p>MAMOLE~1.PDF</p> <p>220728 Representations for Molesey Land.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

	<p>We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.</p>
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Name	Steven Fidgett
User ID	24581601
Organisation	Union4 on behalf of Molesey Road Land Limited
Policy / Evidence base/ part of plan:	ENV6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No The policy is based in part on out of date data and should be amended to reflect the current position in respect of designated sites.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No ENV6 - Protecting, enhancing and recovering biodiversity Objection While the approach of the policy towards the protection and enhancement of biodiversity is supported, the list of sites to which it applies, as set out in the (unnumbered) table after para 5.24 is out of date. The Field Common/ Hershams Pits SNCI was de-designated following the restoration of the former flooded gravel pits to equestrian use and loss of the previous wetland and wildfowl interest that had been the basis of the original designation. This was confirmed in correspondence at the time of the de-designation in 2017.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [Y]

	<p>Consistent with national policy: []</p> <p>ENV6 - Protecting, enhancing and recovering biodiversity Objection</p> <p>While the approach of the policy towards the protection and enhancement of biodiversity is supported, the list of sites to which it applies, as set out in the (unnumbered) table after para 5.24 is out of date. The Field Common/ Hersham Pits SNCI was de-designated following the restoration of the former flooded gravel pits to equestrian use and loss of the previous wetland and wildfowl interest that had been the basis of the original designation. This was confirmed in correspondence at the time of the de-designation in 2017.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Proposed Modifications to make the ELP sound: Deletion of the Field Common/ Hersham Pits SNCI from the Land East of the Molesey Road to reflect the de-designation of the previously infilled gravel pits.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	<p>We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and</p>

	deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.
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Name	Steven Fidgett
User ID	24581601
Organisation	Union4 on behalf of Molesey Road Land Limited
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>HOU1 Objection</p> <p>We raise objection to the substantial under provision targeted in the proposed housing requirement in HOU1 and the corresponding housing trajectory.</p> <p>The proposed ELP requirement of a minimum of 452 homes each year is substantially below the actual number of homes needed by the local community.</p> <p>Although the problems of undersupply are acknowledged, the further consequences of deliberately not meeting local needs are not spelled out in the Local Plan. These include:</p> <ol style="list-style-type: none"> 1. an ever increasing, cumulative under provision between the community's need for homes and the available supply; 2. further increases in house prices and worsening affordability ratios which affects lower and even average wage earners who can no longer afford to live in the Borough; 3. further shortfalls in affordable housing provision; 4. life chances are frustrated as access to decent housing is effectively rationed; 5. adverse impacts on economic growth as recruitment suffers; 6. the wider impact on adjoining authorities is exacerbated as unmet need is displaced. <p>It is important to understand that these are not randomly imposed targets, but are a reflection of the real need for more homes in the South East and in Elmbridge in particular. These needs arise from the local community, and it is the community that suffer the consequences of a deliberate under-supply.</p> <p>The level of new housing required is identified in the standard methodology as 647 homes each year and should be the minimum level that should be provided for in the Local Plan. This includes population and household change and market signals. The latest assessment indicates a</p>

	<p>particular need for smaller homes from studios to 3 beds to meet the needs of smaller households including first time buyers and those on average and lower incomes. This includes key workers and others that are an essential part of the community and the ability to effectively run local services.</p> <p>The standard method however, caps housing needs where plans are out of date, as is the case for Elmbridge, at 40% above the average annual household growth or current housing requirement, whichever is higher. The actual level of need therefore, is likely to be significantly more. The HBF have identified this as 859 new homes each year.</p> <p>Elmbridge has been a Borough where there has been a persistent and substantial under-delivery of new homes when compared with local need.</p> <p>This has resulted in some of the least affordable housing in England.</p> <p>The Housing Delivery Test records Elmbridge as consistently underperforming, achieving only 70% of the requirement over the last 3 years, a performance that reflects the previous years' results. The Borough delivered just 1133 new homes in the three preceding years against a requirement of 1618 homes.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>See above and attached statement.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p>

	see above and attached statement
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>The scale and locations of growth should be increased to meet the objectively assessed need of a minimum of 9,705 homes over the plan period, at least 647 each year over the period. This should adopt a housing trajectory that prioritises early delivery, to address the substantial pre-existing unmet need arising from persistent under delivery and spiralling house price inequality. The second part of the proposed policy proceeds to identify the broad locations for growth and the corresponding number and percentage of overall housing provision for each settlement. This should be revised to include additional sites to meet housing need and that this should be reflected in a revised spatial distribution. A sustainable strategy should also be weighted to favour the most sustainable locations for growth, close to the main urban centres of Walton on Thames, Hersham and the Moleseys and Lower Green, where the benefits of growth can achieve the greatest benefit to existing and future resid</p> <p>220720 Representations for Molesey Land.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the

	<p>exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.</p>
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Name	Steven Fidgett
User ID	24581601
Organisation	Union4 on behalf of Molesey Road Land Limited
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No see comments on SS2/3 and HOU1 and below.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No While we support the objectives of the policy, the optimisation of development options should apply irrespective of whether the site is within the urban area or lies outside of this as part of a Green Belt release or previously developed land. The emphasis on increasing density and smaller homes supply near to train stations and other accessible locations is supported and is a key aim of sustainable place making.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] see above

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Proposed Modifications to make the ELP sound: The policy should be amended to apply generally, within and outside the urban area, promoting efficient design and optimisation of delivery in sustainable locations. This should be fully considered in the review of Green Belt and spatial strategy recommended in our response to SS2/3 and HOU1.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	<p>We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.</p>

Name	Steven Fidgett
User ID	24581601
Organisation	Union4 on behalf of Molesey Road Land Limited
Policy / Evidence base/ part of plan:	HOU4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>While the aims of the policy are supported, it is not considered that the policy will be effective since it fails to tackle the underlying undersupply that is driving up house prices through constrained supply. The overall supply of homes should be increased in line with need and the policy brought into line with the NPPF.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>see above.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>see above</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Proposed Modifications to make the ELP sound: Increase the overall provision for housing in the ELP and consequently the level of affordable homes delivered.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.

Name	Steven Fidgett
User ID	24581601
Organisation	Union4 on behalf of Molesey Road Land Limited
Policy / Evidence base/ part of plan:	HOU5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>HOU5 - Housing technical standards Objection</p> <p>The aims of the policy are broadly supported, but the policy itself imposes a rigid and unduly prescriptive requirement on design issues that are normally the subject of design guidance that should be interpreted flexibly to take account of site circumstances. The policy will be ineffective and is not supported by national standards or evidence as set out below.</p> <p>Parts 4 and 5 of the policy express a rigid requirement that does not reflect the relevant guidance or effective design. This is notably the case in respect of daylight requirements and in the requirement for 100% dual aspect dwellings, which precludes optimisation of site capacity and is not a pre-requisite of good quality housing. Such circumstances are not exceptional and are a feature of many sites and developments that provide good quality accommodation. This is especially a constraint on apartment building design, where some element of single aspect dwellings are both inevitable and appropriate and can provide good quality accommodation. Both are relevant considerations but should not be imposed as rigid requirements. they would in effect restrict site optimisation, design solutions and the number of homes delivered.</p> <p>This is particularly important in the context of the need to optimise development density as a result of the under-delivery proposed in the ELP.</p>

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>see above</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Proposed Modifications to make the ELP sound:</p> <p>The policy should be expressed as guidance (e.g. to optimise the number of dual aspect dwellings but not preclude single aspect other than single aspect north facing) and should allow detailed design and site specific circumstances to consider the most appropriate response. Part 5 should 'wherever possible seek to' achieve the daylight levels set out and not require that as an absolute. It should be consistent with national guidance.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its

	<p>fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.</p>
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Name	Miss Field
User ID	41222625
Organisation	Savills
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Nigel FILBY
User ID	24503105
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I think the Draft Local Plan sets out a reasoned and justified balance between meeting housing demand and preserving and improving the character and facilities of the Borough.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Lance Flannigan
User ID	24486209
Organisation	
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes N/A
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No These representations are made on behalf of The Trustees of Weybridge Cricket Club, who hold a 50 year lease on the Pavilion at Weybridge Cricket Green together with a right to play cricket on the Cricket Green and a right to use the Cricket Green Car Park. The Trustees object to the proposed allocation of the York Road Car Park, Weybridge (Site Allocation Reference WEY13) for 8 residential units on the basis that it is not justified and is not consistent with national policy and so does not meet the test of soundness under Paragraph 35 of the NPPF.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [Y]

	<p>The proposed allocation of the York Road Car Park is not justified because it does not represent an appropriate strategy, taking account of reasonable alternatives, and based on proportionate evidence.</p> <p>Specifically, development of the York Road Car Park for housing will result in the loss of a public off street car park which will have the following unacceptable consequences:</p> <ol style="list-style-type: none"> 1. Given the close proximity of the York Road Car Park and the lack of alternative car parking in the area, the loss of car parking will result in the increased (unlawful) use of the Car Park at Weybridge Cricket Green, which will further restrict or prevent its use by lawful users of the Car Park. This will have an unacceptable impact on the use and enjoyment of Weybridge Cricket Green, (a designated Town or Village Green) by Weybridge Cricket Club and other lawful recreational users. This is contrary to Policies SS2 (a) iv), SS2 (d) i), ENV1.1, ENV1.4 and IMP1.c) of the Reg 19 Draft Elmbridge Local Plan 2037 and amounts to a statutory nuisance under Section 12 of the Inclosure Act 1857 and Section 29 of the Commons Act 1876. 2. It will undermine the vitality and viability of the Weybridge Queens Road Local Centre, contrary to Policies SS2 (c) ii), SS3 3.a), ECO3 and IMP1.d) of the Reg 19 Draft Elmbridge Local Plan 2037. <p>For the reasons set out in 1. and 2. above, the proposed allocation of the York Road Car Park for housing is not consistent with national policy set out in Paragraphs 8 b), 8 c), 80, 85, 91, 92 and 96 of the NPPF.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Delete the York Road Car Park (Site Allocation Reference WEY) from the list of allocated sites in Chapter 9.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	My apologies. I do not wish to participate at the oral part of the examination, but the online form is not allowing me to change my answer to Q5.- This has now been amended manually.

Name	Janis Fletcher
User ID	24372801
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I support the local plan and believe it to be in line with the five guiding principles. I want Elmbridge to retain as many green belt areas as possible whilst still providing enough housing and development for the borough to thrive. Tackling climate change and protecting the environment is important to me. I believe the plan proposals will help to continue to make Elmbridge a desirable area for residents.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Dorothy Ford
User ID	26818145
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: <input checked="" type="checkbox"/> [Y]</p> <p>Effective: <input type="checkbox"/> []</p> <p>Justified: <input type="checkbox"/> []</p> <p>Consistent with national policy: <input checked="" type="checkbox"/> [Y]</p> <p>Paragraphs 1.13-1.15 explains the Local Plan aims to “ balance”growth/development with conserving and enhancing “Green Belt and open spaces”. This is inconsistent with the NPPF definition of Green Belt as open. The NPPF para 137 clearly states “the essential characteristics of Green Belts are their openness and permanence”. The NPPF section 11, “Sustainable Development”, paragraph b, states “ strategic policies should, as a minimum, provide for objectively assessed needs for housing [...] unless : the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the</p>

	overall scale, type or distribution of development in the plan area”. The assets of particular importance referred to include Green Belt. This draft Local Plan should include this paragraph 11b of the NPPF in order to clarify the protection of the Green Belt and make it clearly consistent with the NPPF. By merely stating it aims to balance growth and protection, the Local Plan seems to imply that some Green Belt might be sacrificed for development - in order to achieve a balance.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	I wish to participate in the oral part, in order to represent the concerns and interests of the 2495 signatories of the petition addressed to Elmbridge BC to save Green Belt Sub-Area 11 : https://www.change.org/p/our-green-belt-is-under-threat EBC Head of Planning, Kim Tagliarini, instructed me in writing to submit this petition now - during the Regulation 19 public consultation.

Name	Dorothy Ford
User ID	26818145
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The EBCouncil's justification for protecting the Green Belt, as published in the 2011 EBC Core Strategy para 3.11, needs to be adopted in its entirety in the current draft Local Plan in order to duly protect all our green spaces, inc Green Belt, from inappropriate development. Paragraph 3.11 of the 2011 document states :</p> <p>"Protecting the Green Belt</p> <p>3.11 Elmbridge is embedded in the London Green Belt and is under a national obligation to protect and maintain it. The success of Green Belt policy over the years has shaped the pattern of settlements, and separates towns and villages into individual and distinctive local communities. The Green Belt permeates all parts of the Borough and has prevented the coalescence of its component settlements. The fragmented nature of the Green Belt in Elmbridge distinguishes the Borough from the more developed London boroughs on one side and the more open countryside on the other, beyond the M25."</p> <p>https://www.elmbridge.gov.uk/_resources/assets/attachment/full/0/736.pdf</p> <p>Green Belt surrounds nearly the entirety of Oxshott, contributing significantly to its character. Each Oxshott Green Belt site differs slightly. Therefore each one is unique and irreplaceable.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.

	<p>Positively prepared: []</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>Please see the comments in Box 2 above. They are all relevant to this Box as well.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Dorothy Ford
User ID	26818145
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>In order to justify the principle 2 aim of “Ensuring strong protection of the Green Belt from inappropriate development”, the Green Belt Evidence Base documents need to be</p> <ul style="list-style-type: none"> - made consistent (currently the evidence and performance assessments are inconsistent-including for Sub-Area11) - made accurate (currently the evidence and assessment for Sub-Area 11 are inaccurate) - made up-to-date (many Green Belt sites have changed)

	<p>Specifically : Green Belt Sub-Area 11’s performance to “Assist the Countryside from Development” is assessed inaccurately in several documents as “ less than 10% built form and largely rural character, ie score 3. In fact 0% of Sub-Area 11 is built on and it possesses a strong, unspoilt rural character. Sub-Area 11 therefore needs its performance assessed as top : ie it should score 5.</p> <p>The key document (but not the sole document) imposing this significant inaccuracy is the EBC Green Belt Boundary Review - Supplementary Work, Methodology and Assessment, dated 2018, and drafted by ARUP.</p> <p>In addition, the contribution of SA-11 to creating a buffer between the 2 differing settlements Stoke d’Abernon and Oxshott needs to be recognised. The EBCsign marking the border between Stoke d’Abernon and Oxshott is in Blundel Lane, very close to SA-11. The Waverley Road settlement north of SA-11 consists of a range of terraced, semi-detached and detached homes, including formal Council housing. In contrast, the Stoke d’Abernon settlement to the west of SA-11 consists solely of large detached homes (4 and 5 bedroom homes) . In other words, the Stoke d’Abernon settlement on the west boundary of SA-11 is less densely developed than the Oxshott settlement on the north boundary of of SA-11.</p> <p>Finally, the stunning landscape of Surrey Hills AONB is visible from the top stories of some of the houses on the western boundary of SA-11, as well as from the ancient Public Footpath in SA-11.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Dorothy Ford
User ID	26818145
Organisation	
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Dorothy Ford
User ID	26818145
Organisation	
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No It is inconsistent with the NPPF section 20 on conservation and enhancement of landscapes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [] Consistent with national policy: [Y] Section 20 of the NPPF states “Strategic policies should [...] make sufficient provision for [...] conservation and enhancement of the natural [...] environment, including landscapes and green infrastructure”. Green Belt SA-11 offers a stunning landscape, readily visible to the many passersby and commuters using busy Blundel Lane - whether the road itself, or the pedestrian pavement. The many walkers, runners, drivers and horse riders passing along Blundel Lane to work, shops, schools, or church are able to enjoy the readily visible landscape from the road. In

	<p>addition, Surrey Hills AONB are visible from the southern end of the ancient Public Footpath in SA-11. The view of Surrey Hills from here is an unspoilt, rural view with lots of character and beauty.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Please see my response in the box above. I have posted a photo of the strategic view of the Surrey Hills AONB from the Sub-Area 11 Public Footpath; and of the landscape readily visible from the busy Blundel Lane commuter and recreation road/pavements. As the NPPF states : 145. Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity.</p> <p>This all needs to be included in the Evidence Base documents - where there are inaccuracies and inconsistencies in the evidence for, and assessment if, Sub-Area 11. I mention these details elsewhere in this questionnaire.</p> <p>5FE6D2AC-940B-4759-A638-8C2006F5858F.jpeg</p> <p>65747365-B1FF-43BC-B1B2-FE8FD06840B0.jpeg</p> <p>A4167395-0CB0-4088-8B7C-326E7CF5CB82.jpeg</p> <p>EB8C4DE9-2135-43F1-BF97-FC79BF8A321B.jpeg</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

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Name	Dorothy Ford
User ID	26818145
Organisation	
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Several Evidence Base details on Green Belt Sub-Area 11 are incorrect and therefore inappropriate. The draft Local Plan policy on protecting the Green Belt is generally headed in the right direction, given that 85% of respondents to the 2019 Reg 18 consultation opted to protect all Green Belt from inappropriate development; and 2503 people have signed the petition that demands that all SA-11 be saved from development. This clearly shows how much our beautiful landscape, readily visible to passing horse riders, cyclists, walkers, runners and drivers, is treasured and essential for our health, well-being and happiness. Ms Tagliarini, EBC Head of Planning, instructed me to submit the petition now - during this consultation : https://www.change.org/p/our-green-belt-is-under-threat</p> <p>ARUP's pro forma setting out evidence for and assessment of SA-11/GB46, to which the EBC 2022 Sustainability Assessment refers, is available in Green Belt Boundary Review Annex 1A(Sub-Area pro formas). SA-11's pro forma contains 3 key errors, and avoids photos of the gorgeous undulating landscape and strategic view :</p> <p>A. The description states : "The Sub-Area is [...] bounded by the built edge of Oxshott to the north and west". This is not correct. The built edge to the west is in Stoke d'Abernon (not Oxshott), as clearly indicated by the Elmbridge Council's village welcome/boundary sign a few steps from the northwest corner of SA-11; and as indicated by the Church of England official parish boundaries map : https://arcgis.com/home/we</p>

map/viewer.html?webmap=67bce0ed36dd4ee0af7a16bc079aa09a&extent=-0.4891,51.2975,0.256,51.6099

The development to the west is a ribbon development of detached 4 & 5 bedroom houses built roughly 95-100 years ago - whereas the development to the north is a more recently built mix of detached, semi-detached and terraced houses - some of which are former Council housing.

B. On page 24, the assessment of SA-11's role in safeguarding the countryside from encroachment is merely moderate because it fails to recognise that 0% of the land is previously developed (it instead inaccurately claims less than 10% is previously developed); and fails to recognise that SA-11 is characterised by open rural land uses and landscapes, including agricultural land consisting of open fields yielding crops of hay, with many wildflowers on the field edges. Strategic views of Surrey Hills AONB, from the southern end of the SA-11 Public Footpath leading to SA8, have not been recognised. These stunning views need to be recognised in order to assess accurately, and duly recognise, SA-11's high performance in safeguarding the countryside from encroachment.

Furthermore, development of SA-11 would isolate SA-15 (Danes Hill School sports grounds) from the wider countryside. SA-15 is designated as Institutional Spaces to be protected in EBC's Green Infrastructure map. SA-15 therefore needs to be duly protected by safeguarding SA-11 from development. Development of SA-11 would be visible from Bridle Lane, marking the boundary with SA8. Development of SA-11 would also reduce the performance of SA8 by affecting the pretty views to SA8's north.

C. Correction of this inappropriate, inaccurate ARUP evidence would provide clear justification for the conclusion that SA-11 should not be considered further for development - since SA-11 in fact meets the 3 Purposes assessment more strongly than currently indicated. Correction of the Evidence Base inaccuracies for SA-11 is needed in order to save in from development by Savills who, acting on behalf of The Crown Estate landowners, have been lobbying EBC for several years to develop this readily visible, readily accessible open landscape with stunning strategic views.

SA-11 is in the northern part of LF1 in the 2015 Surrey Landscape Character Assessment, conducted by Hankinson Duckett Associates on behalf of Surrey County Council, Surrey LPAs including Elmbridge Council, and Surrey Hills AONB. The LF1 assessment states : page 23 "The northern part of the area is a pleasant rural farmland landscape with less urban influence despite adjoining Built Up areas to the north." The page 23 character assessment duly recognises the

visible, unspoilt rural environment of SA-11 - unlike the ARUP work commissioned by EBC. EBC contradicts/rejects this assessment of clear evidence. EBC's rejection of these key facts is inappropriate, inaccurate and disproportionate. Page 27 : The section on LF1 Built Development recommends that LPAs "Retain gaps in linear development particularly where these allow rural views over farmland." This Built Development policy needs to be adopted. It will save SA-11 in the medium and long term, as so many passersby enjoy the rural views over farmland along Blundel Lane.

The draft Local Plan section "Protecting the Green Belt" should make this proposal more sound, and therefore more readily deliverable, by adopting the following part of the 2011 Elmbridge Development Strategy :

"Protecting the Green Belt : 3.11 Elmbridge is embedded in the London Green Belt and is under a national obligation to protect and maintain it. The success of the Green Belt policy over the years has shaped the pattern of settlements, and separates towns and villages into individual and distinctive communities. The Green Belt permeates all parts of the Borough and has prevented the coalescence of its component settlements. The fragmented nature of the Green Belt distinguishes the Borough from the more developed London boroughs on one side and the more open countryside on the other." This statement is essential since SA-11 is part of the Green Belt that surrounds Oxshott and helps define Oxshott's green, healthy beautiful character.

The draft LP Green Infrastructure map and policy exclude nearly all the Green Belt - in stark contrast to the 2011 Elmbridge Development Strategy (cf page 54) which includes all the Green Belt. The draft LP's exclusion of SA-11/GB46 and nearly all other Green Belt from Green Infrastructure is inconsistent with the NPPF. NPPF Page 67 defines Green Infrastructure as : "A network of multifunctional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and well-being benefits for nature, climate, local and wider communities and prosperity."

In other words, Green Infrastructure is not just a beneficial network of Public Footpaths (as the draft LP proposes), but a range of views from these Footpaths of stunning landscapes and open countryside and fields; clean air; and biodiversity. For example, our SA-11 benefits the local economy by providing unspoilt farmland, hay fields, or pastureland, as the local Esher Arbrook Farm who currently lease the land deem appropriate.

	<p>Therefore in order to make the draft Local Plan's Green Belt protection policy more sound throughout the 15 coming years, the LP should include all appropriate Green Belt sites in the Green Infrastructure map.</p> <p>This will then make the LP consistent with the NATIONAL POLICY on Green Infrastructure adopted by HMG in December 2021, as proposed by Natural England.</p> <p>The general policy in the draft LP to protect the Green Belt, such as SA-11, is enormously encouraging in the short term, and needs more sound evidence in the medium and long term in order to deliver this policy effectively.</p> <p>This statement is from Dorothy Ford, on behalf of residents living near the SA-11 site, and the 2505 people who have signed the petition to save SA-11 by correcting the evidence base used to assess its performance. Dorothy Ford and Richard Marshall are co-leaders of the BluWav Residents Group, set up to save SA-11. Richard Marshall and Blu-Wav endorse all the comments in this box.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>Please see my detailed reply in the previous box - number 2.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Please see my detailed reply in an earlier box - number 2. If you need clarification, please don't hesitate to contact me.</p>

	<ul style="list-style-type: none"> • E7546CF2-EEC2-4C17-ABDC-C86933767F24.jpeg • Copy of Copy of SA-11 Response to Reg 19 Consultation.docx • 44C3AD65-688C-4424-87A0-43C77730CE68.jpeg • 3093897D-DD73-4910-B27F-2809B1FC840E.jpeg • 84E13120-BDEA-4978-9F19-36E9E7424E87.jpeg • 6686144F-7B85-4854-BF6C-46C681A24CAE.jpeg • AE06195A-330F-4E7E-9F79-11FECA114DA4.jpeg • 12A23769-44B9-441B-B163-52C1608F2895.jpeg • AC48B871-91CD-4DF6-874B-E73592A8E845.jpeg • FBE6EDB4-B880-4F76-9A52-834CF23B803B.jpeg
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	<p>As co-leader of BluWav Residents Group, I owe it to the 2505 people who have signed the change.org petition https://www.change.org/p/our-green-belt-is-under-threat to save all of Green Belt Sub-Area 11/GB46 from development</p> <p>- by correcting the draft Local Plan evidence base relating to this stunning, readily visible Green Belt site; and</p> <p>- by strengthening the enormously encouraging LP policy to protect the Green Belt by making this protection more sound, and more consistent in all respects with national policy as set out in the NPPF</p> <p>The evidence base for this site is disproportionate because it fails to recognise the strengths of the site - such as the valued landscape readily visible from the corner of Blundel Lane/Waverley Road; the strategic views of SurreyHills AONB visible from the SA-11 Public Footpath; and the</p>

	<p>role this Green Belt plays in separating a diverse Oxshott settlement from a Stoke d'Abernon settlement consisting solely of large, detached houses. The parish boundaries of Stoke d'Abernon have now been published on the website of Stoke d'Abernon Residents Association.</p> <p>This is a once-in-a-lifetime opportunity to save our local green, healthy, biodiverse character and our much valued, readily visible landscape. As the NPPF Green Belt section clearly states, LPAs should not just protect our Green Belt landscapes, access, and biodiversity, but seek to enhance them.</p>
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Name	Dorothy Ford
User ID	26818145
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The policy of Protecting the Green Belt - avoiding inappropriate development - needs to be strengthened in order to succeed. In order to protect my local Oxshott Green Belt from inappropriate development, Local Plan needs to correct part of the Evidence Base Base. There are inaccuracies relating to the evidence/assessment of Sub-Area 11/GB46 in the Evidence Base documents - due to be submitted to the Secretary of State along with the Local Plan. The evidence is not proportionate as it does not recognise the strengths of this Sub-Area either in words or photos.</p> <p>I have submitted detailed comments/suggestions, with photos to support these, photos in my response to Chapter 3.- as the representative of the 2505 people who have signed the SA-11 "Our Green Belt is Under Threat" change.org petition to demand that the evidence for SA-11 be duly corrected. The EBC Planning Head Ms Tagliarini instructed me many months ago that it was only acceptable and appropriate to submit this petition during the current Regulation 19 consultation.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: []

	<p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>Please see my previous response. In other words, the Local Plan generally is sound - with the exception of the inaccurate, inconsistent, contradictory and disproportionate Evidence Base for Sub-Area 11 that is available in several documents on the EBC website - which EBC officers say indicated to me in June (following the Community group workshop) we're going to be submitted to the Secretary of State along with draft Local Plan.</p> <p>I have therefore submitted comments, a document, and photos in my response to Chapter 3 of the draft Local Plan.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Please see the document and photographs I submitted in response to Chapter 3 of the draft Local Plan. The photos support 3 key strengths of Sub-Area 11/GB 46 that need to be recognised in order for the evidence base to be accurate, sufficiently detailed, and proportionate</p> <ol style="list-style-type: none"> 1. the “strategic views” of the SurreyHills AONB from the popular, accessible SA-11 Public Footpath 2. the cherished, unspoilt landscape view, full of character, which is readily visible to the busy, popular commuter road Blundel Lane - where many drive/walk/cycle or ride horses. The photo I’ve provided is view from the corner of Blundel Lane & Waverley Road, taken by the Vicar of StAndrew’s Church, Oxshott. 3. the positive function of SA-11 as a buffer between a low-density Stoke d’Abernon parish settlement and a higher- density, more diverse settlement of Oxshott parish. The boundaries of the parishes is recognised by EBC’s road sign marking the boundary between Oxshott and Stoke D’Abernon; the Church of England website; and the Stoke d’Abernon Residents Association website which includes a map of the parish boundaries of Stoke d’Abernon.

	<ul style="list-style-type: none"> • F3099F33-078C-4A8E-A185-09E2F4684A4C.jpeg • 3808185F-5B1B-41B8-85E5-4BCE2E7F9C49.jpeg • SA-11+Response to Reg 19 Consultation.docx • 6E0BDCA2-75F2-4961-87AA-98B9F2CACA56.jpeg • C3C1B626-4D40-40A1-8743-9A36581EF101.jpeg • 0C4CB674-9D6D-4CA8-AC84-05471F9D85CE.jpeg
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	I consider attendance necessary in order to ensure that the concerns of the 2505 people who have signed the change.org petition to save my local Green Belt Sub-Area 11 ("Our Green Belt is Under Threat) are duly noted and concerns addressed. There are a few possibilities, such as published an accurate summary of corrected evidence in EBC's Topic 1 paper, or amending the Local Plan's strategic view section to record that glimpses of the Surrey Hills AONB are visible not just from Oxshott Heath - but also from the Sub-Area 11 Public Footpath. Another possibility is to add Sub-Area11 to the Green Infrastructure map (which currently only includes neighbouring Green Belt Sub-Area 15). Development of Sub-Area 11 would reduce the performance of Sub-Area 15 by restricting the views of the wider countryside; and reduce or eliminate the contribution of walks/runs along SA-11's Public Footpath as a contribution to residents' health, happiness and well-being by providing stunning, unspoilt, biodiverse leisure and pleasure/views.

Name	Dorothy Ford
User ID	26818145
Organisation	
Policy / Evidence base/ part of plan:	ENV6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>The map of the Thames Basin Heath Special Protection Area, which shows the zone within 5km of the TBH SPA, should be more detailed so that it is then apparent which roads and which Green Belt sites are indeed with 5km of the TBH SPA. For example, the entirety of Green Belt Sub-Area 11 is indeed within 5 km of the Thames Basin Heath SPA. However this is not apparent from the map provided in the draft Local Plan.</p>

	<p>The map on page 18 of the 2011 Elmbridge Core Strategy clearly shows that the entirety of Green Belt Sub-Area 11 is within 5 km of the TBH SPA. The map achieves this by including all Green Belt boundaries.</p> <p>If the draft Local Plan map includes the Green Belt boundaries and main roads, that would help.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Dorothy Ford
User ID	26818145
Organisation	
Policy / Evidence base/ part of plan:	ENV11
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No It's a good start, but needs more detail to respect/implement the NPPF.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>The Surrey Hills AONB is visible from the Public Footpath in Oxshott's Green Belt Sub-Area 11 - not just from Oxshott Heath. The Surrey Hills are visible from the ancient southern part of the Footpath leading to other Green Belt sites, including Sub-Area 8, which have been duly recognised as strongly performing.</p> <p>Sub-Area 11 is part of the larger Green Belt Parcel 10 site which has been duly designated as strongly performing. Given the stunning landscape of Sub-Area11, its unspoilt rural character, the</p>

	<p>fact that it is 100% undeveloped greenfield agricultural land currently yielding crops of hay, and the stunning landscape of Surrey Hills AONB - the Evidence Base for the Local Plan should designate SA-11 as strongly performing and therefore not worthy of further consideration for possible development. The facts/evidence need correcting.</p> <p>Because SA-11 is so strongly performing, it has been teamed up with weak performing, previously developed Sub-Area 15 in order to designate it for further consideration for development. It is inconsistent with national policy, and potentially unlawful, to join up a high performing Green Belt Sub-Area such as SA-11, with a weakly performing Sub-Area such as SA-15 simply in order to consider developing that high performing site. Page 37 of ARUP's December 2018 Green Belt - Boundary Review Supplementary Work :Methodology and Assessment recommends that SA-11 is coupled with previously developed SA-15 so that it can be considered for future development.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	M Foreman
User ID	16387969
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I would like to express my support for the spatial strategy proposed in the Draft Local Plan. I believe strongly about protecting The Green Belt and Green spaces. These spaces should not be used to build on . I agree with the council's justification in protection of The Green Belt and green spaces.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Nigel Forrest
User ID	41194209
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Thomas Forster
User ID	41059841
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Bridget Fox
User ID	23160481
Organisation	Woodland Trust
Policy / Evidence base/ part of plan:	ENV2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>The National Planning Policy Framework (NPPF) 2021 (paragraph 180c) states: “development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”.</p> <p>The proposed wording of ENV2 para 2. "Development must not result in the loss of, or damage to, ancient trees, trees, woodlands and hedgerows that make or are capable of making a significant contribution to the character or amenities of an area, unless the benefits would clearly outweigh the loss and replacement planting is provided" is insufficiently robust to match the requirement of the NPPF as it refers to relative benefit rather than to wholly exceptional reasons.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The National Planning Policy Framework (NPPF) 2021 (paragraph 180c) states: “development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”.</p> <p>The proposed wording of ENV2 para 2. "Development must not result in the loss of, or damage to, ancient trees, trees, woodlands and hedgerows that make or are capable of making a significant contribution to the character or amenities of an area, unless the benefits would clearly outweigh the loss and replacement planting is provided" is insufficiently robust to match the requirement of the NPPF as it refers to relative benefit rather than to wholly exceptional reasons.</p>

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: [Y]</p> <p>The National Planning Policy Framework (NPPF) 2021 (paragraph 180c) states: “development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”.</p> <p>The proposed wording of ENV2 para 2. "Development must not result in the loss of, or damage to, ancient trees, trees, woodlands and hedgerows that make or are capable of making a significant contribution to the character or amenities of an area, unless the benefits would clearly outweigh the loss and replacement planting is provided" is insufficiently robust to match the requirement of the NPPF as it refers to relative benefit rather than to wholly exceptional reasons.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>The Woodland Trust recommends the following policy wording for protection of ancient woodland:</p> <ul style="list-style-type: none"> i. Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons. ii. As ancient woodland and ancient or veteran trees are irreplaceable, discussions over possible compensation should not form part of the

	<p>assessment to determine whether the exceptional benefits of the development proposal outweigh the loss.</p> <p>iii. Ancient wood pasture and historic parkland should receive the same consideration as other forms of ancient woodland. The protection of the whole habitat is necessary even though tree cover may be comparatively sparse. Development on open space between trees in an area of ancient wood pasture or historic parkland should not be permitted. Further information is available in the Trust's "Planners' Manual for ancient woodland".</p> <p>planners-manual-for-ancient-woodland.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Bridget Fox
User ID	23160481
Organisation	Woodland Trust
Policy / Evidence base/ part of plan:	ENV4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>The Woodland Trust objected to the potential allocation for development of a number of Green Belt sites in the 'Shaping Elmbridge: Local Plan Options' consultation (September 2019) on the basis that they contained or were adjacent to, areas of ancient woodland or ancient/veteran trees. We are therefore support the policy ENV4 on the basis that it protects those ancient woodland sites.</p> <p>The Trust does not take a view on the principle of green belt release per se but will object to the allocation of any site for development that contains ancient woodland (both ASNW and PAWS), as contrary to the National Planning Policy Framework section 180c. Development that encroaches on or removes areas of ancient woodland will necessarily cause net loss of biodiversity and cannot, even with mitigation, deliver biodiversity net gain.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>The Woodland Trust objected to the potential allocation for development of a number of Green Belt sites in the 'Shaping Elmbridge: Local Plan Options' consultation (September 2019) on the basis that they contained or were adjacent to, areas of ancient woodland or ancient/veteran trees. We are therefore support the policy ENV4 on the basis that it protects those ancient woodland sites.</p> <p>The Trust does not take a view on the principle of green belt release per se but will object to the allocation of any site for development that contains ancient woodland (both ASNW and PAWS), as contrary to the National Planning Policy Framework section 180c. Development that</p>

	encroaches on or removes areas of ancient woodland will necessarily cause net loss of biodiversity and cannot, even with mitigation, deliver biodiversity net gain.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Bridget Fox
User ID	23160481
Organisation	Woodland Trust
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>The National Planning Policy Framework (NPPF) 2021 (paragraph 180c) states: “development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”.</p> <p>Development which would result in the loss of ancient woodland, aged or veteran trees should not be permitted.</p> <p>We object to the allocation of the following proposed sites for development, as they contain or are adjacent to veteran trees.</p> <p>WOT25 US79 Regnolruf Court, Church Street, Walton-on-Thames, KT12 2QT contains two Veteran Common Yews – ATI ID: 195028 at Grid ref: TQ10196658 and ATI ID: 195034 at Grid ref: TQ10186657.</p> <p>ESH1 US279 Esher Place, 30 Esher Place Avenue, Esher, KT10 8PZ contains a Veteran Tulip Tree – ATI ID: 6747 at Grid ref: TQ13356484</p> <p>WEY19 US431 Shell Petrol Filling Station 95 Brooklands Road Weybridge KT13 0RP is adjacent to a Veteran Pedunculate Oak – ATI ID: 13797 at grid ref: TQ07166194.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No

	<p>We are concerned about the allocation of the following proposed sites for development given their proximity to veteran trees.</p> <p>WOT25 US79 Regnolruf Court, Church Street, Walton-on-Thames, KT12 2QT contains two Veteran Common Yews – ATI ID: 195028 at Grid ref: TQ10196658 and ATI ID: 195034 at Grid ref: TQ10186657.</p> <p>ESH1 US279 Esher Place, 30 Esher Place Avenue, Esher, KT10 8PZ contains a Veteran Tulip Tree – ATI ID: 6747 at Grid ref: TQ13356484</p> <p>WEY19 US431 Shell Petrol Filling Station 95 Brooklands Road Weybridge KT13 0RP is adjacent to a Veteran Pedunculate Oak – ATI ID: 13797 at grid ref: TQ07166194.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: [Y]</p> <p>The National Planning Policy Framework (NPPF) 2021 (paragraph 180c) states: “development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”.</p> <p>"Wholly exceptional reasons" would typically relate to Nationally Significant Infrastructure Projects, not to residential site allocations.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	<p>Development which would result in the loss of ancient woodland, aged or veteran trees should not be permitted. Ancient and veteran trees should be excluded from development sites and protected with an appropriate buffer / root protection area.</p> <p>Natural England specifies a minimum 15 metre buffer where development sites are adjacent to ancient woodland. The Woodland Trust recommends that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ms Fraser
User ID	16287041
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ms Fraser
User ID	16287041
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>I have the following issues;</p> <p>1) SS2 iii) "offering excellent connection through sustainable transport links to reduce reliance on private motor vehicles". A great statement but not achievable. All you are offering is mention of charging points, more cycling and walking routes. The problem is that not everyone drives, or can afford an electric car and if you can, there are problems with charging it if you live in terraced houses, flats etc. Also, old and disabled people can't walk and cycle more. What is needed is more buses giving access to trains, towns and other facilities, but you don't have any control over buses.....unless you're thinking of starting an EBC fleet??</p> <p>2) The plan states that new housing should be 1/2 bed except like for like replacement. Towns such as Walton (18.5%) and Weybridge (17.7%) have the lion's share of new housing compared to Claygate (4.7%) and Cobham/Oxshott (12.8%). The plan also mentions "creation of sustainable, inclusive and mixed communities". Surely if you want to create those mixed communities you should be building more in Claygate and Oxshott and should not give exception for like-for-like houses. Then you could build 1 & 2 bed houses on a previous 4/5 bed plot and you'd achieve more housing and also a more mixed community.</p> <p>3) Site allocations. There are numerous sites in your list of potential areas for housing development which are counterintuitive if you want to keep and promote healthy, sustainable communities. Earmarking station car parks for housing will just mean fewer people use the trains (unless you provide a far reaching bus service that runs all day and evening). Earmarking village</p>

	halls, car parks, Civic Centre, Hersham Shopping Centre, Churches will again just wipe our any town centre and community places. So this plan is not sound.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: [Y]</p> <p>Justified: []</p> <p>Consistent with national policy: []</p> <p>My previous comments provide the explanation.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>1) Need buses. You need to either think of providing your own fleet or get together with Surrey County Council and come up with an innovative plan.</p> <p>2) Remove the exception for like for like house size replacement.</p> <p>3) Don't earmark station car parks, community areas, churches etc for house building</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Lionel Frewin
User ID	41176961
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Reference your Draft Local Plan 2022-37- As a long-term resident / owner of land in Claygate, owning our family home at 53 Red Lane, having a legally binding Agreement for acquisition of 45 Red Lane & owning the fallow grass field to the rear. We write to lodge these representations to set out our case to develop the land at 45 Red Lane forming access to the rear field & to develop land for much needed local affordable family housing.</p> <p>The site was introduced to the local authority on our behalf in correspondence between POD Architects and Joseph Kelly of the Elmbridge Planning Policy and Strategy Team on the 21st December 2021. Correspondence provided was accompanied by detailed site assessment which included proposals of how the land within our ownership boundary could be developed. Part of this edge of settlement site is currently designated within the Elmbridge Green Belt Boundary. Local plan representations seek to promote the site as one that could be removed from the green belt and brought forward for housing that would meet the shortfall in local housing supply. We commissioned POD Architects to prepare studies, demonstrating positive potential of the 1.3ha site illustrating the sustainability and suitability for residential allocation within Elmbridge's Local Plan. This principle is supported by the National Planning Policy Framework, reinforcing the governments objectives to boost housing in places like Claygate. The design document, which accompanied the letter of the 21st December, has not been subject to any discussions with Elmbridge Borough Council planning department at this stage.</p> <p>The Site</p>

Current site consists of a plot occupied by a house and associated garden at 45 Red Lane, Claygate. The boundary line is a mix of fences, bushes and trees creating an urbanised feel. The cluster of farm buildings contain blockwork sheds with corrugated roofs and light industrial units supporting non-agricultural functions. There's also a rural pursuits centre. The northern boundary is defined by hedgerow which is unkempt in parts particularly where leylandii feature. This scruffy area separates part of the site from a scrap yard and made-up land. Western boundary is Surbiton Golf Club, which has long since changed the landscape from former agricultural usage to a leisure pursuit. Beyond are glimpses of the wider Claygate area. The descriptions emphasises the urbanising affect the town has had on this parcel of land.

The Elmbridge Borough Council Green Belt Boundary Reviews

Part of the process to develop initial proposals the design team examined the suite of documents that formed part of the Local Plan Evidence Review and will inform the forthcoming spatial strategy for the Borough. The EBC Green Belt Boundary Reviews in March 2016 and December 2018 assessed current Green Belt and identified land that could be removed to allow for development.

We understand the reason for this review was to identify how Elmbridge could meet the existing shortfall in the delivery of new family and affordable homes in the area. The previous Land Availability Assessments relying solely on previously developed land to meet the annual housing targets. The most recent LAA available suggested only a 4.88 year supply, not meeting the 5 year requirement. Conclusion from this is some currently designated Green Belt land would need to be considered to meet the shortfall.

The Elmbridge Green Belt Boundary Review in 2017 assessed land that could be released for development from current Green Belt Boundary. Report identified the land to the rear of 45 Red Lane within a larger area known as 'Number 34'. Area 34 was categorised as 'Strongly Performing' based on the assessment criteria. In essence this a significant and large area that stops Claygate merging with neighbouring settlements like Hinchley Wood. The site in question forms a very small part of this land.

Arup's 'Elmbridge Green Belt Boundary Review – Supplementary Work – Methodology and Review'. Rev A. (Dec 2018) identified land that performs weakly against the green belt designations. This included parcels within Area 34 that overall had been described as 'Strongly Performing'. The land (Part of RSA-25) subject to this representation was described as follows:

a. Performs Weakly Overall

b. Makes less important contribution to the Green Belt

c. The inner green belt boundary is weak, following the weakly defined backs of residential properties (Those on Red Lane).

d. The sub area maybe reduced in scale by realigning the northern and eastern boundaries (of my land) with dense well established tree belts separating Manor Farm and the paddock to north of properties on Red Lane.

e. Finally it recommended: "That sub area 51 (including RSA- 25 (my land)) is considered further for release in its entirety, which would require the strengthening of the northern boundary as RSA-25, or alternatively a reduced area bounded by more readily recognisable boundary features could be considered". Effectively the diagram in the report identifies my land. The site is subject to policy CS14 which protects views across the site between Winey Hill and Telegraph Hill. This is in place to protect the local prevailing character of the area.

Findings of the review support the site description conclusions that part of the green belt has been urbanised.

At the time that the Arup study took place in 2019 no development proposals had been considered for the parcel of land on the basis that there was limited access from the Red Lane. The proposals that were sent to the Elmbridge Planning Policy and Strategy on the 21ST December 2021 had not been previously included in a 'call for sites' for this reason. However, the council had been made aware of the land by another developer called Lavanter.

The design team has recognised that sites of this nature on the edge of a settlement like Claygate need to be carefully considered to ensure they add value to the existing settlement and further justify their removal from poorly performing green belt areas. The Elmbridge Core Strategy states sites greater than 0.3HA are required to have a density of 30 dwellings per hectare, which would apply to this site as it is 1.3HA. The Elmbridge Strategic Housing Market Assessment (SHMA) also sets out a general mix of 20% 1 beds; 50% 2 beds; 20% 3 beds and 10% 4-5 beds within schemes in order to meet targets.

Meeting these points may support a scheme being removed from the green belt. However, these targets seem a broad-brush approach to delivering new dwellings and seems to be contradicted by other Elmbridge local policies such as the Local Plan Evidence base and Claygate Character Companion SPG. It suggests that a 30dph scheme is inappropriate in Claygate.

When considering previous planning permissions, higher densities can be achieved in the Local Centre, around the station and in the local parade of the village centre. This is due to the

conversions of offices and businesses above shops and the size of the site plot as well as flatted development above shops and offices. Despite these, it has done little to increase the supply of affordable family homes in the area.

Schemes have been considered for the site that are at 30dph and utilise the same mix suggested by the Strategic Housing Market Assessment during our feasibility exercises. The examination of the various policies and addressing the current criteria during our studies informed our design approach. We concluded that a scheme of 20dph would be an appropriate density for the land. This representation is mindful that sites that have come forward in Claygate in recent years have been developed at a low density with large, detached homes of 5 bedrooms. This has exacerbated the shortfall in delivering affordable appropriately sized family homes. In setting out the site at 20dph consideration has been given to providing a suitable mix of dwellings. Therefore that density is based on a mix that only promotes 3, 4 and 5 bed family dwellings. We think the delivery of 26 new homes provides a positive quantum of dwellings that would support the Elmbridge Housing supply.

Throughout the design process the design team will closely consult the planning guidance provided by Elmbridge Borough Council to help develop a thoughtful and attractive proposal which enhances the character of the area. This document has been developed with reference to the Ministry of Housing, Communities and Local Government 'National Design Guide' and makes reference to the 10 characteristics. This will form part of the post analysis design development that we hope to undertake in due course. Elmbridge Core Strategy has been used as a tool when developing the proposal with key policies highlighted and addressed:

- CS1 - Spatial Strategy
- CS14 - Green Infrastructure
- CS17 - Local Character. Density and Design
- CS19 - Housing type and size
- CS21 - Affordable Housing
- CS27 - Sustainable Buildings

The design submission demonstrated that this is a highly sustainable site that meets '15-minute city' type principals whereby all amenities and public transport connections are within a 5-, 10-, or 15-minute walk or cycle of the development site. The development will respect the context and will seek to reinforce the current boundaries with suitable landscapes. These properties would be traditional in style reflecting Claygate's character and grain whilst taking advantage of the gentle

	<p>slope of the land and south orientation, to make them energy efficient and keep much of its wild meadow character.</p> <p>We believe such a proposal (removal of land from Green-Belt) would accord with Elmbridge Councils policies as defined in DM10 and other sections of the LDP. As a family, we are proud to be part of the Claygate community, having lived in the village for thirty-six years. It is our intention to remain resident by downsizing into a new property and offering up a site for much needed new affordable family homes.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: [Y]</p> <p>Justified: []</p> <p>Consistent with national policy: [Y]</p> <p>Current plan will only meet 73% of housing requirement</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Increase the current 3.1 year supply of land available for development by, amongst other things, releasing previously defined poorly performing Green Belt land.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	<p>Yes, I wish to participate at the oral examination</p>

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	because I have carried out a considerable amount of work on the proposed development site referred to previously and could expand on my submission.

Name	Vincent Gabbe
User ID	40214145
Organisation	VRG Planning, on behalf of of Damian Norris, Sharon Giffen and Bruce Fenn
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>We believe that the Local Plan is not positively prepared, justified or consistent with national policy, because the Green Belt boundary has not been considered sufficiently with regard to minor boundary changes, or with regarding the Green Belt Review.</p> <p>In particular, this representation is concerned with the area of Green Belt covering 24 and 26 Spencer Road, East Molesey, as identified on the attached plan at Appendix 1. This area is designated as Green Belt, but comprises two houses and the associated gardens.</p> <p>Given that the area comprises two dwellings, it is difficult to see how this land can perform the functions of Green Belt. The delineation also does not present a logical or defensible Green Belt boundary, as required by the National Planning Policy Framework. A defensible boundary would follow the edge of the Spencer Park ownership and exclude these two dwellings. This would mean that the boundary would follow the edge of the urban area and a dense landscaping buffer. Whilst the Green Belt review has included a review of minor Green Belt boundaries, this only appears to relate to mapping errors and not other changes that may be needed. Other Local Authorities have extended their Green Belt reviews more widely to include this.</p> <p>By delineating the Green Belt boundary to include two dwellings within the built up area, this has removed the ability of these dwellings to secure planning permission for extensions or alterations that they should be entitled to deliver. The planning history for number 26 Spencer Road confirms that the Green Belt status means that securing planning permission for any extension to address existing deficiencies to the property has become impossible.</p>

	<p>Finally, we note that the Green Belt Review (Methodology and Assessment) undertaken by Arup on behalf of the Council and published in 2016 considered the land in question to perform poorly against the National criteria for Green Belt. Specifically, the document states the following in relation to Parcel 77:</p> <ul style="list-style-type: none"> - Purpose 1: To check the unrestricted sprawl of large built-up areas: score of 1 out of 5. - Purpose 2: To prevent neighbouring towns from merging: score of 0 out of 5. - Purpose 3: Assist in safeguarding the countryside from encroachment: score of 2 out of 5. - Overall Summary: Weak (on a scale of weak, moderate and strong). <p>Whilst additional Green Belt review documents were released in 2018 and 2019, these acknowledge that Government policy regarding the purposes of Green Belt remain unchanged since the original assessment. The results of the 2016 review therefore remain relevant. The Council's own technical evidence therefore confirms that the land in question performs weakly against the National criteria for Green Belt. This is further evidence supporting removal of the land in question from Green Belt.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>See previous answer.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	The Local Plan proposals map should be amended, to exclude numbers 24 and 26 Spencer Road, as identified on the attached plan delineated in blue on the attached plan.

	Elmbridge Local Plan Representations - 24 and 26 Spencer Road Final.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Rosalind Gall
User ID	37998849
Organisation	Solve Planning Ltd obo Acre
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Please see attached representations
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please see attached representations
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please see attached representations.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please see attached representations

	Reg 19 Reps Obo Acre - With App.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	It is considered that the fundamental issues with the soundness of the plan warrant further discussion through oral examination. Further as set out in the accompanying representations, we consider there are exceptional circumstances to justify Green Belt release. Should the Inspector direct the Council to allocate further sites, it will be important for participation in the oral examination so that any questions the Inspector may have regarding omission sites can be discussed.

Name	Gareth Garner
User ID	41232705
Organisation	Willow Tree Homes
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No see separate representations document
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No see separate representations document
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: [Y] see separate representations document
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	see separate representations document

	Regulation 19 Reps - Pharaohs Lodge.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	see separate representations document

Name	John Gaule
User ID	16421505
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes I don't really know as I'm not a lawyer or a planning expert. I presume it's been checked by both.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Completely unsuitable for the area.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] This is gross overdevelopment of the area, destroying and undermining all the reasons why people want to live here in the first place. Of course you should not build on the Green Belt but this alternative solution is also unacceptable.

	<p>6,875 units, many of them just human hutches, is far too many. It turns Elmbridge into an extension of the London concrete jungle, with overpopulation and increasingly inadequate infrastructure, everything from schools and medical care to traffic management, public transport and policing.</p> <p>It will do untold damage to the local environment, increase pollution and exacerbate climate change.</p> <p>Clearly a lot of work has gone into this document to ensure it addresses current concerns but as we have seen many times planning objections get brushed aside and parties with different agendas overrule sensible decisions.</p> <p>Even current approved plans go too far: e.g. Hampton Court Jolly Boatman site: a massive hotel and 100 flats next to a national monument, affordable housing promised 40%: delivered 12%; and a further 84 flats on Hampton Court Way will cause problems and traffic chaos for years. As would the mooted Sandown and Café Rouge developments.</p> <p>Further to these follies your plan would turn important local amenities such as the Civic Centre and even Esher library into human storage warehouses.</p> <p>The fundamental premise needs overturning. The problem is not too few houses, it's too many people in one area (London and the South East). The population density need levelling up across Great Britain. People should be encouraged to move to less crowded areas of the UK, with employment and even financial inducements if necessary.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Scrap it and fight the government proposals all the way.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Wendy Gibbs
User ID	22910273
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Rowan Gilbert
User ID	24621889
Organisation	NHS Property Services
Policy / Evidence base/ part of plan:	INF1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>Policy INF1 states that the council will work in partnership with providers of infrastructure and services to facilitate the timely provision of infrastructure necessary to support sustainable development.</p> <p>NHSPS supports the overall approach to infrastructure delivery set out with Policy INF1 and welcomes that the delivery of infrastructure will be funded through a combination of existing public funding, developer-led provision, and through the use of the Community Infrastructure Levy (CIL). Our experience has shown that the provision of new purpose-built healthcare infrastructure to mitigate the impacts of development will require extensive capital funding. This means a large proportion of CIL for health should be anticipated. NHSPS encourage the Council to work with NHS commissioners and NHS delivery teams to identify opportunities to utilise CIL funding towards the delivery of new and expanded health facilities to support growth.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p>

	Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	2022 NHSPS Elmbridge Local Plan Reg 19 Reprs.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Rowan Gilbert
User ID	24621889
Organisation	NHS Property Services
Policy / Evidence base/ part of plan:	INF2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>Policy INF2 stipulates that development which would result in the unnecessary loss of community facilities will not be permitted unless the proposal demonstrates that:</p> <ol style="list-style-type: none"> there is no longer an identified community need for the facilities or they no longer meet the needs of users and cannot be adapted; or they will be replaced by alternative and well-located facilities that will continue to serve the similar needs of the neighbourhood and wider community; and the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use for which there is a local need has been fully assessed. <p>NHSPS supports the provision of quality health infrastructure, to enable this provision and requires flexibility in its estate. In particular, the capital receipts and revenue savings generated from the disposal of unneeded or unsuitable sites and properties for best value is an important component in helping to provide funding for new or improved NHS services and facilities. Restrictive policies can prevent, or delay required investment in services and facilities. To confirm, a property can only be released for disposal or alternative use by NHSPS once it is confirmed that it is no longer required for the delivery of NHS services by ICBs. Furthermore, NHSPS estate code requires that any property to be disposed of is first listed on “e-PIMS”, the central database of Government Central Civil Estate properties and land, which allows other public sector bodies to consider their potential use for it.</p>

	<p>An essential element of supporting the wider transformation of NHS services and the health estate is to ensure that surplus and vacant NHS sites are not strategically constrained by local planning policies, particularly for providing alternative uses (principally housing). Therefore, where SH ICB can demonstrate that healthcare facilities are no longer required for the provision of services, there should be a presumption that such sites are suitable for housing (or other appropriate uses) and should not be subject to restrictive policies or periods of marketing. To ensure Policy INF2 is sufficiently flexible and allows for NHS estate strategies to be implemented effectively, a suggested amendment to part 3 of the policy is set out below: Development proposals that would result in the unnecessary loss of community facilities will not be permitted unless it can be demonstrated that:</p> <ul style="list-style-type: none"> a. there is no longer an identified community need for the facilities or they no longer meet the needs of users and cannot be adapted; or b. they will be replaced by alternative and well-located facilities that will continue to serve the similar needs of the neighbourhood and wider community; and c. the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use for which there is a local need has been fully assessed. d. the loss of change of use of existing facilities is part of a wider public service estate reorganisation
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	2022 NHSPS Elmbridge Local Plan Reg 19 Reprs.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Rowan Gilbert
User ID	24621889
Organisation	NHS Property Services
Policy / Evidence base/ part of plan:	INF3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Policy INF3 sets out how the Council expects developments to contribute to healthy and active lifestyles. NHSPS support the provisions set out within the draft policy which will help achieve this.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	2022 NHSPS Elmbridge Local Plan Reg 19 Reprs.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Rowan Gilbert
User ID	24621889
Organisation	NHS Property Services
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>1. Site WEY5 - Weybridge Hospital and Car Park, 22 Church Street, Weybridge, KT13 8PY NHSPPS supports the identification of Site WEY5 as a mixed-use health and housing site allocation, subject to the following comments. NHSPPS is the freehold owner of Weybridge Hospital, and the site extends to c.0.8ha, with existing vehicular access off Church Street and Minorca Road. A fire in July 2017 resulted in the complete destruction of the buildings on site. Following demolition and make safe, temporary prefabricated modular units have been installed. The remainder of the site consists of car parking. The entire site falls within the defined Weybridge 'District Centre' boundary and within 150m of both Primary and Secondary Shopping Frontages. The site has good connectivity. Several bus stops are located close to the site, providing connections to a number of locations including Woking, Oxshott, Addlestone, Brooklands and Kingston. The Weybridge Rail Station is situated 120m to the south of the site and provides regular services into London Waterloo. NHSPPS and Surrey Heartlands ICB (SH ICB) have been working to develop proposals to re-instate permanent clinical services in Weybridge. It is anticipated that pre-application discussions will be held on the potential redevelopment of the site in 2022. NHSPPS previously supported draft site allocation US395 and recommended that the site area cover the entire site, rather than only the car park area, through the 2019 Issues and Options Consultation.</p>

The Draft Local Plan has allocated the site to provide 30 units/mixed use redevelopment within the period 1-5 years. NHSPS supports this draft allocation and can confirm that the site is suitable and available (in accordance with NPPF definition) for health and residential, and/or other appropriate uses. The delivery of residential development onsite will be contingent on the retention of part of the site for health and will be determined by SH ICB need for the whole site. NHSPS cannot therefore provide an estimated number of dwellings which may be delivered on this site, however, consider 30 units appropriate at this stage.

Lastly, it's important to understand that NHS funding for new health care facilities relies significantly on generating capital from the sale of existing assets which are surplus to service requirements. Any potential receipt from land sale of the Weybridge Hospital site will allow for reinvested towards improving local healthcare services. If a mixed-use healthcare/residential development were to come forward on the site, then we would request that any forthcoming allocation recognises the need to secure optimum value from the residential development. This would be in accordance with draft policy HOU4 - Affordable housing, which recognises the need to balance overall viability of schemes and any site-specific abnormal costs.

Site WOT35 - The Heath Centre, Rodney Road, Walton-on-Thames, KT12 3LB

NHSPS supports the identification of Site WOT35 as a potential housing site allocation, subject to the following comments.

NHSPS is the freehold owner of Walton Community Hospital and Health Centre sites on Rodney Road, Walton on Thames. The site extends to c.1.2ha. The site is in two parts, separated by Rodney Road.

The portion to the north of Rodney Road includes Walton Health Centre, a single-storey brick building, and two areas of car parking. The portion to the south includes Walton Hospital (part single, part two storey) and a further car parking area. Vehicular and pedestrian access to both sites is via Rodney Road, but a further access point lies to the north of the site via Clements Road.

NHSPS previously supported draft site allocation US370 and recommended that the site area cover the entire site, rather than only the northern area, through the 2019 Issues and Options Consultation.

The entire site is now included as a site allocation within the Draft Local Plan, to provide 36 residential units/mixed use redevelopment within the period 11-15 years.

	<p>NHSPS have recently invested in Walton Community Hospital and Walton Health Centre to support ongoing health services. Whilst NHSPS welcomes the opportunity to drive value from existing NHS sites to ensure they are fully utilised in an efficient manner, both Walton Community Hospital and Walton Health Centre remain active health sites. Should any part of the site be declared surplus to operational healthcare requirements in the future, including, for example, delivering new/improved health accommodation alongside housing, then NHSPS would welcome the opportunity to explore this with the Council. NHSPS cannot provide an estimated number of dwellings which may be delivered on this site, as this will be dependent on healthcare commissioning requirements which will also determine whether the site is available or deliverable. Site MOL11 – Molesey Hospital, High Street, KT8 2LU</p> <p>NHSPS supports the identification of Site MOL11 as a housing site allocation, subject to the following comments.</p> <p>NHSPS is the freehold owner of the Molesey Hospital site on High Street, Molesey. The site extends to c.0.73ha and includes Wesley Lodge to the south of the site.</p> <p>NHSPS previously promoted the site to the 2019 Issues and Options Consultation. Should any part of the site be declared surplus to the operational healthcare requirement of the NHS, it should be considered positively for residential, care, or other appropriate uses.</p> <p>The site has been included as a site allocation within the Draft Local Plan to provide 70 residential units within the period 6-10 years.</p> <p>NHSPS can confirm that alternative uses are being explored for the vacant clinic at Wesley Lodge and vacant land adjacent to the Wesley Lodge. A site plan has been provided for clarity. NHSPS confirm that this land is suitable and available (in accordance with NPPF definition), subject to confirmation of health commissioning requirements, and capable of being delivered within the period 6-10 years for housing. NHSPS are working with SH ICB to understand future healthcare requirements of the remaining land. NHSPS cannot provide an estimated number of dwellings which may be delivered on this site, this will be dependent on healthcare requirements.</p>
<p>Question 3</p>	<p>If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.</p>
	<p>Positively prepared: []</p>

	<p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>2022 NHSPS Elmbridge Local Plan Reg 19 Repls.pdf</p> <p>WESL01_4751_SitePlan.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	National Highways (Beata Ginn)
User ID	36489505
Organisation	National Highways
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Please see attached e-mail.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Please see attached e-mail.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	National Highways FORMAL RESPONSE #17039 reg19 Elmbridge Local Plan Regulation 19 Representations Consultation.msg

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Erion Gjika
User ID	41174497
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>The plan was drafted without the benefit of an assessment of the needs of liveaboard boaters and which was not completed until February 2022. This assessment was withheld from the public including the boaters their legal teams , even during a planning appeal hearing on 15 March 2022. This withholding of such a vital document from us and the planning Inspector shows the contempt and disregard EBC holds for due process and the law. The plan fails to address the specific housing requirements of Boat Dwellers contrary to para 60 NPPF. The approach is in clear breach of para 62 NPPF which states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>The Plan was prepared without proper regard to those who live on boats on the River Thames and fails to address the needs of those known to be living on boats in the EBC area. This ORS survey uses phrases and descriptions which do not exist e.g licenced moorings, there is no such thing as a licenced mooring. It uses EBC terminology e.g unauthorised and illegal moorings giving the impression that all boats moored in the Borough of EBC are unconsented or illegal. This, of course is very inaccurate. It also fails to mention that</p>

many boats are moored to land where the boaters (including myself) are legally asserting their ownership of the Land. This was explained to ORS by the boaters but has not been included. The plan is not positively prepared in so far as it fails to consider, let alone address, the needs of Boat Dwellers.

The Council has known that boats are occupied on the River Thames and are exercising their legal right under the Thames conservancy act 1932 to moor their boats to their land under riparian rights.

There are many more liveaboard boats in the EBC area than ORS was unable to contact. It was pointed out to the Council at the March 2022 appeal hearings, there is no specific policy for livaboard boaters in national planning policy. Section 5 NPPF is concerned with 'Delivering a sufficient supply of homes'. This is unchanged from the July 2018 and 2019 versions. Paragraph 62 NPPF 2021 states as follows Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes). This also remains unchanged since 2018

The Local Plan Evidence Base had not identified a need for houseboat dwellers because no study had been commissioned to address this. The 2017 GTAA by ORS was only required to address the needs of Gypsy-Travellers and did not interview or include the needs of those living on boats on the river. There is no policy in the current Local Plan to address the needs of house boat dwellers nor is there a policy in the pre submission local plan. It is far from clear what 'wider corporate commitments' would help meet the need. There is no evidence that Officers have reviewed Policy DM 13 or how that would assist in addressing the issue of residential moorings. On 8 Aug 2019, the compliance team issued 9 enforcement notices for a number of moorings located north west of Cherry Orchard Gardens and adjacent to the towpath. The Notice failed to explain what purpose the moorings were being used for (ie storage, recreational, residential) but it was clear the concern was with the residential use made of the boats. Some Notices claimed there was land based development where there was none. The Plans attached so some Notices failed to identify the correct location of the

	<p>moorings.</p> <p>Travellers carried out a survey of 356 people from the Liveaboard Boater community using the Survey Monkey platform to ascertain experiences of healthcare services, and the challenges faced when accessing care. The study noted that it was difficult to ascertain the population of Liveaboard Boaters in the UK. Information from the Residential Boat Owners Association highlights suggested that at least 15,000 people live afloat in Great Britain but FFT noted that it was unclear how this figure had been calculated. The National Bargee Travellers Association estimate that over 50,000 or more people are currently living on boats. In 2021 EBC commissioned ORS to undertake the first survey of liveaboard boaters in the district. 51.... I am told that the Council is now currently undertaking a needs assessment. However, this is not currently in the public domain and so there is no evidence before me on the level of demand for permanent residential moorings and whether this would be addressed or met through a future development plan examination process or by some other means, and the timescales for doing so The Local Plan EIP will be the first opportunity for the findings to be examined. The study provides some useful information but omits any assessment of the existing availability of existing residential or leisure moorings.</p>
<p>Question 3</p>	<p>If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.</p>
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
<p>Question 4</p>	<p>Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.</p>
	<p>EBC should fulfill legal obligation by encouraging existing permanent residential moorings.</p>

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Because this going to effect my home and my future. 1

Name	S Graves
User ID	12103137
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>I support my local organisations, the CCHT and CDRA, in supporting the strategies and vision of the EBC DLP 2037 in principle.</p> <p>We believe the DLP to be legally compliant and sound but only with the following modifications to be inserted prior to and during the Examination in Public as appropriate:-</p> <p>Omission of a strategy for impact of the Wisley Airfield Development on Cobham, Stoke D'Abernon and Downside risks rejection of the DLP for lack of recognition of this major strategic cross border project. This development will significantly impact Cobham's infrastructure. It is estimated that a third of traffic movements from this development will be in the direction of Cobham.</p> <p>The Infrastructure Development Plan (IDP) does not place infrastructure as a prior condition to development and is weak on specific delivery and funding. The deliverability of the DLP is therefore questionable.</p> <p>Recognition that reduction on reliance on the car requires different solutions in the IDP for different areas of the Borough.</p> <p>Flood protection of existing assets not just new development to be included in the IDP in particular Plough Corner Conservation Area.</p> <p>The concept of a hierarchy of Green Belt performance in assessments by Arup are flawed. Land is either Green Belt or it is not.</p> <p>Improved provision for protection and replacement for trees under threat by development.</p> <p>Design Codes must protect the character of our streets as well as produce excellent individual buildings. This is particularly important because if we are to suffer a greater density of dwelling it is fundamental that effective design codes are adhered to and outcomes monitored.</p>

Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Guy Greaves
User ID	7958465
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>The draft Local Plan does not meet the number of additional dwellings required under the Government's standard method for calculating local housing need.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The draft Local Plan does not put forward how it might supply the number of additional dwellings required under the Government's standard method for calculating local housing need.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: [Y]</p> <p>Justified: []</p> <p>Consistent with national policy: [Y]</p> <p>Protection of Local identities</p>

In Section 2.2 of Chapter 2 of the Draft Local Plan states “Elmbridge is a collection of separate and distinctive places and local communities each with its own unique local identity, historic assets and attractive green and natural environment which are highly valued by our communities.”

‘The vision for Elmbridge 2037’ goes on to state “Building on the success of our existing communities, the built environment will be well designed, beautiful and will offer high quality public realms, contributing to the uniqueness of each settlement. Excellent design will safeguard the built, historic and natural environment for the health and wellbeing of existing residents and future generations.”

Policy SS2 states that the Local Plan will achieve this through ‘Sustainable place-making’ by, among other things: “Protecting and enhancing our natural, historic and built environment by enhancing the character and qualities of places and contribute positively to local distinctiveness, identity and history in accordance with national planning policy and the policies set out in the Plan.”

Policy ENV9 requires all new buildings and places “to be of a high quality, beautiful and sustainable, and respond positively and enhance the local context. Development that is not well designed will be refused where it fails to reflect local design policies and the code.”

However, Appendix A1 replaces Core Strategy policies CS3 through to CS12 (the policies which protect those ‘unique local identities’) before a Design Code is established and becomes enforceable as part of the new Local Plan (should it be adopted in the near future).

This lack of co-ordination and timing of the adoption of these two important documents will allow developers to do totally what they please over the time lapse and so, potentially, destroy the individual character of parts of the Borough.

Reliance on “excellent design (to) safeguard the built, historic and natural environment for the health and wellbeing of existing and future generations” as stated in ‘The Vision for Elmbridge’, will not happen unless enforced through a tough and detailed Design Code.

For this reason I find the draft Local Plan unsound.

Land for new development

The draft Local Plan is structured around the best use of previously developed (‘brownfield’) land (Chapter 1 Section 1.13) but recognises that it may not be sufficient to meet all the new development required. The draft Local Plan also intends to “renew, enhance and protect green

and blue spaces across the Borough” which includes the protection of the Green Belt against inappropriate development (Policy ENV4.1).

Elmbridge Borough Council currently cannot meet the Government’s required 5-year housing land supply (the latest figure of land supply being 3.96 years) and the draft Local Plan is proposing only 6,785 additional dwellings in the plan period which is ‘confirmed’ in the Land Availability Assessment 2022. This is 70% of the Government’s standard method for calculating local housing need.

There is huge pressure on all councils to provide more housing in order to meet the demand for dwellings and reduce the continuing escalation of house prices which is exacerbated by the lack of supply.

Planning Authorities should take this into account in the preparation of their Local Plans regarding how that demand for housing should be met and not avoid the issue. The release of marginal Green Belt land within Elmbridge Borough Council is therefore a necessity if the identified local housing need is to be met and those sites that are permitted are not to be developed out at unacceptably high densities, totally inappropriate for their locality within the Borough just to make up the numbers.

As an aside, I note that the Elmbridge Borough Council’s Brownfield Land Register is significantly different to the site allocations identified in Chapter 9 of the draft Local Plan. For example, is it logical or even viable to consider the redevelopment of the Elmbridge Borough Council’s Civic Centre to provide 400 dwellings when redevelopment of major assets is now being considered to be poor for the environment and achieving carbon-net-zero, or have a number of properties been included to boost the possible availability of brownfield sites?

For these reasons I find the draft Local Plan unsound.

Other specific comments

Policy CC3. Why is the requirement for new developments to meet Home Quality Mark 4 star and BREEAM UK Domestic Refurbishment ‘Excellent’ standards limited to project of 10 or more dwellings. These standards should apply to all new residential developments.

Policy HOU3. Although the Assessment of Local Housing Needs undertaken by Cobweb Consulting in 2020 identifies a critical need for additional Extra Care accommodation, that is not reflected in this policy.

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>There are marginal areas currently classified as green Belt which could be released for residential development.</p> <p>For example, the draft Local Plan allocates 20 residential units (and mixed use floor space) for the Cafe Rouge, Portsmouth Road, Esher (US276) and 10 residential units at Two Furlongs, Portsmouth Road (US274) but recently refused a planning application for additional housing on the perimeter of the Sandown Race Course. The two properties above are also adjacent to the race course. Why is there a distinction when there is a very serious requirement for additional housing?</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	I will be extremely interested in hearing the arguments as to why the draft Elmbridge Local Plan is considered sound or otherwise.

Name	Roy Green
User ID	22375361
Organisation	Hersham Village Society
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>The Hersham Village Society could employ a legal representative to answer this question but consider this a strange question for our Council to be asking the public. The Hersham Village Society with a membership of approximately 154 members could employ a legal representative to deal with this but would naturally assume that the council, staffed by local government professionals reporting to our elected representatives, that was responsible for managing our local affairs would work within the law.</p> <p>Having said that there are a number of areas that concern me:</p> <ol style="list-style-type: none"> 1. There is an overall impression that the Council does not actually want the public to respond and has deliberately made this process 'hard work': <ol style="list-style-type: none"> a. Complexity of this 'comment' process b. Short time for consultation by ordinary members of the public, given that it has taken Council professionals several years to produce this highly detailed document. c. The timing of issue - summer holidays d. Non-availability on website at start of consultation period e. Changes to website during the consultation periodic 2. Some statements regarding ownership of properties are incorrect 3. There are a number of occasions where the document states that property owners have been consulted. I know this is not true in all cases. 4. There have been important changes to the plan that have not been clearly communicated. In particular US379 originally referred to the Waitrose Car Park. It now refers to the Hersham Shopping Centre.
Question 2	Do you consider this part of the draft Local Plan to be sound?

No

As already covered in our response to Q1 there are a number of demonstrably inaccurate statements within the plan which in my opinion make it unsound. There are also several proposals that we do not believe are justified. As that is the case, it is highly likely that the plan will therefore also be ineffective.

Further to our points in Q1, We would add that the inclusion of the Barley Mow Public House within the plan (H11 US 376) is an error, given that it is recognised as a Listed Building.

We are also concerned about the possibility that Hersham might be deprived of some important Community Assets - Hersham Library (H15 US374) and the Hersham Village Hall (H6 US40). Similarly we cannot understand why the 63 Queens Road Hersham KT12 5LA (H1 US441) is included when planning permission was recently refused on the grounds that this site was also a Community Asset.

We particular concerned about the content relating to Car Parks

1. General Observations

a. The car driving population of Hersham has increased significantly in recent times and continues to do so.

b. New arrivals moving out of London tend to be younger with a 'two car need'.

c. School leavers, graduates and young workers are now more likely to continue living with their parents which means that 3 or even 4 car dwellings are no longer unusual.

d. You only have to glance around the village to see the impact of this with cars parked on pavements and crammed into what used to be 'front gardens' – or listen to residents who have been blocked into their own driveways

e. Obviously, this plan is aimed at increasing the number of properties which will increase the number residents and therefore the number of vehicles in the area.

f. We understand that there is an argument that Residential Units would not necessarily be built on the actual Car Parks but be built in blocks above. That rather misses the point that, not only may these buildings be tall causing issues for neighbours, but the Units will require additional parking spaces of their own. Underground parking may alleviate this issue, but we suspect that will be expensive particularly if impacted by the water table.

g. We also understand that there is an environmental agenda to reduce the amount of

vehicle use and encourage people to walk, bicycle and use public transport. While we support that in principle, to build a 'parking plan' on that basis when there are ever increasing constraints on the time of working people and inadequate bus services, is unrealistic.

h. Following on from the above agenda which includes a move to electric cars and a commitment to supply charging points for these, one has to question how that will be facilitated when our car parks will be reduced in size and new residents will be living in flats denying them the option of arranging their own private points.

i. Given the above it does seem rather strange (or to use the appropriate language 'not sound') that a central plank of this plan is to reduce the amount of public parking available to residents and visitors.

2. Site Name Hersham Shopping Centre, Molesey Road

Site Allocation Ref H3

Site LAA Reference US379

Delivery Period 1-5 Years

Allocated for 200 Residential Units

a. This reference was originally allocated to the Waitrose Car Park. It now applies to the Shopping Centre. I assume that the provision is to build 200 Residential Units over the combined Shopping Centre & Car Park areas.

b. The Shopping Centre and its car park are central to the Hersham Community and act as a major attraction for people moving into the village.

c. The Waitrose Car Park also provides for all the village centre shops and amenities. Most particularly it provides for parents delivering children to Burhill School.

d. It may well be possible to deliver 200 Residential Units in this area, while maintaining the current quantity and quality of Shops and Car Parking (allowing for the additional requirements of the 200 new residences). However, if any plans are allowed to progress that fall short of that, then this Council could potentially be responsible for the collapse of our village as we know it. do not think the community will stand for that!

e. Para 1 f above applies.

f. We are particularly concerned about the short timeframe associated with this case and the inevitable disruption at the heart of our village during this potentially lengthy project.

3. Site Name New Berry Lane car park

	<p>Site Allocation Ref H7 Site LAA Reference US380 Delivery Period 6-10 Years Allocated for 7 Residential Units</p> <ol style="list-style-type: none"> a. Same arguments as for H3 above (they are adjacent) although reduced concerns over timeframe and scale. b. However, this car park was originally retained by the Council to specifically provide for the Doctor's Surgery and Burhill School opposite. c. Once again the level of parking must be maintained (allowing for that associated with the 7 Residential Units) so that sufficient Parking is available for the ever increasing number of people that need to visit the Surgery – more residences implies more people which implies more visits to a doctor. So we will need more Surgery parking not less. <p>4. Site Name Car park to the south of Mayfield Road</p> <p>Site Allocation Ref H5 Site LAA Reference US45 Delivery Period 6-10 Years Allocated for 9 Residential Units</p> <ol style="list-style-type: none"> a. Obviously this car park provides for the railway station and is a necessity in a commuter environment. b. While there are occasions when it is not full, there are others when it is absolutely full and people have to search elsewhere. c. It would appear that the Council assessment regarding utilisation was made during the Covid period. d. It is worth registering that while utilisation has increased as Covid regs have relaxed, we are still not yet back to pre Covid ways of living and working. e. Para 1f applies <p>5. Site Name Car Park next to Waterloo Court</p> <p>Site Allocation Ref H12 Site LAA Ref US435 Delivery Period 11-15 Years Allocated 62 Residential Units</p> <ol style="list-style-type: none"> a. Overfill car park for the station but little used - no objection to development
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6. Below are some extracts from Council documents (notably the Parking SPD) which are contradicted by the approach of this Draft Plan

j. "Having a balanced approach to delivering car parking can help stimulate growth in the borough, meet the needs of our residents, whilst also trying to minimise the effect on the environment. It is generally accepted that because of the lack of public transport in many parts of the Borough, many residents rely on their cars as their main form of travel. This SPD aims to deliver effective parking solutions while taking account of other planning considerations."

k. "Whilst the Borough benefits from good/ very good rail links to central London, access to other major centres such as Kingston, Guildford and Woking vary. Outside of the key commuter routes, public transport services are more limited, which leads to greater reliance on the private motor vehicle for internal Borough trips. It is not surprising that the Borough has one of the highest levels of car ownership with 1.5 cars per household and 46% of households owning more than two vehicles. Only 12% of households do not own a car, significantly lower than the South East average of 18.6%"

l. "Commuting still plays a significant part for much of the workforce, with both radial and orbital journeys into London and around the region. The average median gross weekly pay for Elmbridge residents is higher than for those who work in the Borough, indicating that a considerable number of residents' commute to higher-paid jobs within Greater London. Access to a train station is a key consideration for existing and future residents."

m. "Improving transport infrastructure by; Working in partnership with transport providers and Surrey County Council, as the Highway Authority, to support improvements to transport infrastructure. Those relating to new development will be delivered through the collection of developer contributions subject to viability. The Council will support improvements to stations and station parking that facilitate increased public transport use."

n. "Public off-street parking will continue to be provided where it supports the economic or recreational use of the immediate area and provides dual use allowing parking for residents and shoppers/employees, particularly in town centres."

o. "well-designed car and cycle parking at home and at other destinations is conveniently sited so that it is well used. This could be off-street to avoid on-street problems such as pavement parking or congested streets. It is safe and meets the needs of different users including occupants, visitors and people with disabilities."

	<p>p. "All development proposals will be required to provide cycle and vehicle parking and associated facilities, including electric vehicle charging points in line with the standards set out in the Parking Supplementary Planning Document (SPD). 6. Car free development will be encouraged in appropriate locations and where supported by evidence demonstrating that proposals would not lead to parking stress".</p> <p>q. "Parking Stress - A pressure on local highway network negatively affecting amenities of local residents caused by limited capacity of on-street parking provision in the area. Factors to take into account when considering whether an area experiences on-street parking stress will be the levels of parking on nearby roads, the availability of spaces in public car parks and whether there are any particular pressures caused by existing uses or developments in the area "</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>The Hershams Village Society in June 2022 held a Public Meeting on this subject it was made clear that the Plan is an attempt to meet targets laid down by Central Government. Apparently it falls short, but the hope is that it will be close enough to be accepted centrally and avoid the Borough having responsibility for the plan removed.</p> <p>My concern is that so many of the statements in the plan are wrong and some of the key intentions do not play well for the Hershams Community in the long term.</p> <p>The approach conveyed at the Public Meeting seemed to be "trust us - most of these things will never really happen, particularly if there are future changes in central government and its thinking".</p>

	<p>Regrettably, the 'trust us' concept does not bear scrutiny. Once these ideas are formally ratified as part of the Local Plan they represent a risk to the community because even if a future Planning Request was turned down it will almost certainly be granted on appeal by a Planning Inspector on the basis that it was included in the Local Plan.</p> <p>There are other parts of the country who do not appear to have the same issues that we have. Maybe Central Government's targets for an already highly populated area are not necessarily that valid. Perhaps our Council should debate that with Central Government rather try to duck the issue, potentially at the expense of residents.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>We have stated that there are a number of unsatisfactory elements to this plan both in the detail within its content and some of its direction. I would ask that once the Council has, had feedback from the community it takes a step back and re-considers its overall position, particularly with regard to the Hersham Shopping Centre and Parking generally. We would like to see a written commitment that the quantity and quality of shops in the Shopping Centre will be maintained and that the number of parking spaces in, what is now the Waitrose Car Park, will be maintained with additional spaces provided for the residents of the new Units. We are an organisation which has represented the residents of Hersham for over forty years and are not planning experts, so we are afraid that responsibility for re-drafting this document rests entirely with yourselves.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	The Hersham Village Society is a local amenity organisation with a current approximate membership of 140 members. It held a Public meeting on the Local Plan in June 2022 and invited

	<p>both the Leader of the council and Portfolio Holder for Planning plus six other local councillors to attend to listen to what residents' comments on the Local Plan.</p> <p>So far as the Hershams elements of the plan were concerned the majority of the residents were against the proposals in the Local Plan, especially those parts which would mean the closure of the Village Hall and Library.</p> <p>The loss of a recreation ground, was also resisted as was the loss of car parks.</p> <p>The Hershams Village Society, sincerely believes that the Local Plan as presented is not fit for purpose and needs a good re-thought.</p> <p>The Local Plan as it stands would mean a decimation of the Hershams Community and we believe that we should be given the chance to explain further at a Public Inquiry.</p>
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Name	Brenda Green
User ID	8252865
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>There have been difficulties in the website working properly, so in fact there has not been a full six weeks for this consultation. Pages were found to be initially missing from some of the documents. Then put in. Changes have been made. Sometimes it was unclear what site was being referred to.</p> <p>In particular ref US379 (H3) did I believe refer originally only to the Waitrose Car Park. It now refers to the whole of the Waitrose Site.</p> <p>How can I consider the draft Local Plan to be legally compliant when so many mistakes have been made?</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>There are a number of inaccurate statements within the plan. Changes have been made to site drawings. Proposals are not sound or in the interests of the community .</p> <p>H1 / US441 63 Queens Road - why has this been included as planning applications have already been turned down on grounds of loss of a community asset?</p> <p>H6 / US40 allocated for 15 residential units / mixed use. Site is a Village Hall and Centre for the Community. No guarantee has been given that these vital social amenities would remain on the site. Loss of vital social and community asset that could not be replicated elsewhere.</p> <p>H11 / US376 Trinity Hall(?) 63-67 Molesey Road (Hersham South Recreation Ground)</p> <p>Initially it proved difficult to find what the exact boundaries of this site were. However, when the map of the site could eventually be accessed it shows included, not only the part of the Recreation Ground to the left of the by-pass, but also Laithwaites and the Barley Mow. a) the</p>

	<p>Recreation Ground area is still used by people walking through (a quiet area) even though in recent years it has not been maintained, hedges overgrown, flower beds now non-existent, no benches The building on the site (the old Bowls Pavilion) is used by a Day Nursery b) No indication that Laithwates / site owners area aware of or approve of the site's inclusion c) the Barley Mow is a Grade II Listed Building!</p> <p>Inclusion of this site in the Local Plan would be loss of a community asset that should be being maintained for the community.</p> <p>H15 / US374 Hersham Library Site. Included for 13 residential units and re-provision of community use. This gives no assurance that a Library will remain on this site. This is a vital and much used community asset. Treasured and used by all sections of the community especially the most vulnerable.</p> <p>Several Car Parks have been include in the Local Plan as sites for housing units. I would particularly object to the inclusion of H7 / US380. This is a small car park which is vital to people visiting the local Doctors' Surgery, the Burhill, School, Dentist and Chemist/Pharmacies. Allocated for seven residential units.. How is this to be achieved when public car parking in this area will still desperately be needed - in addition to the increased demand from any potential new housing units.</p> <p>Similarly I would object to the inclusion of other car park development (H5 / US45) - Car Park south Mayfield Road. If car parks are developed where will the car parking (and charging units) be?</p> <p>The Waitrose Proposal for 200 residential units (H3 / US379) would create a massive upheaval. If the intention is for the whole site then it could mean the loss of our shopping centre for a great number of years while development is underway. Our shops must be retained. We don't want to lose a vital asset. It is greatly used by residents of Hersham and surrounding districts. If the intention is to build on the car park, where will the parking be for the residents and the shops? For all these reasons I do not consider the local Plan to be sound.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y]

	<p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>The Plan has not been positively prepared when it doesn't seem to be in the interests of the local community. Will it be effective? So much is wrong with it, how can it be effective. Justified. Not when it seems if put into effect it would destroy many aspects of our treasured local community. Surely national policy targets were not intended to cause this much upheaval in local communities?</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>I am not qualified to comment on how to make the draft Plan legally compliant. I am merely a Hersham Resident who doesn't want to see assets and amenities destroyed and lost forever. To make it sound and effective I hope that you will take notice of the responses from the public and address their concerns. With particular regard to the Hersham Shopping Centre and vital community amenities such as the Village Hall / Centre for the Community and Hersham Library. You need to make the plan more sensible, coherent and less confusing, ensure mistakes are corrected and engage more with the public.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

	<p>I have lived in Hersham for most of my 52 years of married life. My husband and I have raised two children here, one of whom still lives locally with her own family. I have loved living in Hersham. Although we have lost some shops and a few amenities over these many years we desperately want to keep those we still have. To steamroller ahead with some of the proposals in this Local Plan would drastically change our lovely community, and once gone it will have changed forever.</p>
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Name	David Greenwood
User ID	16497889
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>There should be a "I don't know" option here, how would "the man in street" know? I've no idea, I can only take yopuir word for it & this is irrelevant to the points I wish to make.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Silly question. What does "Sound" mean? As with Question1, there should be a "I don't know" option here, how would "the man in street" know? I've no idea, Therefore this questionnaire, which is part of the consultation on the plan, is not sound.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p>

	<p>As I submitted to the previous consultation, this plan only considers areas within existing high density areas of Cobham as potential "Sites". It includes privately owned houses. Yet it ignores the vast expanses of large houses some of which are frequently being pulled down and replaced with new large houses and the plots of ALL of them would justify being "Sites" as bigger than many of the ones listed. Where are all of the roads between Cobham centre and Oxshott centre for example? The plan should allow for large inefficient dwellings to be replaced by multiple occupancy developments. As it is biased only to the already dense areas being considered sites then the plan is neither Effective or Justified. There are far more potential brown fields sites (strangely maybe they are more likely to be owned by councillors ... ?).</p> <p>To identify retail and community facilities as "Sites" as this does is stupid as increased housing needs MORE retail and community facilities.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Read my answer to question 3. e.g. Take out all the identified private addresses, retail and community facilities from "Sites" and instead add in a minimum occupancy ratio to size of house (or some other measure) such that no large house can be rebuilt with a house the same size or bigger but must be split into multiple smaller units.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Haberfield
User ID	41247169
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No I believe the Local Plan has not considered adequately (or not stated) (a) the re-provision of lost community centres, and (b) provision of parking with new residential units.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: <input type="checkbox"/> [Y] Effective: <input type="checkbox"/> [] Justified: <input type="checkbox"/> [] Consistent with national policy: <input type="checkbox"/> [] 1. With this overall number of new residential units, will these units include parking spaces? It is noticed that currently new developments are not being allowed parking – e.g. the 4 cottages (Nos 13-19) on the old factory site in the High Street, Thames Ditton. If not, there is a concern that there will be insufficient local parking space in the already overcrowded residential roads.

	<p>2. Many of the site allocations refer to existing car parks. Replacing these will increase further the competition for local parking. It is a vain hope that residents of the new properties will not own vehicles and only travel by public transport.</p> <p>3. The lack of residential parking spaces will become even more acute if it is expected that more residents will purchase electric or hybrid vehicles, but no provision is made for charging points.</p> <p>4. Some of the site allocations refer to community centres. How are these to be “re-provisioned” in the same space along with all the new residential units, or “relocated” when every spare piece of land has been consumed for residential units within the Draft Local Plan?</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	The Local Plan should spell out how community centres may be "re-provisioned" and whether planning permission will be granted for new residential units to have associated parking space / charging points.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Nick Haig
User ID	41258433
Organisation	Montagu Evans LLP obo BEGG (Nominees) Ltd
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>We write on behalf of our client, BEGG (Nominees) Ltd c/o CBRE Global Investors who own Walton Lodge, Bridge Street, Walton-On-Thames, KT12 1BT. This letter of representation is submitted in response to the Regulation 19 consultation on the Draft Elmbridge Local Plan.</p> <p>BACKGROUND</p> <p>The purpose of the consultation is to establish if the Local Plan meets the legal and procedural requirements for Plan-making as set out by Paragraph 35 of the NPPF and whether the Plan can be found sound. These representations are intended to help guide the formulation of Elmbridge's Local Plan. In the main, BEGG (Nominees) Ltd are supportive of the Local Plan and its approach but have a number of observations in respect of the current iteration which raise several soundness concerns.</p> <p>We also wish to make a clarification in respect of the Council's emerging Plan which has removed Walton Lodge as a proposed site allocation in the publication version. The unpublished draft presented to Members included the Site as a proposed allocation. Plainly we see no justification for the Site's removal from the Plan simply due to benefiting from prior approval for conversion of the existing offices to residential (ref: 2021/2591).</p> <p>We are in pre-application discussions with the Council on a comprehensive residential proposal for the Site that would make a material contribution to the Council's housing land supply. Our client has engaged with the Council on a proposal which identifies a capacity of circa 51 homes for the Site and the concept scheme is appended to these representations. Detailed technical and environmental assessments will be undertaken in due course to ensure that sufficient evidence is provided to underpin the allocation of the site. This will be fundamental in ensuring the allocation is sound and based on proportionate evidence as sought by the NPPF.</p>

The discussions with the Council have been positive and highlight the suitability of the Site for an optimised residential development. In our view there remains a need for the Site to be allocated in the emerging Plan through an allocation. We also note that the Bridge Motor Works on the southern side of Walton Lodge is recommended for allocation. A further reason to allocate both sites is so that any future proposals can be planned for holistically and this can only be appropriately done if led by the requirements of a site allocation where site specific policy can be set out.

SITE AND SURROUNDING AREA

The site is located on Bridge Street in Walton-on-Thames. It is located in a mixed use context, which is defined by a car sales garage to the east and offices to the north. The wider context is defined by residential development of a mixed character which includes flatted development to the east of up to 10 storeys along Hepworth Way.

The site is within close walking distance (approximately 200 metres) of Walton-on-Thames Town Centre. Walton on Thames Station is approximately 1.6 kilometres to the south of the Site and provides regular train services into Central London, as well as to regional locations including Woking and Basingstoke. A number of local bus routes also connect the Site with neighbouring towns.

There are no statutorily or locally listed buildings on site and the Site does not fall within a Conservation Area.

The site is located within Flood Zone 1, the area with the least likelihood of flooding. The Site is not affected

by any other environmental designations.

CONSIDERATION OF THE REGULATION 19 LOCAL PLAN

We remind the Council of the expectations of national policy for Plan-making. Paragraph 35 makes clear that Local Plans must be:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Within this context our soundness concerns relate to the following draft policies:

- Policy SS3 – Scale and location of good growth
- Policy HOU1 – Housing Delivery
- Policy HOU2 – Optimisation of sites

We comment on each of the policies below and make recommendations on how the policies should be amended, or where further evidence is required to demonstrate that the draft Plan can be made acceptable.

Policy SS3: Scale and location of good growth

Draft Policy SS3 outlines the Council’s strategic policy on delivering development over the Plan period, including for housing.

The supporting text for Policy SS3 states EBC sought to meet its building needs through brownfield first sustainable development, however, this is not enough to meet the identified need within the Borough. Consideration was given to pursuing changes to the Green Belt Boundary but

concluded that exceptional circumstances required by national policy for these amendments are not achieved. Therefore, the Council is seeking a 'capped need' in respect of housing provision and are only seeking to deliver 6,785 homes despite an objectively assessed need of 9,705 homes over the plan period. This is contrary to National Planning Policy 2021 (NPPF) Paragraph 60 which seeks to boost the supply of homes siting the importance that sufficient and variety of land comes forward where needed. Furthermore, NFFP Paragraph 61 requires objectively assessed needs to be met unless exceptional circumstances apply. The Council must ensure that sufficient evidence is set out to deviate from the expectation to deliver its objectively assessed housing need of 9,705 homes over the Plan period.

Policy HOU1 (Housing Delivery) seeks to further justify the Local Plan approach that the local housing needs have been assessed alongside the borough's environmental constraints. Elmbridge Borough Council have not tested a scenario where in which the objectively assessed needs have been met as such it is considered that the plan does not align with Paragraph 35 of the NPPF for the examining of plans, as the plan has not been 'positively prepared' nor 'justified' and as such are not consistent with national policy. This is likely to be a matter discussed extensively were the draft Plan to be submitted for Examination as written.

Of the 1,255 new units to be delivered in Walton-On-Thames over the course of the plan, site allocations for Walton-On-Thames within the draft plan will only provide 774 of these based on unit allocations.

Part 2 of Policy SS3 supports a 'brownfield first' approach alongside the utilisation of previously developed land. Part 3 of the policy supports the optimisation of development within urban areas to allow for the most efficient use of land. We support these objectives in principle. In our view the Council must exhaust all suitable opportunities for allocating brownfield land in urban areas such as Walton Lodge. The Site has the potential for further optimisation and could achieve at least 51 units as demonstrated by the pre-application discussions.

Part 4 of the Policy HOU1 further supports this and seeks to 'maximise opportunities to increase the supply of additional homes on unallocated suitable and available land' given the shortfall in housing numbers to be provided over the course of the draft Local Plan it is considered this policy should further apply to allocated sites.

Policy HOU2: Optimisation of sites

In principle emerging Policy HOU2 is supported, as it supports the optimisation and efficient use of sites within the urban area. This would accord with national policy requirement under NPPF

	<p>Paragraph 125 which places importance on planning policy and decisions to avoid homes being built at low densities and ensure the optimal use of potential within each site.</p> <p>In our view we find conflict between this and Policy SS2 (Sustainable place-making) because the Council has not sought to accept that there needs to be a step change in the density of development to deliver housing for plan in order for the plan to be considered positively prepared and to align with NPPF Paragraph 35.</p> <p>Paragraph 6.13 states that one of the key aims of the draft Plan is to boost the supply of new homes. We do not agree that this objective can be achieved if the Borough's objectively accessed needs are not being aspired to. There is a concern that this will mean the Council cannot deliver sufficient homes to meet its identified needs and the longstanding issues of under supply of housing will persist. Paragraph 6.15 refers to greater detail and clarification that is to be provided within the forthcoming Elmbridge Design Code. This is eagerly awaited, however, must be ambitious within its scope and ambitions.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Concluding remarks</p> <p>In conclusion, we are generally supportive of the Local Plan and its approach, however, we have a number of observations in respect of the current iteration which raise several soundness concerns. As such we submit these representations to help guide the formulation of Elmbridge's Local Plan.</p> <p>We wish to make a clarification in respect of the Council's emerging Plan which has removed Walton Lodge as a proposed site allocation in the publication version. The unpublished draft presented to Members included the Site as a proposed allocation. As such we see no justification for the Site's removal from the Plan simply due to benefiting from prior approval for conversion of the existing offices to resi</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y]

	<p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Answer above.</p> <p>290722 Elmbridge Reg 19 - Walton Lodge - Letter of Representation FINAL.pdf</p> <p>A12032OT0001P1_LR-pre-app document.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	As above.

Name	Nigel Haig-Brown
User ID	41017057
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Peter Hall
User ID	40935681
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I am happy that the green belt land around Elmbridge will hopefully be preserved, as I feel that any loss of these areas would negatively change the character of the towns within the borough and impact the local wildlife.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Catherine Hallett
User ID	8253569
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I fully support the spatial strategy. I full support continued protection of the Green Belt and agree with the council's justification for doing so.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Siobhan Halliday
User ID	16411329
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>I am sure that it is legally compliant. However, two areas for development in particular, I think will really badly impact upon the local area.</p> <p>To build so many units on Sandpiper, Newlands Avenue, Weston Green will have a very negative impact upon the local roads. Esher College, Weston Green School and Thames Ditton station are all on the road that Newlands Avenue has to join to exit the cul-de-sac. The traffic is already a nightmare around there. There is little in the way of public transport, such as buses, into Kingston, so people will be dependent upon their cars.</p> <p>Palace Road, Hampton Court is already so busy. No one can park as it is. The roads into Hampton Court Village from there, and access to the bridge are tiny and congested. The quality of life for these people will be dreadful.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>I think not enough attention has been paid to roads and infrastructure, such as GPs etc., which is difficult enough at present.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: []

	<p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>I know that everyone has a right to a home, but building homes that will make the lives of those living in these streets already a living hell, and making it so impossible for the new residents to move helps no one.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	I feel that we all need to speak up to protect not only those living in the borough, but those wishing to move into the borough. Don't over-develop existing roads: go for brownfield.

Name	Siobhan Halliday
User ID	16411329
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes To reduce reliance on the car, you need to build houses where people have access to public transport and you need to improve cycle lanes etc.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No I don't think enough thought has been given to how people will travel, get access to GPS and dentists.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [Y] Consistent with national policy: [] You are condemning people to live in roads with little access to public transport, which means they will be forced to drive on already over-crowded roads, and this will be very stress everyday.

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Simon Harker
User ID	16377473
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>I support the Local Plan. It is both legally compliant and fundamentally sound and represents a sensible plan for the future development of Elmbridge. In particular, the Local Plan takes a pragmatic approach to determining housing numbers and provides a welcome commitment to preserve Green Belt.</p> <p>However I would just point out as a point of detail that when it comes to assessing the performance of Green Belt sites there have been some fundamental errors in reports prepared in the past. Most importantly, site SA-11 next to Waverley Road and Blundel Lane has been incorrectly assessed. It is definitely not “weakly performing” by any stretch of the imagination. You only have to look at it.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>I support the Local Plan. It is both legally compliant and fundamentally sound and represents a sensible plan for the future development of Elmbridge. In particular, the Local Plan takes a pragmatic approach to determining housing numbers and provides a welcome commitment to preserve Green Belt.</p> <p>However I would just point out as a point of detail that when it comes to assessing the performance of Green Belt sites there have been some fundamental errors in reports prepared in the past. Most importantly, site SA-11 next to Waverley Road and Blundel Lane has been incorrectly assessed. It is definitely not “weakly performing” by any stretch of the imagination. You only have to look at it.</p>

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Julie Harker
User ID	16377601
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>I support the Local Plan. It is both legally compliant and fundamentally sound and represents a sensible plan for the future development of Elmbridge. In particular, the Local Plan takes a pragmatic approach to determining housing numbers and provides a welcome commitment to preserve Green Belt.</p> <p>However I would just point out as a point of detail that when it comes to assessing the performance of Green Belt sites there have been some fundamental errors in reports prepared in the past. Most importantly, site SA-11 next to Waverley Road and Blundel Lane has been incorrectly assessed. It is definitely not “weakly performing” by any stretch of the imagination. You only have to look at it.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>I support the Local Plan. It is both legally compliant and fundamentally sound and represents a sensible plan for the future development of Elmbridge. In particular, the Local Plan takes a pragmatic approach to determining housing numbers and provides a welcome commitment to preserve Green Belt.</p> <p>However I would just point out as a point of detail that when it comes to assessing the performance of Green Belt sites there have been some fundamental errors in reports prepared in the past. Most importantly, site SA-11 next to Waverley Road and Blundel Lane has been incorrectly assessed. It is definitely not “weakly performing” by any stretch of the imagination. You only have to look at it.</p>

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Daniel Harley
User ID	41255809
Organisation	WSP obo EAL Ltd (Helen Roberts)
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] See Draft Local Plan Representations Attached
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	See Draft Local Plan Representations Attached

	20220727 Draft Local Plan Reprs.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Claygate Parish Council represents circa 7100 people. We believe that the need to get the right balance between necessary growth and protection of environmental assets is more important than ever. The need to respond to the climate emergency is a key element of sustainable development and the new local plan must ensure that the highest standards are applied to all new development. This policy will ensure that the right balance across all elements – minimising emissions, mitigation and adaptation and the promotion of renewable / low carbon energy schemes will contribute to positive and effective planning. This non-strategic policy will satisfy the most relevant soundness tests (justified, effective and consistent).
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Claygate Parish Council represents circa 7100 people. We believe that this policy takes an appropriate balanced and flexible approach to achieving the high-quality sustainable places that people will want to live in and which will build on the local distinctiveness of existing places and communities. It recognises the need to provide an appropriate mix of development types, making best use of existing developed land and allocations in places that are well served, or will be well served, by suitable facilities and infrastructure. In this holistic way, it will minimise the need to use private cars and at the same time protect important assets that contribute to the character of the area and borough as a whole and thus meets the relevant soundness tests.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>Claygate Parish Council represents circa 7100 people. We recognise that this strategic policy does not make provision in full for the area's assessed housing needs. However, the Council's evidence demonstrates that the need to protect important assets of the borough provides a strong reason for restricting the overall scale of development in the plan area. Through the Duty to Cooperate, the Council has demonstrated that effective working with adjoining (and further afield) authorities has been undertaken but they are unable to assist with the unmet need of the borough. The important assets, including Green Belt and green spaces, are an important and integral part of the overall character of the borough and its individual settlements. These areas also perform a vital role in preventing the outward sprawl of London and preventing neighbouring towns from merging with one another, as well as safeguarding the countryside from encroachment. By retaining Green Belt land, the spatial strategy of optimisation will be supported by urban regeneration and the encouragement of recycling of derelict and other urban land. The policy has identified an appropriate and proportionate level of development for each settlement which fairly corresponds with its existing size and sustainability. This is particularly the case with Claygate which the Parish Council acknowledges contains a good level of local services and facilities as reflected in the Council's Settlement Assessment. This approach is supported by the non-strategic policies which require the most effective use of brownfield land compatible with the area in which it is located, thus further supporting the 'optimisation' approach of the plan. These broad locations for growth together with the sites identified will bring forward</p>

	<p>an appropriate level of ‘good growth’ which will deliver the type of homes needed in the most suitable and sustainable locations. At the same time, this policy encourages and supports the evolution / growth of the town and village centres in a way that will ensure they remain vital and viable to support that growth.</p> <p>Claygate Parish Council believes this is justified on the basis that it is an appropriate strategy based on a full balancing of all environmental, social and economic objectives and taking into account reasonable alternatives. The release of Green Belt land has been considered as part of this and Claygate Parish Council believes that Elmbridge Council’s evidence base demonstrates (through the consideration of individual sites) that the exceptional circumstances necessary to enable the release of such land has not been fully evidenced and demonstrated given the important role that these areas perform.</p> <p>Therefore, Claygate Parish Council believes this policy meets the tests of soundness and will provide an appropriate and flexible approach to the achievement of sustainable development in a way that is positive, justified, effective and consistent with national policy.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	CC1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	CC2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	CC3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	CC4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	CC5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	ENV1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	ENV2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	ENV3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	ENV4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	ENV5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	ENV6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	ENV7
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	ENV8
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	ENV9
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	ENV10
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	ENV11
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	HOU3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	HOU4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	HOU5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	HOU6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	HOU7
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	HOU8
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	ECO1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	ECO2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	ECO3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	ECO4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	ECO5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	INF1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	INF2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	INF3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	INF4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	INF5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	INF6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	Monitoring
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Harman
User ID	16115809
Organisation	Claygate Parish Council
Policy / Evidence base/ part of plan:	Appendices
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Matt Harris
User ID	41213473
Organisation	Nexus obo of Kingacre Estates Ltd
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes N/A
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please see attached documents
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [] Consistent with national policy: [] Please see attached documents
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please see attached documents

	Elmbridge Vision-Principle3.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We represent a developer with significant land interests in the borough and to whom the housing strategy in Elmbridge as a whole, and the release of land from the Green Belt, is of fundamental importance. Accordingly, it is essential that we are able to participate in all relevant hearing sessions.

Name	Matt Harris
User ID	41213473
Organisation	Nexus obo of Kingacre Estates Ltd
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes N/A
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please see attached documents
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please see attached documents
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please see attached documents

	Elmbridge Policy SS2.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We represent a developer with significant land interests in the borough and to whom the housing strategy in Elmbridge as a whole, and the release of land from the Green Belt, is of fundamental importance. Accordingly, it is essential that we are able to participate in all relevant hearing sessions.

Name	Matt Harris
User ID	41213473
Organisation	Nexus obo of Kingacre Estates Ltd
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes N/A
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please see attached documents
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please see attached documents
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please see attached documents

	<p>SS3 Appendix 3 - Cabinet Report March 2022.pdf</p> <p>SS3 Appendix 4 - Guildford Local Plan Inspector's Report.pdf</p> <p>Elmbridge Policy SS3.pdf</p> <p>SS3 Appendix 2 - Minutes of the Local Plan Working Group Meeting held on 22 June 2021.pdf</p> <p>SS3 Appendix 1 - Elmbridge and Surrey London Fringe Housing Needs.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We represent a developer with significant land interests in the borough and to whom the housing strategy in Elmbridge as a whole, and the release of land from the Green Belt, is of fundamental importance. Accordingly, it is essential that we are able to participate in all relevant hearing sessions.

Name	Matt Harris
User ID	41213473
Organisation	Nexus obo of Kingacre Estates Ltd
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes N/A
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please see attached documents
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please see attached documents
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please see attached documents

	Elmbridge Policy HOU1.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We represent a developer with significant land interests in the borough and to whom the housing strategy in Elmbridge as a whole, and the release of land from the Green Belt, is of fundamental importance. Accordingly, it is essential that we are able to participate in all relevant hearing sessions.

Name	Matt Harris
User ID	41213473
Organisation	Nexus obo of Kingacre Estates Ltd
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes N/A
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please see attached documents
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [Y] Consistent with national policy: [] Please see attached documents
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please see attached documents

	Elmbridge Policy HOU2.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We represent a developer with significant land interests in the borough and to whom the housing strategy in Elmbridge as a whole, and the release of land from the Green Belt, is of fundamental importance. Accordingly, it is essential that we are able to participate in all relevant hearing sessions.

Name	Matt Harris
User ID	41213473
Organisation	Nexus obo of Kingacre Estates Ltd
Policy / Evidence base/ part of plan:	HOU5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes N/A
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please see attached documents
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [Y] Please see attached documents
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please see attached documents

	Elmbridge Policy HOU5.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We represent a developer with significant land interests in the borough and to whom the housing strategy in Elmbridge as a whole, and the release of land from the Green Belt, is of fundamental importance. Accordingly, it is essential that we are able to participate in all relevant hearing sessions.

Name	Matt Harris
User ID	41213473
Organisation	Nexus obo of Kingacre Estates Ltd
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes N/A
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please see attached documents
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [] Please see attached documents
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please see attached documents

	Elmbridge Site Allocations.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We represent a developer with significant land interests in the borough and to whom the housing strategy in Elmbridge as a whole, and the release of land from the Green Belt, is of fundamental importance. Accordingly, it is essential that we are able to participate in all relevant hearing sessions.

Name	Nigel Harris
User ID	24526849
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes The plan seems to achieve a large part of the new house building objective without using any green belt land, which is a vital consideration.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	William David Hartell
User ID	40928641
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No I am concerned about the survival of the Hershams Library. I object to it being placed on the Local Plan with no guarantee about its survival. The library is a valuable resource for the vulnerable including less technically savvy people who need access to resources such as the library provides.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] The Hershams Library is proposed to be replaced by '13 units' and 'community use'. This is not justified based on inadequately appreciating the value and use of this community asset by many users especially the vulnerable and or less technically savvy people who need access to

	resources such as the library is able to provide. I am opposed to any changes that may jeopardize the future of this library.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	The Hershams Library is an essential community resource whose future must be guaranteed. It must not be placed in the Local Plan without clear assurances of its future and continued availability to the local community. The proposed current wording does not provide this assurance.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Richard Harvey
User ID	16392801
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Anything that prevents the loss of vital green spaces is excellent news. We need to trees and paths for exercise and mitigate awful noise and air pollution from the A3.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Emma Hatcher
User ID	23359777
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I am very supportive of the continued protection of the green belt that this plan provides. I am particularly pleased the council have listened to feedback from the community with regards to the greenbelt when putting together this plan - consultation with the local community earlier in the local plan process had garnered overwhelming support from the community in terms of protecting our green spaces and stressed the importance, for future generations, in doing so. I'm glad the council have listened to this and I feel they are totally justified in doing so. They have done a good job in terms of delivering a local plan which took into consideration the wants and needs of the community who live and who wish to continue to live in it. Other councils should take note. This is true of the spatial strategy proposed within the plan also. The plan is realistic in terms of what the borough of Elmbridge can deliver - and I am broadly supportive of this too.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: []

	Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Paul Hazeldine
User ID	23678049
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No don't know
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No don't know
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Paul Hazeldine
User ID	23678049
Organisation	
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No How can it be legally compliant if I cannot find where to comment on each site allocation?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Can't find how and where to comment on each listed site. How can the draft Local Plan be sound if it is difficult, perhaps impossible, to comment on these?
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [] Can't find where to comment on specific sites.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	Allow comments to be made against each site. If there is such a facility then it is almost impossible to find - please advise.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Stephen Heath
User ID	24533249
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Stephen Heath
User ID	24533249
Organisation	
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I firmly support the designation of site D7 / US443 / 47 Portsmouth Road, Thames Ditton, KT7 0TA as "residential". This site (the former Guy Salmon car dealership) is completely unsuitable for a supermarket or similar.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Trevor Hedges
User ID	24550913
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Heine Planning Consultancy (Alison Heine)
User ID	41044193
Organisation	Heine Planning Consultancy
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>The northern boundary of Elmbridge Borough is formed by the River Thames and this is an extensive section of waterfront. Yet the draft Local Plan was prepared without regard to those who live on boats on the River Thames and the pre-submission Local Plan fails to address the needs of those known to be living on unauthorised moorings. As such the Plan fails to address the specific housing requirements of Boat Dwellers contrary to para 60 NPPF.</p> <p>In addition, despite the fact the Council were aware of this issue and agreed back in 2019 that the need for houseboat moorings should be assessed, the plan was drafted without the benefit of any such assessment, the assessment was not completed until February 2022 and was not put into the public domain and added to the Evidence Base until after a planning appeal in mid March 2022. Emerging Policy is not informed or shaped by this need assessment and its findings are not even documented in draft policy such as SS3 Scale and Location of good growth. No new policy is proposed to address the need identified.</p> <p>Furthermore, the public have been given just one opportunity, now, to comment on the need assessment published earlier this year. This on line form fails to provide enough space to detail all the concerns. This will be the one and only chance to comment on its methodology, assumptions and findings. That is so unfair when previous stages of the Local Plan have provided opportunity to comment on other reports forming the Evidence Base. It was left up to liveaboard boaters to discover that the need assessment had infact been published and now formed part of the Local Plan Evidence Base. The approach taken by Elmbridge Council lacks fairness, transparency and proper engagement with those most affected by this matter.</p>

	<p>I am not aware of any sustainability appraisal of the policy approach proposed by Elmbridge Council. No change is proposed to draft Policy and the Council do not seek to insert any additional policy to address the need identified.</p> <p>This failure to</p> <ul style="list-style-type: none"> a) complete the Evidence Base in an appropriate and timely fashion, and b) address or indeed acknowledge a specific housing need for residential moorings on the River Thames <p>is a clear breach of para 62 NPPF which states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The plan fails to consider the needs of Boat Dwellers.</p> <p>The Council has known that boats are occupied on the River Thames and are moored outside official moorings for at least 5 years and the start of the local plan review.</p> <p>Failure to address this is in breach of s8 of the Housing Act 1985 and s124 of the Housing and Planning Act 2016, the March 2016, DCLG draft guidance to local housing authorities and NPPF (para 62) which has remained unchanged since 2018.</p> <p>There is no national planning policy for livaboard boaters so this is a matter for local plan policies. In 2019 Elmbridge Cabinet approved stakeholder consultation on a range of options to seek a long-term solution to manage the ongoing issues of mooring without consent on the River Thames. It was noted that up to 80 boats were moored without consent in Elmbridge and there was a need to address this in the Local Plan. But this has not happened.</p> <p>Para 1.2 of the Pre -submission draft Local Plan states that it will form the basis on which planning applications in the borough will be determined replacing the 2011 Core Strategy and 2015 Development Management Plan. Appendix A1 lists the policies it will replace. They are all 2011 Core Strategy policies. There is no evidence officers have reviewed Policy DM13 in the context of unauthorised moorings on the River Thames as stated in the 2019 Cabinet Report. The 2015 Plan includes Policy DM 22 for Recreational Uses of waterways addresses the need to resist the loss of facilities, encourage new/ improved facilities, public access to the river and the</p>

bank and make further permanent moorings for recreational not residential uses as agreed at the 2022 Appeal Hearing for boats a West Molesey.

Since mid 2019 the approach of Elmbridge is to prevent not address this need.

On 8th August 2019, just three months after the June 2019 Cabinet report and before the results of the stakeholder consultation had been reported back to Members, the Planning Compliance Team issued 9 Enforcement Notices for a number of moorings located north west of Cherry Orchard Gardens and adjacent to the tow path.

In June 2020 planning applications were however submitted and validated for 5 moorings at West Molesey. These applications were refused for a variety of reasons including different reasons to those cited in the Enforcement Notices. With the exception of one mooring, the appeals were dismissed. Permission was granted on a temporary basis for one mooring on part of a pre existing wharf for a family with a young child in March 2022.

A second report was taken to Elmbridge Cabinet in September 2019 to report back on the Stakeholder consultation. The report noted that any enforcement could have implications on making a liveaboard boater homeless. Work on a need assessment was expected to commence in 2019 and conclude in early 2020 to inform the approach taken in the new Local Plan. This did not happen.

Rather than follow the planning process, in July 2020, the Leader of Elmbridge Council contacted the Chief Executive of the EA saying

'I am writing to you as a last resort to seek your intervention to resolve a seemingly intractable problem of illegally moored boats along the Thames in Elmbridge'.

The Need Assessment was published February 2022 but the Council failed to submit this evidence at the March 2022 appeals for 5 moorings in this Borough. As the appeal decision letter published April 2022 for these moorings records:

51.... I am told that the Council is now currently undertaking a needs assessment. However, this is not currently in the public domain and so there is no evidence before me on the level of demand for permanent residential moorings and whether this would be addressed or met through a future development plan examination process or by some other means, and the timescales for doing so.

There are issues with this study.

-only 25 interviews were completed over one weekend in January 2022

-terminology is not explained

-it omits any plan to show the location of the boats thought to be lived on and where interviews were completed.

-it assumes permanent moorings are available for year round residential use.

-it is not clear if all parts of the riverside were accessed.

The study found a need for at least 10 -16 residential moorings on the Thames in Elmbridge 2022-2027

In 2022 Site Assessment Paper is woefully inadequate and was completed too late to incorporate findings into the draft Local Plan. Only public landowners were contacted. It fails to assess existing capacity. There is no consideration of policy constraints (Green Belt, flooding, wildlife designations), ownership or site factors/ constraints (nature of river bank/ depth of water/access to river bank/ services/ structures like locks and bridges). It ignores the availability of the purpose built wharf near Cherry Orchard Gardens, West Molesey where, in April 2022 permission was granted on a temporary basis for one such mooring and where scope exists for additional moorings.

This is the first opportunity to comment on the need assessment and Site Assessment paper. Elmbridge claim that whilst the assessed need would not be met through a site allocation policy, draft Policy INF6 would assist in ensuring that any windfall proposals for boat dweller accommodation are considered and this would be kept under review. Policy INF6-Rivers is concerned with the special character and setting of the River Thames, sustainable travel and leisure uses, new habitat creation, opportunities for tourism and river based recreation and leisure activities and appropriate riverside development. Para 8.31 of the justification to this policy states that the river is

‘...an important natural and cultural asset providing leisure, ecological, environmental, landscape and economic benefits, this role will be protected and promoted’

There is no mention or acknowledgment that the River also provides a home for livaboard boaters. Criteria 8 concerns new moorings or other floating structures. Given the Council’s objections to 5 of the moorings at West Molesey it is unclear how any proposal for a new mooring would satisfy these requirements. Policy INF6 refers in the justification to the need for 10m wide river side buffer zones-no details are provided. INF6-Rivers is not drafted with residential moorings in mind and as a policy will not assist address the need identified Read in conjunction with saved Policy DM13 it will be relied on to thwart speculative applications for new residential moorings which is why a bespoke policy is needed.

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>The draft Local Plan is not positively prepared as it fails to address or acknowledge the need for permanent moorings for livaboard boaters. In the absence of any national policy or guidance it is critical this matter is not omitted from Local Plans where, as in the case of Elmbridge, there is a substantial length of the River Thames within the borough, this is a contentious issue and this is a local issue that has concerned the Council since work started on the review of the 2011 Core Strategy in 2016. There is no policy and no positive strategy to address the needs of the homeless families living on river boats with no official mooring. This is in conflict with NPPF and draft policy HOU3 Housing Mix which seeks to deliver the right homes to address local housing needs. The pre-submission Local Plan was drafted and submitted for consultation without the benefit of any assessment of the needs of boaters and has not been amended to reflect the need identified as late as February 2022. The only mention I can find of river boat moorings is in HOU4 Affordable Housing criteria 9 which notes that affordable housing is not required for residential schemes involving river boat moorings. Whilst there are other policies for specialist housing needs for Travellers, Elderly and specialist care there is no policy for those seeking to live on boats on the River Thames. There has been no proper, thorough, methodical assessment of the availability of suitable sites/ new moorings for this use. Whilst the Council has a saved policy (DM22 for Recreational uses of waterways) which anticipates the need for further permanent moorings of houseboats for recreational uses, it has failed to draft a similar policy for permanent residential moorings.</p>

	<p>The Council withheld the February 2022 Need Assessment from the 16th March 2022 appeal hearings for 5 moorings at West Molesey and could not say how the needs of the households who occupied 4 of the 5 boats would be met. One Appellant was not seeking a residential mooring as he did not live on his boat. The Planning Inspector had this to say in his decision letter issued 26 April 2022 (appeals APP/K3605/W/21/3266924, APP/K3605/W/21/3266928, APP/K3605/W/21/3266934, APP/K3605/W/21/3266936, APP/K3605/W/21/3266938)</p> <p>50. The Council admitted at the Hearing that neither the policies relied upon for the appeals, nor any within the development plan, concern permanent residential moorings. Thus, there was no evidence before me of an understanding of need Appeal Decisions and no provisions made for sites to address it. Given that the Council has a substantial waterfront edge and where the wider area is evidently popular for boat moorings, I am surprised that this is the case, and I can sympathise with the appellants' assertion that the Council has repeatedly failed to address this. The draft Local Plan is not justified as the proposed strategy as set out in the June 2022 Boat Dwellers Site Assessment paper, which was added to the pre submission Local Plan Evidence Base at the start of Reg19 consultation process, is not drafted to address this matter or the issues relied on at the March 2022 appeal hearings for boaters at West Molesey.</p> <p>The draft Local Plan is not effective as there is no evidence of any effective joint working with other local authorities with boundaries fronting the River Thames (including the north bank of the River on the boundary with Elmbridge) and no common policy approach by these authorities to deal with the issue of residential river boats. This is unacceptable. Whilst there are other joint policy approaches for flood risk and biodiversity along the River Thames, there are none for the provision of moorings for those who choose to live on their boats.</p> <p>For similar reasons it is questionable whether the Duty to Co-operate has been complied unless an agreement by neighbouring local authorities to do nothing and hope the problem drifts downstream would count.</p> <p>The plan is not consistent with para 62 NPPF as it fails to address an identified housing need and in the absence of any national policy for residential river boats fails to include a positive policy to address this need/ issue.</p>
<p>Question 4</p>	<p>Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.</p>

	<p>Policy SS1 'Scale and location of good growth' should acknowledge and recognise the need for at least 10-16 permanent residential moorings 2022-2027 and the need to monitor and update this need within 5 years .</p> <p>Issues with the robustness of the 2022 need assessment should be addressed. There is insufficient space provided in this on line form to address this.</p> <p>The Local Plan should include a bespoke policy which will</p> <ul style="list-style-type: none"> a) Identify and safeguard existing moorings where permanent residential occupation is permitted b) Assess the capacity of these moorings for additional boats/ extension/ infill c) Identify realistic, achievable and appropriate criteria for the determination of applications for new permanent moorings so that such applications are not determined using INF6-Rivers and saved policy DM13 d) Amend INF6-Rivers to make clear the River also provides potential for residential uses and make clear what sections of the River are to have a 10m wide buffer. e) commit to a detailed Site Assessment appraisal. As much of the river bank is understood to be in the Green Belt, allocate land or areas of riverbank (including those areas already used by unauthorised moorings on existing wharfs and stretches of the river bank which are unregistered) suitable for permanent residential moorings suitable to meet the need identified (ie for low cost, private moorings) which can, if relied on, be taken out of/ inset from the Green Belt so that those seeking planning permission can be certain any applications for moorings will not be treated as inappropriate development. f) commit to future monitoring/ update of need every 5 years. <p>There should be an appropriate sustainability appraisal of any new / amended policy.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	David Helsen
User ID	16425089
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I fully support this plan which is the culmination of extensive consultation with local people, Residents Associations and other interested parties. Most importantly it protects the Green Belt.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Michael Hepworth
User ID	41064737
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I have attended local meetings of the Claygate PC for some time, and am firmly of the view that what is left of the Green Belt around the village should be responsibly preserved, whilst understanding the need for additional but affordable housing to be available. What convinced me to support the plan was the soundness of the spatial strategy spelt out and the careful thought which has gone into it. Whilst not perfect from my point of view, I think it to be the wisest and most feasible way forward, and I am grateful to the councillors for their care to propose what I consider to be the best way forward.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mark Herbert
User ID	16235841
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Geoffrey Herbert
User ID	37591521
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes The supporting evidence covers the legal requirements.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Addresses the requirements and seeks to maximize the housing without affecting the standard of life.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Moiya Heyburn
User ID	40934721
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>If Building on 'Brownsites ' means the distruction of well used community resources that encourage people to walk, encourage community life and nature without proper and fair consultation of the communities it effects how is this legally compliant?</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>How is it justified to take a well-used community Library that enhances community Life, that is easily accessible for the disabled and parents with prams and pushchairs, that people can easily walk to thereby helping tackle climate change, with beautiful gardens encouraging wildlife that has been a part of the community for over 60 years and is still a busy part of community life be pulled down for a block of flats.</p> <p>From HMRC Website</p> <p>Councils remain responsible for overseeing the delivery of a 'comprehensive and efficient' library service by listening to and reflecting the changing needs of their communities. Councils have a statutory obligation to provide a library service,</p> <p>The needs assessment should ensure the council has a thorough understanding of the current provision and, critically, local community needs and views. This is to help inform choices about the future strategy and delivery model for the service. Consultation and engagement with users, non-users and local community groups is integral to this work.</p> <p>This has not been done If so I would like to see evidence of when I or my friends were contacted.</p>

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>How is it justified to take a well-used community Library that enhances community Life, that is easily accessible for the disabled and parents with prams and pushchairs, that people can easily walk to thereby helping tackle climate change, with beautiful gardens encouraging wildlife that has been a part of the community for over 60 years and is still a busy part of community life be pulled down for a block of flats.</p> <p>From HMRC Website</p> <p>Councils remain responsible for overseeing the delivery of a 'comprehensive and efficient' library service by listening to and reflecting the changing needs of their communities. Councils have a statutory obligation to provide a library service,</p> <p>The needs assessment should ensure the council has a thorough understanding of the current provision and, critically, local community needs and views. This is to help inform choices about the future strategy and delivery model for the service. Consultation and engagement with users, non-users and local community groups is integral to this work.</p> <p>This has not been done If so I would like to see evidence of when I or my friends were contacted. If you have other plans for Walton and Hersham that will affect the residents. Should the users of the facilities or local residents not be informed?</p> <p>If Friends of Hersham Library hadn't contacted us we would be none the wiser you had plans to demolish Hersham Library 'again' and build a block of flats in its place. Pulling down Hersham Library or any changes like this without informing the local community is not justified or consistent with national policy. It is an underhand way of forcing change that will not be Consult the local</p>

	communities as to changes that will affect them giving them time to think and question and disagree with the proposals if they feel they need to.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Posting things online is not good enough as residents who struggle with technology or can't afford computers and the internet or are just busy with work will not be logging onto the council website to try to find information that is made difficult to find and object to. The sheer volume of the 140 pages and innumerable repeating questions on 45 questionnaires is enough to deter anyone who has a learning disability this is therefore unfair and underhand. To give people a fair chance to know of changes that will affect them or their community they may or may not agree with not take away well used community resources without true and fair consultation.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	To give people a fair chance to know of changes that will affect them or their community they may or may not agree with not take away well used community resources without true and fair consultation.

Name	Moiya Heyburn
User ID	40934721
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>You say these are your aims below yet you wish to pull down a well used and loved community library with gardens that attract wildlife, that local schools and people walk to, to build a block of flats. to use Walton library we would have to drive our car, pay exorbitant parking fees and either walk up a long flight of stairs or use a small lift , great for the elderly, disabled, mothers with toddlers or the claustrophobic and people with health related issues.</p> <p>2.1 The Local Plan needs to respond to a number of significant challenges over the plan period, including:</p> <ul style="list-style-type: none"> • Tackling climate change and moving towards a low / zero carbon economy; • Protecting and enhancing the natural environment; <p>2.2 Elmbridge is a collection of separate and distinctive places and local communities each with its own unique local identity, historic assets and attractive green and natural environment which are highly valued by our communities.</p> <p>2.4 The carbon footprint of the borough is high and must be addressed to help tackle the climate emergency and improve the borough's resilience to climate change, as well as improve biodiversity and issues of air quality and road congestion.</p> <p>2.5 The borough has high-quality green and blue infrastructure that weaves its way through the urban areas and provides invaluable open spaces, highly treasured by local residents. Our urban open spaces play an important role within our green assets/natural capital and help to shape the character of our communities. However, we must continue to protect and enhance these spaces and work to improve accessibility and strengthen connectivity between them as</p>

	<p>movement corridors for the benefit of wildlife, climate change mitigation and adaptation as well as for the enjoyment and health and wellbeing of our residents and visitors.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>How is it justified to take a well-used community Library that enhances community Life, that is easily accessible for the disabled and parents with prams and pushchairs, that people can easily walk to thereby helping tackle climate change, with beautiful gardens encouraging wildlife that has been a part of the community for over 60 years and is still a busy part of community life be pulled down for a block of flats.</p> <p>From HMRC Website</p> <p>Councils remain responsible for overseeing the delivery of a ‘comprehensive and efficient’ library service by listening to and reflecting the changing needs of their communities. Councils have a statutory obligation to provide a library service,</p> <p>The needs assessment should ensure the council has a thorough understanding of the current provision and, critically, local community needs and views. This is to help inform choices about the future strategy and delivery model for the service. Consultation and engagement with users, non-users and local community groups is integral to this work.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>You State below</p>

	<p>2.8 The needs of businesses are also changing, as well as how people shop and spend their leisure time. Our high streets need support to help them adapt to the changing retail market and become distinctive hubs for socialisation, community support, leisure and culture. The Plan seeks to positively respond to these issues and changes whilst protecting and enhancing the qualities and features that not only make Elmbridge a sought-after place to live, work and visit but also sustainable and fit for the future</p> <p>Is forcing people to go into Walton for library services encouraging local High Streets to be diverse and thrive or is it just trying to make an at present defunct Walton town centre with secondhand shops, coffee shops, womens clothing stores or closed shops and expensive parking the place to go. I would rather go to Kingston or Woking if I had to drive to a shopping centre.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>his plan started on the 17 June with 6 weeks consultation.</p> <p>Local residents have not been informed as to what is happening to/in their community. Without being informed this makes this plan a fait accompli a bit of " Hitch Hikers Guide to the Galaxy" going on here.</p> <p>If you have other plans for Walton and Hersham that will affect the residents. Should the users of the facilities or local residents not be informed?</p> <p>The sheer volume of the 140 pages and innumerable repeating questions on 45 questionnaires is enough to deter anyone who has a learning disability this is therefore unfair and underhand. To give people a fair chance to know of changes that will affect them or their community they may or may not agree with not take away well used community resources without true and fair consultation.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	<p>To give people a fair chance to know of changes that will affect them or their community they may or may not agree with not take away well used community resources without true and fair consultation.</p> <p>The sheer volume of the 140 pages and innumerable repeating questions on 45 questionnaires is enough to deter anyone who has a learning disability this is therefore unfair and underhand.</p>

Name	Moiya Heyburn
User ID	40934721
Organisation	
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>Your aims</p> <p>1.Minimising carbon emissions:</p> <p>a) Directing development towards locations that minimise the need to travel and maximise the ability to make trips by sustainable modes of transport including cycling, walking and public transport.</p> <p>b) Delivering an efficient use of land especially on the most accessible sites.</p> <p>c) Providing more walkable and cyclable neighbourhoods that reduce demand for the use of private vehicles.</p> <p>f) Avoiding demolition by repurposing existing structures.</p> <p>g) Promoting the retrofitting of existing buildings, including incorporating measures to reduce energy consumption.</p> <p>Yet you want the whole village of Hersham to drive to Walton to use the library so you can demolish the existing library and gardens to build a block of flats</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>This plan started on the 17 June with 6 weeks consultation.</p> <p>Local residents have not been informed as to what is happening to/in their community.</p> <p>Without being informed this makes this plan a fait accompli a bit of " Hitch Hikers Guide to the Galaxy" going on here.</p> <p>How is it justified to take a well-used community Library that enhances community Life, that is easily accessible for the disabled and parents with prams and pushchairs, that people can easily</p>

	<p>walk to thereby helping tackle climate change, with beautiful gardens encouraging wildlife that has been a part of the community for over 60 years and is still a busy part of community life be pulled down for a block of flats.</p> <p>From HMRC Website</p> <p>Councils remain responsible for overseeing the delivery of a 'comprehensive and efficient' library service by listening to and reflecting the changing needs of their communities. Councils have a statutory obligation to provide a library service,</p> <p>The needs assessment should ensure the council has a thorough understanding of the current provision and, critically, local community needs and views. This is to help inform choices about the future strategy and delivery model for the service. Consultation and engagement with users, non-users and local community groups is integral to this work.</p> <p>This has not been done If so I would like to see evidence of when I or my friends were contacted.</p>
<p>Question 3</p>	<p>If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.</p>
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>This plan started on the 17 June with 6 weeks consultation.</p> <p>Local residents have not been informed as to what is happening to/in their community.</p> <p>Without being informed this makes this plan a fait accompli a bit of " Hitch Hikers Guide to the Galaxy" going on here.</p> <p>How is it justified to take a well-used community Library that enhances community Life, that is easily accessible for the disabled and parents with prams and pushchairs, that people can easily walk to thereby helping tackle climate change, with beautiful gardens encouraging wildlife that</p>

	<p>has been a part of the community for over 60 years and is still a busy part of community life be pulled down for a block of flats.</p> <p>From HMRC Website</p> <p>Councils remain responsible for overseeing the delivery of a 'comprehensive and efficient' library service by listening to and reflecting the changing needs of their communities. Councils have a statutory obligation to provide a library service,</p> <p>The needs assessment should ensure the council has a thorough understanding of the current provision and, critically, local community needs and views. This is to help inform choices about the future strategy and delivery model for the service. Consultation and engagement with users, non-users and local community groups is integral to this work.</p> <p>This has not been done If so I would like to see evidence of when I or my friends were contacted.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>If you have other plans for Walton and Hersham that will affect the residents. Should the users of the facilities or local residents not be informed?</p> <p>The sheer volume of the 140 pages and innumerable repeating questions on 45 questionnaires is enough to deter anyone who has a learning disability this is therefore unfair and underhand.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	To give people a fair chance to know of changes that will affect them or their community they may or may not agree with not take away well used community resources without true and fair consultation.

Name	Moiya Heyburn
User ID	40934721
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>This plan started on the 17 June with 6 weeks consultation. Local residents have not been informed as to what is happening to/in their community.</p> <p>Without being informed this makes this plan a fait accompli a bit of " Hitch Hikers Guide to the Galaxy" going on here.</p> <p>If Friends of Hersham Library hadn't contacted us we would be none the wiser you had plans to demolish Hersham Library 'again' and build a block of flats in its place.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>How is it justified to take a well used community Library that enhances community Life, that is easily accessible for the disabled and parents with prams and pushchairs, that people can easily walk to thereby helping tackle climate change, with beautiful gardens encouraging wildlife that has been a part of the community for over 60 years and is still a busy part of community life be pulled down for a block of flats.</p> <p>From HMRC Website</p> <p>Councils remain responsible for overseeing the delivery of a 'comprehensive and efficient' library service by listening to and reflecting the changing needs of their communities. Councils have a statutory obligation to provide a library service.</p> <p>The needs assessment should ensure the council has a thorough understanding of the current provision and, critically, local community needs and views. This is to help inform choices about</p>

	<p>the future strategy and delivery model for the service. Consultation and engagement with users, non-users and local community groups is integral to this work.</p> <p>This has not been done, If so I would like to see evidence of when I or my friends were contacted.</p> <p>If you have other plans for Walton and Hershams that will affect the residents. Should the users of the facilities or local residents not be informed ?</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>Pulling down Hershams Library or any changes like this without informing the local community is not justified or consistent with national policy . It is an underhand way of forcing change that will not benefit the community.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Consult the local communities as to changes that will affect them giving them time to think and question and disagree with the proposals if they feel they need to.</p> <p>Posting things online is not good enough as residents who struggle with technology or can't afford computers and the internet or are just busy with work will not be logging onto the council website to try to find information that is made difficult to find and object to.</p> <p>The sheer volume of the 140 pages and innumerable repeating questions on 45 questionnaires is enough to deter anyone who has a learning disability, this is therefore unfair and underhand.</p>

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	To give people a fair chance to know of changes that will affect them or there community they may or may not agree with not take away well used community resources without true and fair consultation.

Name	Steve Hinsley
User ID	38190593
Organisation	Stephen Hinsley Planning obo PA Housing
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Para. 1.10 The bullet points are fine as far as they go but there is one significant omission which given the need in Elmbridge should be added: “Ensures that housing needs are met to ensure every household has a safe and suitable home which they can afford.”</p> <p>Para. 1.12 We welcome the acknowledgement that there is a significant need for more homes in the Borough and in particular “more affordable housing”. This is the most pressing need in the Borough, but having stated this the vision, objectives and policies of the LP do not reflect this or ensure this need will be met.</p> <p>Paras. 1.13 to 1.15 It must be recognised that “A brownfield approach” will not, on its own, be enough to enable housing needs to be met. These paragraphs do not answer the question “How are we going to respond to our needs?” adequately. In fact, these paragraphs, so early in the LP, confirm that the Council will not meet its housing needs.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: []

	<p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Steve Hinsley
User ID	38190593
Organisation	Stephen Hinsley Planning obo PA Housing
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Para. 2.1 We are pleased to see “Delivering more affordable homes” is identified as one of the challenges. We say this is THE biggest challenge facing Elmbridge and this needs to be properly recognised.</p> <p>Para. 2.7 This clearly explains how a lack of sufficient affordable housing will mean that the social and economic dimensions of sustainable development will not be achieved during the LP period.</p> <p>The Vision The Vision should be the section in the LP where a proper weighting of the conflicting aims of and challenges for the LP, should be attempted so that there becomes a single priority for the LP. This will ensure that when, for example, individual planning applications are submitted and the “planning balance” exercise is undertaken, that this single priority is given additional weight where there is a conflict with other objectives.</p> <p>The single most important priority for Elmbridge over the LP period is to deliver sufficient homes, particularly affordable homes to meet identified housing needs. The evidence indicates that there should be an overarching policy in this section which states:</p> <p>Overarching Policy Aim The priority for this Local Plan will be to enable sufficient affordable homes to be provided to meet the identified need for affordable housing so that by 2037 in Elmbridge there will be:</p> <ul style="list-style-type: none"> • No homelessness • No households in temporary accommodation • No rough sleeping

	<p>The five “guiding principles” without the overarching policy above will not deliver sustainable development. Delivering Homes should be Principle 1 and should be more strongly worded as follows:</p> <p>Principle 1 Delivering sufficient homes to meet market and affordable housing needs, ensuring housing choice and well-designed homes are delivered.</p> <p>Principle 2: We say that to achieve the Overarching Policy Aim and Principle 1 will require the release of Green Belt. A Green Belt Review should be undertaken so that GB land which is not constrained by other environmental designations, and which does not perform well against the reasons for inclusion as GB can be released for housing. Thus, the second bullet of Principle 2 should only apply to GB land remaining after sufficient land has been removed and allocated for housing, following a review.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Steve Hinsley
User ID	38190593
Organisation	Stephen Hinsley Planning obo PA Housing
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Spatial Strategy and Delivery Para. 3.1 The previous LP failed to deliver sufficient sustainable development to meet needs. Para. 3.4 This is not true: the scale of growth has not been informed by a proper “balancing” of social, economic, and environmental positive and negative effects. “Responding to the climate emergency” does not mean that needs should not be met; it means that development needs must be met in a way which minimises harm by minimising carbon emissions, mitigating and adapting to the impacts of climate change and promoting renewable and low carbon energy schemes. There is no reason why releasing Green Belt land to meet development needs should conflict with the above. Policy SS1 This is not a Spatial Strategy policy.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p>

	<p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Steve Hinsley
User ID	38190593
Organisation	Stephen Hinsley Planning obo PA Housing
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Policy SS2 This policy provides conflicting aims. As explained above there is a need for an overarching policy to provide the correct weight to these competing aims. This is not a Spatial Strategy policy.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Steve Hinsley
User ID	38190593
Organisation	Stephen Hinsley Planning obo PA Housing
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Policy SS3 As para. 3.19 explains the standard method of calculating housing need is 9,705 homes (647 pa). SS3 1(a) only requires at least 6,785 homes. The policy should be amended to “At least 9,705 net additional homes with at least 30% to be affordable. SS3 2 states that a “brownfield first” approach will be taken. This will not be sufficient to enable needs to be met – GB land will have to be released. Para. 3.30 It is manifestly untrue that the Council “has fully examined all reasonable options responding positively to meeting the borough’s local housing needs...”. It has ignored the option of reviewing the Green Belt. Para. 3.31 Contrary to what is stated there is ample evidence to indicate that exceptional circumstances exist to amend the Green Belt boundaries and to release and allocate land for housing.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: []

	<p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Steve Hinsley
User ID	38190593
Organisation	Stephen Hinsley Planning obo PA Housing
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	See attached letter
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No See attached letter
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: [] See attached letter
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	See attached letter

	Appendix A SHP022003.pdf SHP022003 Reg 19 reps elmbridge LP.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Steve Hinsley
User ID	38190593
Organisation	Stephen Hinsley Planning obo PA Housing
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Policy HOU1 The minimum target for housing growth should be raised to 647pa. (1) The trajectory falls short of delivering sufficient housing to meet identified need. (2) 30% of 452pa is only 135 affordable homes per annum (2034 for plan period) against our estimate of net need for affordable housing of 484 dwellings per annum (see our summary Statement). (3) Insufficient site allocations are made to ensure housing needs will be met. (5) This requires adaptation to ensure that the policy is not applied in a way which would restrict affordable housing, particularly for larger affordable housing for which there is an identified need. (8) It should be explained in the supporting text that where a Registered Provider of affordable housing is seeking to redevelop or convert existing hostel, sheltered or bedsit accommodation, this provision will not apply.</p> <p>Para. 6.7 The housing target has not been informed by a proper assessment of the borough's "environmental constraints" which should include a Green Belt review.</p> <p>Para. 6.12 We do not believe that the Council will be able to demonstrate a five-year supply of affordable housing.</p> <p>Para. 6.1 The heart of the Plan should be the Overarching Policy Aim as stated above.</p> <p>Para. 6.2 The policies will not deliver sufficient housing to meet identified needs.</p>

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Steve Hinsley
User ID	38190593
Organisation	Stephen Hinsley Planning obo PA Housing
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Policy HOU2 As with HOU1 (5) this policy requires amendment to ensure its application does not prevent affordable housing, particularly affordable family accommodation. Para. 6.13 As explained above the aim is not “brownfield first” it is “brownfield only”. How can the council say there will be a “boost” to supply when it doesn’t even attempt to meet its identified need?</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Steve Hinsley
User ID	38190593
Organisation	Stephen Hinsley Planning obo PA Housing
Policy / Evidence base/ part of plan:	HOU3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Policy HOU3 and supporting text below</p> <p>The policy fails to address the size requirements for affordable housing as evidenced in the Council's Local Housing Need Assessment which at para. 21 states that: In total, 15% of need is for one-bedroomed units, 34% for two-bedrooms; 11% for three bedrooms; and 40% for four or more bedrooms.</p> <p>Para. 6.17 Policy HOU3 will not provide a "balanced" housing market.</p> <p>Para. 6.20 We say that it is the restriction on housing land release which is the primary cause of "exacerbated affordability issues" in Elmbridge. Policy HOU3 will not "ensure that future housing stock reflects local need".</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p>

	Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Steve Hinsley
User ID	38190593
Organisation	Stephen Hinsley Planning obo PA Housing
Policy / Evidence base/ part of plan:	HOU4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>(1) b We believe there is scope for raising the provision of affordable housing on allocated sites formerly in the Green Belt, i.e., allocated following a Green Belt Review, to 50%. Indeed, we believe this will be imperative if sufficient affordable housing is going to be delivered over the LP period.</p> <p>(3) The needs for affordable housing are varied across the borough – there is a need for all types of affordable housing. The requirement that “All affordable housing should be genuinely affordable, with the cost substantially lower than 30% below local market prices and rents.” is far too onerous and will place an unacceptable burden on Registered Providers. The Glossary in the NPPF provides the definition of affordable housing and this is all that is required. To impose the above requirement in policy goes beyond what is reasonable in the context of a LP.</p> <p>(4) As Registered Providers are the main deliverers of affordable housing their knowledge and expertise are of paramount importance when making decisions about the level, tenure and mix of affordable housing in individual developments. Therefore, the following should be added:</p> <p>(c) The views of Registered Providers of Affordable Housing Para. 6.24 This states housing affordability is a significant issue. This underplays the seriousness of the position. It is referred to as a “key priority” for the Council, but in reality, it is THE PRIORITY for the Council and hence why we are stating the need for an Overarching Policy Aim to give proper direction for the LP. Para. 6.27 Our assessment of the need for affordable housing is at least 484 dwellings per annum.</p>

	<p>Para. 6.30 We agree with the Council that “affordable housing need (is) so acute in the borough”. But what we do not agree with is the lack of emphasis in this LP to do anything about it.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Steve Hinsley
User ID	38190593
Organisation	Stephen Hinsley Planning obo PA Housing
Policy / Evidence base/ part of plan:	ECO1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>ECO2</p> <p>It has been shown that SEL can provide opportunities for affordable housing, for example the PA development at Britannia House. In a borough like Elmbridge where sites for affordable housing are at a premium Policy should allow for a limited number of sites for mixed employment/affordable housing in SEL. To enable this Policy ECO2 a) should be amended to:</p> <p>2a) There would be no reduction in the employment density at the site.</p> <p>And add OR after 4 b), and add,</p> <p>4 c) The proposal is for a mixed-use development for employment use and 100% affordable housing.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Steve Hinsley
User ID	38190593
Organisation	Stephen Hinsley Planning obo PA Housing
Policy / Evidence base/ part of plan:	ECO2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>ECO2</p> <p>It has been shown that SEL can provide opportunities for affordable housing, for example the PA development at Britannia House. In a borough like Elmbridge where sites for affordable housing are at a premium Policy should allow for a limited number of sites for mixed employment/affordable housing in SEL. To enable this Policy ECO2 a) should be amended to:</p> <p>2a) There would be no reduction in the employment density at the site.</p> <p>And add OR after 4 b), and add,</p> <p>4 c) The proposal is for a mixed-use development for employment use and 100% affordable housing.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Steve Hinsley
User ID	38190593
Organisation	Stephen Hinsley Planning obo PA Housing
Policy / Evidence base/ part of plan:	INF2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Policy INF2 3 Outmoded community use sites can also provide an opportunity for 100% affordable housing schemes. Therefore, it is suggested that a new c) is added to 3 as follows: Change b) by removing and replace with or, and insert c) the proposal will be for 100% affordable housing The existing c) can be removed</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Steve Hinsley
User ID	38190593
Organisation	Stephen Hinsley Planning obo PA Housing
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Site allocations</p> <p>PA Housing have 2 sites which should be included in the site allocations as follows: Former Nursery, Manor Road, Walton-on-Thames 1-5 years 19 residential units Bramcote House, York Road, Weybridge 1-5 years 27 residential units</p> <p>In addition, WOT2 (US350) Leylands House, Molesey Road, Walton-on-Thames needs to be removed from the allocations list as it is no longer deliverable because the site is owned by 2 separate landowners, and the first landowner has indicated that they no longer wish to join PA Housing (the second landowner) in jointly developing this site.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Steve Hinsley
User ID	38190593
Organisation	Stephen Hinsley Planning obo PA Housing
Policy / Evidence base/ part of plan:	Monitoring
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Monitoring</p> <p>The list of indicators under Principle 3 do not go far enough. The number of affordable homes from new build and acquisitions should be recorded separately. The following indicator should be added:</p> <p>Total net number of affordable homes delivered (new build and acquisitions) after taking account of demolitions and Right to Buy.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Steve Hinsley
User ID	38190593
Organisation	Stephen Hinsley Planning obo PA Housing
Policy / Evidence base/ part of plan:	Appendices
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	A2 Glossary For consistency and clarity, the definition for Affordable Housing should be the same as that in the glossary of the NPPF.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	M Hinton
User ID	24525825
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>I am not au fait with the laws of town planning but I would assume it's been checked by lawyers.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>I feel that it is right that climate change should be our number one priority but planning to build more houses in areas where the infrastructure can't cope and closing basically every thing we have left that builds a community is a mistake.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>I think it is unethical to build houses in Surrey but to remove all services. It feels like it's profit over providing a pleasant area to live. The services being removed are those council run and predominantly used by those with fewer means or are more vulnerable.</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Invest in the services, the community. You can't add houses where it's already impossible to get a doctor's appointment and there is no parking (and getting worse) and then remove all the local services. In Hersham you plan to take our library, our supermarket, other local shops, the opticians, the pub, the social club, the sports club....</p> <p>How can you say you want to improve climate change when we can no longer walk anywhere to run any errands?</p> <p>You mention improvement to infrastructure, but there are no concrete plans. Where are we going to build a larger doctor's surgery? On Hersham Green?</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Well, because I care a lot about the quality of life in Hersham and I believe that we need to fight for it not to turn into a concrete jungle which is choked with cars and with no amenities.

Name	M Hinton
User ID	24525825
Organisation	
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>You can't possibly plan to close FOUR libraries. You can't talk about quality of life and climate change and close everything within walking distance. Removing everything within walking distance will destroy the communities. Even if you plan to move them, that's an unbelievable waste of carbon when they are already existing. Elmbridge can't cope with more houses. Deal with the empty houses before building new. And the traffic, the parking, the doctor's surgeries... For a new mother like I was recently, I had two things I could do in Hersham: the children's centre (which has already been taken) and the library, oh, and just going for a walk around the little</p>

	<p>shops. Once the shopping centre and the library has gone there will be NOTHING. Comparing that to other places that I have lived, where the government cares about providing things to do for people with fewer means, it's shocking how much profit appears to outweigh the needs of residents. We don't all have money to spend being members of golf clubs and health clubs, just because we live in Elmbridge. I got most of my children's stuff from Sue Ryder and Barnardo's. Just looking around the charity shops was my entertainment. The parks are nice, but there is just so much rubbish and dog poo, something really needs to be done about that, maybe DNA test and trace on the dog poo should be included in the Improving Health and Wellbeing section. We need to aid community spirit, not destroy it. Don't take pubs, libraries, social clubs, cricket clubs. There were tears when the children's centres were taken. They were a vital resource for people with lower means but weren't known to social services. Children are important, having someone there to talk to and get advice and play was so so great, but now it's all gone. All that investment in those spaces, wasted.</p> <p>I wish I had time to answer all of these, but I don't. Please don't take the libraries, please don't take Waitrose and the other shops (Waitrose is a community hub, not like Tesco's or Sainsbury's, they have helpful, knowledgeable staff who appear to care, it makes you feel good going in there. The others are over busy, faceless and horrible in comparison, and a drive away), please don't take another pub, the Royal George has only just got new owners! Please don't take sports and social clubs just because the general clientele are older. Please give respect to all residents of Elmbridge, not just those with money, those who work in the city, those who are not too old and not too young.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>You need to make concrete plans to improve infrastructure before building more houses. Listing things that can possibly be improved isn't good enough. We need to know where you plan to put a larger doctor's surgery, for example. Basically every site in chapter 9 is being allocated to new housing -- not to services and infrastructure, and that appears to be going against the National Planning Policy mentioned in chapter 8. It needs to be proactive not reactive, leading to suffering for people for years until changes can happen to infrastructure. To be honest, it already can't cope, even before these extra residents appear.</p>

	You need to make/keep towns and villages walkable. That's only mentioned once on page 21, and then in Chapter 9 you say you're tearing down all the walkable amenities!
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Again, because I care a lot about not living in a town where EVERYTHING involves getting in a car. Where there is no community. Where there are no doctor's appointments. Where there is traffic everywhere, always. Where everything involves a queue and hence stress because your parking is about to expire! It's not a nice way to live.

Name	Histon Allvey Architects (Sophie Histon)
User ID	24384161
Organisation	Histon Allvey Architects
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No The plan designates Moore Place as an Urban Area It is green Belt and in no way ab urban area
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No The word Sound does not mean anything
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Change the allocation of Moore place to Green Belt.

	<p>The council should be making proposals to allow all their observations to happen and be more aware of the local population.</p> <p>At no point has the lack of local services been mentioned.</p> <p>With increased development the council should make provision to expand the following;</p> <p>Doctors surgeries</p> <p>Sewage plants</p> <p>Train stations need expanding/ improving</p> <p>Local Transport - Electric Shuttle buses should be provided around towns.</p> <p>Additionally</p> <p>Rivers need protecting from continual sewage overload</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Peter Hostler
User ID	24213473
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Celia Houlihan
User ID	40954369
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	David HOWE
User ID	41204001
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No I believe the evidence base to be inconsistent with data previously supplied by EBC as evidence. I believe EBC is not committed to assist Self-Builders The plan does not acknowledge the significant fall in the number of additional homes delivered that occurred when current policy CS21 was introduced in 2011
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [] Consistent with national policy: [Y] 1)The Plan for Self-Builders does not include sufficient detail - requiring a subsequent SPD it defines process but not policy

	<p>2)The evidence base conflicts with data EBC has submitted in evidence previously, namely Planning Permission data</p> <p>3) Elmbridge Planning data systems seem to be flawed and inconsistent</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>1) Add the 'Exemption' criteria for Self-Builders from Affordable Housing Contributions suggested, but not detailed into Hou8 eg : must occupy for 3 years?</p> <p>2) Identify which set of Gross annual Planning Permission data sets (if either) is correct- The one in the evidence base (HDT Action plan) conflicts significantly with the Gross annual Planning Permission figures submitted as evidence by EBC to the Inspectorate since Nov 2018.</p> <p>3) Delivery of Housing need- Lessons learned from implimentation of Policy CS21 2002 to 2011 should be highlighted and the policy reappraised to more closely align with Govt and NPPF guidance. After CS21 intoduced in 2011 the average (mean) delivery for the preceding 9 years was an additional 383 units pa. This fell to just 284 additional units pa for the 9 years after the introduction of CS21. EBC now 279th worst Council out of 297 for additional home delivery. Consistently delivering only 58% of need.</p> <p>2022Plan Consult Response - v1.docx</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Back

Name	George Brian Howells
User ID	41061025
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Tom Cole
User ID	41258529
Organisation	Montagu Evans obo Centrica Combined Common Investment Fund Ltd (c/o LaSalle Investment Management)
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>We write on behalf of our client, Centrica Combined Common Investment Fund Ltd (c/o LaSalle Investment Management) who own 42 Portsmouth Road, Long Ditton, Surbiton, KT6 5PZ. This letter of representation is submitted in response to the Regulation 19 consultation on the Draft Elmbridge Local Plan.</p> <p>BACKGROUND</p> <p>The purpose of the consultation is to establish if the Local Plan meets the legal and procedural requirements for Plan-making as set out by Paragraph 35 of the NPPF and whether the Plan can be found sound. These representations are intended to help guide the formulation of Elmbridge's Local Plan. Our client is generally supportive of the draft Local Plan and its approach, whereby the Council proposes to de-designate the Kingston House Estate (including our client's Site) as Strategic Employment Land under the adopted Local Plan.</p> <p>In light of the development pressures the Council faces in order to meet its minimum housing requirements, we conclude that the Council must go further and allocate the Site within the draft Local Plan to more positively encourage development. This would align with the Council's own conclusions on the Site as being underutilised, with the Elmbridge Strategic Employment Land Review (2019) concluding that the Kingston House Estate (which includes the Site) 'no longer contains a significant concentration of employment uses'.</p> <p>We are in pre-application discussions with the Council on a comprehensive residential proposal for the Site that would make a material contribution to the Council's housing land supply. Our client has engaged with the Council on a proposal which identifies a capacity of circa 158 homes for the Site. Detailed technical and environmental assessments will be undertaken in due course to ensure that sufficient evidence is provided to underpin the allocation of the site. This will be</p>

fundamental in ensuring any allocation is sound and based on proportionate evidence as sought by the NPPF.

SITE AND SURROUNDING AREA

The site is located to the south of Portsmouth Road and lies adjacent the southerly bank of the Thames. Surrounding uses to the east and south are residential. West of the Site is a self storage building and the Crowne Plaza Hotel, beyond which is residential. To the north of the Site is a marina and the River Thames. Surbiton Station is approximately 0.8 miles to the east of the Site and provides regular train services into Central London. A number of local bus routes also connect the Site with neighbouring towns.

There are no statutorily or locally listed buildings on site and the Site does not fall within a Conservation Area.

The Site is located within Flood Zone 1, the area with the least likelihood of flooding. The Site is not affected by any other environmental designations and so is evidently highly suitable for consideration for allocation.

The Site is currently used as a car dealership with a planning history consisting of a number of applications associated with the Site for this use. As noted above the Site is recommended for de-designation as Strategic Employment Land as part of the Kingston House Estate.

CONSIDERATION OF THE REGULATION 19 LOCAL PLAN

We remind the Council of the expectations of national policy for Plan-making. Paragraph 35 makes clear that Local Plans must be:

a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Within this context our soundness concerns relate to the following draft policies:

- Policy SS3 – Scale and location of good growth
- Policy HOU1 – Housing Delivery
- Policy HOU2 – Optimisation of sites
- Policy ECO1 – Supporting the Economy

We comment on each of the policies below and make recommendations on how the policies should be amended, or where further evidence is required to demonstrate that the draft Plan can be made acceptable.

Policy SS3: Scale and location of good growth

The draft Local Plan under Policy SS3 provides the Council's strategic policy for delivering development over the Plan period, including for housing. We support the Council's 'brownfield first' approach under part 2 of Policy SS3, with the aim to promote the development of previously developed land within urban areas, considering such locations to provide significant opportunities for sustainable development. This is a core objective in national policy, where Paragraph 119 makes explicitly clear that strategic policies must make as much use as possible of previously developed land.

Through following this objective, the Council concludes, however, that it cannot identify sufficient land to meet objectively assessed housing needs across the Borough. Some consideration was given to reviewing Green Belt boundaries and removing land from the Green Belt to deliver

housing, but the Council concluded that no circumstances would apply that would support Green Belt release. As a result of this the Council is only looking to deliver 6,785 homes over the Plan period despite being required to provide a minimum of 9,705 homes up to 2037.

This is contrary to National Planning Policy 2021 (NPPF) Paragraph 60 which seeks to boost the supply of homes citing the importance that sufficient and variety of land comes forward where needed. Furthermore, NPPF Paragraph 61 requires objectively assessed needs to be met unless exceptional circumstances justify an alternative approach which reflects current and future demographic trends and market signals. The Council must ensure that sufficient evidence is set out to deviate from the expectation to deliver its objectively assessed housing need of 9,705 homes over the Plan period.

We conclude that this has not been demonstrated adequately and there are clearly opportunities to formally allocate additional suitable land for development that have not been realised. Part 3 of Policy SS3 refers to development opportunities being encouraged that include “repurposing/redevelopment/diversification of specific sites now vacant in employment uses”. The Council must revisit its housing land supply and include allocations on sites like 42 Portsmouth Road that would align with the aspirations of Policy SS3 and ensure the Council puts forward a positively prepared strategy.

The draft Plan identifies that Long Ditton, Thames Ditton, Hinchley Wood and Weston Green are collectively expected to deliver only 635 homes against the Council’s suggested reduced housing target of 6,785 homes. Plainly speaking this is inadequate when considering the contribution our client’s land could make towards the Council’s housing target, which would evidently be further increased were the wider Kingston House Estate be put forward for a comprehensive allocation.

Policy HOU1: Housing delivery

Policy HOU1 (Housing Delivery) seeks to further justify the Council’s approach to deliver only part of its objectively assessed housing needs. The policy explains that this is due to balancing the need to deliver housing whilst understanding the Borough’s environmental constraints.

Elmbridge Borough Council have not tested a scenario in which the objectively assessed needs have been met as such it is considered that the plan does not align with Paragraph 35 of the NPPF for the examining of plans, as the Plan has not been ‘positively prepared’ nor ‘justified’ and as such are not consistent with national policy. This is likely to be a matter discussed extensively were the draft Plan to be submitted for Examination as written.

	<p>Policy HOU1 also explains that housing growth will be sought on allocated sites and to maximise opportunities to increase the supply of additional homes on unallocated suitable and available land.</p> <p>Of the 635 new units to be delivered in Long Ditton, Thames Ditton, Hinchley Wood and Weston Green over the course of the plan, site allocations for Thames Ditton, Long Ditton, Hinchley Wood and Weston Green within the draft plan will only provide 397 of these based on unit allocations. Of these allocations only 49 units are provided within sites in Long Ditton.</p> <p>Part 2 of Policy SS3 supports a 'brownfield first' approach alongside the utilisation of previously developed land. Part 3 of the policy, it supports the optimisation of development within urban areas to allow for the most efficient use of land. We support these objectives in principle, but in our view the Council must exhaust all suitable opportunities for allocating brownfield land in urban areas such as 42 Portsmouth Road. The Site evidently has significant potential for a comprehensive development and could achieve at least 158 units as demonstrated by the pre-application discussions.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Policy HOU2: Optimisation of sites</p> <p>In principle emerging Policy HOU2 is supported, as it prioritises the optimisation and efficient use of sites within the urban area. This would accord with national policy requirement under NPPF Paragraph 124 which places importance on planning policy and decisions to avoid homes being built at low densities and ensure the optimal use of potential within each site.</p> <p>In our view we find conflict between this and Policy SS2 (Sustainable place-making) because the Council has not sought to accept that there needs to be a step change in the density of development to deliver sufficient housing in order for the Plan to meet objectively assessed needs and demonstrate consistency with national policy.</p> <p>Paragraph 6.13 states that one of the key aims of the draft Plan is to boost the supply of new homes, however, we question how this can be achieved if the Borough's objectively assessed needs are not being aspired to. There is a concern that this will mean the Council cannot deliver sufficient homes to meet its identified needs and the longstanding issues of under supply of housing will persist. Paragraph 6.15 refers to greater detail and clarification is to be provided</p>

within the forthcoming Elmbridge Design Code, this is eagerly awaited, however, must be ambitious within its scope and ambitions.

Policy ECO1: Supporting the Economy

The removal of the Site's allocation in the adopted Local Plan is welcomed in light of the fact that the Kingston House Estate no longer contains significant employment uses. Policy ECO1 outlines the Council's overarching employment policy. It generally seeks to protect employment land and sets out the following criteria that must be met to enable the loss of employment-generating uses on non-Strategic Employment Land:

- a) There is no reasonable prospect of the site being retained in employment use;
- b) The site is no longer suitable for its existing use or other employment uses;
- c) The existing use creates (or any other employment use would create) significant amenity issues for neighbouring occupiers, best remedied by encouraging a replacement with a nonemployment use; and
- d) The development provides opportunities for sustainable co-location with other non-employment uses.

The supportive text to Policy ECO1 suggests that the Council would target between 12 – 36 months marketing evidence under criterion a) above to demonstrate that there is no reasonable prospect of employment sites being retained in employment use. This is very onerous and not appropriate.

Focusing on our client's land, as identified by the Council's own Employment Land Review, the Site is acknowledged to lack a concentration of employment uses and therefore evidently has limited function as an employment site. This is the reason why the Site is being de-allocated. It would be illogical to require any evidence of marketing to reaffirm what the Council already knows. This is a fundamental soundness issue and the Council must change its policy approach. If the intended purpose is to safeguard valuable employment uses this must be clarified (and those particular uses set out in policy), rather than simply a reference in policy to "employment-generating uses" which is vague and could be misinterpreted as restricting the redevelopment of any site in the Borough that currently provides jobs.

The Council must revisit this policy and readdress the priority being given to protecting poorly performing (or limited) employment sites in the face of the Council's significant housing supply shortfall against objectively assessed needs. Employment sites can make a more meaningful contribution to resolving this shortfall and the Council must reflect this in its Local Plan strategy.

	<p>Concluding Remarks</p> <p>In these representations we have highlighted a number of concerns with the current iteration of the draft Plan which presents soundness issues that must be resolved. This is particularly in respect of the Council's onerous safeguarding policy for employment land and opportunities for allocating additional land for housing to meet the required objectively assessed need.</p> <p>We respectfully request that we are added to the Local Plan consultation database and are kept up to date with the emerging Local Plan. Additionally, we reserve our position to appear at the EiP Hearing Sessions.</p> <p>We would welcome the opportunity to meet with officers to discuss the future of the site and to facilitate a site visit. Please do not hesitate in contacting Tom Cole (020 7866 8674 / tom.cole@montagu-evans.co.uk) or Alex Partridge (07584 154 762 / alex.partridge@montagu-evans.co.uk) of this office in the first instance should this be of use.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>As above.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>As above.</p> <p>1899 Thames Ditton Emerging Design and Access Statement.pdf</p>

	290722 Thames Ditton Reps FINAL.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	As above.

Name	Sally Hunt
User ID	40367137
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No I have reservations about development in brown belt land being pushed through and over developed come what may because of the pressure not to use green belt and our housing shortfall. Any development on brown belt should be adaptable and resilient to any climate issues such as flooding and not exacerbate these issues elsewhere it should also protect the amenities of local residents and not block light, enclose or impact on privacy
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	To protect the identified sites of brown belt land from being over developed in order to ease pressure and protect amenities environment and residents. Sympathetic redevelopment in keeping with the locality is paramount
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sally Hunt
User ID	40367137
Organisation	
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No There are so many empty one two bedroom senior living accommodation across the borough. It is almost impossible to find flats suitable for families in affordable housing/private rent. Families need homes not just professional couples and seniors. Families with parents over the age of 55 also don't want to live in retirement villages. The swing towards provision for senior living has gone too far. As has small dwellings not suitable for families. This is a family dominated borough many people come to live here to bring up their families in such pleasant abs safe surroundings
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Consider a cross section of housing provision do not focus solely on senior living and un family friendly accommodation
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Surrey Wildlife Trust (Robert Hutchinson)
User ID	41259329
Organisation	Surrey Wildlife Trust
Policy / Evidence base/ part of plan:	ENV6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>We have the following comments and observations:</p> <p>1. Biodiversity Net Gain</p> <p>We note that Policy ENV6 has regard for a minimum 10% biodiversity net gain. Please be advised that Surrey Nature Partnership recommend a minimum of 20% biodiversity net gain policy. The Surrey Nature Partnership recommends that Surrey's local planning authorities adopt a policy for Biodiversity Net Gain that will require developers using Biodiversity Metric 2.0 (or as subsequently amended) to demonstrate the post-development achievement of a minimum 20% increase in biodiversity units, in support of their planning application(s).</p> <p>Further information this is provided in the link - https://surreynaturepartnership.files.wordpress.com/2020/11/recommendation-for-20-bng-in-surrey_snp-november2020_final.pdf. This can be provided in full, if the link does not work.</p> <p>2.. Policy ENV6 Point 3.</p> <p>Point 3 - "Development proposals must seek to protect, enhance and conserve wildlife habitats and species by creating new natural areas or restoring and enhancing existing habitats". We would advise that the wording is altered to specifically include Habitats of Principal Importance, and Species of Principal Importance.</p> <p>Therefore we would advise that this states "Development proposals must seek to protect, enhance and conserve wildlife habitats, including Habitats of Principal Importance, and species,</p>

	<p>including Species of Principal Importance, by creating new natural areas or restoring and enhancing existing habitats”</p> <p>3. Policy ENV Point 4b. Point 4b – “Protect, conserve and enhance existing biodiversity features and secure their long-term management and maintenance” We would advise that the wording is altered to specifically include Habitats of Principal Importance. Therefore we would advise that this states “Protect, conserve and enhance existing biodiversity features, including Habitats Principal Importance, and secure their long-term management and maintenance</p> <p>4. Habitats of Principal Importance and Species of Principal Importance Section 41 of the Natural Environment and Rural Communities Act 2006 refers to a published list of habitats and species which are of principal importance for the conservation of biodiversity in England. The above wording amendments to Policy ENV6 Point 3 and 4b, would provide greater emphasis of the protection of important habitats and species in Elmbridge. Policy ENV6, Point 6 - We would advise that the Local Plan clearly defines what public benefits arising from a development outweigh harm to biodiversity. This could be in the narrative and not necessarily in the policy but it would provide clarity to members of the public, developers, ecologists, planning officers and councilors. This could include a criteria of public benefits, and scenarios for when they are relevant.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sara Jamieson
User ID	24461377
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Surrey County Council (Sue Janota)
User ID	23665857
Organisation	Surrey County Council
Policy / Evidence base/ part of plan:	CC1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Following the declaration of a climate emergency and the setting of net-zero targets, there is strong justification for Local Plan policies to be in keeping with the future challenges faced around climate change. It is disappointing that there is no policy requirement for zero carbon development, particularly for the largest schemes, alongside exploration of a carbon offset scheme.</p> <p>We note that reference to the June 2022 update to part L of the Building Regulations has not been referenced specifically. This could be updated at paragraph 4.8 in chapter 4</p> <p>We note that a Climate Change and Renewables SPD is due to be produced to accompany the Local Plan policies. Areas that could be expanded upon within this include:</p> <ul style="list-style-type: none"> • Detail on the scope to require more challenging Target Emission Rates in future as areas of policy such as the Future House/Future Buildings Standard progress. • Information on future proofing so development can be adapted to be carbon neutral without significant retrofit • Additional consideration of climate change adaptation and analysis of climate risks and vulnerability
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: []

	<p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Surrey County Council (Sue Janota)
User ID	23665857
Organisation	Surrey County Council
Policy / Evidence base/ part of plan:	CC2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	As the Minerals and Waste Planning Authority we are pleased to see Policy CC2 'Minimising waste and promoting a circular economy' as it accords with objectives set out in the Surrey Waste Local Plan. We are particularly pleased to note that development proposals will be required to adopt a circular economy approach to building design and construction, reducing waste and keeping products and materials in use for as long as possible, minimising embodied carbon.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Surrey County Council (Sue Janota)
User ID	23665857
Organisation	Surrey County Council
Policy / Evidence base/ part of plan:	CC4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>There is no reference to Local Transport Plan 4 (LTP4), although policy CC4 aligns well with LTP4 objectives. Additional supporting text referencing both LTP4 and the LCWIP would be beneficial and could include:</p> <p>“Surrey County Council’s 2022 Local Transport Plan 4 sets out county-wide policies on reducing transport emissions in order to help meet the county’s commitment to becoming net zero by 2050. One of the primary delivery mechanisms for achieving net zero is the role out of Local Cycling and Walking Infrastructure Plans (LCWIP)”.</p> <p>Policy CC4 makes reference to walking and cycling, however please note that we are starting to see a move to the inclusion of “wheeling” when referring to walking and cycling, and this allows for inclusion of people who move at the same pace as a pedestrian but are not walking, and instead are using a wheelchair or similar mobility aid. For example please find a link to the Department for Transport’s Cycling and Walking Investment Strategy Report to Parliament 2022: Cycling and Walking Investment Strategy Report to Parliament 2022 (publishing.service.gov.uk) The first line of the report states “The virtuous circles of walking, wheeling and cycling help us tackle environmental issues whilst boosting our health and wellbeing.”</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: []

	<p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Surrey County Council (Sue Janota)
User ID	23665857
Organisation	Surrey County Council
Policy / Evidence base/ part of plan:	CC5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Comments are made in our capacity as Lead Local Flood Authority. To improve consistency in how surface water flood risk is reviewed across the county we would recommend that the following policy wording is considered in terms of surface water flood risk under CC5 – Managing flood risk:</p> <p>All development proposals are required to demonstrate that land drainage will be adequate and that they will not result in an increase in surface water run-off. Sustainable drainage systems are required on all developments, unless proved to be not reasonable practicable, and should:</p> <ol style="list-style-type: none"> a) Ensure surface run-off is managed as close to the source as possible and does not increase flood risk elsewhere; b) Be in accordance with the rainwater disposal hierarchy of Buildings Regs Part H3 (3); c) In circumstances where it has been proved that infiltration is impractical, discharge of surface water to watercourse/sewer shall not exceed the following peak rates: <ul style="list-style-type: none"> • at pre-development greenfield runoff rates on all new development; • as close as reasonably practicable to greenfield run off rates from all other brownfield sites. d) Be designed to be multi-functional and incorporate sustainable drainage into landscaping and public realm, including maximising opportunities to establish surface water ponding areas, urban watercourse buffer areas and multi-use flood storage areas in locations of high surface water flood risk and critical drainage areas to improve flood resilience, amenity and biodiversity. e) Achieve improvements in water quality through a sustainable drainage system management train; f) Be designed with consideration of future maintenance and climate change; and

	<p>g) Make improvements in accordance with the Council's most up to date Infrastructure Delivery Plan.</p> <p>We have the following suggestions on the wording of policy CC5:</p> <p>CC5 - Managing flood risk</p> <p>To reduce the overall and local risk of flooding and manage water resources:</p> <ol style="list-style-type: none"> 1. Development must be located, designed and laid out to ensure that it is safe; the risk from flooding from all sources is minimised whilst not increasing the risk of flooding elsewhere; and that residual risks are safely managed. Planning permission therefore will only be granted, or land allocated for development where it can be demonstrated that: <ol style="list-style-type: none"> a) Through a sequential test it is located in the lowest appropriate flood risk zone (consider amending to 'lowest area of flood risk from all sources' otherwise this only refers to fluvial flood risk) in accordance with national policy and the Elmbridge Strategic Flood Risk Assessment (SFRA); b) It would not constrain the natural function of the flood plain or surface water flow route, either by impeding flood flow or reducing storage capacity; and c) Where sequential and exception tests have been undertaken, any development that takes place where there is a risk of flooding from all sources will need to ensure that flood mitigation measures are integrated into the design to minimise the risk to property and life should flooding occur. 4. Development proposed must attenuate surface water run-off so that the run-off rate is no greater than the run-off prior to development taking place or, if the site is previously developed, development actively reduces run-off rates and volumes. Consider replacing points 4 and 5 with our suggested wording above. 5. All new development is required to ensure that sustainable drainage systems are used for the management of surface water. Comment as point 4 above.
<p>Question 3</p>	<p>If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.</p>
	<p>Positively prepared: []</p> <p>Effective: []</p>

	<p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Surrey County Council (Sue Janota)
User ID	23665857
Organisation	Surrey County Council
Policy / Evidence base/ part of plan:	ENV6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>SCC has been notified, on a provisional basis, that it will be the responsible body for a county wide Local Recovery Strategy (LNRS). The following comments are made in relation to the county's strategic interest in biodiversity arising from this role.</p> <p>Clause 1 of policy ENV6 could include reference to the nature recovery networks to be proposed in the LNRS for Surrey, which will be developed in 2022 and 2023.</p> <p>Clause 6 of ENV6 would benefit from additional clarification. It is unclear what is meant by 'harm to biodiversity' where a net gain is provided. An acceptable compensation strategy should always be in place even in the context of irreplaceable habitats, which are dealt with outside of the Biodiversity Net Gain metric.</p> <p>Terminology could be standardised to ensure that 'conservation, restoration and enhancement' of biodiversity is the consistent term.</p> <p>In supporting policy text, further details could be added about the Surrey context. For example, with reference to the Surrey Nature Partnership's State of Nature report, which revealed that trends in extinction locally are even higher than the already very concerning rates nationally.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p>

	<p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Surrey County Council (Sue Janota)
User ID	23665857
Organisation	Surrey County Council
Policy / Evidence base/ part of plan:	ENV9
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	We note that policy ENV9 sets out that development should be consistent with the National Design Guide and that the forthcoming Elmbridge Design Code will be based on this. We assume that this design guidance will ensure that all new properties, including flats, have suitable storage space for a full range of recyclable collections.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Surrey County Council (Sue Janota)
User ID	23665857
Organisation	Surrey County Council
Policy / Evidence base/ part of plan:	ENV10
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>The heritage policy ENV10 is quite high-level in nature. Although the NPPF deals with some concerns, the policy does lack some fine detail and doesn't reflect the different ways that heritage assets are managed within planning. The policy could provide further clarity on the approaches that the borough might adopt when considering development that affects heritage assets of different classes.</p> <p>Policy Paragraphs 1-2 deal with "designated heritage assets, assets at risk and non-designated heritage assets". It is not made clear that within these different classes of heritage asset, different legislative conditions apply and that development must be designed accordingly. Development affecting Grade I Listed Buildings or Scheduled Monuments is considerably more prohibitive than that affecting Grade II listed sites or "non-designated" heritage assets such as Locally Listed Buildings for example, and the planning process is weighted accordingly. "Great Weight" is accorded to the conservation and preservation of the former, but in lesser graded or ungraded sites the considerations are significantly more nuanced. The policy as written doesn't reflect this and it would be helpful for applicants if it were more detailed.</p> <p>We welcome the inclusion of consideration of the settings of heritage assets in paragraph 2. We would suggest adding "and curtilage" after this reference in this paragraph as setting and curtilage are different things and the latter is absent currently.</p> <p>Policy paragraph 5 on archaeology doesn't mention Scheduled Monuments or County Sites of Archaeological Importance (CSAIs). These are the most sensitive class of archaeological sites in the borough and we would expect to see note of them somewhere within the archaeological policy. The draft policies map appears to show Areas of High Archaeological Potential and CSAIs</p>

	<p>as one combined layer. Much as comments above relate to the difficulties in differentiating between grades of heritage in the policy, it is also not possible to differentiate between grades of non-designated archaeology on the policies map. We suggest a more fine-grained approach to better inform applicants.</p> <p>Both classes of monument also have enhanced setting considerations. To better accommodate these most significant sites, a suggested enhanced wording for this final paragraph is below, for consideration:</p> <p>Development proposals should take into account the potential for heritage assets of archaeological importance being present on the site. A desk-based assessment, at a minimum, will be required for sites affecting the area or setting of Scheduled Monuments and County Sites of Archaeological Importance, or which are located within Areas of High Archaeological Potential, and for any site outside of these which is greater in area than 0.4ha.</p> <p>We welcome the retention of the 0.4ha requirement for archaeological assessment.</p> <p>The supporting paragraphs also lack discussion of the importance of retaining and the differences in managing heritage assets of the most significant character and highest designated level and those lower down the tiers of grading. Paragraph 5.45 omits CSAIs as noted above in ENV10, and these need to be included.</p> <p>The Heritage Impact Assessment that accompanies the Local Plan Draft is comprehensive and we are pleased to note that it includes CSAIs.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Surrey County Council (Sue Janota)
User ID	23665857
Organisation	Surrey County Council
Policy / Evidence base/ part of plan:	INF1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Education</p> <p>Brooklands is one of two Further Education colleges in Elmbridge. We welcome the recognition of Brooklands College for the important contribution to the borough, in terms of higher and further education and vocational training and upskilling, that development at the site could make. From a county council point of view, sustainability of the Brooklands College offer is vital in terms of ensuring sufficiency of post 16 education provision, including post 16 SEND provision, in the borough.</p> <p>Following the rising demand for secondary school places in Elmbridge, there is expected to be a corresponding increased demand for post 16 places. An expansion of the current specialist provision at Brooklands College is also being considered as part of the SEND Capital Programme. Additional SEND places at Brooklands College would enable increased numbers of pupils with Educational Health and Care Plans resident in Elmbridge to access Post 16 education at a college local to them.</p> <p>Special Educational Need and Disability (SEND) provision</p> <p>Surrey County Council has identified a long-term sufficiency gap for additional specialist school places in Elmbridge. The May 2022 Elmbridge Infrastructure Delivery Plan (IDP) highlights this need and references Surrey's SEND Capital Programme. The IDP provides details of the first set of schemes planned to be brought forward to increase the number of specialist places available locally.</p> <p>There is a potential opportunity to secure investment in the specialist education estate through the next wave of the Department for Education (DfE) Special Free School programme.</p>

	Applications will be submitted in October 2022 and successful applicants will be announced in Summer 2023. SCC has submitted a pre-registration application for a school in Elmbridge. Site search and land due diligence is underway. There is an expectation that in order to successfully secure one of these new Special Free Schools, applicant authorities would need to provide a suitable site, available to the DfE for a 'peppercorn rent'. For any school delivered through this route, a planning application would be made by the DfE to the relevant district or borough.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Surrey County Council (Sue Janota)
User ID	23665857
Organisation	Surrey County Council
Policy / Evidence base/ part of plan:	INF2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>With regard to the impact on libraries, it should be noted that libraries in Elmbridge are currently undersized for the populations they service, and additional housing will further impact on the need for more space to deliver essential services. Libraries use the Department for Digital, Culture, Media and Sport (DCMS) standard of 30m² net of public library space per 1000 population to determine space requirements for each area. Care needs to be given to maintaining these standards in the development of the library estate.</p> <p>The desire to redevelop on current library space in Esher, Hersham, Molesey and Weybridge aligns with our long terms plans to refurbish those libraries to ensure they deliver a modern library service. It is essential that a library is re-provided in all these areas and Surrey County Council welcome the opportunity to work jointly with Elmbridge on proposed plans.</p> <p>Any such work would be subject to a full options appraisal which would determine the most suitable location for the library service and services will be co-designed with residents and local stakeholders to ensure we are reflecting the needs of the community. These options appraisals will be undertaken at the appropriate time in line with the proposed housing plans.</p> <p>There will be a requirement to maintain service provision throughout the duration of works, so care needs to be given to the consideration of temporary relocation sites during the course of any redevelopment works.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.

	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Surrey County Council (Sue Janota)
User ID	23665857
Organisation	Surrey County Council
Policy / Evidence base/ part of plan:	INF3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	We note the policy requirement for Health Impact Assessments. This is welcomed and it is an area that Public Health colleagues are starting to look at. They are keen to involve EBC as work progresses.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	David Jardine
User ID	26203905
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	David Jardine
User ID	26203905
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes The green belt must be protected at all costs for everyone
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	David Jardine
User ID	26203905
Organisation	
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes Good to see re-purposing of existing buildings
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Some good ideas
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	David Jardine
User ID	26203905
Organisation	
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	David Jardine
User ID	26203905
Organisation	
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes Need to maintain open spaces for local enjoyment
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	David Jardine
User ID	26203905
Organisation	
Policy / Evidence base/ part of plan:	CC1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes Very important for the future generations
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	David Jardine
User ID	26203905
Organisation	
Policy / Evidence base/ part of plan:	CC2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	David Jardine
User ID	26203905
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>I hope it will protect the green belt and not allow a sprawl of over development by outside developers who do not care about the local area</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>Generally sound but care must be take to ensure communities are not affected by over development. There must be a sound infrastructure to ensure the wellbeing of all ages and protect the area for future generations</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	David Jardine
User ID	26203905
Organisation	
Policy / Evidence base/ part of plan:	ENV1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes Green belt must be protected for the benefit of all
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	David Jardine
User ID	26203905
Organisation	
Policy / Evidence base/ part of plan:	ENV2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes Trees must be protected at all costs and developments carefully monitored
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	David Jardine
User ID	26203905
Organisation	
Policy / Evidence base/ part of plan:	ENV3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Spencer Jefferies
User ID	7934657
Organisation	National Grid
Policy / Evidence base/ part of plan:	INF1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Provided letter dated: 26.07.2022 with advice and recommendations. Therefore, to ensure that Infrastructure Policy INF1 is consistent with national policy we would request the inclusion of a policy strand such as: “x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.”
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Robert Jenkins
User ID	41246177
Organisation	
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No There need to be far more houses/ flats built. probably 10 times as many.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [Y] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Plan to provide 60,000 more dwellings.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sharon Jenkins Jenkins
User ID	7940417
Organisation	Natural England
Policy / Evidence base/ part of plan:	ENV5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please see letter attached for full response. As it stands we feel this documents fails the tests of soundness within the NPPF.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please see letter attached for full response. As it stands we feel this documents fails the tests of soundness within the NPPF.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	<p>We feel that Elmbridge Borough Council need to formally provide further evidence and justification that there are mitigation projects available. To allow the Planning Inspectorate to be satisfied that there is enough mitigation available to allow all the Plan to be delivered. Natural England and Elmbridge Borough Council are still engaged in ongoing discussions and we feel that progress is being made on this matter. Following receipt of further information, we are hoping to issue a Statement of Common Ground, in advance of the Examination in Public. Natural England may then review our challenge upon the Local Plan.</p> <p>395889 - NATURAL ENGLAND Response.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sarah Jones
User ID	24585793
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Gareth Jones
User ID	24456417
Organisation	Mr
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I support the Spatial Strategy and the continued protection of the Green Belt.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sarah Jones
User ID	24585793
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Fatmir Kastrati
User ID	41151713
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>The plan was drafted without the benefit of an assessment of the needs of liveaboard boaters and which was not completed until February 2022. This assessment was withheld from the public including the boaters their legal teams ,even during a planning appeal hearing on 15 March 2022. This withholding of such a vital document from us and the planning Inspector shows the contempt and disregard EBC holds for due process and the law. The plan fails to address the specific housing requirements of Boat Dwellers contrary to para 60 NPPF. The approach is in clear breach of para 62 NPPF which states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The Plan was prepared without proper regard to those who live on boats on the River Thames and fails to address the needs of those known to be living on boats in the EBC area. This ORS survey uses phrases and descriptions which do not exist e.g licenced moorings, there is no such thing as a licenced mooring.. It uses EBC terminology e.g unauthorised and illegal moorings giving the impression that all boats moored in the Borough of EBC are unconsented or illegal. This, of course is very inaccurate. It also fails to mention that many boats are moored to land where the</p>

boaters(including myself) are legally asserting their ownership of the Land. This was explained to ORS by the boaters but has not been included.

The plan is not positively prepared in so far as it fails to consider, let alone address, the needs of Boat Dwellers.

The Council has known that boats are occupied on the River Thames and are exercising their legal right under the Thames conservancy act 1932 to moor their boats to their land under riparian rights as I do.

There are many more liveaboard boats in the EBC area than ORS was unable to contact.

It was pointed out to the Council at the March 2022 appeal hearings, there is no specific policy for livaboard boaters in national planning policy. Section 5 NPPF is concerned with 'Delivering a sufficient supply of homes'. This is unchanged from the July 2018 and 2019 versions. Paragraph 62 NPPF 2021 states as follows

Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

This also remains unchanged since 2018

The Local Plan Evidence Base had not identified a need for houseboat dwellers because no study had been commissioned to address this. The 2017 GTAA by ORS was only required to address the needs of Gypsy-Travellers and did not interview or include the needs of those living on boats on the river. There is no policy in the current Local Plan to address the needs of house boat dwellers nor is there a policy in the pre submission local plan. It is far from clear what 'wider corporate commitments' would help meet the need. There is no evidence that Officers have reviewed Policy DM 13 or how that would assist in addressing the issue of residential moorings

On 8 Aug 2019, the compliance team issued 9 enforcement notices for a number of moorings located north west of Cherry Orchard Gardens and adjacent to the towpath.

The Notice failed to explain what purpose the moorings were being used for (ie storage, recreational, residential) but it was clear the concern was with the residential use made

of the boats. Some Notices claimed there was land based development where there was none. The Plans attached so some Notices failed to identify the correct location of the moorings. Although the Notices were appealed the Planning Inspectorate determined that the owner/occupiers of the boats had no right of appeal as the bank of the river was unregistered land. The notices came into effect on the 9th September and required the cessation of the use of the land for the permanent mooring of boat/s and the removal of any structures, fencing or enclosures, which have been erected in association with the use of the land for the permanent mooring of boat/s, within one month from the date of which the notice takes effect.

In June 2020 planning applications were however submitted and validated for 5 moorings at West Molesey. These applications were refused for a variety of reasons including different reasons to those cited in the enforcement notices. With the exception of one mooring ,the appeals were dismissed. Permission was granted for one mooring on a part of a pre-existing wharf for a family with a young child in March 2022.

This was the councils aim from the beginning, they had promised their residents in their election pamphlets that they would do this.

Even during our planning applications process, 2 council leaders and the chief executive of EBC wrote to the chief executive of the EA stating 'I am writing to you as a last resort to seek your intervention to resolve a seemingly intractable problem of illegally moored boats along the Thames in Elmbridge'.

Our group have never been illegally moored.

This unethical and outrageous behaviour was designed to get us moved off of the land which I am legally asserting my ownership of, by means of adverse possession.

The whole purpose of the enforcement notices is

1) to make the land we are legally occupying unusable, that is why EBC has acted in this way using underhanded and dirty tactics, being bullish and deceiving as well as colluding with the Environment Agency (who wants the land for themselves by the way) and other groups who want us out of here to achieve their goal.

They have made us poorer by having to pay for a lot of legal costs while they spend our tax money on pointless marygoround of red tape and bureaucracy.

They are employed by us to take care of our needs which they seem to forget.

Not letting the appeal hearing know that they had the ORS study in their possession at

that time.

2 Not consulting with anybody until it was too late to be included in the local plan(very convenient).

3 Putting on the pretence of trying to find land for residential boaters but not contact us who can supply such land on existing moorings (ironic comedy).
While they actively block all applications for residential moorings.
A boat is a chattel not a building and boats add to the ambience and character of any river.
EBC and EA have no residential moorings on any of this extensive riverbank that forms the norther boundary of EBC

It is clear Elmbridge Council understands the process. What is unclear is why they failed to follow their own advice and prepared and consulted on the new local plan without first establishing the evidence base which would confirm the need for more permanent residential moorings.
NPPF makes clear that the development plan is supposed to be the starting point for decision making and the planning system should be genuinely plan led, providing a framework for addressing housing needs. Yet in July 2020, the Leader of Elmbridge Council and the Chief Executive of the Council contacted the Chief Executive of the EA saying 'I am writing to you as a last resort to seek your intervention to resolve a seemingly intractable problem of illegally moored boats along the Thames in Elmbridge.
At this stage Elmbridge Council had still failed to commission a houseboat survey or attempted to address the issue, other than take enforcement action in an attempt to rid themselves of the problem and push it up/down stream.
The Council were clearly aware of the existence of river boats occupied residentially a full 2 years before the Reg19 stage of this Local Plan.
This issue is not unique to Elmbridge. During October 2019, Friends, Families and Travellers carried out a survey of 356 people from the Liveaboard Boater community using the Survey Monkey platform to ascertain experiences of healthcare services, and the challenges faced when accessing care. The study noted that it was difficult to ascertain the population of Liveaboard Boaters in the UK. Information from the Residential Boat Owners Association highlights suggested that at least 15,000 people live afloat in Great Britain but FFT noted that it was unclear how this figure had been calculated. The National Bargee Travellers Association estimate that over 50,000 or more people are currently living on boats.

	<p>In 2021 EBC commissioned ORS to undertake the first survey of liveboard boaters in the district.</p> <p>51.... I am told that the Council is now currently undertaking a needs assessment. However, this is not currently in the public domain and so there is no evidence before me on the level of demand for permanent residential moorings and whether this would be addressed or met through a future development plan examination process or by some other means, and the timescales for doing so The Local Plan EIP will be the first opportunity for the findings to be examined. The study provides some useful information but omits any assessment of the existing availability of existing residential or leisure moorings</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>The remedy is simple, EBC should now fulfill their legal obligation by encouraging existing permanent residential moorings and creating more of them as the problem clearly doesn't go away by just bullying people around who have nowhere else to go.</p> <p>Thank you</p>

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	I would like to attend as it will directly effect my home, lifestyle and well being. I am evolved directly in the legal process against the EBC planning policies.

Name	Jennifer Kazandjian
User ID	16491265
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>There is an inherent contradiction between a stated commitment to managing the effect of climate change and any meaningful strategy to reduce the impact of increased traffic. The impact on Elmbridge of the large Wisley development represents an important omission. There are fundamental errors in the reports assessing the performance of Green Belt sites. Most importantly site SA-111 next to Waverley road & blundell lane has been incorrectly assessed. There is no recognition of the need for densification of urban areas such as Oxshott to be progressive & avoid the character of areas of comparatively low density being damaged by individual high density schemes.</p> <p>While areas close to local centres and train stations are targeted for flats & infill development the converse should apply so that the character of other areas such as most of residential Oxshott is protected.</p> <p>There are no design codes available to provide protection for local character & ensure excellent buildings.</p> <p>Calculations of developer contributions for affordable housing continue to be based on flawed methodology that has been subject to continual abuse.</p> <p>The infrastructure delivery plan is weak with a heavy reliance on a document that has not yet been produced by Surrey county council .key to successful development must be the recognition that infrastructure must precede development. A noteworthy omission is the lack of commitment to instal cycle lanes alongside trunk roads thereby promoting road safety & improving traffic flow.</p>

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Talal Kheir
User ID	41159137
Organisation	The Water Gardens board
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>Application Ref: 2018/3810 Appeal Ref: APP/K3605/W/22/3291461 The Local Plan as drafted by the Elmbridge Borough council is locally compliant and based on a multitude of residents representations</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>We are a board that represents 24 detached houses in the Wilderness, East Molesey KT8 0JT. We Fully support Elmbridge in objecting to the proposed Jolly Boatman Hampton Court development.</p> <p>The 97 dwelling development will be of little help to solving local housing needs as the proposing offshore company, whose origin of finances and directors are unknown, may not even be advertised in the UK, and simply be Investment opportunities elsewhere.</p> <p>Facing the Historic river setting of Hampton Court Palace, a National Treasure, this is one of the most important sites in the UK and must not to be marred by inappropriate building.</p> <p>The proposed Jolly Boathouse Development is totally excessive in scale and would adversely dominate the skyline, activity, access and character of the local area and was previously rightly rejected by Elmbridge Council.</p> <p>The site is essentially an island and all access to the land is across a busy pavement and cycle route and onto an already convoluted junction of a busy main road which leads to the only Thames river crossing between Kingston and Walton.</p>

	<p>This pathway will have to be transversed by all deliveries, refuse collection, residents and hotel cars, buses and emergency vehicles leaving pedestrians and cyclists vulnerable. The increased vehicle access will greatly inhibit the flow of traffic at this important junction next to the Bridge. The proposed underground parking is totally inadequate for Hotel staff and guests, residences, shops and train commuters and would overflow to local streets.</p> <p>The Station was built to exploit tourism to Hampton Court and Molesey.</p> <p>The threatened removal of parking to Elmbridge residents and Hampton Court by Network rail is indefensible and would flood the local streets with commuter's cars which in turn would stifle local businesses.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adam Kindred
User ID	41249281
Organisation	CBRE
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes No further comments.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please refer to the attached representations.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please refer to the attached representations.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please refer to the attached representations.

	Burwood Road - Reg 19 - FINAL.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Policy SS3 as drafted is unsound. We wish to be given the opportunity to elaborate upon this at the Examination in Public to advance the Local Plan.

Name	Adam Kindred
User ID	41249281
Organisation	CBRE
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Draft Policy HOU1 states that opportunities for housing growth in Elmbridge will be “optimised” yet this policy only strives to deliver a minimum of 452 homes per annum over the plan period. This is considerably lower (shortfall of 195 homes per annum) than the latest Standard Method (March 2022) which sets an indicative requirement for EBC of a minimum 647 homes per annum. This policy should be amended to reflect spatial strategy Option 6: ‘Optimisation and intensification in more sustainable locations’ and delivery of a “minimum 647 homes per annum over the plan period” as part of optimising delivery of new homes in accordance with Chapter 5 of the NPPF.</p> <p>Therefore, EBC’s housing delivery target is not reflective of the Borough’s housing needs. For this reason, Draft Policy HOU1 is unsound and should be amended to reflect spatial strategy Option 6: ‘Optimisation and intensification in more sustainable locations’ or our suggested 5b’ option and the delivery of a “minimum 647 homes per annum over the plan period” as part of optimising delivery of new homes in accordance with Chapter 5 of the NPPF and if it is to be found sound by an Inspector and deemed to be ‘positively prepared’ to ensure as a minimum the area’s objectively assessed needs will be satisfied in accordance with paragraph 35(a) of the NPPF.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.

	<p>Positively prepared: <input type="checkbox"/> [Y]</p> <p>Effective: <input type="checkbox"/> []</p> <p>Justified: <input type="checkbox"/> []</p> <p>Consistent with national policy: <input type="checkbox"/> []</p> <p>Draft Policy HOU1 states that opportunities for housing growth in Elmbridge will be “optimised” yet this policy only strives to deliver a minimum of 452 homes per annum over the plan period. This is considerably lower (shortfall of 195 homes per annum) than the latest Standard Method (March 2022) which sets an indicative requirement for EBC of a minimum 647 homes per annum. This policy should be amended to reflect spatial strategy Option 6: ‘Optimisation and intensification in more sustainable locations’ and delivery of a “minimum 647 homes per annum over the plan period” as part of optimising delivery of new homes in accordance with Chapter 5 of the NPPF.</p> <p>Therefore, EBC’s housing delivery target is not reflective of the Borough’s housing needs. For this reason, Draft Policy HOU1 is unsound and should be amended to reflect spatial strategy Option 6: ‘Optimisation and intensification in more sustainable locations’ or our suggested 5b’ option and the delivery of a “minimum 647 homes per annum over the plan period” as part of optimising delivery of new homes in accordance with Chapter 5 of the NPPF and if it is to be found sound by an Inspector and deemed to be ‘positively prepared’ to ensure as a minimum the area’s objectively assessed needs will be satisfied in accordance with paragraph 35(a) of the NPPF.</p>
<p>Question 4</p>	<p>Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.</p>
	<p>Refer to attached representations.</p> <p>Burwood Road - Reg 19 - FINAL.pdf</p>

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Refer to attached representations.

Name	Adam Kindred
User ID	41249281
Organisation	CBRE
Policy / Evidence base/ part of plan:	HOU3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Ashill support the thrust of Draft Policy HOU2 in terms of making efficient use of land and optimising site capacity in accordance with paragraph 124 of the NPPF. However, this policy is unsound as currently drafted as it does not seek to optimise sites outside urban areas / town centres. Reference should be made to the optimisation of suitable sustainably located sites released from the Green Belt outside the urban area / town centres, including Land at Burwood Road, Hersham which has capacity for 80-100 new dwellings, and is available now, offers a suitable and sustainable location for development that is achievable and developable within the short term i.e. next five years.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [] Consistent with national policy: [Y]

	<p>Ashill support the thrust of Draft Policy HOU2 in terms of making efficient use of land and optimising site capacity in accordance with paragraph 124 of the NPPF.</p> <p>However, this policy is unsound as currently drafted as it does not seek to optimise sites outside urban areas / town centres. Reference should be made to the optimisation of suitable sustainably located sites released from the Green Belt outside the urban area / town centres, including Land at Burwood Road, Hersham which has capacity for 80-100 new dwellings, and is available now, offers a suitable and sustainable location for development that is achievable and developable within the short term i.e. next five years.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Refer to appended representations.</p> <p>Burwood Road - Reg 19 - FINAL.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Refer to appended representations.

Name	Richard Kirchner
User ID	16366145
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Andrea Kitzberger-Smith
User ID	24620705
Organisation	LB Richmond upon Thames and LB Wandsworth
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	see email attached
Question 2	Do you consider this part of the draft Local Plan to be sound?
	see email attached
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	FW LB Richmond upon Thames response on Elmbridge Regulation 19 Local Plan.msg

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Tal Kleiman
User ID	38520737
Organisation	Horsham District Council
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes Please see attachments
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No To be clear, we are neither supporting nor objecting on grounds of soundness. However, the form requires one option to be chosen. Please see attachment for HDC's view
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	We are not seeking to modify the Local Plan. Please see attachments.

	Final Elbridge Planning Policy 18Feb2020.pdf 211108 Elbridge Response FINAL.pdf 220719 Elbridge Reg 19 Response.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alice Knowles
User ID	41223425
Organisation	Waverley Borough Council
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes No comments
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Thank you for consulting Waverley Borough Council on the above document. This response has been prepared in consultation with the Portfolio Holder for Planning and Economic Development. In response to the Strategic Options Consultation in 2016, we raised concerns about the issue of unmet need arising from the strategic options as none of the options proposed suggested that the objectively assessed need could be met entirely within the Borough. In response to the Regulation 18 Consultation, we were pleased to see that one of the three options would deliver all the required homes over the plan period within Elmbridge Borough. We note that the Regulation 19 Draft Elmbridge Local Plan 2037 seeks to deliver 6785 (452 per annum) homes over the plan period against an objectively assessed need of 9,705 (647 per annum) homes. Whilst we recognise that our respective housing market areas do share some linkages, we would expect that every opportunity is taken to meet any unmet need in the first instance within your own housing market area (HMA) of Kingston and North Surrey. Waverley has a challenging housing requirement in the Local Plan Part 1 (LPP1) as a result of the uplift applied at the LPP1 examination. Through LPP1, Waverley is seeking to meet its own identified needs in full, as well as fifty percent of the unmet need from Woking Borough, which is in the same HMA. This has resulted in a final housing requirement of 590 homes per annum from 2013 to 2032 which totals 11,210 new homes over the plan period. Looking forward, we anticipate that the housing need in Waverley will continue to be extremely challenging. Waverley also has significant constraints

	<p>such as Green Belt, the Surrey Hills Area of Outstanding Natural Beauty, the Area of Great Landscape Value, a number of Conservation Areas and European sites, including the Thames Basin Heath and two Wealden Heaths Special Protection Areas. We therefore consider that Waverley would not be in a position to accommodate any unmet housing need arising from the Kingston and North Surrey HMA.</p> <p>We do not anticipate that any of the other policies would have any strategic impacts.</p> <p>Yours faithfully, Andrew Longley Planning Policy Manager (Interim)</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Waverley Council CPM 2022 041 WBC response to Elmbridge Reg 19.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Elizabeth Laino
User ID	40986753
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes The plan is a sensible one which recognises how much green belt Elmbridge has and how little urban space. Green belt should be protected and housing targets realistic. Elmbridge is one of the most expensive places in the country to live. It sets a sensible target for affordable homes and concentrates on building first time ownership properties.. I fully support it
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Jez Langham
User ID	40288961
Organisation	Elmbridge BC
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Julie Lavender
User ID	41157249
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Gemma Lawrence-Pardew
User ID	41166913
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>Whilst you are legally consulting with regards to the Plan, I would seriously question the extent to which views will be taken into consideration.</p> <p>I say this with knowledge that the retail units within Hersham Shopping Centre have already been served with notice of termination for the "proposed" future development. Likewise, the contract award for the renovation of Hersham Golf Course (not currently listed as a critical site and being a greenbelt area) - I believe has already be rewarded to a developer.</p> <p>Whether this has been achieved by a public backhander or otherwise remains to be seen. Given the state of party politics generally at present, nothing would surprise me.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Whilst containing at the correct "buzz" words like sustainable, green deliverables, etc. this plan reads with more holes than a sieve. The majority of the report is focused on repeating public mandates in the area of sustainability, which I would know being a professional expert in this area. However, I find it very concerning that every proposal to protect green space is caveated. I also find it laughable that the creation of more homes will lend Elmbridge to being more affordable. With the new flexible working regime, you will simply see Londoners relocate to benefit from suburban life and this plan appears to be creating the concrete playground to better help them assimilate.</p>

	<p>Those of us who have lived in Elmbridge for many years, have chosen to remain here due to the green spaces, the lack of mid-high rises, the focus on community, etc. That all seems to be being swept away with this plan, particularly given the plan to wipe out local pubs (which I believe the Government had introduced legislation to protect), social clubs, village halls, libraries, churches, etc.</p> <p>Moving on to local resources - I must question how you plan to accommodate the increase in children at nurseries and schools - which are already experiencing a resourcing crises. Same for local surgeries, strain on nearby hospitals, etc. It is not a matter of simply requesting a building be provided, it needs to be staffed.</p> <p>All in all I have no faith that this Local Plan will enhance the area in any way.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>Whilst there is a housing crisis, I do not understand why, with this new flexible working environment in which we live, we are looking to build up already suburban areas.</p> <p>In addition, the doing away with local community institutions I find baffling in this time of social upheaval, with the focus on mental health largely owing to isolation caused by the pandemic. These changes will adversely impact mental health as a whole, a national emergency we should be seeking to remediate.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	<p>Refocus areas of potential development away from green belt (remove the caveats) and local community areas.</p> <p>I would also like to see far greater detail in how the additional populace will be catered for with regards to existing services - not just in terms of space but in terms of finding the employment required to staff additional nurseries, schools, dentists, doctors surgeries, etc.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	<p>All plans should be considered in light of a Just Transition and I wish to better understand who the proposed buildings are just, in terms of the mental impact with the removal of community areas and services.</p> <p>Being a parent, I also have genuine concerns regarding the provision of additional resources to cater to childrens needs in terms of schooling, aiding literacy (via libraries), safe spaces to play (sports and social clubs) and so on. The health of the community appears to be being sacrificed for profitability. I say this particularly given the number of second homes that are located within the Elmbridge area - which I see doubling with the housing plans.</p>

Name	Ellie Laws
User ID	41195617
Organisation	Stride Treglown obo Whiteley Village
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	See letter attached
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Whiteley Homes Trust observations: Draft Local Plan</p> <p>The Trust is pleased that the Council recognise the vital role played by the Trust in helping to meet the growing needs of older people in providing affordable housing, and specialist care for older people in the Borough. The Trust welcomes that the emerging Local Plan has identified Whiteley Village as a “broad location for development” under Policy SS3 “Scale and Location of Growth”.</p> <p>The Trust acknowledges that the scale and location of growth set out in Strategic Policy SS3 has been informed by “careful consideration of the evidence and the balancing of the social, economic and environmental positive and negative effects which could arise from growth and development” as presented by the Council. Strategic Policy SS3 sets out the quantum and spatial distribution of development in the borough, including setting out the preferred location for growth, as required by national policy.</p> <p>It is noted that Strategic Policy SS3 promotes the principle of growth and development within a defined location within the Green Belt (Whiteley Village). Policy SS3 is strategic in nature and therefore it is entirely appropriate to conclude that the scale of development envisaged by this policy is of a greater scale that merely isolated infilling of individual development plots as suggested by Adopted Core Strategy CS6 (2011) and the subsequent Conservation Area Appraisal and Management Plan (2012).</p> <p>The Trust and Council are committed to work in a collaborative manner to develop a Masterplan for the Village, on the understanding that the Masterplan principles will need to reflect and align</p>

with the charitable and operational requirements of the Trust. Clarification as to the status of the emerging Masterplan required by Policy HOU6, and its future role as a material planning consideration in the determination of planning applications is considered appropriate and necessary.

The Trust is keen to ensure that the future development context at Whiteley Village is presented as a site-specific policy within the emerging Local Plan. Such a policy can address the opportunities in the Village, and refer, in supporting text, to the importance of the concept of “very special circumstances” applicable to a Green Belt location.

Given the reference to Whiteley Village within Policy SS3, we consider that the Village should therefore be identified within the Site Allocations list and on a Site Allocation Map.

In summary, while the Draft Local Plan includes supportive statements towards appropriate long-term development within Whiteley Village, the absence of a site-specific policy, and loss of importance references to the original development principles (which inform the broad location and scale of development within the Village reflecting the policy sentiment of Policy SS3), is such that the Trust must object to the current wording. The Trust is committed to working with the Council to find a suitable alternative wording which captures the disparate supportive statements within the Draft Plan, and which acknowledges the importance of prudent and positive planning through the vehicle of a site-specific Masterplan for the Village.

A new site-specific policy and supportive text is presented for consideration:

Policy ** Whiteley Village

In recognition of Whiteley Village’s unique and very special circumstances, its charitable status, the evolving needs of the elderly population in the Borough, the desire to conserve and enhance its character and function, and the importance of safeguarding a sustainable long term future for the Village, the Council will support the long-term ambition to expand the almshouses and care provision in Whiteley Village.

The Whiteley Homes Trust – Representation to Elmbridge Local Plan (June 2022)

Prepared by Stride Treglown for client discussion prior to formal issue in July 2022 P a g e | 4

A long-term development aspiration will be delivered via a Masterplan to be prepared collaboratively between the Council and the Trust. The Masterplan will set out a modern interpretation of the original development principles of the Village as promoted by the founder William Whiteley in a way which does not cause detrimental harm to interests of acknowledged

importance and which has regard to contemporary living standards, design quality, and updated sustainable development objectives.

Supporting text alongside the Policy

Founded in 1907, Whiteley Village is unique in that it forms a completely self-contained settlement devoted entirely to older people. It continues to play a vital role as a provider of a range of specialist accommodation and care for older people of 'limited means'.

The village is located within the Green Belt, is a designated Conservation Area and the vast majority of buildings are listed.

The unique nature of Whiteley Village means that it should be protected and its future supported, to enable it to continue to make an important contribution to the provision of accommodation and care for older people. In this regard the Village is identified in Policy SS3 Scale and Location of Growth as a development and location which makes an important contribution to the borough.

The Whiteley Homes Trust accommodation is targeted at those of 'limited means' in accordance with the wishes of its founder. The Trust has recently applied to become a Registered Provider of affordable accommodation. It is recognised that, in order for the village to continue this role and to support its long-term sustainability, a more comprehensive approach is necessary to plan for its future to ensure the special significance and integrity of the village as a whole, together with its constituent parts, is protected. This comprehensive approach will be delivered through a Whiteley Village Masterplan. The Masterplan will have regard to the 2012 Conservation Area Appraisal and Management Plan prepared jointly between the Council and the Trust. The Management Plan identified an infill boundary at the time to acknowledge how well considered development plots could be brought forward around the Village heart.

In looking to the future and to accommodate increasing pressure facing society in relation to the care of a growing elderly population, the comprehensive approach will look beyond the infill boundary and consider ways in which specialist accommodation can be delivered which does not harm the Conservation Area, but which endeavours to progress the evolution of the Village as originally conceived. While the majority of new accommodation is likely to involve almshouses (bungalows) a modern interpretation of the original development principles offers the opportunity to deliver new quality homes which can adapt to residents needs and which meet modern living and energy efficiency standards.

The Council and Trust accept that a very special circumstances case will need to be made as part of the submission of future planning applications. The identification of the Village as a broad

	<p>location for development acknowledges the Council's support for a comprehensive development strategy. The Council acknowledges that the issues pertinent to the very special circumstances facing proposals across the Village are likely to include, but not be limited to the following issues:</p> <ul style="list-style-type: none"> - The unique origins of village and its underlying ethos. - Focusing on the delivery of affordable and specialist accommodation without significant impact on the public purse. - The demonstrable need for specialist and elderly accommodation for those in need. - The desirability of preserving the integrity of the heritage assets. - Opening up the village, its setting and amenities, to the wider community. - The suitability of the site given existing community and infrastructure. - The unique status and role of the Trust - The extended life expectancy of residents of the Village - The identification of an infill development boundary within the 2012 Conservation Area Management Plan - Safeguarding the long-term operational future of the Trust. <p>These issues will be developed, as appropriate, through the preparation of a Masterplan for the Village.</p> <p>The Whiteley Homes Trust – Representation to Elmbridge Local Plan (June 2022) Prepared by Stride Treglown for client discussion prior to formal issue in July 2022 P a g e 5</p> <p>The policy will help to deliver the aims of the Elmbridge Sustainable Community Strategy (SCS11) by helping older people to remain independent in their own home.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	220728 The Whiteley Homes Trust Local Plan Representations.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ellie Laws
User ID	41195617
Organisation	Stride Treglown obo Whiteley Village
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Please see letter attached
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Please see letter attached
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	220728_The Whiteley Homes Trust Local Plan Representations.pdf

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ellie Laws
User ID	41195617
Organisation	Stride Treglown obo Whiteley Village
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Given the reference to Whiteley Village within Policy SS3, we consider that the Village should therefore be identified within the Site Allocations list and on a Site Allocation Map.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mrs Le Clerc
User ID	41248161
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: <input type="checkbox"/> [Y]</p> <p>Effective: <input type="checkbox"/> []</p> <p>Justified: <input type="checkbox"/> []</p> <p>Consistent with national policy: <input type="checkbox"/> [Y]</p> <p>Chapter 9 of the Draft Elmbridge Local Plan 2037 identifies Sundial House, The Molesey Venture, Orchard Lane, East Molesey, KT8 0BN as a site allocation (reference D6 US462). Through this this regulation 19 consultation I would like to question the soundness of the allocation.</p> <p>A focus of the Local Plan is to deliver sustainable development and promote development that helps towards tackling the climate crisis. To that end, it is recognised that the redevelopment of the site would make use of previously developed land. However, it should also be recognised</p>

that the site falls within flood zone 2 and placing this site into a more vulnerable residential use should itself be discouraged, particularly at the densities being suggested in the Land Availability Assessment 2021, which would suggest a more intensive use of the land.

This is therefore likely to increase the potential for flood risk both on site and to the surrounding area, placing existing residential properties at greater risk.

Indeed, the recommended density identified for this site in the Land Availability Assessment is 120 dph. This is not consistent with the policies in the Draft Local Plan and the findings of evidence based studies that were used to inform the plan. Draft Local Plan Policy HOU1, whilst requiring efficient use of land, it also states that "...all new residential and mixed-use development to demonstrate that it represents the optimal use of land and density, positively responding to the location and the appearance of the surrounding area".

To that end, the Land Availability Assessment 2021 para 3.21 states that the council has provided an estimate for each site, based on a range of factors including:-

- Nature of the area
- A consideration of historic development yields achieved on comparable schemes within the locality.

However, the density proposed for site D6 US462 of 120 dph does not reflect the nature of the area or development yields in the locality and as a result is contrary to the Draft Local plan guidelines. Below is the evidence showing where the site density allocation is not consistent with the proposed draft plan and evidence based studies:-

1) The Elmbridge Urban Capacity Study 2018 has site US462 situated within the East Molesey District Centre catchment area. The proposed density for this site of 120 dph is double the top range of densities achieved on recent schemes in this catchment area. The Elmbridge Urban Capacity Study identified that densities achieved on recent schemes range from 21-60 dph. (Para 4.22, 4.23). The proposed density for the site is also significantly higher than the low and high density multipliers identified for town and district centre catchments of 30pdh – 70dph. (Para 4.34 Table 3).

2) In the Elmbridge Density Study 2019 the site falls within MOL10 Ember Lane Environs sub area. (Figure 15 Policy Layers for East and West Molesey). This sub area has a current density of 10.86 dph and is the lowest density sub area in East and West Molesey (Table 9 East and West Molesey Density Figures, para 4.57). The proposed density for the site is over 3 times the

	<p>average densities permitted since Jul 2011 in MOL10 of 35.67 dph. (Table 10 Average Densities permitted since Jul 2011)</p> <p>3) The Elmbridge Density Study 2019 identified the most sustainable locations in the area as MOL04 and MOL09 (para 4.62) and that the key gateway to the settlement around Hampton Court station could accommodate higher density development (para 4.66). The site US462 does not fall within either of these areas.</p> <p>4) As site US462 is not identified in the above evidence bases studies as being most sustainable for higher density development the proposed density of 120 dph is not in line with strategic policy SS2 (Sustainable Place Making) point 1. The council will apply the presumption in favour of sustainable development, balancing the economic, social and environmental objectives and point 2(a)iii Enhancing the character and qualities of places and contribute positively to local distinctiveness, identity and history.</p> <p>5) It is also not in line with policy HOU2 Optimisation of sites: this policy aims to develop higher density housing within or on the edge of town, district and local centres and sites adjacent to train stations. (HOU2 2.a) NPPF defines edge of town as 300m of a town centre boundary or 500m of a station. Based on the Retail Centres Boundary Review 2021 site US462 is an estimated 1000m from both the Bridge Road District Centre and East Molesey District Centre. It is and estimated 1100m from Thames Ditton Station and 1400m from Hampton Court Station and so would sit outside the areas suitable to higher density development.</p>
<p>Question 4</p>	<p>Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.</p>
	<p>In summary based on the evidence based reports and draft local plan policies the allocation of a density of 120 dph to site D6 US462 Sundial House, The Molesey Venture, Orchard Lane, East Molesey, KT8 0BN is unsound and should be amended to a more appropriate level before the draft local plan becomes adopted.</p> <p>Regulation 19 consultation Site US462.docx</p>

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Jason Lee
User ID	24516737
Organisation	
Policy / Evidence base/ part of plan:	CC1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I would like to see buses move to electrification. There doesn't seem to be any provision for this.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Jason Lee
User ID	24516737
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Christopher Lee
User ID	24373089
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No The plan is not sound since it lays out specific targets for delivery of residential housing units but fails to make any specific plans as to the infrastructure requirements that are needed. Esher town centre is often at a standstill and Surrey Roadshave regularly admitted in planning meetings at the Town Hall that Esher roads are already at breaking point. Adding thousands of new homes with thousands of new cars whilst not properly addressing beforehand the transport, educational and health infrastructure of Esher is criminal, negligent and redolent of short-termism. The Council's plans for infrastructure are broad words with no actual real substance. The Local Plan is therefore not sound
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [] Consistent with national policy: []

	Esher roads are, according to Surrey Highways, already at breaking point. We regularly face gridlock and environmentally damaging traffic jams. The Local Plan has no policy to solve this and plans to exacerbate the issue by just increasing residential units but not actually planning to do anything other than "have a chat" with other organisations about roads, education and health provision. It is not a sound plan to build homes but not forecast and plan for roads, health centres and schools.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	The Council needs to commit to concrete action on roads, schools and health provision before increasing the number of residential units
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Christopher Lee
User ID	24373089
Organisation	
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No As a resident of Esher who lives on New Road, I see three plots are earmarked for multiple residential use. My issue is the affordability that you focus on. The land cost of New Road means multiple use residential units (the three plots earmarked suggest knocking down one house and building between five and six units) are not affordable housing. They add pressure onto infrastructure (the road is thinly metalled and damages easily) and upset the drainage. They are also NOT carbon neutral. Huge increases in density are not carbon neutral and involve increased amounts of building materials. It is disingenuous to suggest this is not so. Overdevelopment of residential plots leads to environmental degradation, infrastructure issues, air pollution and does not address the issue of affordable housing. Flats costing over half a million pounds and townhouses costing 2 million pounds do not solve the issue of affordable housing. Less dense developments are more sensible. Elements of your plan are therefore not sound and go contrary to policy.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y]

	<p>Justified: []</p> <p>Consistent with national policy: []</p> <p>The issue that Esher needs to address is affordable housing. Building apartments that cost over half a million pounds each on the most expensive roads in Esher does not solve this issue. All the council receives is CIL payments which serve little other than help to balance the council budget in other areas. There are other land banks in Esher that are more sensible (such as the Jockey Club plans for residential units at Sandown Park and the use of More place (formerly a 9 hole golf course) which is now running wild with weeds and rodents.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Notice must be taken to address the issue of affordability of housing which may not be suitably addressed by development on land whose cost precludes the effective delivery of such housing
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Joan Simon Leifer
User ID	24370625
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes We know that the Elmbridge officers have worked hard to ensure that the Local Plan is evidence based and therefore legally compliant
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes In particular a large percentage of proposed housing is allocated for Esher but we can see where this is to be sited and are supportive
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Simon Leifer
User ID	41208769
Organisation	Esher Residents Association
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>We know that the Elmbridge officers have worked hard to ensure that the Local Plan is evidence based and therefore legally compliant</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>In particular a large percentage of proposed housing is allocated for Esher but we can see where this is to be sited and are supportive</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Simon Leifer
User ID	41208769
Organisation	Esher Residents Association
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Chris Liddiard
User ID	23360993
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes The utilising of brownfield sites and higher density on existing sites as the preferred option to achieving the housing target is the best way . No Green Belt must be sacrificed.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Chris Liddiard
User ID	23360993
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	David Lock
User ID	41247809
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>I am not qualified to answer this question - but would be concerned if the national guidelines encouraged a large proportion of local facilities to be re designated for housing use as, apparently appears to be the case for Hersham.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>I answered no as a resident of Hersham concerned about the proportion of local facilities to be re designated for housing use as in Hersham, for example the Village Hall and Library and several of the remaining pubs (the Barley Mow and Royal George) and the Comrades Club. Also, I would expect, as a starting point the local plan to identify with the community important local facilities which the community want to protect - however the current plan appears to identify such sites and designate these for housing.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p>

	<p>Consistent with national policy: []</p> <p>I have a question about whether it's justified to generally reduce social and community buildings and land use / car parks when there will be a likely increase in population. Also, I am concerned that only a small percentage of the new housing built under the plan will be genuinely affordable for generations to come - if not I fear that the increased housing will do little to help low income families in the area.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Re-look at other land elsewhere, or in Hersham if necessary, before resorting to re-designating community land use (like the village hall and library) for housing.</p> <p>For example, has the land on the left beyond Sir Richard's Bridge in the direction of Weybridge been considered?</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Maria Long
User ID	23618465
Organisation	
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>We support this aspect of the draft plan in particular. We were very concerned about any proposal to release greenbelt in our area. The greenbelt areas surrounding Claygate give the village a unique character and are used by all for walking and playing (in the case of our children). There is a variety of wildlife inhabiting these areas: foxes, deer, birds, rabbits and many other species. It is unlikely that affordable housing (which we understand is a national priority) would result in any development of greenbelt around Claygate. It is far more likely that affordable housing would arise out of the development of brownfield sites and increased density sites in town centres. These areas are also likely to have better communications and facilities for lower income families. So we were very pleased to learn of this aspect of the plan and the intention to develop these sorts of sites instead of releasing greenbelt.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p>

	Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Coenraad Alex Lugt
User ID	41247521
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <ul style="list-style-type: none"> • There is an inherent contradiction between a stated commitment to managing the effects of climate change and any meaningful strategy to reduce the impact of increased traffic. • The impact on Elmbridge of the large Wisley housing development represents an important omission. • There are fundamental errors in the reports assessing the performance of Green Belt sites. Most importantly, site SA-11 next to Waverley Road and Blundel Lane has been incorrectly assessed. • There is no recognition of the need for densification of urban areas such as Oxshott to be progressive and avoid the character of areas of comparatively low density being damaged by individual high-density schemes. • While areas close to local centres and train stations are targeted for flats and infill development, the converse should apply so that the character of other areas (such as most of residential Oxshott) is protected. • There are no design codes available to provide protection for local character and ensure excellent buildings. • Calculations of developer contributions for affordable housing continue to be based on flawed methodology that has been subject to continual abuse. • The Infrastructure Delivery Plan is weak with heavy reliance on a document that has not yet been produced by Surrey County Council. Key to successful development must be the

	recognition that infrastructure must precede development. A noteworthy omission is the lack of commitment to install cycle lanes alongside trunk roads thereby promoting road safety and improving traffic flow.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Elizabeth Lugt
User ID	41251201
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <ul style="list-style-type: none"> • There is an inherent contradiction between a stated commitment to managing the effects of climate change and any meaningful strategy to reduce the impact of increased traffic. • The impact on Elmbridge of the large Wisley housing development represents an important omission. • There are fundamental errors in the reports assessing the performance of Green Belt sites. Most importantly, site SA-11 next to Waverley Road and Blundel Lane has been incorrectly assessed. • There is no recognition of the need for densification of urban areas such as Oxshott to be progressive and avoid the character of areas of comparatively low density being damaged by individual high-density schemes. • While areas close to local centres and train stations are targeted for flats and infill development, the converse should apply so that the character of other areas (such as most of residential Oxshott) is protected. • There are no design codes available to provide protection for local character and ensure excellent buildings. • Calculations of developer contributions for affordable housing continue to be based on flawed methodology that has been subject to continual abuse. • The Infrastructure Delivery Plan is weak with heavy reliance on a document that has not yet been produced by Surrey County Council. Key to successful development must be the

	recognition that infrastructure must precede development. A noteworthy omission is the lack of commitment to install cycle lanes alongside trunk roads thereby promoting road safety and improving traffic flow.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Veronica Lushington
User ID	41132321
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>I am opposed to the inclusion of Hersham Library in the Local Plan. This facility is an asset to the local community, and its closure would be a great loss to the area and to future generations.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Whilst recognising the need for more housing, Hersham Library should be preserved for the benefit of the community.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>It is vital not to close important community facilities such as Hersham Library.</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please remove the redevelopment of Hersham Library from the draft Local Plan.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Katharine Maclean
User ID	41196129
Organisation	
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	SS1 1c) I would amend the sentence to read 'providing more SECURE walkable and cyclable neighbourhoods that reduce the demand for private vehicles'

	<p>Better (possibly low level bollard) lighting is needed for paths, improved vegetation clearance on all streets (including overhanging from gardens) and improved monitored cycle storage is needed if we want to encourage people to use these methods.</p> <p>SS1 2a) To support principle 1 and 2, I would suggest an article 4 directive removing any PD rights to pave front gardens with impermeable paving. This would need to be supported with a publicity campaign and updates to local paving firms. This would prevent flash floods caused by rapid run off, and also ensure protection of biodiversity. Permeable drives would be encouraged.</p> <p>SS12) b) we should encourage the use of drought resistant planting here, and reduction in hard (non permeable) paving which contributes so much to solar glare and over/heating</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Katharine Maclean
User ID	41196129
Organisation	
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: <input checked="" type="checkbox"/> [Y] Effective: <input type="checkbox"/> [] Justified: <input type="checkbox"/> [] Consistent with national policy: <input type="checkbox"/> [] see below
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	on item SS2 2.b) i) I think the explanation text should be expanded to ensure that any newly built housing stock has a limitation applied to its size/number of bedrooms, or we continually find that this house type in this area is extended to a point whereby people are priced out. Smaller

	<p>housing is required to meet local needs, and unless that need changes, these properties should be ringfenced at their approved sizes.</p> <p>on item 2 d) ii) again on the explanation text, this should be expanded to show a clear commitment to the construction of bus shelters with automated updated displays (to protect residents from inclement or hot weather) which would encourage more to use these facilities. Also a commitment to the construction of more secure and monitored bike storage, alongside additional cycleways.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Katharine Maclean
User ID	41196129
Organisation	
Policy / Evidence base/ part of plan:	CC1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	on CC1 point 1) i think this may benefit from being expanded to clarify what is meant by development? I believe it should include all new builds, all change of use applications, and all extensions over a certain size. An environmental assessment report should be required at planning stage. Whilst a lot of energy efficiency will be covered at Building Regulations stage, the

	<p>general principles of orientation, materials window size, solar gain, landscape, water harvesting/run off etc are all dealt with at an earlier point on cc1 point 2) can/should this be expanded or clarified to confirm expectation for same under change of use to create new housing? Is it possible to apply this to schemes delivered under permitted development rights?</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Katharine Maclean
User ID	41196129
Organisation	
Policy / Evidence base/ part of plan:	CC3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	on cc3 point 1) e) can we apply a lower standard such as BREEAM 'Good' to developments of less than 10 dwellings? Finally on 'Sustainable Design Standards' the borough should resist the demolition of detached dwellings and consequent rebuilding of one house, UNLESS additional units can be created.

	<p>There are numerous issues with this: 1) massive waste of material and embedded carbon 2) almost without exception these properties are generous well cared for family homes 3) increased vehicle movements for waste disposal/skips and new building material delivery 4) the reason this often occurs is that the homeowner can then benefit from a full VAT reduction on their building works as it is classified as a 'new build'. On a project of £1m+ this is a huge saving, and less than the cost of demolition. This is particularly prevalent in areas such as St Georges Hill and the private estates. Look to Camden Council who have similar policy AGAINST any demolition in CA's - can we do whole borough?</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Katharine Maclean
User ID	41196129
Organisation	
Policy / Evidence base/ part of plan:	CC4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	for all new developments of over (say) 3 houses, can a S106 or similar agreement be put in place to prevent new properties having on-street parking rights if no on-site parking can be provided. This only really works successfully if local residents have parking permits too for on-street

	<p>parking. With so many houses owning 4+ cars these days, perhaps one alternative option is to increase permit coverage across the borough and offer on-street parking permits for up to 2 vehicles registered at one address, and thereafter, a huge uplift in price for vehicles 3 & 4, and no permits granted after this? Or on-street parking meters. These extra funds could be isolated for use in improving public transport, street planting, and cycleways/bike storage etc.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Katharine Maclean
User ID	41196129
Organisation	
Policy / Evidence base/ part of plan:	CC5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Can we apply an article 4 directive to all existing properties to remove all automatic rights for paving, driveways, or installation of artificial lawn over 12m2? (This is approx area of one parking space) Not only do we have a loss of biodiversity with all this, it increases the amount of rapid water run off on an already suffering drainage system, and increases solar glare/over heating.

	Such works would be permitted, but would require evidence of how permeability was achieved. Look to Royal Borough of Kensington and Chelsea for their policies on this. For example, whenever there is development of a certain size they expect hard surfaces to be changed to permeable. Not sure this is the correct response in terms of waste, but the situation should not be allowed to be made any worse than it is currently. If people want a two car drive, and currently have one paved, then the second should be gravel in a retention mesh, permeable paving, or resin bound permeable gravel -or other examples.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Katharine Maclean
User ID	41196129
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Katharine Maclean
User ID	41196129
Organisation	
Policy / Evidence base/ part of plan:	ENV10
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Can you please highlight that heritage assets are not just historic buildings. They can be culturally, environmentally, and aesthetically important. The borough has a rich and important history in terms of its mid-century development (such as Span developments in Templemere in Weybridge, or the houses on Lakeside Drive in Esher), and this is being rapidly eroded away.

	This too counts as a heritage asset, and we should be looking to protect such areas just as much (if not more) as the more commonly understood and appreciated ones.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Katharine Maclean
User ID	41196129
Organisation	
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	on HOU1 Item 8) In other boroughs (such as RBKC) this has only been permitted if it was an amalgamation of units (flats) within a listed property to reunite the house once again. This was seen as a heritage gain. The only other exception was if the unit was below current space standards. However, they are now changing their interpretation of this to prevent all

	amalgamations unless undersized. Perhaps the wording here could be changed to resist all amalgamations unless the original units are undersized against current housing standards.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Katharine Maclean
User ID	41196129
Organisation	
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Can you please make a commitment that on all sites currently identified as car parks retain at least 75% of their parking provision if used for housing. This could be achieved by maximising the sites via low level multi-storey parking, or basement parking. Whilst the use of public transport etc. has to be encouraged, these local car parks are vital for local businesses, onward

	<p>travel (trains) and the community generally. It is of particular importance to our aging local population who need close proximity, to enable accessibility for those with other limitations, and to assist families with young children. Our commuting habits have changes massively, but that doesnt mean there will not be a huge requirement for car parking again in the future. Wiping out all such provision with housing may be a very short term solution.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Portmore Park & District Residents Association (Miles Macleod)
User ID	12058913
Organisation	Portmore Park & District Residents Association
Policy / Evidence base/ part of plan:	ENV3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No It omits some significant green spaces in north Weybridge which merit consideration for protection as Local Green Spaces
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] It omits some significant green spaces in north Weybridge which appear to meet the criteria for protection as Local Green Spaces
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	<p>Consideration and inclusion for protection as Local Green Spaces of the following green spaces in north Weybridge: the Thames Street Weybridge Green Space; the Grotto Road Recreation Area and the Walton Lane Open Space. Please see the attached pdfs for the rationale and case for inclusion.</p> <p>Grotto Road Recreation Area Weybridge Local Green Space PPDR evidence.pdf Thames Street Weybridge Local Green Space PPDR evidence.pdf Walton Lane Open Space Weybridge Local Green Space PPDR evidence.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	N/A

Name	Angela Main
User ID	26303297
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I strongly support the spatial strategy and the continued protection of the green belt.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Calvin Man
User ID	16530817
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <ol style="list-style-type: none"> 1. There is an inherent contradiction between a stated commitment to managing the effects of climate change and any meaningful strategy to reduce the impact of increased traffic. 2. The impact on Elmbridge of the large Wisley housing development represents an important omission. 3. There are fundamental errors in the reports assessing the performance of Green Belt sites. Most importantly, site SA-11 next to Waverley Road and Blundel Lane has been incorrectly assessed. 4. There is no recognition of the need for densification of urban areas such as Oxshott to be progressive and avoid the character of areas of comparatively low density being damaged by individual high-density schemes. 5. While areas close to local centres and train stations are targeted for flats and infill development, the converse should apply so that the character of other areas (such as most of residential Oxshott) is protected. 6. There are no design codes available to provide protection for local character and ensure excellent buildings. 7. Calculations of developer contributions for affordable housing continue to be based on flawed methodology that has been subject to continual abuse. 8. The Infrastructure Delivery Plan is weak with heavy reliance on a document that has not yet been produced by Surrey County Council. Key to successful development must be the

	recognition that infrastructure must precede development. A noteworthy omission is the lack of commitment to install cycle lanes alongside trunk roads thereby promoting road safety and improving traffic flow.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Calvin Man
User ID	16530817
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <ol style="list-style-type: none"> 1. There is an inherent contradiction between a stated commitment to managing the effects of climate change and any meaningful strategy to reduce the impact of increased traffic. 2. The impact on Elmbridge of the large Wisley housing development represents an important omission. 3. There are fundamental errors in the reports assessing the performance of Green Belt sites. Most importantly, site SA-11 next to Waverley Road and Blundel Lane has been incorrectly assessed. 4. There is no recognition of the need for densification of urban areas such as Oxshott to be progressive and avoid the character of areas of comparatively low density being damaged by individual high-density schemes. 5. While areas close to local centres and train stations are targeted for flats and infill development, the converse should apply so that the character of other areas (such as most of residential Oxshott) is protected. 6. There are no design codes available to provide protection for local character and ensure excellent buildings. 7. Calculations of developer contributions for affordable housing continue to be based on flawed methodology that has been subject to continual abuse. 8. The Infrastructure Delivery Plan is weak with heavy reliance on a document that has not yet been produced by Surrey County Council. Key to successful development must be the

	recognition that infrastructure must precede development. A noteworthy omission is the lack of commitment to install cycle lanes alongside trunk roads thereby promoting road safety and improving traffic flow.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Christine Manly
User ID	16641729
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I fully support a Local Plan which aims to support the provision of affordable housing of 1/2/3 bedroom houses and apartments but without removing any of our precious Green Belt. However, these homes need to be genuinely affordable. I feel that many opportunities have been lost in the past with the provision of low density 5 bedroom+ housing on some large windfall sites in my area. 2 of my grown up children still live at home because they cannot afford to buy their own homes in the area where their jobs are located. I also fully support the principle that new development should be constructed sustainably and look forward to the forthcoming Climate Change & Renewables SPD
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Newsteer Real Estate Advisers (Paul Manning)
User ID	41257985
Organisation	Newsteer Real Estate Advisers obo Leos International Holding Group (Chris Pittock)
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Having reviewed the emerging Local Plan document, as a developer in the local area our client is supportive of the Vision for Elmbridge in 2037, which states that “Residents, existing and new, will have the choice of a range of housing types to meet their needs”. They can see a desire to make change across the borough, particularly in ensuring a minimum delivery of 452 housing units per annum, and is supportive that one of the five guiding principles of the Plan is dedicated to achieving this: “Principle 3: Delivering homes: Improving housing choice and delivering well-designed high-quality homes hat we need in a highly sustainable way. Creating strong and thriving communities”. Our client is fully supportive of these aspirations and welcomes the opportunity to be involved in making meaningful change, delivering high-quality homes for the borough’s residents.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: []

	Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Newsteer Real Estate Advisers (Paul Manning)
User ID	41257985
Organisation	Newsteer Real Estate Advisers obo Leos International Holding Group (Chris Pittock)
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Our client is encouraged to see that EBC recognises the need to deliver homes in the borough throughout the plan period and looks forward to working with the Council and contributing to the required delivery. They also welcome the reduction in the minimum requirement for affordable housing, particularly on brownfield sites. The focus on delivering homes through site allocations, as well as maximising opportunities to increase the supply of additional homes on unallocated, suitable and available sites is also supported. Our client also supports the Council's position in providing more flexibility than the existing Core Strategy policy in relation to housing density. They welcome the move away from arbitrary calculations, and suggesting a number of dwellings per hectare, often restricting the level of development, to a design-led approach ensuring optimal use of land.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: []

	Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Newsteer Real Estate Advisers (Paul Manning)
User ID	41257985
Organisation	Newsteer Real Estate Advisers obo Leos International Holding Group (Chris Pittock)
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes In relation to ensuring the optimisation of sites, our client is encouraged by the policy set out in the Draft Local Plan. They recognise that making the most efficient use of land within the urban area is crucial to achieving the annual housing targets and supports the provision of higher density housing including flats and terraced homes, as well as the promotion of increased building heights in these locations.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Newsteer Real Estate Advisers (Paul Manning)
User ID	41257985
Organisation	Newsteer Real Estate Advisers obo Leos International Holding Group (Chris Pittock)
Policy / Evidence base/ part of plan:	HOU4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Our client welcomes the reduction in the minimum requirement for affordable housing on brownfield sites compared to the existing Core Strategy Policy CS21. They consider it a positive that the Council acknowledge the challenge in delivering the current 40% requirement on sites of 15 dwellings or more.</p> <p>However, with regard to the sub-text to the policy at paragraph 6.34 which concerns viability assessments, it is our client's view that the policy is restrictive as the policy does permit negotiations in relation to the affordable housing provision post-submission, which does not allow for changes to external factors, including market conditions and potential amendments that may be required to a scheme following the receipt of statutory consultee responses.</p> <p>Our client has also commented that the current phrasing of paragraphs 6.34-6.36 is ambiguous.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p>

	<p>Consistent with national policy: []</p> <p>It is our client's view that the policy is restrictive as the policy does permit negotiations in relation to the affordable housing provision post-submission, which does not allow for changes to external factors, including market conditions and potential amendments that may be required to a scheme following the receipt of statutory consultee responses.</p> <p>Our client has also commented that the current phrasing of paragraphs 6.34-6.36 is ambiguous.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>The affordable housing requirements and thresholds of this policy are achievable. This has been confirmed by the viability assessment of the Local Plan. Notwithstanding this, the Council acknowledges that circumstances may arise post adoption of the Plan which impact on viability. Where this is the case, the Council will accept a viability assessment both at the application stage, and a viability assessment at the decision-making stage, should conditions change post-submission of an application.</p> <p>220729 Leos Elmbridge Local Plan Reps</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Newsteer Real Estate Advisers (Paul Manning)
User ID	41257985
Organisation	Newsteer Real Estate Advisers obo Leos International Holding Group (Chris Pittock)
Policy / Evidence base/ part of plan:	ECO2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Our client acknowledges the need to safeguard land for employment use in order to ensure that there is sufficient land retained, in the most suitable and attractive locations, for future employment opportunities.</p> <p>Notwithstanding this, our client proposes that residential accommodation is acceptable within the Strategic Employment Land allocations both where, and where it does not form part of a larger redevelopment proposal. Further, they propose that residential redevelopment should be acceptable if either criteria a) or b) of Section 4 of the proposed policy applies, to optimise the sites and make most efficient use of the land to deliver the housing required. It is their view that it should not be a requirement that both of these criteria are met for residential accommodation is considered acceptable, and that residential only redevelopment should be deemed acceptable where it can be demonstrated that the floorspace is redundant for employment use.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: []</p>

	<p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>Our client acknowledges the need to safeguard land for employment use in order to ensure that there is sufficient land retained, in the most suitable and attractive locations, for future employment opportunities.</p> <p>Notwithstanding this, our client proposes that residential accommodation is acceptable within the Strategic Employment Land allocations both where, and where it does not form part of a larger redevelopment proposal. Further, they propose that residential redevelopment should be acceptable if either criteria a) or b) of Section 4 of the proposed policy applies, to optimise the sites and make most efficient use of the land to deliver the housing required. It is their view that it should not be a requirement that both of these criteria are met for residential accommodation is considered acceptable, and that residential only redevelopment should be deemed acceptable where it can be demonstrated that the floorspace is redundant for employment use.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Residential accommodation in SELs will only be acceptable where:</p> <ul style="list-style-type: none"> a. It would bring investment to floorspace which has been demonstrated to be redundant for employment uses; or b. The proposal would comprise a mix of flexible uses. <p>220729 Leos Elmbridge Local Plan Repls</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Newsteer Real Estate Advisers (Paul Manning)
User ID	41257985
Organisation	Newsteer Real Estate Advisers obo Leos International Holding Group (Chris Pittock)
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Our client is supportive of the Site Allocations set out in the Draft Local Plan and consider the identification of these crucial if housing delivery targets are to be achieved. However, it is noted that the site at St George's Business Park, Brooklands Road, Weybridge, KT13 0RH is not identified as a proposed Site Allocation, and our client proposes that as this site would be available, suitable and deliverable for residential redevelopment within the Plan period, it should be considered as a Site Allocation within the Local Plan.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [] Consistent with national policy: [] Availability

Currently the Site is underutilised as an employment business park. Redeveloping the Site for residential use would enable the land to be optimised, both enabling more efficient use of the land within the borough's open area, and also supporting the borough in achieving its housing targets. This is therefore in accordance with proposed Policy HOU2 of the Draft Local Plan. Further, the existing buildings on the Site each have an extensive planning history with permitted development rights. The existing Permitted Development means that already, the Site is capable of providing 169 residential units (assuming approvals across all buildings and floors are implemented). Therefore, these units should be factored into the five-year housing supply, and allocating the site for residential development would bolster the number of units capable of being delivered on the Site through a more comprehensive redevelopment.

Suitability

The Site is situated on brownfield land within the Weybridge urban area and in a sustainable location. It is within a 20-minute walk to Weybridge Station with bus stops immediately adjacent to the Site along Brooklands Road. Further, the town centre is within walking distance of the Site, which provides the necessary amenities for potential future residents. The location is therefore considered to be suitable, and in accordance with Policy SS3 of the Draft Local Plan which supports a 'brownfield first' approach and sets out that 17.7% of housing is to be delivered in Weybridge, as well as Policy HOU1 and Policy HOU2.

As the Site is previously developed, there is already existing access and this is provided off Locke King Road.

The Site is within Flood Zone 1 and is therefore not considered to be at risk of flooding and no sequential test would be required.

While the Site is within the Thames Basin Heath Special Protection Area 400m – 5km zone, and it has been highlighted by the Council that the Site potentially contains contaminated land, if this Site was to come forward as a Site Allocation for residential use, any development would take the appropriate measures to ensure compliance with both Policy ENV5 and Policy EN7 of the Draft Local Plan.

While the Site is partially within a Conservation Area and is located within close proximity to a heritage asset, the wording of the Site Allocation would ensure that any development for residential use must comply with relevant heritage policies, including Policy ENV10. Further, due to its proximity to heritage assets, any application for development at the Site would be required

	<p>to be supported by a Landscape and Visual Impact Assessment and take into consideration the heritage assets and the character of the area.</p> <p>The above acknowledges the constraints on the Site, but demonstrates that Site Allocation would still be suitable, as the Site Allocation can be suitably phrased ensure that any development complies with the other relevant policies of the Plan.</p> <p>Deliverability</p> <p>The Council has already accepted that residential use is both suitable and deliverable on the Site; it already benefits from several Permitted Development approvals for conversion of the existing offices to residential units (though these have never been implemented). Allocating the Site for residential use would allow improved optimisation of the Site, in accordance with draft Policy HOU2, as the Site could be redeveloped to make more efficient use of the land through providing a higher density, but more importantly a higher quality development than that which will be achievable through the existing Permitted Development.</p> <p>Summary</p> <p>It is considered that in the absence of a five-year housing supply and a Green Belt Review, that this Site should be allocated for residential use within the emerging Local Plan. The above has demonstrated that it is available, suitable and deliverable and should therefore be included within the calculations of the five-year housing supply. The Site already has Permitted Development approval for residential use and allocating the Site will allow for additional housing units to be provided.</p>
<p>Question 4</p>	<p>Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.</p>
	<p>St George's Business Park, Brooklands Road, Weybridge, KT13 0RH to be added as a residential site allocation.</p> <p>220729 Leos Elmbridge Local Plan Reps</p>
<p>Question 5</p>	<p>If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?</p>

	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Newsteer Real Estate Advisers (Paul Manning)
User ID	41257985
Organisation	Newsteer Real Estate Advisers obo Leos International Holding Group (Chris Pittock)
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Having reviewed the emerging Local Plan document, as a developer in the local area our client is supportive of the Vision for Elmbridge in 2037, which states that “Residents, existing and new, will have the choice of a range of housing types to meet their needs”. They can see a desire to make change across the borough, particularly in ensuring a minimum delivery of 452 housing units per annum, and is supportive that one of the five guiding principles of the Plan is dedicated to achieving this: “Principle 3: Delivering homes: Improving housing choice and delivering well-designed high-quality homes hat we need in a highly sustainable way. Creating strong and thriving communities”. Our client is fully supportive of these aspirations and welcomes the opportunity to be involved in making meaningful change, delivering high-quality homes for the borough’s residents.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: []

	Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Newsteer Real Estate Advisers (Paul Manning)
User ID	41257985
Organisation	Newsteer Real Estate Advisers obo Leos International Holding Group (Chris Pittock)
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Our client is supportive of this policy and looks forward to supporting the Council in delivering the 6,785 net homes required through to 2037. They also support the 'brownfield first' approach, and prioritising land in the urban areas. Notwithstanding this, our client proposes the following alterations to Section 3 of the policy wording, to allow for both underutilised and now vacant sites in employment use, to be considered for residential redevelopment.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [] Consistent with national policy: [] This amendment will ensure that the Policy continues to accord with proposed Policy HOU2 concerning the optimisation of sites.

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Development opportunities will be encouraged within the urban areas which accord with other policies in the Plan and meet the following strategic aims:</p> <ul style="list-style-type: none"> a. Enhancing the vitality and viability of town and district centres. b. Repurposing/redevelopment/diversification of specific sites now vacant and/or underutilised in employment use. c. Repurposing/redevelopment of previously developed sites into residential and/or mixed uses. <p>220729 Leos Elmbridge Local Plan Reps</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Newsteer Real Estate Advisers (Paul Manning)
User ID	41257985
Organisation	Newsteer Real Estate Advisers obo Leos International Holding Group (Chris Pittock)
Policy / Evidence base/ part of plan:	CC3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Our client is supportive of the Council's aspirations to promote and achieve sustainable design. Whilst the majority of the proposal reflects the direction of travel of many boroughs, it is felt that measure d) requiring all residential development of 10 or more dwellings to achieve a Home Quality Mark 4 star as a minimum is particularly onerous.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] It is felt that measure d) requiring all residential development of 10 or more dwellings to achieve a Home Quality Mark 4 star as a minimum is particularly onerous.

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>It is suggested that a degree of flexibility is added to this policy, i.e. requiring all residential development to aim towards achieving a Home Quality Mark 4.</p> <p>220729 Leos Elmbridge Local Plan Reps</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Newsteer Real Estate Advisers (Paul Manning)
User ID	41257985
Organisation	Newsteer Real Estate Advisers obo Leos International Holding Group (Chris Pittock)
Policy / Evidence base/ part of plan:	ENV10
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Our client is supportive of the Council's intention to conserve designated heritage assets and the requirement for all development proposals to ensure that the significance of these assets is sustained, and where possible, enhanced. They are also favourable of the Council's position on the demolition of buildings within conservation areas and welcomes the allowance for demolition where the proposed development would contribute positively to the character and appearance of the conservation area.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	hgh Consulting (Lauren Manoharan)
User ID	37727937
Organisation	hgh Consulting obo Sorbon Estates
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Brownfield approach Comments on the Brownfield approach: Sorbon Estates have submitted a planning application for the redevelopment of Abbey House; a brownfield site located on Brooklands Road and Wellington Way for 106 residential units (application ref: 2022/1272; decision currently pending). The proposals seek to make best use of this previously developed land and optimise the development potential of the site. Sorbon Estates is therefore supportive of the Council's approach to seek to make the best use of previously developed land; and ensure the potential of sites is optimised to increase the capacity of new development within the Borough (paragraphs 1.13-1.15). This approach is fully in line with policy in chapter 11 of the NPPF: Making effective use of land.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: []

	Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	hgh Consulting (Lauren Manoharan)
User ID	37727937
Organisation	hgh Consulting obo Sorbon Estates
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Policy SS3 – Scale and location of good growth Comments on Policy SS3 – Scale and location of good growth: Sorbon Estates is supportive of the Council seeking opportunities to develop previously developed land within the urban areas of the borough and that development in urban areas should be optimised to increase the efficient use of land. They are also supportive of Weybridge being identified as an urban location to deliver 1,200 units (17.7% of the borough's total housing) as part of the Borough's housing targets. However, the 1,200 units proposed should not be considered to be a maximum number, as there may be opportunities to deliver a higher number of units in Weybridge subject to available sites coming forward.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: []

	Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	hgh Consulting (Lauren Manoharan)
User ID	37727937
Organisation	hgh Consulting obo Sorbon Estates
Policy / Evidence base/ part of plan:	CC3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Policy CC3 – Sustainable design standards Comments on Policy CC3 – Sustainable design standards: Sorbon Estates is committed to achieving high standards in sustainable design and construction. However, it has some concerns over the deliverability of point 1D of the policy in relation to the achievement of Home Quality Mark 4 star. The achievement of Home Quality Mark 4 star represents a very steep rise in requirements for developers over what is current needed, with early stage additional costs for a HQM pre-assessment and additional reports / evidence for individual credits before a scheme has been granted planning permission. This required upfront information could stifle development on brownfield land in urban locations in coming forward for development and prevent much needed housing being delivered. This would compromise the Council’s overall strategy for the delivery of new housing on brownfield sites in urban areas and does not take into account reasonable alternative options.</p> <p>As an alternative, there could be a requirement for stepped integration / compliance similar to Code for Sustainable Homes in the past for example: all applications approved by 2025 to achieve Home Quality Mark 3 star and by 2028 Home Quality Mark 4 star. This would enable developers to factor in the additional costs and work required when planning developments. Part 1D) of the policy could therefore be amended to read:</p> <p>D) All residential development of 10 or more dwellings will meet the following minimum standards:</p>

	<ul style="list-style-type: none"> • By 2025: Home Quality Mark 3, or any equivalent new standard • By 2028: Home Quality Mark 4, or any equivalent new standard <p>It would be helpful if the Council undertook further discussions with housebuilders/developers in respect of this part of the policy to ensure that much needed development on brownfield sites is not prohibited by this policy.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: <input checked="" type="checkbox"/> [Y]</p> <p>Effective: <input type="checkbox"/> []</p> <p>Justified: <input checked="" type="checkbox"/> [Y]</p> <p>Consistent with national policy: <input type="checkbox"/> []</p> <p>Policy CC3 – Sustainable design standards Comments on Policy CC3 – Sustainable design standards: Sorbon Estates is committed to achieving high standards in sustainable design and construction. However, it has some concerns over the deliverability of point 1D of the policy in relation to the achievement of Home Quality Mark 4 star. The achievement of Home Quality Mark 4 star represents a very steep rise in requirements for developers over what is current needed, with early stage additional costs for a HQM pre-assessment and additional reports / evidence for individual credits before a scheme has been granted planning permission. This required upfront information could stifle development on brownfield land in urban locations in coming forward for development and prevent much needed housing being delivered. This would compromise the Council’s overall strategy for the delivery of new housing on brownfield sites in urban areas and does not take into account reasonable alternative options. As an alternative, there could be a requirement for stepped integration / compliance similar to Code for Sustainable Homes in the past for example: all applications approved by 2025 to</p>

	<p>achieve Home Quality Mark 3 star and by 2028 Home Quality Mark 4 star. This would enable developers to factor in the additional costs and work required when planning developments. Part 1D) of the policy could therefore be amended to read:</p> <p>D) All residential development of 10 or more dwellings will meet the following minimum standards:</p> <ul style="list-style-type: none"> • By 2025: Home Quality Mark 3, or any equivalent new standard • By 2028: Home Quality Mark 4, or any equivalent new standard <p>It would be helpful if the Council undertook further discussions with housebuilders/developers in respect of this part of the policy to ensure that much needed development on brownfield sites is not prohibited by this policy.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Part 1D) of the policy could therefore be amended to read:</p> <p>D) All residential development of 10 or more dwellings will meet the following minimum standards:</p> <ul style="list-style-type: none"> • By 2025: Home Quality Mark 3, or any equivalent new standard • By 2028: Home Quality Mark 4, or any equivalent new standard
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Sorbon Estates would like to have the opportunity to participate at the oral part of the examination to further explain to the Inspector why they consider that changes should be made to this policy.

Name	hgh Consulting (Lauren Manoharan)
User ID	37727937
Organisation	hgh Consulting obo Sorbon Estates
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Policy HOU1 – Housing Delivery Comments on Policy HOU1 – Housing Delivery: Sorbon Estates is supportive of the requirement to maximise opportunities to increase the supply of additional homes on unallocated suitable and available land. They are also supportive of the Council’s approach to ensure the efficient use of land by requiring all new residential development to demonstrate the optimal use of land and density.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	hgh Consulting (Lauren Manoharan)
User ID	37727937
Organisation	hgh Consulting obo Sorbon Estates
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Comments on Policy HOU – Optimisation of sites: Sorbon Estates is supportive of the policy approach that development should make efficient use of land and optimise sites within urban areas of the borough which is in line with policy in the NPPF.</p> <p>Additionally, they are supportive of the provision within the policy that states that sites within or on the edge of town centres, district and local centres and sites adjacent to train stations should deliver additional homes through: the provision of higher density housing such as flats; promoting increased building heights; and that development in these locations should comprise of predominantly 1 and 2 bedroom homes. However, there may be brownfield urban sites that do not fall within these specific categories that are also in sustainable locations with good access to services, shops, workplaces and with good transport links that are suitable for delivering higher density housing such as one and two bedroom flats.</p> <p>Sorbon Estates therefore request that part 2 of the policy is amended to include ‘and brownfield sites in sustainable locations with good transport links’. This amendment to the policy would strengthen the ability of the plan to deliver high density housing on brownfield sites in sustainable locations and ensure that the plan is positively prepared and will meet the areas objective housing needs.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.

	<p>Positively prepared: [Y]</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: [Y]</p> <p>Policy HOU2 - Optimisation of sites Comments on Policy HOU – Optimisation of sites: Sorbon Estates is supportive of the policy approach that development should make efficient use of land and optimise sites within urban areas of the borough which is in line with policy in the NPPF. Additionally, they are supportive of the provision within the policy that states that sites within or on the edge of town centres, district and local centres and sites adjacent to train stations should deliver additional homes through: the provision of higher density housing such as flats; promoting increased building heights; and that development in these locations should comprise of predominantly 1 and 2 bedroom homes. However, there may be brownfield urban sites that do not fall within these specific categories that are also in sustainable locations with good access to services, shops, workplaces and with good transport links that are suitable for delivering higher density housing such as one and two bedroom flats. Sorbon Estates therefore request that part 2 of the policy is amended to include ‘and brownfield sites in sustainable locations with good transport links’. This amendment to the policy would strengthen the ability of the plan to deliver high density housing on brownfield sites in sustainable locations and ensure that the plan is positively prepared and will meet the areas objective housing needs in accordance with the overarching theme of the NPPF to deliver sustainable development.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Part 2 of the policy could therefore be amended to:

	2. Sites within or on the edge of town, district and local centres, sites adjacent to train stations and brownfield sites in sustainable locations with good transport links will deliver additional homes by.....
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Sorbon Estates would like to have the opportunity to participate at the oral part of the examination to further explain to the Inspector why they consider that changes should be made to this policy.

Name	hgh Consulting (Lauren Manoharan)
User ID	37727937
Organisation	hgh Consulting obo Sorbon Estates
Policy / Evidence base/ part of plan:	HOU3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Comments on Policy HOU3 – Housing Mix: Sorbon Estates is supportive of Policy HOU3, particularly the emphasis placed on delivering residential development proposals that include 1 and 2 bedroom homes suitable for newly forming households, young couples and older people as this clearly reflects Elmbridge’s current housing need as evidenced within the Local Housing Needs Assessment.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	hgh Consulting (Lauren Manoharan)
User ID	37727937
Organisation	hgh Consulting obo Sorbon Estates
Policy / Evidence base/ part of plan:	INF4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Comments on Policy INF4 – Play and informal recreation space: Sorbon Estates has concerns with the requirement in 1 b) of the policy for external play space and facilities to be provided on site on all residential developments with 50 or more family units (as defined as those with 2 or more bedrooms). There may be some instances where a site is constrained by size or other environmental factors and it may not be possible to provide adequate facilities on the site. Furthermore, where a development is a 100% flatted development with one and two bed units, it will generate a very low child yield. It is noted that part d) of the policy advises that where the creation of new play facilities is not feasible, developers will be required to work with the council to deliver enhanced provision nearby.</p> <p>Part 4 of the policy repeats that major housing development of over 50 units are expected to make appropriate provision of play space. It continues that “In determining the amount of play space required the council will consider the type of development, amount, quality and use of existing accessible provision of play space, as well as the anticipate child yield of the development.”</p> <p>As noted above, the provision of play space may not be feasible on development sites due to site constraints. Depending on the type of development, its location and the future occupants of a development (where a development could be 100% flatted development aimed at newly forming households, young couples or older people generating no or a very low child yield), it may not be necessary or justifiable for that development to provide play space on or off site. There is also an</p>

	<p>inconsistency in the wording of parts 1b and 4 of the policy with part 1b having a requirement for play space to be provided for developments with over 50 2 plus bedroom units with part 4 of the policy requiring play space to be provided in any development with over 50 units.</p> <p>As currently drafted Policy INF4 is not positively prepared as it could result in stifling the delivery of highly sustainable flatted residential developments with much needed smaller units for newly forming household, young couples or older people) on brownfield sites in urban locations. The strategy in the policy is not appropriate as does not take into account alternatives and the policy as currently drafted is therefore not justified.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: <input checked="" type="checkbox"/> [Y]</p> <p>Effective: <input type="checkbox"/> []</p> <p>Justified: <input checked="" type="checkbox"/> [Y]</p> <p>Consistent with national policy: <input type="checkbox"/> []</p> <p>Policy INF 4 - Play and informal recreation space Comments on Policy INF4 – Play and informal recreation space: Sorbon Estates has concerns with the requirement in 1 b) of the policy for external play space and facilities to be provided on site on all residential developments with 50 or more family units (as defined as those with 2 or more bedrooms). There may be some instances where a site is constrained by size or other environmental factors and it may not be possible to provide adequate facilities on the site. Furthermore, where a development is a 100% flatted development with one and two bed units, it will generate a very low child yield. It is noted that part d) of the policy advises that where the creation of new play facilities is not feasible, developers will be required to work with the council to deliver enhanced provision nearby. Part 4 of the policy repeats that major housing development of over 50 units are expected to make appropriate provision of play space. It continues that “In determining the amount of play</p>

	<p>space required the council will consider the type of development, amount, quality and use of existing accessible provision of play space, as well as the anticipate child yield of the development.”</p> <p>As noted above, the provision of play space may not be feasible on development sites due to site constraints. Depending on the type of development, its location and the future occupants of a development (where a development could be 100% flatted development aimed at newly forming households, young couples or older people generating no or a very low child yield), it may not be necessary or justifiable for that development to provide play space on or off site. There is also an inconsistency in the wording of parts 1b and 4 of the policy with part 1b having a requirement for play space to be provided for developments with over 50 2 plus bedroom units with part 4 of the policy requiring play space to be provided in any development with over 50 units.</p> <p>As currently drafted Policy INF4 is not positively prepared as it could result in stifling the delivery of highly sustainable flatted residential developments with much needed smaller units for newly forming household, young couples or older people) on brownfield sites in urban locations. The strategy in the policy is not appropriate as does not take into account alternatives and the policy as currently drafted is therefore not justified.</p> <p>To take account of instances where sites are constrained or the provision of play space on or off site is not considered to be necessary to meet the requirements of that development, the policy should be amended to make clear that play space provision will be dealt with on a case-by-case basis, especially with flatted developments.</p>
<p>Question 4</p>	<p>Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.</p>
	<p>1b) Requiring external play space and facilities on the site as part of new residential developments of over 50 units which comprise predominantly family housing where there is an identified need arising from the development, and it is feasible.</p> <p>1d) Where there is an identified need for the creation of new play facilities from a development and the creation of new play facilities is not feasible on site, requiring developers to work with the council to deliver enhanced provision nearby.</p> <p>4. Major housing developments of over 50 units which comprise predominantly family housing and where there is an identified need arising from the development are expected to make appropriate provision of play space. In determining the amount of play space required the council</p>

	will consider each development on a case by case basis in terms of the type of development, amount, quality, and use of existing accessible provision of play space, as well as the anticipated child yield of the development.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Sorbon Estates would like to have the opportunity to participate at the oral part of the examination to further explain to the Inspector why they consider that changes should be made to this policy.

Name	hgh Consulting (Lauren Manoharan)
User ID	37727937
Organisation	hgh Consulting obo Sorbon Estates
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Chapter 9 – Site Allocations: With regards to the list of site allocations within chapter 9; Sorbon Estates notes that its Abbey House Site is not included on the list of allocations and requests that the site at Abbey House is included within the list of housing site allocations. The full address of the site is Abbey House, Wellington Way, Weybridge, KT13 0TT. It has an extant permission (ref. 2021/2695) for the prior approval of “change of use from Offices (B1a) to residential” for 28 units which can be delivered within 1-5 years. Furthermore, the Council is currently considering a planning application for the redevelopment of the site for residential development comprising 106 one and two bed units which can also be delivered within 1-5 years (application ref: 2022/1272). The above justifies the inclusion of the Abbey House site on the list of site allocations in chapter 9.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: []

	<p>Consistent with national policy: []</p> <p>Chapter 9 – Site Allocations: With regards to the list of site allocations within chapter 9; Sorbon Estates notes that its Abbey House Site is not included on the list of allocations and requests that the site at Abbey House is included within the list of housing site allocations. The full address of the site is Abbey House, Wellington Way, Weybridge, KT13 0TT. It has an extant permission (ref. 2021/2695) for the prior approval of “change of use from Offices (B1a) to residential” for 28 units which can be delivered within 1-5 years.</p> <p>Furthermore, the Council is currently considering a planning application for the redevelopment of the site for residential development comprising 106 one and two bed units which can also be delivered within 1-5 years (application ref: 2022/1272). The above justifies the inclusion of the Abbey House site on the list of site allocations in chapter 9.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please include the site at Abbey House, Wellington Way, Weybridge, KT13 0TT on the list of site allocations appropriate and available for the delivery of housing within the next 1-5 years.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Sorbon Estates would like to have the opportunity to participate at the oral part of the examination to further explain to the Inspector why they consider that changes should be made to this policy.

Name	Adrian Marriott
User ID	41026113
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes The Plan reflects the views of the local population, protects the Green Belt and makes sensible provision for new housing. Overall a balanced and sustainable solution for Elmbridge
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ms McAree
User ID	24458081
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sean McCallion
User ID	24507169
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	N/a

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes No idea if it is or not
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes No idea if it is or not
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Too much pandering to the environmental lobby. Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] As above

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes Not sure
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] As above

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes Not sure
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] See above

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	CC1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes Not sure
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Too much pandering to environmental lobby at the expense of everything else. Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] See above

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	CC2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] See above
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	CC3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] As above
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	CC4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	CC5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Na

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	ENV1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes Not sure
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	ENV2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	ENV3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: <input type="checkbox"/> [Y] Effective: <input type="checkbox"/> [] Justified: <input type="checkbox"/> [] Consistent with national policy: <input type="checkbox"/> []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	ENV4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	ENV5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	ENV6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	ENV7
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	ENV8
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	ENV9
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	ENV10
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	ENV11
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Over development
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	HOU3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	HOU4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes Not sure
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No The number of new properties your intending to squeeze into Weybridge is far too many and it doesn't need any more blocks of council housing.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] See above
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	HOU5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	HOU6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes Not sure
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No See previous comments
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] See previous comments
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	HOU7
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Encourages anti social behaviour and increased crime
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No See above
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] See above
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	HOU8
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	ECO1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	ECO2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	ECO3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	ECO4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	ECO5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	INF1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	INF2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	INF3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	INF4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	INF5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	INF6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes Not sure
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	Monitoring
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes Not sure
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan McCann
User ID	23413857
Organisation	
Policy / Evidence base/ part of plan:	Appendices
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes Not sure
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] See above

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Kathleen McDougall
User ID	41144769
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No not in a position to answer
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No moving away from traditional cars in this timeframe is absurd
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [] the building of home without parking taking away car parks
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	<p>not enough infrastructure to support the building</p> <p>too much building</p> <p>taking away car parks is absurd</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Peter Russell Mcgarry
User ID	40966849
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>Inadequate non-ionizing EMF international guidelines The various agencies setting safety standards have failed to impose sufficient guidelines to protect the general public, particularly children who are more vulnerable to the effects of EMF. The International Commission on Non-Ionizing Radiation Protection (ICNIRP) established in 1998 the “Guidelines For Limiting Exposure to Time-Varying Electric, Magnetic, and Electromagnetic Fields (up to 300 GHz)”¹. These guidelines are accepted by the WHO and numerous countries around the world. The WHO is calling for all nations to adopt the ICNIRP guidelines to encourage international harmonization of standards. In 2009, the ICNIRP released a statement saying that it was reaffirming its 1998 guidelines, as in their opinion, the scientific literature published since that time “has provided no evidence of any adverse effects below the basic restrictions and does not necessitate an immediate revision of its guidance on limiting exposure to high frequency electromagnetic fields² . ICNIRP continues to the present day to make these assertions, in spite of growing scientific evidence to the contrary. It is our opinion that, because the ICNIRP guidelines do not cover long-term exposure and low-intensity effects, they are insufficient to protect public health.https://www.emfscientist.org/</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.

	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Since there is controversy about a rationale for setting standards to avoid adverse health effects, we recommend that the United Nations Environmental Programme (UNEP) convene and fund an independent multidisciplinary committee to explore the pros and cons of alternatives to current practices that could substantially lower human exposures to RF and ELF fields. The deliberations of this group should be conducted in a transparent and impartial way. Although it is essential that industry be involved and cooperate in this process, industry should not be allowed to bias its processes or conclusions. This group should provide their analysis to the UN and the WHO to guide precautionary action.</p> <p>Collectively we (2,500 scientist from worldwide organisations) also request that:</p> <ol style="list-style-type: none"> 1. children and pregnant women be protected; 2. guidelines and regulatory standards be strengthened; 3. manufacturers be encouraged to develop safer technology;https://www.emfscientist.org/ <p>International_EMF_Scientist-Appeal.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sarah Mcgivern
User ID	41247361
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p> <p>I don't understand how some properties on the plan which are seemingly not owned by the council are subject to demolition and redevelopment</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please make clearer the reasoning behind some properties being on this list when they are apparently privately owned.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sarah Mcgivern
User ID	41247361
Organisation	
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>I don't understand how properties that are seemingly privately owned are on a list to be demolished and redeveloped</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	An explanation as to how some of the plots are on the list.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Judith McGuigan
User ID	16332257
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes The plan sets out the context & why it is needed. I support the rationale behind this plan.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Judith McGuigan
User ID	16332257
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>I strongly support the Spatial Strategy proposed in the Draft Local Plan. I particularly support the Draft Local plan's continued protection of the Green Belt, which is so important for residents' health & wellbeing and for the environment as a whole. I very much agree with the council's justification for continuing to protect our valuable Green Belt.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>I believe the council has a strong justification for continuing to protect our valuable Green Belt, especially with encroaching urbanisation. The Council's 5 principles are to be applauded.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Judith McGuigan
User ID	16332257
Organisation	
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>I strongly support the Council's spatial strategy as outlined in this chapter. I support ensuring planning decisions benefit Elmbridge residents and protect the environment. I strongly support the plan's commitment to continue protecting our precious Green Belt.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>The Spatial Strategy sets out a reasoned rationale for the Council's approach, delivery & measurement.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Judith McGuigan
User ID	16332257
Organisation	
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>The principle of Sustainable Place Making is completely in keeping with national sustainable development planning policy</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>The criteria used to assess development proposals are sound. I support the criteria for delivering sustainable places. The criteria protect biodiversity & the Green Belt and support the delivery of homes and a prosperous economy.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Judith McGuigan
User ID	16332257
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>I consider the Council has carried out wide-ranging consultation, research and evidence gathering over several years.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>I strongly support the Council's proposed Spatial Strategy. The Council seems to have given a great deal of consideration into developing a strategy for future development of the borough that protects the environment, attempts to mitigate the effects of climate change & meets Elmbridge's social and economic needs. The Spatial Strategy has taken into consideration the views of residents & businesses, looks to the future and attempts to secure and grow local communities.</p> <p>I am particularly encouraged to see the Plan's continued protection of our precious Green Belt as a way of creating sustainable places. I strongly support this approach & the Council's view that Green Belt land helps to mitigate climate change and is required for community health and wellbeing. I strongly support the council's approach of using Brown Field land for development.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p>

	<p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Susan Mealor
User ID	39027297
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>For the document to be legally valid, the detail must be accurate. Of the site allocations in Hersham, we are aware of these factors:</p> <ol style="list-style-type: none"> 1. H8 US389 the members of this club say that they have never agreed or been asked that this site be on the list. Thus the list is based on incorrect information. 2. H3 US379 The boundary of this site has been significantly changed since the 2020 consultation/2018 Land Availability Assessment. At that time, the boundary only encompassed the car parking area. Two weeks into this consultation, when the plan detail was added to the document, it was discovered that the same coding numbers are being used for the entire shopping centre site. This puts the community at risk of losing the entire car park to 200 Residential Units , as any developer could reasonably argue that the site US379 refers to the car park. A different code must be used to prevent this. This is careless. 3. H11 US 376 The land availability assessment for this site makes no mention of the sewerage pumping station on the site which requires 24 hour accessibility with space for emergency pumping equipment and road tanker movements which can include all night working and vehicle movements. 4. Report: Sustainability appraisal for the Draft Plan, June 2022. New options 2021 para 3.61 lists 33 sites which are so-called available and poorly performing Green Belt sites. Table 9 lists these 33 for both option 5 and 5a, of which 12 were selected for the latest iteration of option 5a. These sites are still in play, as the only option which gives the required number of dwellings has green belt land release (option 5a). Totally unbelievably, the entire site of the Burhill Primary School (GB62, also SA47) is on this list! This is a popular school which has had a large new extension, and these is nowhere in Hersham or nearby that could provide a

	<p>replacement. The school site was added to the green belt land following a public inquiry in 1980s, precisely to protect this educational site. This is a serious failure of oversight by the Officers involved.</p> <p>All of the above points lead me to believe that this document has been not been produced with the care and precision that is needed be legally compliant.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>My comments to Question 1 apply here as well. There is no reason to believe the listings for Hersham are less accurate than those for the rest of the borough</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>Not positively prepared. With respect to the community of Hersham: There are too many errors in the Site Allocations, some are outlined in Q1 above. Not Effective. Too many of the sites appear to be unfeasible in particular the use of all the Hersham car parks and many of the public facilities. Included here are the Site Allocations:</p>

	<p>H1 US441 (recently rejected by EBC); H6 US40 Day centre and Village Hall. Day Centre is popular and well used and is where the Meals-on-Wheels service prepares the meals for the borough. The Village Hall has recently been refurbished at considerable expense following considerable local demands that the hall be kept for public use. H7 US380 car park, H5 US45 car park; H12 US435 car park; H15 US374 library car park; H3 US379 shopping centre car park. Where are locals meant to park in the future? Not Justified. It is clear from the report on the 2020 consultation, that residents of Hershams were unaware of it. The lack of any publicity within Hershams means that consultation was not valid the results are not justified.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>The officers of the council must make a careful review of all the proposed sites listed to ensure that ownership is correct, facts are actually facts, covenants are followed and there is proper consultation with all communities. All Councillors must in future be made fully aware of the implications for their wards, and must make their voters aware. It is up to the officers to do this effectively, and for the councillors to police this properly. It is not for me to work out how to do this.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
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Name	Susan Mealor
User ID	39027297
Organisation	
Policy / Evidence base/ part of plan:	CC4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>CC4 is about sustainable transport This Local Plan refers to the Parking Supplementary Planning Document which is based on the end of fossil fuel car sales by 2035, which is towards the end of the period. But this has been brought forward to 2030. Public transport (buses) are poor in Hersham with very limited timetables and routes. At present in Elmbridge, car ownership is around 1.5 cars per household on average with only 12% having no cars. Thus it is likely that private car usage will be still be significant within the timescale of this plan. Public car parking will still be needed. But virtually all the public car parks in Hersham are designated as available for building. This is untenable as it will put added considerable stress on the on-street parking which is already a problem. The removal of all of our car parks has not been discussed in this community: no consultation, therefore not valid therefore not legally compliant.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>2e of CC4 states: Provide electric vehicle charging facilities situated in convenient and easy to use locations. 5. of CC4 :All development proposals will be required to provide cycle and vehicle parking and associated facilities, including electric vehicle charging points in line with the standards set out in the Parking Supplementary Planning Document (SPD). With particular regard to the community of Hersham. I agree with the need for additional and especially one and two bed residential units, but they must add to the attractiveness and vibrancy of the district centre. Plonking them onto car parks</p>

	<p>will not do this. The planning policy should be fair throughout the borough including those areas with predominantly large houses, not just built up areas.</p> <p>I have not found any mention of car parking in any of the documents that I have read. Throughout the draft plan and accompanying documents there is a presumption that there will be considerable drop in car usage with a replacement by walking, cycling and public transport. This is fully desirable. However it is most likely that there will still be large usage of cars, and by 2030 all new vehicles will be electric.</p> <p>There will need to be a significant public supply of Electric Vehicle Charging Points (EVCP). These are undesirable on lampposts and other street fixtures, due to trailing leads, parking on footpaths. Disabled, limited vision people, wheelchair users, buggy users, disabled vehicle users are all at risk if there is street use of EVCPs with any trailing leads. Thus it is obvious that there will need to be EVCP in public car parks and shopping centres. Parking SPD published in 2020 is out of date as the end of sale fossil fuel vehicles has been brought forward to 2030 from 2035. Most parking spaces will need to have EVCP by 2030</p> <p>It therefore makes no sense to include almost every Hersham publicly used car park and shopping centre car park in the local Plan: H3; H5; H6; H7; H8; H10; H11; H12; H15. Only H13 appears to preserve car parking, but for its church communicants.</p> <p>It is vital that off road EVCPs are supplied, for the use of visitors, those residents without their own front gardens and residents of flats. These will have to be in well controlled and monitored public places, ie they will have to be on the present car parking locations, as no new ones are envisaged in the plan. In addition to this, this could be a considerable income generating project on council owned and run sites, as long as they are well monitored and with sensible fees and therefore advantageous to EBC.</p> <p>Chapter 7 ECO3 is also relevant here.</p> <p>So is Chapter 8, INF2</p>
<p>Question 3</p>	<p>If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.</p>
	<p>Positively prepared: []</p> <p>Effective: [Y]</p>

	<p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>With regard to the community of Hershham Not effective or justified</p> <p>CC4 2e states: Provide electric vehicle charging facilities situated in convenient and easy to use locations.</p> <p>CC4.6 states: Car free development will be encouraged in appropriate locations and where supported by evidence demonstrating that proposals would not lead to parking stress.</p> <p>CC4.5 states: All development proposals will be required to provide including electric vehicle charging points in line with the standards set out in the Parking Supplementary Planning Document (SPD).</p> <p>There are many dwellings within the Hershham Community that do not have front gardens where off-street parking can be achieved. There are also a large number of flats.</p> <p>Most recently built housing only has parking for one vehicle, including for 3&4 bed houses. Few recently built flats have much in the way of private car parking.</p> <p>Streets around the Railway Stations have commuter parking, which is beginning to build up again following the Covid crisis. It is inevitable that within the time scale of the plan, there would be considerably increased on-road parking stress if off-road car parks are built over.. together with the added vehicles that come with these residences.</p> <p>It therefore makes no sense to include almost every Hershham publicly used car park and shopping centre car park in the local Plan: H3 US379; H5 US45; H6 US40; H7 US380; H8 US389; H10 US390; H11 US376; H12 US435; H15 US374. Only H13 US378 appears to preserve car parking, but for its church communicants.</p> <p>There will need to be a significant public supply of Electric Vehicle Charging Points (EVCP). These are undesirable on lampposts and other street fixtures, due to trailing leads, parking on footpaths. Disabled, limited vision people, wheelchair users, buggy users, disabled vehicle users are all at risk if there is street use of EVCPs with any trailing leads. Thus it is obvious that there will need to be EVCP in public car parks and shopping centres. Parking SPD published in 2020 is</p>
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	out of date as the end of sale fossil fuel vehicles has been brought forward to 2030 from 2035. Most parking spaces will need to have EVCP by 2030
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	It is not my responsibility to provide wording for the professionals. Public car parks will need to have the majority of parking spaces fitted with EVCP well before 2030. This will prevent residential streets becoming blocked and impassable because of on-street EVCPs
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Susan Mealor
User ID	39027297
Organisation	
Policy / Evidence base/ part of plan:	ENV3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>The criteria for registering local green spaces emphasises repeatedly that there must be a benefit to the local community. It is my assertion that private land should not be included in the open spaces sites as they are inaccessible to the community at large. In particular I refer to reference to Number 30 : Wooded area in Burwood Park area D.</p> <p>since there is no community benefit, this site should not be included in a legal document.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>2.2 As part of the NPPF (first published in 2012), the Government introduced a new designation to protect local green areas which are valued by local communities.the opportunity to identify and protect areas that are of particular importance and value to the community. 2.4 Setting out the circumstances for using the designation, paragraph 102 of the NPPF continues that, “the Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, healthy community. Green or open space ...can provide tangible health and wellbeing benefits such as promoting healthier lifestyles through recreation uses and encouraging social interaction within a community. As well as these health and wellbeing benefits, green spaces can also improve the visual amenity of particular area...</p> <p>With specific reference to Number 30 : Wooded area in Burwood Park area D.</p>

	<p>The site should be removed as there is no access to the community of Hersham, only for the residents who own it. Therefore it is not sound to include it as there is no benefit to the community</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>Not positively prepared, effective or justified. Local Green Space Study April 2022 states: “Demonstrably Special to a Local Community” . A private estate is no more accessible than a private back garden. The criteria for registering local green spaces emphasises repeatedly that there must be a benefit to the local community.for example: 5.12 High quality green space..... is a vital part of a vibrant and healthy community. Green or open space ...can provide tangible health and wellbeing benefits such as promoting healthier lifestyles through recreation uses and encouraging social interaction within a community. As well as these health and wellbeing benefits, green spaces can also improve the visual amenity of particular area... 5.13 National policy recognises the importance of particular green areas to local communities These spaces are demonstrably special to the local community Whilst this site may well be attractive, it is in a private estate that is totally inaccessible to the local population, which is the Community of Hersham (even though for EBC purposes only, it comes in area designated Weybridge). Not only is the estate private and exclusive, it is a fact that during the worst days of the Covid crisis when the community was severely restricted in travel and movement from home, the</p>

	<p>owner/residents of this private estate employed security guards specifically to keep all non-residents out.</p> <p>Since the last public consultation early 2020 , the owner/residents have installed locked gates on roadways and foot entry points and it is patrolled by security guards to keep allcomers out. Thus it is clear that the local population has no contact or ability to access this site. The sole benefit is to the owners.</p> <p>It must be removed from the plan.</p> <p>I would further suggest that no sites within private gated and therefore exclusive estates be included as green places. All developments on such sites are within the remit of the owners anyway, and presumably subject to normal planning regulations, tree preservation orders, etc It is my assertion that this type of private land should not be included in the open spaces sites as they are inaccessible to the community at large.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>With specific reference to Number 30 : Wooded area in Burwood Park area D.</p> <p>The site should be removed as there is no access to the community of Hersham, only for the residents who own it.</p> <p>The clause reference is ENV3 and this site is also in Appendix A4 of the draft local plan</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	<p>Reference to Number 30 : Wooded area in Burwood Park area D.</p> <p>No private exclusive sites should be allowed to be listed as community assets, any more than private back gardens would be. Whilst this is a pleasant area, it has no community access whatsoever. As a private piece of land which specifically excludes the community, it cannot be</p>

	regarded as a useful asset. It should not be listed but should have normal regulations applied, such as tree preservation orders.
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Name	Susan Mealor
User ID	39027297
Organisation	
Policy / Evidence base/ part of plan:	ECO4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>By the proposals to build on so many of Hersham public amenities without appropriate consultation, it cannot be dais that there has been a proper community involvement.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The loss of so many social and cultural facilities in Hersham is not consistent with the plan's aims to improve the health and well being on Hersham community. Unnecessary loss of community infrastructure is not permitted if there is still an identified need. In Hersham, the following social sites are listed for building, with precisely this loss: H1; H6; H8; H10; H13; H15. Of these only H6 and H15 have potential re-use, but neither of these is likely to happen.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p>

	<p>Not justified.</p> <p>In Hershams, with so many car parks in the building plans, there will be increased park on streets, which are already pretty choked.</p> <p>Hershams Library (H15) holds regular literary talks with famous authors. The Hershams Sports and social Club(H8) is on the list, as is the Hershams Catholic Church hall (H13), the United Reform church (H1), Royal George Pub (H10) , and the Hershams Village Hall and Day Centre (H6). Plus the Nursery/playgroup (H11)</p> <p>There will be less opportunity to attend functions locally. This is against the principles of ECO4</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Remove H15, H6, H8, from the plan.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Susan Mealor
User ID	39027297
Organisation	
Policy / Evidence base/ part of plan:	INF2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>Ch8 INF2 SOCIAL AND COMMUNITY INFRASTRUCTURE There has been no consultation with the community of Hersham over the loss of so many community infrastructure sites. There were no notices on Hersham on-line social sites, no communication from councillors, no notices on notice boards. No one seems have known about the Feb/Mar2020 consultation. Thus it cannot be said that the council has fulfilled the requirement to consult fully.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Chapter 8 INF2 Unnecessary loss of community infrastructure is not permitted if there is still an identified need. In Hersham, the following social sites are listed for building, with precisely this loss: H1; H6; H8; H10; H13; H15. Of these only H6 and H15 have potential re-use, but neither of these is likely to happen.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: [Y]</p>

	<p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>Not Effective or Justified</p> <p>Chapter 8 INF2 SOCIAL AND COMMUNITY INFRASTRUCTURE</p> <p>INF2.3 states: Development proposals that would result in the unnecessary loss of community facilities will not be permitted unless it can be demonstrated that:</p> <p>a) that there is no longer an identified community need for the facilities or they no longer meet the needs of users and cannot be adapted</p> <p>Ch 8 para 8.8 states: Social and community infrastructure plays an important role in providing good quality of life, stimulating and supporting social cohesion and interaction, as well as developing strong and inclusive communities. They provide opportunities to bring different groups of people together, contributing to social integration and the desirability of a place. These places also need to promote social interaction, be safe and accessible and support healthy lifestyles</p> <p>It is in clear contravention of these statements that so many social and employment sites in Hershams have been included in the Local Plan:</p> <p>H1 US 441 63 Queens Road, United Reform Church</p> <p>This building was previously a United Reform Church and then used as a children's nursery. An application to convert to offices has recently been refused planning permission on these grounds: "The proposed development would result in the loss of community use which would not be replaced by equivalent or better provision at the site nor is there any justification that there would be alternative community use in a suitable location in the locality. As such the proposal is contrary to Policies CS16 of the Core Strategy 2011, Policy DM9 of the Development Management Plan 2015 and the NPPF 2019"</p> <p>H6 US40 Hershams Day Centre and Village Hall</p> <p>This site has been threatened with redevelopment for numerous years, and a Community Hall here is highly unlikely to be replaced once the present one is closed.</p> <p>The comments in H1 above apply equally well to H6.</p> <p>This Hall has been cited as an alternative hall in other past proposals for closure of other venues throughout Elmbridge, so the whole of Elmbridge will be affected by the loss of the building.</p>
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Hersham Village Hall is the designated site for flood emergencies, being a large capacity building (200 in main hall) and the Elmbridge leisure centre is likely to be one of the first properties to be flooded in any inundation.

It was one of the few sites in Elmbridge suitable for a Testing Centre during the Covid Crisis.

The Day Centre is popular and well used. It's kitchen is used to provide the meals for the Meals-on-Wheels service to the elderly and housebound throughout Elmbridge.

Both the day Centre and Village Hall have recently undergone extensive refurbishments, the first since the buildings were provided cost-free by the developers of the Hersham Shopping Centre, on a site which previously included the Working Men's Club, so it has been a community asset for well over 100 years.

H8 US 389 Hersham sports and social club

This is privately owned and run by the members, who have not agreed to its inclusion, it is not available and is therefore not suitable to be included, contrary to the statement in Land Availability Assessment 2022 appendix 5.

H10 US 390 is a Public House The Royal George with a restaurant and car parking. The loss of this will also involve loss of employment in the Hersham area.

H11 US376 Trinity Hall and 63-76 Molesey Road.

This site has a listed building, the Barley Mow, which provides employment as well as a social venue.

The off licence next to the public House provides employment.

There is also has a children's Nursery, Little Limes Day Nursery on the green area which was the bowls club. It provides a service to local families and employment.

All of these would be lost and not replaced. The report 2022 Local Green Spaces does not mention that the bowls club is now used as a children's nursery. It does mention that the site appears neglected but that is because EBC itself has neglected it.

The Land Availability Assessment 2022 Appendix 5 has omitted to mention an important building and vital service on the site. It houses a sewerage pumping station, which has significant underground structures and requires 24 hour access in emergencies. At any time large vehicles and road tankers will need access, including at night..

H15 US374 Hersham Library

The library site has a covenant that precludes the use of the site other than for a library. A covenant is imposed to ensure that the generosity and vision of the donors is kept for future

	<p>generations, and that the site does not become vulnerable to the fads and fashions of short-termism. The library is well used and popular and its loss would be indirect contravention of INF2. A library provides a service to all, with no social, educational or other hang-ups for users who may have had problems at school, home or in society. This is given in full in my submission in Ch9. There can be no justification on community, welfare or health grounds to close the library. It is extremely unlikely that a new library will be provided on the site at greater expense and much higher running costs than the existing one.</p> <p>It is also worth noting Ch9 para 4 which states: All site allocations require planning permission prior to development. Allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses. Pre-application advice prior to the submission of a planning application is encouraged as well as engagement with infrastructure providers at the earliest opportunity.</p> <p>There is also a loss of green sites: on H15 and H11.</p> <p>I note that Hersham has recently accepted a major reduction in green space to support the rebuilding of the local secondary school on its playing fields. This is accepted as necessary. The previous site of the school buildings has been used to build 259 dwellings to fund the deal. Because this Local Plan is delayed, there is no acknowledgement of this. That is, Hersham has already provided land for half of its allocation which is not included through no fault of the community. This number of dwellings should be included in the tally of housing requirement, especially considering the severe shortage of future sites in this vicinity.</p> <p>For the Hersham Area, the following sites give employment which will be lost by these proposals: H5; H8; H9; H10; H11; H15; with only one increased employment area: H14. This is not good for the well being of the community.</p>
<p>Question 4</p>	<p>Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.</p>
	<p>Remove H1, H6, H8, H11 and H15 from the plan</p>
<p>Question 5</p>	<p>If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?</p>

	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	The loss of social and community sites as proposed in this plan is too great to be acceptable. The community fully accepted that the local secondary school be rebuilt on the playing fields, which resulted in a significant loss of green space. The site of the previous buildings were sold for housing to pay for it. But the 259 dwellings thus provided have not been included in the contribution to the housing total, because of delays in the plans. This is not the fault of Hershams Residents. It does not seem right to then expect further community assets to be used to provide even more housing, with associated job losses..

Name	Susan Mealor
User ID	39027297
Organisation	
Policy / Evidence base/ part of plan:	INF3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>Ch8 INF3 Health and Well being of local communities There has been no consultation with the community of Hersham over the loss of so many community infrastructure sites. There were no notices on Hersham on-line social sites, no communication from councillors, no notices on notice boards. No one seems have known about the Feb/Mar2020 consultation. Thus it cannot be said that the council has fulfilled the requirement to consult fully.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>It is clear from the horrified reaction to the list of recommended building sites in Hersham, that this community has not been aware of any “public” consultations concerning the sites in this local plan. Compare the reaction in recent weeks June/July 2022 to the total of one respondent to the last consultation in February/March 2020. Which incidentally was at a time when many of us had already gone into Covid shutdown, frightened for our lives, prior to the official government edict. 46% of the 657 responses came from Claygate. Thus the plan has not been carried out with the involvement of this community.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: []

Effective: [Y]

Justified: [Y]

Consistent with national policy: []

Ch 8 INF3 Health and Wellbeing of communities

Not Justified or effective.

Developments must contribute to healthy and active lifestyles. Closure of so many facilities does not do this.

I note that Hersham has recently accepted a major reduction in green space to support the rebuilding of the local secondary school on its playing fields. This is accepted as necessary. The previous site of the school buildings has been used to build 259 dwellings to fund the deal. Because this Local Plan is delayed, there is no acknowledgement of this. That is, Hersham has already provided land for half of its allocation which is not included through no fault of the community. This number of dwellings should be included in the tally of housing requirement, especially considering the severe shortage of future sites in this vicinity.

Community Sites at risk of loss due to the local plan;

H1 US 441 63 Queens Road, United Reform Church

This building was previously a United Reform Church and then used as a children's nursery. An application to convert to offices has recently been refused planning permission on these grounds: "The proposed development would result in the loss of community use which would not be replaced by equivalent or better provision at the site nor is there any justification that there would be alternative community use in a suitable location in the locality. As such the proposal is contrary to Policies CS16 of the Core Strategy 2011, Policy DM9 of the Development Management Plan 2015 and the NPPF 2019"

H6 US40 Hersham Day Centre and Village Hall

This site has been threatened with redevelopment for numerous years, and a Community Hall here is highly unlikely to be replaced once the present one is closed.

The comments in H1 above apply equally well to H6.

This Hall has been cited as an alternative hall in other past proposals for closure of other venues throughout Elmbridge, so the whole of Elmbridge will be affected by the loss of the building.

	<p>Hersham Village Hall is the designated site for flood emergencies, being a large capacity building (200 in main hall) and the Elmbridge leisure centre is likely to be one of the first properties to be flooded in any inundation.</p> <p>It was one of the few sites in Elmbridge suitable for a Testing Centre during the Covid Crisis. The Day Centre is popular and well used. It's kitchen is used to provide the meals for the Meals-on-Wheels service to the elderly and housebound throughout Elmbridge.</p> <p>Both the day Centre and Village Hall have recently undergone extensive refurbishments, the first since the buildings were provided cost-free by the developers of the Hersham Shopping Centre, on a site which previously included the Working Men's Club, so it has been a community asset for well over 100 years.</p> <p>H8 US 389 Hersham sports and social club This is privately owned and run by the members, who have not agreed to its inclusion, it is not available and is therefore not suitable to be included, contrary to the statement in Land Availability Assessment 2022 appendix 5.</p> <p>H15 US374 Hersham Library The library site has a covenant that precludes the use of the site other than for a library. A covenant is imposed to ensure that the generosity and vision of the donors is kept for future generations, and that the site does not become vulnerable to the fads and fashions of short-termism. The library is well used and popular and its loss would be indirect contravention of INF2. A library provides a service to all, with no social, educational or other hang-ups for users who may have had problems at school, home or in society. This is given in full in my submission in Ch9. There can be no justification on community, welfare or health grounds to close the library.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Remove H1, H6, H8, H15 from the plan
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Susan Mealor
User ID	39027297
Organisation	
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>For the document to be legally valid, the detail must be accurate. Of the site allocations in Hersham, we are aware of these factors:</p> <ol style="list-style-type: none"> 1. H8 US389 the members of this club say that they have never agreed or been asked that this site be on the list. Thus the list is based on incorrect information. 2. H3 US379 The boundary of this site has been significantly changed since the 2020 consultation/2018 Land Availability Assessment. At that time, the boundary only encompassed the car parking area. Two weeks into this consultation, when the plan detail was added to the document, it was discovered that the same coding numbers are being used for the entire shopping centre site. This puts the community at risk of losing the entire car park to 200 Residential Units , as any developer could reasonably argue that the site US379 refers to the car park. A different code must be used to prevent this. This is careless. 3. H11 US 376 The land availability assessment for this site makes no mention of the sewerage pumping station on the site which requires 24 hour accessibility with space for emergency pumping equipment and road tanker movements which can include all night working and numerous vehicle movements. 4. Report: Sustainability appraisal for the Draft Plan, June 2022. New options 2021 para 3.61 lists 33 sites which are so-called available and poorly performing Green Belt sites. Table 9 lists these 33 for both option 5 and 5a, of which 12 were selected for the latest iteration of option 5a. These sites are still in play, as the only option which gives the required number of dwellings has green belt land release (option 5a). Totally unbelievably, the entire site of the Burhill Primary School (GB62, also SA47) is on this list! This is a popular school which has had a large new extension, and these is nowhere in Hersham or nearby that could provide a

	<p>replacement. The school site was added to the green belt land following a public inquiry in 1980s, precisely to protect this educational site. This is a serious failure of oversight by the Officers involved.</p> <p>All of the above points lead me to believe that this document has been not been produced with the care and precision that is needed be legally compliant.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Chapter 9: It is clear from the horrified reaction to the list of recommended development sites in Hersham, that this community has not been aware of any “public” consultations concerning these sites. Compare the reaction in recent weeks June/July 2022 to the total of one respondent to the last consultation in February/March 2020. Which incidentally was at a time when many of us had already gone into Covid shutdown, frightened for our lives, prior to the official government edict. Specifically, there has been a large negative response to the inclusion of H15 Hersham Library, as shown by the postcard campaign. This shows that no-one was previously aware of the inclusion of the library as a development site. Had there been meaningful consultations, this would have been known earlier.</p> <p>Thus the plan has not been carried out with the involvement of this community and cannot be said to be sound.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p>

The council has tried to say that listing does not infer loss as planning permission still needs to be obtained. It has NOT brought the attention of residents to Ch9 para 4 which states:
"All site allocations require planning permission prior to development. Allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses. Pre-application advice prior to the submission of a planning application is encouraged as well as engagement with infrastructure providers at the earliest opportunity."
Thus to be included on the list DOES put all the sites at real risk.
The following refers to H15 HERSHAM LIBRARY H15 US374
Not Justified. Chapter 9, site number H15
Hersham Library site should not be in the local plan as a site for redevelopment. It is a betrayal of the covenant set up 60 years ago specifically to ensure that the site was dedicated to a library for ever. This is as appropriate now as it was then.
Ch 8 of Local Plan. Providing infrastructure and connectivity, specifically references community art and cultural facilities including libraries (para 8.4)
para 8.7, INF2 pt 3. Development proposals that would result in the unnecessary loss of community facilities will not be permitted unless it can be demonstrated that: a) that there is no longer an identified community need for the facilities or that they no longer meet the needs of users.
8.8 Social and community infrastructure plays an important role in providing good quality of life, stimulating and supporting social cohesion and interaction, as well as developing strong and inclusive communities. They provide opportunities to bring different groups of people together, contributing to social integration and the desirability of a place. These places also need to promote social interaction, be safe and accessible and support healthy lifestyles.
8.9 National planning policy promotes healthy and safe communities, and that the social, recreational and cultural facilities and services the community needs are provided. Policy INF2 seeks to ensure that existing social and community infrastructure provision and services in the borough are protected and only lost in exceptional circumstances.
8.10 The loss of social infrastructure can have a detrimental effect on a community. The Council seeks to protect its existing community facilities.
All of the above points illustrate that our library should be considered as a valuable community asset.

The community of Hershams has been encouraged to show its support by sending postcards to the planning office, which it has done with great enthusiasm, proving that the library should remain open and not closed.

The site has a small car park which is much appreciated by the disabled and less mobile. It is readily accessible to wheelchair users, parents with child buggies, sight-impaired and those needing walking aids. A bus journey on an infrequent service to Walton, and then carrying books to and from the bus is not an easy option for the elderly, which in any case is not accessible to users of many designs of wheelchair or mobility scooter. The ground floor access with ramp means that access is easy for all. The building is light and airy and this is often mentioned as making for an ideal environment for reading. There is a garden which is used for events.

Altogether the library projects peace and calm. Also a library is suitable for all, with no social, educational or other hang-ups for users who may have had problems at school, home or society. This is why public libraries work.

It was especially notable that during the Covid shutdowns, the County library service provided a valuable and vital service, by setting up an order and pick up service from the library buildings: there was even an option for the staff to select books from the shelves which fitted the customer's choice criteria. Valuable for mental health.

There is no benefit whatsoever to the library user to the plans to demolish and replace with a room and multiple flats. There would be parking problems, and less space. There would also be an extended period when there was no library service available locally.

The library is valued by the current population. The building is suitable. Events for children and adults are enjoyed by all who attend, usually subsidised by the volunteers of the Friends of Hershams Library. The reading of paper books has not died out. The social function of a library is no less than it ever was. The provision of computers is a vital link for many residents.

A suitable library will not be provided if it shares a site with multiple flats. Whilst it is true that in CH 9 Site allocations, HE15 does state that a community provision can be provided, this does not guarantee that a good library for this community will subsequently exist.

Not positively prepared.

Betrayal of the covenant for the library

Most important of all is the fact that the site was common land, and when exchanged, a covenant was imposed, to ensure that only a library was built on the site. This was to ensure that the vision

and generosity of the founders of the library was preserved for future generations, to eliminate the problems caused by fads and fashions such as this current proposal.

The loss of this library will be detrimental to the Community of Hersham, and thus it should be removed from the plan. A covenant must allowed to do what it was set up to do.

Not Effective.

The library is already one of the cheapest in Surrey to run, because it is on a freehold site. It is extremely unlikely, that a library service will pay a commercial rent for a lesser facility on a site which it has sold, which had on it a building that was purpose built for the function it had.

OTHER SITES ON THE LIST FOR HERSHAM WHICH ARE DISPUTED

H1 US 441 63 Queens Road, United Reform Church

This building was previously a United Reform Church and then used as a children's nursery. An application to convert to offices has recently been refused planning permission on these grounds: "The proposed development would result in the loss of community use which would not be replaced by equivalent or better provision at the site nor is there any justification that there would be alternative community use in a suitable location in the locality. As such the proposal is contrary to Policies CS16 of the Core Strategy 2011, Policy DM9 of the Development Management Plan 2015 and the NPPF 2019"

H3 US379 Hersham Shopping Centre and Car park

The boundary of this site has been significantly changed since the 2020 consultation/2018 Land Availability Assessment. At that time, the boundary only encompassed the car parking area. Two weeks into this consultation, when the plan detail was added to the document, it was discovered that the same coding numbers are being used for the entire shopping centre site. This puts the community at risk of losing the entire car park to 200 Residential Units, as any developer could reasonably argue that the site US379 refers to the car park. A different code must be used to prevent this. This is careless. In order to remain viable for a supermarket, the car park needs to be large enough. 200 new residential units will require an additional large number of private parking spaces

H6 US40 Hersham Day Centre and Village Hall

This site has been threatened with redevelopment for numerous years, and a Community Hall here is highly unlikely to be replaced once the present one is closed.

The comments in H1 above apply equally well to H6.

This Hall has been cited as an alternative hall in other past proposals for closure of other venues throughout Elmbridge, so the whole of Elmbridge will be affected by the loss of the building. Hershams Village Hall is the designated site for flood emergencies, being a large capacity building (200 in main hall) and the Elmbridge leisure centre is likely to be one of the first properties to be flooded in any inundation.

It was one of the few sites in Elmbridge suitable for a Testing Centre during the Covid Crisis. The Day Centre is popular and well used. Its kitchen is used to provide the meals for the Meals-on-Wheels service to the elderly and housebound throughout Elmbridge.

Both the day Centre and Village Hall have recently undergone extensive refurbishments, the first since the buildings were provided cost-free by the developers of the Hershams Shopping Centre, on a site which previously included the Working Men's Club, so it has been a community asset for well over 100 years.

H8 US 389 Hershams sports and social club
This is privately owned and run by the members, who have not agreed to its inclusion, it is not available and is therefore not suitable to be included, contrary to the statement in Land Availability Assessment 2022 appendix 5.

H10 US 390 is a Public House The Royal George with a restaurant and car parking. The loss of this will also involve loss of employment in the Hershams area.

H11 US376 Trinity Hall and 63-76 Molesey Road.
This site has a listed building, the Barley Mow, which provides employment as well as a social venue.
The off licence next to the public House provides employment.
There is also has a children's Nursery, Little Limes Day Nursery on the green area which was the bowls club. It provides a service to local families and employment.
All of these would be lost and not replaced. The report 2022 Local Green Spaces does not mention that the bowls club is now used as a children's nursery. It does mention that the site appears neglected but that is because EBC itself has neglected it.
The Land Availability Assessment 2022 Appendix 5 has omitted to mention an important building and vital service on the site. It houses a sewerage pumping station, which has significant underground structures and requires 24 hour access in emergencies. At any time large vehicles and road tankers will need access, including at night.

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Remove from the Plan H15 Hersham Library. H1 United Reform Church, H6 US40 Hersham Day Centre and Village Hall H8 US 389 Hersham sports and social club H11 US376 Trinity Hall and 63-76 Molesey Road. H3 US379 Shopping Centre Car Park. Change the reference code so that it covers the whole the shopping centre site, to ensure that we cannot lose our car park to 200 residential units.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	<p>Hersham Library It is apparent from the response of the community that the library is a popular and well used public community asset. The community knows that once the library is closed for the site to be redevelopment, it is unlikely be reopened, which will be a loss for the community of Hersham. In particular the covenant placed when the land was allowed to be used for the library, is still as valid as it was in 1960s. The covenant should be respected and not be allowed to fall victim to current fads and fancies.... Which is precisely why it was written in the first place. Other sites in Hersham should also not be on the plan, be it through covenant reasons, misrepresented ownership, incorrect or missing site facts.</p>

Name	Julian Meers
User ID	16438625
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Lois Mistry
User ID	41050529
Organisation	
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Regarding site allocation H15 (Hersham Library) I do not support the allocation for residential units and re-provision of community use. I am a keen library user and benefit from the library services. It is local to me and I will be continuing to use these services even more in the future.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] It is not justified to remove the library services that myself and other local residents rely upon. Many residents are not able to access library services that are further from them.

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Hersham library is extremely important to the local community and therefore should remain in place.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Andrew Mitcham
User ID	16220353
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Those areas identified as remaining green belt and not for future development I support. Andrew Mitcham
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Dominic Mitchell
User ID	41060961
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Barnaby Moffat
User ID	23667137
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I strongly support the council's stance on the protection of green belt land. It's incredibly important that we maintain these vital spaces otherwise we would have a permanent negative impact on our community. The Spatial Strategy proposed by the draft local plan is a good approach whilst protecting green belt, and I support it.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ms Morgan
User ID	40952385
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>I am a cyclist and a driver and I am concerned about proposals to create more cycleways/active travel. Traffic flows through Walton are dominated by traffic on the A244 and A3050. Much of this traffic is involved in long distance travel starting or ending outside Elmbridge or both. Very little if any of this type of traffic will be converted to active travel.</p> <p>I would draw attention to the cycle ways that were put in along Terrace Road/Walton Road from Walton to Hampton Court. Cyclists were not consulted and in general they do not support the cycle lanes on the pavement. So everyone loses out - drivers got a narrower road yet still have cyclists using the road.</p> <p>Much of the traffic is drawn to Walton Bridge, particularly heavy traffic, because there is no weight limit on this bridge, unlike other "local" bridges such as Hampton Court. So better to introduce a weight limit on the bridge making it safer and hopefully will last longer, as well as protecting Walton on Thames from through traffic.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p>

	<p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Nexus Planning (Lucy Morris)
User ID	39898753
Organisation	Nexus Planning
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Please refer to accompanying submission.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please refer to accompanying submission.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please refer to accompanying submission.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please refer to accompanying submission.

	Former Moore Place Golf Course Elmbridge Draft LP (Reg.19).pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Please refer to accompanying submission. Please note that Nexus Planning is acting on behalf of Charterhouse Strategic Land.

Name	Reside Developments (Andrew Munton)
User ID	9580065
Organisation	Reside Developments
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>We are extremely disappointed and concerned with this Reg 19 local plan, which fails the most vulnerable people in the borough. This plan fails to deliver even its minimum OAN of 9,615 homes year, only providing 6,985 homes, which is 73% of its minimum need. In other words, over 25% of the population needing new homes in Elmbridge is being left without homes.</p> <p>In addition, the council is already failing its electorate, where it cannot demonstrate a 5-year supply of housing land (published at 3.96 over a year ago) and has failed the Housing Delivery Test reaching only a meagre 58% and is therefore in a position where the Presumption of sustainable development is engaged.</p> <p>The reason for not meeting the OAN in the revised local plan is cited as being to protect the green belt and to build only building on brownfield land.</p> <p>However, the green belt is not an environmental designation, and the green belt's fundamental aim to prevent urban sprawl (NPPF). However, there is not an embargo on releasing and building on green belt land, where there are exceptional circumstances.</p> <p>In fact it has already helped by steering development to the existing brownfield sites. However, these seem to have been exhausted, otherwise one assumes more brownfield sites would have been included to the meet the OAN. Para 141 of the NPPF specifically points to using brownfield first, but then, once exhausted, there being exceptional circumstances for green belt land release.</p>

Not providing sufficient housing to meet its needs and the extremely high affordability ratios are clear exceptional circumstances for releasing green belt land for new homes. This has been tested at many EiPs up and down the country, including locally at neighbouring Guildford, Waverley and Woking to name but a few.

To release no green belt land and fail to meet the OAN renders the plan unsound. It has clearly therefore not been Positively Prepared and the choice to not release any green belt land is not Justified. Furthermore, the plan cannot be considered to be Effective, where it is not providing for over 25% of its housing need, and is not Consistent with national policy, which requires councils to meet its OAN.

The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective.

Since the Reg 18 document, nothing in green belt policy has changed and there are therefore no reasons for the council's retrograde step in its strategy to exclude any green belt land release. This is a political decision, not a planning policy decision.

As well as not delivering market housing, this will also have a knock-on effect of delivering much needed affordable housing. In 2019, the council's HHRSS paper report that there were 1,801 applications on its waiting list.

In 2019, the same HHRSS report stated that the council has the second highest ratio of house prices to income in the South East at 15.08 (2017). This gap has been widening considerably, where the ratio was 9.65 in 2003. Not only does this point to the need for more housing and meeting the OAN (this would also add to the exceptional circumstances for releasing green belt land for housing), but it also points to needing to deliver more than the OAN.

	<p>This means that the failing to deliver the OAN is even worse than not providing 27% of the need, as more is needed in Elmbridge. This clearly points at the plan being Ineffective, not Positively prepared of Justified and not Consistent with national policy.</p>
<p>Question 2</p>	<p>Do you consider this part of the draft Local Plan to be sound?</p>
	<p>No</p> <p>We are extremely disappointed and concerned with this Reg 19 local plan, which fails the most vulnerable people in the borough. This plan fails to deliver even its minimum OAN of 9,615 homes year, only providing 6,985 homes, which is 73% of its minimum need. In other words, over 25% of the population needing new homes in Elmbridge is being left without homes.</p> <p>In addition, the council is already failing its electorate, where it cannot demonstrate a 5-year supply of housing land (published at 3.96 over a year ago) and has failed the Housing Delivery Test reaching only a meagre 58% and is therefore in a position where the Presumption of sustainable development is engaged.</p> <p>The reason for not meeting the OAN in the revised local plan is cited as being to protect the green belt and to build only building on brownfield land.</p> <p>However, the green belt is not an environmental designation, and the green belt's fundamental aim to prevent urban sprawl (NPPF). However, there is not an embargo on releasing and building on green belt land, where there are exceptional circumstances.</p> <p>In fact it has already helped by steering development to the existing brownfield sites. However, these seem to have been exhausted, otherwise one assumes more brownfield sites would have been included to the meet the OAN. Para 141 of the NPPF specifically points to using brownfield first, but then, once exhausted, there being exceptional circumstances for green belt land release.</p> <p>Not providing sufficient housing to meet its needs and the extremely high affordability ratios are clear exceptional circumstances for releasing green belt land for new homes. This has been tested at many EiPs up and down the country, including locally at neighbouring Guildford, Waverley and Woking to name but a few.</p> <p>To release no green belt land and fail to meet the OAN renders the plan unsound. It has clearly therefore not been Positively Prepared and the choice to not release any green belt land is not Justified. Furthermore, the plan cannot be consider to be Effective, where it is not providing for</p>

	<p>over 25% of its housing need, and is not Consistent with national policy, which requires councils to meet its OAN.</p> <p>The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective.</p> <p>Since the Reg 18 document, nothing in green belt policy has changed and there are therefore no reasons for the council's retrograde step in its strategy to exclude any green belt land release. This is a political decision, not a planning policy decision.</p> <p>As well as not delivering market housing, this will also have a knock-on effect of delivering much needed affordable housing. In 2019, the council's HHRSS paper report that there were 1,801 applications on its waiting list.</p> <p>In 2019, the same HHRSS report stated that the council has the second highest ratio of house prices to income in the South East at 15.08 (2017). This gap has been widening considerably, where the ratio was 9.65 in 2003. Not only does this point to the need for more housing and meeting the OAN (this would also add to the exceptional circumstances for releasing green belt land for housing), but it also points to needing to deliver more than the OAN.</p> <p>This means that the failing to deliver the OAN is even worse than not providing 27% of the need, as more is needed in Elmbridge. This clearly points at the plan being Ineffective, not Positively prepared or Justified and not Consistent with national policy.</p>
<p>Question 3</p>	<p>If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.</p>
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p>

Consistent with national policy: [Y]

We are extremely disappointed and concerned with this Reg 19 local plan, which fails the most vulnerable people in the borough. This plan fails to deliver even its minimum OAN of 9,615 homes year, only providing 6,985 homes, which is 73% of its minimum need. In other words, over 25% of the population needing new homes in Elmbridge is being left without homes.

In addition, the council is already failing its electorate, where it cannot demonstrate a 5-year supply of housing land (published at 3.96 over a year ago) and has failed the Housing Delivery Test reaching only a meagre 58% and is therefore in a position where the Presumption of sustainable development is engaged.

The reason for not meeting the OAN in the revised local plan is cited as being to protect the green belt and to build only building on brownfield land.

However, the green belt is not an environmental designation, and the green belt's fundamental aim to prevent urban sprawl (NPPF). However, there is not an embargo on releasing and building on green belt land, where there are exceptional circumstances.

In fact it has already helped by steering development to the existing brownfield sites. However, these seem to have been exhausted, otherwise one assumes more brownfield sites would have been included to the meet the OAN. Para 141 of the NPPF specifically points to using brownfield first, but then, once exhausted, there being exceptional circumstances for green belt land release.

Not providing sufficient housing to meet its needs and the extremely high affordability ratios are clear exceptional circumstances for releasing green belt land for new homes. This has been tested at many EiPs up and down the country, including locally at neighbouring Guildford, Waverley and Woking to name but a few.

To release no green belt land and fail to meet the OAN renders the plan unsound. It has clearly therefore not been Positively Prepared and the choice to not release any green belt land is not Justified. Furthermore, the plan cannot be consider to be Effective, where it is not providing for over 25% of its housing need, and is not Consistent with national policy, which requires councils to meet its OAN.

The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound.

	<p>This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective.</p> <p>Since the Reg 18 document, nothing in green belt policy has changed and there are therefore no reasons for the council's retrograde step in its strategy to exclude any green belt land release. This is a political decision, not a planning policy decision.</p> <p>As well as not delivering market housing, this will also have a knock-on effect of delivering much needed affordable housing. In 2019, the council's HHRSS paper report that there were 1,801 applications on its waiting list.</p> <p>In 2019, the same HHRSS report stated that the council has the second highest ratio of house prices to income in the South East at 15.08 (2017). This gap has been widening considerably, where the ratio was 9.65 in 2003. Not only does this point to the need for more housing and meeting the OAN (this would also add to the exceptional circumstances for releasing green belt land for housing), but it also points to needing to deliver more than the OAN.</p> <p>This means that the failing to deliver the OAN is even worse than not providing 27% of the need, as more is needed in Elmbridge. This clearly points at the plan being Ineffective, not Positively prepared or Justified and not Consistent with national policy.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	The plan needs to meet at least its minimum OAN and release green belt land
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	These matters can only be fully tested and explored in person.

Name	Reside Developments (Andrew Munton)
User ID	9580065
Organisation	Reside Developments
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>We are extremely disappointed and concerned with this Reg 19 local plan, which fails the most vulnerable people in the borough. This plan fails to deliver even its minimum OAN of 9,615 homes year, only providing 6,985 homes, which is 73% of its minimum need. In other words, over 25% of the population needing new homes in Elmbridge is being left without homes.</p> <p>In addition, the council is already failing its electorate, where it cannot demonstrate a 5-year supply of housing land (published at 3.96 over a year ago) and has failed the Housing Delivery Test reaching only a meagre 58% and is therefore in a position where the Presumption of sustainable development is engaged.</p> <p>The reason for not meeting the OAN in the revised local plan is cited as being to protect the green belt and to build only building on brownfield land.</p> <p>However, the green belt is not an environmental designation, and the green belt's fundamental aim to prevent urban sprawl (NPPF). However, there is not an embargo on releasing and building on green belt land, where there are exceptional circumstances.</p> <p>In fact it has already helped by steering development to the existing brownfield sites. However, these seem to have been exhausted, otherwise one assumes more brownfield sites would have been included to the meet the OAN. Para 141 of the NPPF specifically points to using brownfield first, but then, once exhausted, there being exceptional circumstances for green belt land release.</p>

	<p>Not providing sufficient housing to meet its needs and the extremely high affordability ratios are clear exceptional circumstances for releasing green belt land for new homes. This has been tested at many EiPs up and down the country, including locally at neighbouring Guildford, Waverley and Woking to name but a few.</p> <p>To release no green belt land and fail to meet the OAN renders the plan unsound. It has clearly therefore not been Positively Prepared and the choice to not release any green belt land is not Justified. Furthermore, the plan cannot be considered to be Effective, where it is not providing for over 25% of its housing need, and is not Consistent with national policy, which requires councils to meet its OAN.</p> <p>The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective.</p> <p>Since the Reg 18 document, nothing in green belt policy has changed and there are therefore no reasons for the council's retrograde step in its strategy to exclude any green belt land release. This is a political decision, not a planning policy decision.</p> <p>As well as not delivering market housing, this will also have a knock-on effect of delivering much needed affordable housing. In 2019, the council's HHRSS paper report that there were 1,801 applications on its waiting list.</p> <p>In 2019, the same HHRSS report stated that the council has the second highest ratio of house prices to income in the South East at 15.08 (2017). This gap has been widening considerably, where the ratio was 9.65 in 2003. Not only does this point to the need for more housing and meeting the OAN (this would also add to the exceptional circumstances for releasing green belt land for housing), but it also points to needing to deliver more than the OAN.</p> <p>This means that the failing to deliver the OAN is even worse than not providing 27% of the need, as more is needed in Elmbridge. This clearly points at the plan being Ineffective, not Positively prepared or Justified and not Consistent with national policy.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.

	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>We are extremely disappointed and concerned with this Reg 19 local plan, which fails the most vulnerable people in the borough. This plan fails to deliver even its minimum OAN of 9,615 homes year, only providing 6,985 homes, which is 73% of its minimum need. In other words, over 25% of the population needing new homes in Elmbridge is being left without homes.</p> <p>In addition, the council is already failing its electorate, where it cannot demonstrate a 5-year supply of housing land (published at 3.96 over a year ago) and has failed the Housing Delivery Test reaching only a meagre 58% and is therefore in a position where the Presumption of sustainable development is engaged.</p> <p>The reason for not meeting the OAN in the revised local plan is cited as being to protect the green belt and to build only building on brownfield land.</p> <p>However, the green belt is not an environmental designation, and the green belt's fundamental aim to prevent urban sprawl (NPPF). However, there is not an embargo on releasing and building on green belt land, where there are exceptional circumstances.</p> <p>In fact it has already helped by steering development to the existing brownfield sites. However, these seem to have been exhausted, otherwise one assumes more brownfield sites would have been included to the meet the OAN. Para 141 of the NPPF specifically points to using brownfield first, but then, once exhausted, there being exceptional circumstances for green belt land release.</p> <p>Not providing sufficient housing to meet its needs and the extremely high affordability ratios are clear exceptional circumstances for releasing green belt land for new homes. This has been tested at many EiPs up and down the country, including locally at neighbouring Guildford, Waverley and Woking to name but a few.</p>
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	<p>To release no green belt land and fail to meet the OAN renders the plan unsound. It has clearly therefore not been Positively Prepared and the choice to not release any green belt land is not Justified. Furthermore, the plan cannot be consider to be Effective, where it is not providing for over 25% of its housing need, and is not Consistent with national policy, which requires councils to meet its OAN.</p> <p>The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective.</p> <p>Since the Reg 18 document, nothing in green belt policy has changed and there are therefore no reasons for the council’s retrograde step in its strategy to exclude any green belt land release. This is a political decision, not a planning policy decision.</p> <p>As well as not delivering market housing, this will also have a knock-on effect of delivering much needed affordable housing. In 2019, the council’s HHRSS paper report that there were 1,801 applications on its waiting list.</p> <p>In 2019, the same HHRSS report stated that the council has the second highest ratio of house prices to income in the South East at 15.08 (2017). This gap has been widening considerably, where the ratio was 9.65 in 2003. Not only does this point to the need for more housing and meeting the OAN (this would also add to the exceptional circumstances for releasing green belt land for housing), but it also points to needing to deliver more than the OAN.</p> <p>This means that the failing to deliver the OAN is even worse than not providing 27% of the need, as more is needed in Elmbridge. This clearly points at the plan being Ineffective, not Positively prepared of Justified and not Consistent with national policy.</p>
<p>Question 4</p>	<p>Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.</p>
	<p>The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green</p>

	<p>belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective.</p> <p>In addition, the full OAN needs to be met as a minimum.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	These matters can only be fully explored in person, where our concerns are fully tested against the council's position.

Name	Reside Developments (Andrew Munton)
User ID	9580065
Organisation	Reside Developments
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>We are extremely disappointed and concerned with this Reg 19 local plan, which fails the most vulnerable people in the borough. This plan fails to deliver even its minimum OAN of 9,615 homes year, only providing 6,985 homes, which is 73% of its minimum need. In other words, over 25% of the population needing new homes in Elmbridge is being left without homes.</p> <p>In addition, the council is already failing its electorate, where it cannot demonstrate a 5-year supply of housing land (published at 3.96 over a year ago) and has failed the Housing Delivery Test reaching only a meagre 58% and is therefore in a position where the Presumption of sustainable development is engaged.</p> <p>The reason for not meeting the OAN in the revised local plan is cited as being to protect the green belt and to build only building on brownfield land.</p> <p>However, the green belt is not an environmental designation, and the green belt's fundamental aim to prevent urban sprawl (NPPF). However, there is not an embargo on releasing and building on green belt land, where there are exceptional circumstances.</p> <p>In fact it has already helped by steering development to the existing brownfield sites. However, these seem to have been exhausted, otherwise one assumes more brownfield sites would have been included to the meet the OAN. Para 141 of the NPPF specifically points to using brownfield first, but then, once exhausted, there being exceptional circumstances for green belt land release.</p>

Not providing sufficient housing to meet its needs and the extremely high affordability ratios are clear exceptional circumstances for releasing green belt land for new homes. This has been tested at many EiPs up and down the country, including locally at neighbouring Guildford, Waverley and Woking to name but a few.

To release no green belt land and fail to meet the OAN renders the plan unsound. It has clearly therefore not been Positively Prepared and the choice to not release any green belt land is not Justified. Furthermore, the plan cannot be considered to be Effective, where it is not providing for over 25% of its housing need, and is not Consistent with national policy, which requires councils to meet its OAN.

The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective.

Since the Reg 18 document, nothing in green belt policy has changed and there are therefore no reasons for the council's retrograde step in its strategy to exclude any green belt land release. This is a political decision, not a planning policy decision.

As well as not delivering market housing, this will also have a knock-on effect of delivering much needed affordable housing. In 2019, the council's HHRSS paper report that there were 1,801 applications on its waiting list.

In 2019, the same HHRSS report stated that the council has the second highest ratio of house prices to income in the South East at 15.08 (2017). This gap has been widening considerably, where the ratio was 9.65 in 2003. Not only does this point to the need for more housing and meeting the OAN (this would also add to the exceptional circumstances for releasing green belt land for housing), but it also points to needing to deliver more than the OAN.

	<p>This means that the failing to deliver the OAN is even worse than not providing 27% of the need, as more is needed in Elmbridge. This clearly points at the plan being Ineffective, not Positively prepared of Justified and not Consistent with national policy.</p>
<p>Question 2</p>	<p>Do you consider this part of the draft Local Plan to be sound?</p>
	<p>No</p> <p>We are extremely disappointed and concerned with this Reg 19 local plan, which fails the most vulnerable people in the borough. This plan fails to deliver even its minimum OAN of 9,615 homes year, only providing 6,985 homes, which is 73% of its minimum need. In other words, over 25% of the population needing new homes in Elmbridge is being left without homes.</p> <p>In addition, the council is already failing its electorate, where it cannot demonstrate a 5-year supply of housing land (published at 3.96 over a year ago) and has failed the Housing Delivery Test reaching only a meagre 58% and is therefore in a position where the Presumption of sustainable development is engaged.</p> <p>The reason for not meeting the OAN in the revised local plan is cited as being to protect the green belt and to build only building on brownfield land.</p> <p>However, the green belt is not an environmental designation, and the green belt's fundamental aim to prevent urban sprawl (NPPF). However, there is not an embargo on releasing and building on green belt land, where there are exceptional circumstances.</p> <p>In fact it has already helped by steering development to the existing brownfield sites. However, these seem to have been exhausted, otherwise one assumes more brownfield sites would have been included to the meet the OAN. Para 141 of the NPPF specifically points to using brownfield first, but then, once exhausted, there being exceptional circumstances for green belt land release.</p> <p>Not providing sufficient housing to meet its needs and the extremely high affordability ratios are clear exceptional circumstances for releasing green belt land for new homes. This has been tested at many EiPs up and down the country, including locally at neighbouring Guildford, Waverley and Woking to name but a few.</p> <p>To release no green belt land and fail to meet the OAN renders the plan unsound. It has clearly therefore not been Positively Prepared and the choice to not release any green belt land is not Justified. Furthermore, the plan cannot be consider to be Effective, where it is not providing for</p>

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Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p>

Consistent with national policy: [Y]

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The reason for not meeting the OAN in the revised local plan is cited as being to protect the green belt and to build only building on brownfield land.

However, the green belt is not an environmental designation, and the green belt's fundamental aim to prevent urban sprawl (NPPF). However, there is not an embargo on releasing and building on green belt land, where there are exceptional circumstances.

In fact it has already helped by steering development to the existing brownfield sites. However, these seem to have been exhausted, otherwise one assumes more brownfield sites would have been included to the meet the OAN. Para 141 of the NPPF specifically points to using brownfield first, but then, once exhausted, there being exceptional circumstances for green belt land release.

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	<p>This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective.</p> <p>Since the Reg 18 document, nothing in green belt policy has changed and there are therefore no reasons for the council's retrograde step in its strategy to exclude any green belt land release. This is a political decision, not a planning policy decision.</p> <p>As well as not delivering market housing, this will also have a knock-on effect of delivering much needed affordable housing. In 2019, the council's HHRSS paper report that there were 1,801 applications on its waiting list.</p> <p>In 2019, the same HHRSS report stated that the council has the second highest ratio of house prices to income in the South East at 15.08 (2017). This gap has been widening considerably, where the ratio was 9.65 in 2003. Not only does this point to the need for more housing and meeting the OAN (this would also add to the exceptional circumstances for releasing green belt land for housing), but it also points to needing to deliver more than the OAN.</p> <p>This means that the failing to deliver the OAN is even worse than not providing 27% of the need, as more is needed in Elmbridge. This clearly points at the plan being Ineffective, not Positively prepared or Justified and not Consistent with national policy.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective.</p> <p>In addition the full OAN needs to be met as a minimum.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?

	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	These concerns and matters raised can only be full tested in person at the EiP.

Name	Reside Developments (Andrew Munton)
User ID	9580065
Organisation	Reside Developments
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>No, the plan fails to plan for the necessary housing need for the area. The council has chosen to not release any green belt land. All of the points to the fact the council has not undertaken its roll in respect to its Duty to Cooperate.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>We are extremely disappointed and concerned with this Reg 19 local plan, which fails the most vulnerable people in the borough. This plan fails to deliver even its minimum OAN of 9,615 homes year, only providing 6,985 homes, which is 73% of its minimum need. In other words, over 25% of the population needing new homes in Elmbridge is being left without homes. In addition, the council is already failing its electorate, where it cannot demonstrate a 5-year supply of housing land (published at 3.96 over a year ago) and has failed the Housing Delivery Test reaching only a meagre 58% and is therefore in a position where the Presumption of sustainable development is engaged. The reason for not meeting the OAN in the revised local plan is cited as being to protect the green belt and to build only building on brownfield land. However, the green belt is not an environmental designation, and the green belt's fundamental aim to prevent urban sprawl (NPPF). However, there is not an embargo on releasing and building on green belt land, where there are exceptional circumstances. In fact it has already helped by steering development to the existing brownfield sites. However, these seem to have been exhausted, otherwise one assumes more brownfield sites would have</p>

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As well as not delivering market housing, this will also have a knock-on effect of delivering much needed affordable housing. In 2019, the council's HHRSS paper report that there were 1,801 applications on its waiting list.

In 2019, the same HHRSS report stated that the council has the second highest ratio of house prices to income in the South East at 15.08 (2017). This gap has been widening considerably, where the ratio was 9.65 in 2003. Not only does this point to the need for more housing and meeting the OAN (this would also add to the exceptional circumstances for releasing green belt land for housing), but it also points to needing to deliver more than the OAN.

This means that the failing to deliver the OAN is even worse than not providing 27% of the need, as more is needed in Elmbridge. This clearly points at the plan being Ineffective, not Positively prepared of Justified and not Consistent with national policy.

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>We are extremely disappointed and concerned with this Reg 19 local plan, which fails the most vulnerable people in the borough. This plan fails to deliver even its minimum OAN of 9,615 homes year, only providing 6,985 homes, which is 73% of its minimum need. In other words, over 25% of the population needing new homes in Elmbridge is being left without homes.</p> <p>In addition, the council is already failing its electorate, where it cannot demonstrate a 5-year supply of housing land (published at 3.96 over a year ago) and has failed the Housing Delivery Test reaching only a meagre 58% and is therefore in a position where the Presumption of sustainable development is engaged.</p> <p>The reason for not meeting the OAN in the revised local plan is cited as being to protect the green belt and to build only building on brownfield land.</p> <p>However, the green belt is not an environmental designation, and the green belt's fundamental aim to prevent urban sprawl (NPPF). However, there is not an embargo on releasing and building on green belt land, where there are exceptional circumstances.</p> <p>In fact it has already helped by steering development to the existing brownfield sites. However, these seem to have been exhausted, otherwise one assumes more brownfield sites would have been included to the meet the OAN. Para 141 of the NPPF specifically points to using brownfield first, but then, once exhausted, there being exceptional circumstances for green belt land release.</p> <p>Not providing sufficient housing to meet its needs and the extremely high affordability ratios are clear exceptional circumstances for releasing green belt land for new homes. This has been</p>

	<p>tested at many EiPs up and down the country, including locally at neighbouring Guildford, Waverley and Woking to name but a few.</p> <p>To release no green belt land and fail to meet the OAN renders the plan unsound. It has clearly therefore not been Positively Prepared and the choice to not release any green belt land is not Justified. Furthermore, the plan cannot be considered to be Effective, where it is not providing for over 25% of its housing need, and is not Consistent with national policy, which requires councils to meet its OAN.</p> <p>The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective.</p> <p>Since the Reg 18 document, nothing in green belt policy has changed and there are therefore no reasons for the council's retrograde step in its strategy to exclude any green belt land release. This is a political decision, not a planning policy decision.</p> <p>As well as not delivering market housing, this will also have a knock-on effect of delivering much needed affordable housing. In 2019, the council's HHRSS paper report that there were 1,801 applications on its waiting list.</p> <p>In 2019, the same HHRSS report stated that the council has the second highest ratio of house prices to income in the South East at 15.08 (2017). This gap has been widening considerably, where the ratio was 9.65 in 2003. Not only does this point to the need for more housing and meeting the OAN (this would also add to the exceptional circumstances for releasing green belt land for housing), but it also points to needing to deliver more than the OAN.</p> <p>This means that the failing to deliver the OAN is even worse than not providing 27% of the need, as more is needed in Elmbridge. This clearly points at the plan being Ineffective, not Positively prepared or Justified and not Consistent with national policy.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was

	<p>proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective.</p> <p>In addition, the full OAN should be met</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Given the severe retrograde step the council has taken in failing to deliver its OAN and not release any green belt land, it is important that this is fully explored with the council and no stone left unturned. This can only be fully achieved by appearing in person and ensuring our questions are tested.

Name	Reside Developments (Andrew Munton)
User ID	9580065
Organisation	Reside Developments
Policy / Evidence base/ part of plan:	ENV4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>We are extremely disappointed and concerned with this Reg 19 local plan, which fails the most vulnerable people in the borough. This plan fails to deliver even its minimum OAN of 9,615 homes year, only providing 6,985 homes, which is 73% of its minimum need. In other words, over 25% of the population needing new homes in Elmbridge is being left without homes.</p> <p>In addition, the council is already failing its electorate, where it cannot demonstrate a 5-year supply of housing land (published at 3.96 over a year ago) and has failed the Housing Delivery Test reaching only a meagre 58% and is therefore in a position where the Presumption of sustainable development is engaged.</p> <p>The reason for not meeting the OAN in the revised local plan is cited as being to protect the green belt and to build only building on brownfield land.</p> <p>However, the green belt is not an environmental designation, and the green belt's fundamental aim to prevent urban sprawl (NPPF). However, there is not an embargo on releasing and building on green belt land, where there are exceptional circumstances.</p> <p>In fact it has already helped by steering development to the existing brownfield sites. However, these seem to have been exhausted, otherwise one assumes more brownfield sites would have been included to the meet the OAN. Para 141 of the NPPF specifically points to using brownfield first, but then, once exhausted, there being exceptional circumstances for green belt land release.</p>

Not providing sufficient housing to meet its needs and the extremely high affordability ratios are clear exceptional circumstances for releasing green belt land for new homes. This has been tested at many EiPs up and down the country, including locally at neighbouring Guildford, Waverley and Woking to name but a few.

To release no green belt land and fail to meet the OAN renders the plan unsound. It has clearly therefore not been Positively Prepared and the choice to not release any green belt land is not Justified. Furthermore, the plan cannot be considered to be Effective, where it is not providing for over 25% of its housing need, and is not Consistent with national policy, which requires councils to meet its OAN.

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Since the Reg 18 document, nothing in green belt policy has changed and there are therefore no reasons for the council's retrograde step in its strategy to exclude any green belt land release. This is a political decision, not a planning policy decision.

As well as not delivering market housing, this will also have a knock-on effect of delivering much needed affordable housing. In 2019, the council's HHRSS paper report that there were 1,801 applications on its waiting list.

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<p>Question 2</p>	<p>Do you consider this part of the draft Local Plan to be sound?</p>
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<p>Question 3</p>	<p>If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.</p>
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p>

Consistent with national policy: [Y]

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Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	These matters can only be fully explored and tested in person.

Name	Reside Developments (Andrew Munton)
User ID	9580065
Organisation	Reside Developments
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>We are extremely disappointed and concerned with this Reg 19 local plan, which fails the most vulnerable people in the borough. This plan fails to deliver even its minimum OAN of 9,615 homes year, only providing 6,985 homes, which is 73% of its minimum need. In other words, over 25% of the population needing new homes in Elmbridge is being left without homes.</p> <p>In addition, the council is already failing its electorate, where it cannot demonstrate a 5-year supply of housing land (published at 3.96 over a year ago) and has failed the Housing Delivery Test reaching only a meagre 58% and is therefore in a position where the Presumption of sustainable development is engaged.</p> <p>The reason for not meeting the OAN in the revised local plan is cited as being to protect the green belt and to build only building on brownfield land.</p> <p>However, the green belt is not an environmental designation, and the green belt's fundamental aim to prevent urban sprawl (NPPF). However, there is not an embargo on releasing and building on green belt land, where there are exceptional circumstances.</p> <p>In fact it has already helped by steering development to the existing brownfield sites. However, these seem to have been exhausted, otherwise one assumes more brownfield sites would have been included to the meet the OAN. Para 141 of the NPPF specifically points to using brownfield first, but then, once exhausted, there being exceptional circumstances for green belt land release.</p>

Not providing sufficient housing to meet its needs and the extremely high affordability ratios are clear exceptional circumstances for releasing green belt land for new homes. This has been tested at many EiPs up and down the country, including locally at neighbouring Guildford, Waverley and Woking to name but a few.

To release no green belt land and fail to meet the OAN renders the plan unsound. It has clearly therefore not been Positively Prepared and the choice to not release any green belt land is not Justified. Furthermore, the plan cannot be considered to be Effective, where it is not providing for over 25% of its housing need, and is not Consistent with national policy, which requires councils to meet its OAN.

The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective.

Since the Reg 18 document, nothing in green belt policy has changed and there are therefore no reasons for the council's retrograde step in its strategy to exclude any green belt land release. This is a political decision, not a planning policy decision.

As well as not delivering market housing, this will also have a knock-on effect of delivering much needed affordable housing. In 2019, the council's HHRSS paper report that there were 1,801 applications on its waiting list.

In 2019, the same HHRSS report stated that the council has the second highest ratio of house prices to income in the South East at 15.08 (2017). This gap has been widening considerably, where the ratio was 9.65 in 2003. Not only does this point to the need for more housing and meeting the OAN (this would also add to the exceptional circumstances for releasing green belt land for housing), but it also points to needing to deliver more than the OAN.

	<p>This means that the failing to deliver the OAN is even worse than not providing 27% of the need, as more is needed in Elmbridge. This clearly points at the plan being Ineffective, not Positively prepared of Justified and not Consistent with national policy.</p>
<p>Question 2</p>	<p>Do you consider this part of the draft Local Plan to be sound?</p>
	<p>No</p> <p>We are extremely disappointed and concerned with this Reg 19 local plan, which fails the most vulnerable people in the borough. This plan fails to deliver even its minimum OAN of 9,615 homes year, only providing 6,985 homes, which is 73% of its minimum need. In other words, over 25% of the population needing new homes in Elmbridge is being left without homes.</p> <p>In addition, the council is already failing its electorate, where it cannot demonstrate a 5-year supply of housing land (published at 3.96 over a year ago) and has failed the Housing Delivery Test reaching only a meagre 58% and is therefore in a position where the Presumption of sustainable development is engaged.</p> <p>The reason for not meeting the OAN in the revised local plan is cited as being to protect the green belt and to build only building on brownfield land.</p> <p>However, the green belt is not an environmental designation, and the green belt's fundamental aim to prevent urban sprawl (NPPF). However, there is not an embargo on releasing and building on green belt land, where there are exceptional circumstances.</p> <p>In fact it has already helped by steering development to the existing brownfield sites. However, these seem to have been exhausted, otherwise one assumes more brownfield sites would have been included to the meet the OAN. Para 141 of the NPPF specifically points to using brownfield first, but then, once exhausted, there being exceptional circumstances for green belt land release.</p> <p>Not providing sufficient housing to meet its needs and the extremely high affordability ratios are clear exceptional circumstances for releasing green belt land for new homes. This has been tested at many EiPs up and down the country, including locally at neighbouring Guildford, Waverley and Woking to name but a few.</p> <p>To release no green belt land and fail to meet the OAN renders the plan unsound. It has clearly therefore not been Positively Prepared and the choice to not release any green belt land is not Justified. Furthermore, the plan cannot be consider to be Effective, where it is not providing for</p>

	<p>over 25% of its housing need, and is not Consistent with national policy, which requires councils to meet its OAN.</p> <p>The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective.</p> <p>Since the Reg 18 document, nothing in green belt policy has changed and there are therefore no reasons for the council's retrograde step in its strategy to exclude any green belt land release. This is a political decision, not a planning policy decision.</p> <p>As well as not delivering market housing, this will also have a knock-on effect of delivering much needed affordable housing. In 2019, the council's HHRSS paper report that there were 1,801 applications on its waiting list.</p> <p>In 2019, the same HHRSS report stated that the council has the second highest ratio of house prices to income in the South East at 15.08 (2017). This gap has been widening considerably, where the ratio was 9.65 in 2003. Not only does this point to the need for more housing and meeting the OAN (this would also add to the exceptional circumstances for releasing green belt land for housing), but it also points to needing to deliver more than the OAN.</p> <p>This means that the failing to deliver the OAN is even worse than not providing 27% of the need, as more is needed in Elmbridge. This clearly points at the plan being Ineffective, not Positively prepared or Justified and not Consistent with national policy.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p>

Consistent with national policy: [Y]

We are extremely disappointed and concerned with this Reg 19 local plan, which fails the most vulnerable people in the borough. This plan fails to deliver even its minimum OAN of 9,615 homes year, only providing 6,985 homes, which is 73% of its minimum need. In other words, over 25% of the population needing new homes in Elmbridge is being left without homes.

In addition, the council is already failing its electorate, where it cannot demonstrate a 5-year supply of housing land (published at 3.96 over a year ago) and has failed the Housing Delivery Test reaching only a meagre 58% and is therefore in a position where the Presumption of sustainable development is engaged.

The reason for not meeting the OAN in the revised local plan is cited as being to protect the green belt and to build only building on brownfield land.

However, the green belt is not an environmental designation, and the green belt's fundamental aim to prevent urban sprawl (NPPF). However, there is not an embargo on releasing and building on green belt land, where there are exceptional circumstances.

In fact it has already helped by steering development to the existing brownfield sites. However, these seem to have been exhausted, otherwise one assumes more brownfield sites would have been included to the meet the OAN. Para 141 of the NPPF specifically points to using brownfield first, but then, once exhausted, there being exceptional circumstances for green belt land release.

Not providing sufficient housing to meet its needs and the extremely high affordability ratios are clear exceptional circumstances for releasing green belt land for new homes. This has been tested at many EiPs up and down the country, including locally at neighbouring Guildford, Waverley and Woking to name but a few.

To release no green belt land and fail to meet the OAN renders the plan unsound. It has clearly therefore not been Positively Prepared and the choice to not release any green belt land is not Justified. Furthermore, the plan cannot be consider to be Effective, where it is not providing for over 25% of its housing need, and is not Consistent with national policy, which requires councils to meet its OAN.

The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound.

	<p>This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective.</p> <p>Since the Reg 18 document, nothing in green belt policy has changed and there are therefore no reasons for the council's retrograde step in its strategy to exclude any green belt land release. This is a political decision, not a planning policy decision.</p> <p>As well as not delivering market housing, this will also have a knock-on effect of delivering much needed affordable housing. In 2019, the council's HHRSS paper report that there were 1,801 applications on its waiting list.</p> <p>In 2019, the same HHRSS report stated that the council has the second highest ratio of house prices to income in the South East at 15.08 (2017). This gap has been widening considerably, where the ratio was 9.65 in 2003. Not only does this point to the need for more housing and meeting the OAN (this would also add to the exceptional circumstances for releasing green belt land for housing), but it also points to needing to deliver more than the OAN.</p> <p>This means that the failing to deliver the OAN is even worse than not providing 27% of the need, as more is needed in Elmbridge. This clearly points at the plan being Ineffective, not Positively prepared or Justified and not Consistent with national policy.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective.</p> <p>In addition the plan needs to meet at least its minimum OAN.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?

	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	These matters can only be fully tested and explored in person.

Name	Chris Nason
User ID	24316001
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sport England (Owen Neal)
User ID	24490177
Organisation	Sport England
Policy / Evidence base/ part of plan:	ECO3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Sport England welcomes recognition of the role physical activity; movement and sport plays in ensuring the vibrancy and vitality of town; district and local centres. Sport England welcomes the approach to resisting the loss of leisure; recreational and community facilities and their promotion in new development proposals.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sport England (Owen Neal)
User ID	24490177
Organisation	Sport England
Policy / Evidence base/ part of plan:	INF2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Please clarify whether draft policy INF2 is intended to apply to sports facilities and playing field land. If so, then Sport England would question whether this is consistent with the relevant paragraph 99 in the NPPF which seeks to protect this provision unless specific exceptional circumstances apply. These are:</p> <p>"Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <p>(a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</p> <p>(b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</p> <p>(c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use."</p> <p>Sport England considers that part 3a of the policy needs strengthening to better protect existing sports facilities and playing field. Currently the drafting allows for the loss of provision if either there is no longer an identified community need or it no longer meet the needs of users and cannot be adapted. Sport England does not consider this is consistent with national planning policy para 99 and would argue that the second part of the policy ie "or no longer meets the needs the needs of users and cannot be adapted" should be deleted.</p>

	Further, we consider that draft policy part 3c) would permit the loss of sports facilities to provide for an alternative community use/development. We do not consider this is consistent with para 99c) above and would ask this is amended to strengthen protection of existing sports facilities through removing the words "or an alternative".
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: [Y]</p> <p>I have set out the reasons why Sport England considers this may not be consistent with national policy.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Again, I have set out modifications to the policy in the main comments box.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sport England (Owen Neal)
User ID	24490177
Organisation	Sport England
Policy / Evidence base/ part of plan:	INF3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>Sport England welcomes the intention behind the policy to ensure new developments contribute to healthy and active lifestyles. Sport England notes that reference is made to Active Design principles which support well being and greater physical movement. Sport England is unclear whether this is a direct reference to our own Active Design guidance which is based on a set of 10 principles and can be applied to both new and existing developments. If not, then Sport England strongly encourages direct reference to our Active Design guidance which we have co-produced with the former Public Health England. Sport England considers that there is a great deal of synergy between our guidance and draft policy INF3 Part 1.</p> <p>It is important to acknowledge that as highlighted in our Active Design guidance, it is important to mobilise and activate places and spaces to be active, and the role of local champions in utilising these areas to motivate the local community to be physically active. Similarly, it is very important that ongoing maintenance and management is put in place to ensure that active travel routes and active spaces are safe and attractive and encourage ongoing healthy lifestyles.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: []

	<p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sport England (Owen Neal)
User ID	24490177
Organisation	Sport England
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>Sport England has identified two site allocations where there is potential to affect playing field land; ancillary facilities which support use of the site as playing field or for sport, or prejudice its use for sport.</p> <p>These are Hersham Sports Club listed as site allocation H8 and Old Pauline's Sports Ground listed as site allocation D23. The site allocation should be considered against our Playing Fields Policy and NPPF para 99 to ensure the protection of these sports facilities and associated ancillary provision. Sport England would object to any residential development of these sites if there is any loss of existing provision. Similarly, locating residential development close to sports facilities can prejudice this use eg where cricket is concerned additional risk of ball strike on new housing from use of the cricket pitch can be a real issue and give rise to restrictions placed on the sports club in an effort to protect the new occupiers amenity. Sport England considers that the NPPF's agent of change principle applies here. It is therefore incumbent upon the proposers of the new residential development to mitigate any potential impact on the new residents as a result of being located within close proximity of the playing field or sports facility.</p> <p>Sport England is not familiar with many of these site allocations but we would object to any further site allocations where other sports facilities or playing field land is likely to be affected or prejudiced unless it complies with any of our exceptions within our playing fields policy.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes

	Subject to the comments above re: protection of existing sports facilities and playing field land.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Northumberland Estates Ltd (Mr/Ms NEL)
User ID	41126561
Organisation	Iceni Projects obo Northumberland Estates Ltd (James Waterhouse)
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The policy fails to identify or positively plan for an objectively assessed need for employment in the borough. The policy is not positively prepared, justified or consistent with national planning policy (a, b and d soundness test as set out in NPPF Para 35) due to a failure to identify the objectively assessed need nor plan positively for it.</p> <p>The Council commissioned GL Hearn to produce a commercial property report in 2014 and 2017, which the Council's Employment Land Review Addendum in November 2021 identifies as "an important part of the Council's evidence base". That evidence, which only considered employment requirements to 2030, identified a need of 16ha of employment land to provide the floorspace needed to support growth, with around 7ha required for warehouse/distribution use and 9ha for office use (along with a forecast net loss of around 2ha of industrial land and 1ha of Sui Generis uses). The Plan has seemingly ignored its own evidence base and failed to identify new employment provision.</p> <p>A major opportunity for new employment growth exists at the allocated waste site Weylands Treatment Works, which adjoins the Hershams Trading Estate (one of only 5 Strategic Employment Land sites in the Borough). This site comprises previously developed land in the Green Belt and could enable high quality employment floorspace to be delivered that could support and strengthen the function of the adjoining SEL.</p>

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: <input checked="" type="checkbox"/> [Y]</p> <p>Effective: <input type="checkbox"/> []</p> <p>Justified: <input checked="" type="checkbox"/> [Y]</p> <p>Consistent with national policy: <input checked="" type="checkbox"/> [Y]</p> <p>The policy is not positively prepared, as it is not derived from or based upon the Borough's objectively assessed need for employment (which identifies the need for 16Ha of land to 2030). The policy is not justified, as a key component of the evidence has been ignored. In this regard, the 2017 market report identifies the need for 16Ha of land and the Council Employment Land Reviews of 2019 and 2021 profile the contracting economic floorspace in the Borough. The policy has not considered reasonable alternatives, such as the utilisation of a major waste and employment site at Weylands Treatment Works, which provides an obvious opportunity to strengthen the role and function of the adjoining Hershams Trading Estate and accommodate some of the new floorspace identified in the Council's own assessment of need.</p> <p>The policy is inconsistent with national planning policy due to a failure to identify the objectively assessed need nor plan positively for it. The policy approach is wholly inconsistent with Section 6 of the NPPF (Building a strong competitive economy) for the following reasons:</p> <ul style="list-style-type: none"> - the strategic policy fails to create the conditions in which businesses can invest, expand and adapt. By not allocating land for new economic development, the policy does not allow the area to build on its strengths, counter its weaknesses and address the challenges of the future (NPPF para 81) - the strategic policy does not set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration (NPPF para 82, criterion a)

	<ul style="list-style-type: none"> - the strategic policy does not set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period (NPPF Para 82, criterion b) - the strategic policy is not flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances (NPPF Para 82, criterion d).
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	The Strategic Policy should be amended to plan positively for economic growth, rather than be allowed to remain as is, which arguably promotes decline. The former Weylands Treatment Works site, which adjoins the Hershams Industrial Estate and which constitutes a significant piece of previously developed land in the Green Belt that currently gives rise to numerous local issues through its existing established uses, should be identified as a key component of a positive economic strategy for the Borough
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	<p>The Plan's ability to plan positively for economic growth is a key issue that should be tested as part of the Examination into the soundness of the Plan, especially given the Plan does not allocate any land for economic development despite an assessment of objectively assessed need indicating 16 HA should be allocated in the period to 2030.</p> <p>Weylands Treatment Works is an obvious employment site that has been overlooked for employment allocation and for which a planning application is being prepared seeking</p>

	employment-led redevelopment. This makes Icenl a logical party to attend the examination to enable debate of the approach and the respective merits.
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Name	Northumberland Estates Ltd (Mr/Ms NEL)
User ID	41126561
Organisation	Iceni Projects obo Northumberland Estates Ltd (James Waterhouse)
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: [Y]</p> <p>Justified: []</p> <p>Consistent with national policy: []</p> <p>The policy is not effective as it is unprecise and therefore at risk of not being delivered. Para 16 d) of the NPPF states that “plans should... contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”. Greater precision is therefore needed for the policy to be unambiguous and clear.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	The modification sought is the insertion of “within 400m of a train station” to replace the references to being “adjacent to” or “near to” a train station.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	The policy cannot be effective when there is ambiguity over the proximity of sites to railway stations. However, we would not need to attend the Examination on this matter if clarity is provided through minor policy amendment.

Name	Northumberland Estates Ltd (Mr/Ms NEL)
User ID	41126561
Organisation	Iceni Projects obo Northumberland Estates Ltd (James Waterhouse)
Policy / Evidence base/ part of plan:	HOU4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Stoke D'Abernon Residents' Association (Ian Nelson)
User ID	16305121
Organisation	Stoke D'Abernon Residents' Association
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>Omission of a formal policy to deal with the impact of the Wisley Airfield Development (WAD) means that the DLP is not legally compliant with the Duty to Cooperate. There is no policy for this strategic site which impacts two Planning Authority areas and there is no extant agreement for mitigation with Guildford Borough Council (GBC).</p> <p>We do not believe that EBC have cooperated with GBC on the WAD in the spirit or meaning of the Planning & Compulsory Purchase Act as amended by the Localism Act. There has been no consideration of joint plan-making arrangements. A loose indication of future discussions in the Statement of Compliance as part of the, as yet, unformed Surrey 2050 Place Ambition, does not satisfy this obligation. No statement of common ground on the subject is in the public domain.</p> <p>This requires modification now rather than risk rejection of the DLP at the outset.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>The following issues are the exceptions to the Soundness of the DLP and we trust will be made good by minor modifications to the DLP in advance of the Examination in Public (EIP).</p> <p>1. A specific strategic policy is necessary to deal with mitigation of the Wisley Airfield Development on Cobham, Downside, Stoke D'Abernon and Oxshott. Its omission renders the DLP unsound in addition to the legal compliance points above. The GBC Local Plan and recently submitted WAD planning application allows the impact to be fully assessed so that mitigation is planned for should WAD receive consent. Making representations on the WAD application to</p>

GBC is not a plan. The outline provisions of the GBC Local Plan are unlikely to be met in full by the developer and extra provision may well be required of EBC. The development impacts on health provision, secondary education, travel, transport, local rural lanes and highways and the amenities in Cobham High Street. None of which have been assessed in the DLP or supporting evidence. This is a wide-ranging omission and we cannot suggest specific wording in any one policy to rectify it.

2. All aspects of the Infrastructure Delivery Plan (IDP) which supports the DLP is, almost without exception, reliant on developer contributions to fund infrastructure for the planned growth. This means that even if fully successful in raising sufficient funds the infrastructure will always lag growth and is unlikely ever to catch up. Policy INF1 (6) should therefore be more positively worded i.e. 'new development must make provision for sufficient capacity in all infrastructure impacted by the development either on site or through a financial mechanism unless existing infrastructure can be shown by the developer to fully accommodate the development into the future.'

3. Policies INF1 to INF6, SS2, and CC4 should also make specific provision to the strategy to deliver the required public transport connectivity to train stations and community/social amenities. This is vital given the IDP statement that modal shift will not be achieved by new bus provision but that the bus connectivity to stations is needed. This is in addition to better walking and cycling provision which will also not deliver the modal shift required. Otherwise the car parking policies and environmental policies and strategies would also not be deliverable or effective. Travel Plans for developments, schools and businesses are helpful but again will not in themselves deliver necessary modal shift. There should also be recognition that different areas of the Borough require and can accommodate different travel and transport solutions to reduce reliance on the car. One size does not fit all in this respect.

4. Key Diagram 5 identifies Cobham as a Town Centre. The existing Local Plan identifies it as a District Centre. No justification is given for this and Cobham should be reinstated as a District Centre to ensure its character and diversity of local shops and services is not endangered. The description of Cobham and Oxshott as Urban Areas also pre-empts the outcomes of their description in local detailed Design Codes and they should be re-designated by area/neighbourhood in accordance with the National Design Codes as appropriate e.g. inner suburb, outer suburb, local designated et al.

5. It is unfortunate that agreed local Design Codes are not available to help interpret the DLP in time for the the EIP. It is important that when produced they should assist developers and residents in understanding what is required by way of character, scale, streetscape and landscaping as well as excellent design of individual buildings. We urge EBC to produce them in advance of the EIP.
6. The note in (5) above would help resolve issues we have with SS2, SS3 and HOU1, 2 and 3.. However, the NPPF emphasises the desirability of retaining the character and scale of existing built areas so, without restraining efficient use of land, each of these policies should specifically address that principle. It would also help smooth delivery of sustainable development rather than encourage one-off high-density development sites with no transitional consideration to existing character. Policy should be clear that housing need, local character and building forms are to be balanced as per National Planning Guidance notes and National Design Codes. Local confidence in this will smooth the application process and speed up delivery of new homes.
7. HOU1 (4) uses the term 'maximise opportunities' in respect of supply of additional homes on unallocated sites. This can be interpreted in a number of ways which is not in line with guidance. Better wording would be 'all opportunities identified to increase supply of homes will be considered in line with detailed Planning Policies'. There is no mention of 'maximising' opportunity in the NPPF.
8. HOU2 (1) appears to be a repeat of HOU1 (5) and the word 'optimise' is open to interpretation. It can be replaced with 'in accordance with detailed planning policies and local design codes.'
9. HOU2 (2a) should not be restrictive on semi-detached homes as small sites often have that capacity but are unable to accommodate flats or terraces so opportunities to double densities would be missed.
10. CC5 addresses surface water flooding with regard to new development and reuse of existing sites but does not acknowledge or address existing issues such as the Plough Corner flooding in Cobham. We request a policy that EBC will work with third party providers to resolve existing chronic surface water flood management issues and actively seek permanent resolution as part of the overall environmental provisions of the DLP. There is no obvious reason why such existing matters are omitted and only new development covered.
11. It is appreciated that it is very difficult to protect trees from felling prior to applications being made where no TPO exists, and we have no intention of thwarting development in this regard. However, we strongly recommend that the matter is addressed by an addition to ENV1 and/or

	<p>ENV2 to create a presumption in favour of replacement of non-TPO mature trees felled prior to development by the landowner and the developer. This can be registered against the property and, at least, gives the council teeth to demand replacement within any new development's landscaping proposals. The matter can then be clearly identified at application stage. It is not perfect but it may provides some protection against wholesale loss of trees in the suburbs as the Local Plan growth is implemented. All tree felling could be subject to an application regardless of TPO.</p> <p>12. The Arup Green Belt Assessment which forms part of the evidence base is not relevant to the DLP process and should be deleted. There is no case or mechanism in the NPPF or guidance to suggest that there are degrees or a hierarchy of Green Belt effectiveness. It is either Green Belt in the Local Plan or it is not. The line should be clear and unambiguous. The provisions of the NPPF scan then be applied should development proposals of whatever nature come forward.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Stoke D'Abernon Residents' Association (Ian Nelson)
User ID	16305121
Organisation	Stoke D'Abernon Residents' Association
Policy / Evidence base/ part of plan:	ENV3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please include Stoke D'Abernon Memorial Park as a Local Green Space
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] Please consider the Stoke D'Abernon Memorial Park to be a Local Green Space
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please consider including Stoke D'Abenron Memorial Park as a Local Green Space

	Stoke mem park map.pdf Stoke Mem park green space.docx
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Stoke D'Abernon Residents' Association (Ian Nelson)
User ID	16305121
Organisation	Stoke D'Abernon Residents' Association
Policy / Evidence base/ part of plan:	ENV6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No I would like the Stoke D'Abernon Memorial Park to be a Local Green Space
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: <input type="checkbox"/> [Y] Effective: <input type="checkbox"/> [] Justified: <input type="checkbox"/> [] Consistent with national policy: <input type="checkbox"/> []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please include Stoke D'Abernon Memorial Park as a Local Green Space Stoke mem park map.pdf

	Stoke Mem park green space.docx
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Audley Group (Matthew Nicholson)
User ID	41038721
Organisation	Barton Willmore now Stantec obo Audley Group
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Please refer to our letter dated and submitted on 28/07/22.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please refer to our letter dated and submitted on 28/07/22. We seek amendments to Policies HOU1, HOU3, HOU4, HOU6, INF2, INF3 and SS2 to ensure that the development of specialist forms of residential accommodation, namely Integrated Retirement Communities, is not prejudiced.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please refer to our letter dated and submitted on 28/07/22.

	<p>Our comments aim to ensure that the development of specialist forms of residential accommodation, namely Integrated Retirement Communities, is not prejudiced. In our view more needs to be done to ensure that the document plans positively for the growth of this sector and that any restrictions be better justified.</p>
<p>Question 4</p>	<p>Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.</p>
	<p>Please refer to our letter dated and submitted on 28/07/22.</p> <p>HOU1: To plan for the most sustainable forms of growth, we consider that the Council should aim to meet and more importantly exceed any identified target, albeit such development should not bring about any significant adverse impacts in the future. We would ask that the target set out at Policy HOU1 is increased to a minimum of 647 dpa to better meet the needs of a growing population</p> <p>HOU3 and HOU6: We ask that the wording of Policies HOU3 and HOU6 is revised to take on a general presumption in favour of proposals for specialist housing.</p> <p>HOU4: We ask that the wording of HOU4 be amended to acknowledge that the application of the policy may need to be applied in a flexible manner to ensure that it does not prejudice the supply of specialist forms of housing.</p> <p>INF2 and INF3: Part (d) of Policy INF3 requires new development to have access to local community facilities, services and shops. We would ask that the wording of this policy be updated to acknowledge that such access could be provided to existing or newly proposed facilities (which in the case of an IRC, would be provided on site).</p> <p>SS2: We would suggest that the wording of Policy SS2(v) (Sustainable Development) be expanded to be consistent with ENV4 and National Planning Policy. Both policies should explicitly note that the NPPF allows inappropriate development within the Green Belt where it can be demonstrated that 'Very Special Circumstances' (VSC) exist. The draft plan should explain what circumstances may constitute VSC, and what types of evidence may be needed to support any development proposals coming forwards.</p> <p>Elmbridge Draft Headline Need Report V2.pdf</p>

	220726 34309 (Audley Group) Representations) v2.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	John Nicol
User ID	41054753
Organisation	KG Creative Consultancy obo Burnlave Properties Limited (Kevin Goodwin)
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Please see response referenced and attached document #1109584
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please see response referenced and attached document #1109584
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [] Consistent with national policy: [Y] Please see response referenced and attached document #1109584. In addition Draft Policy SS3 states that "5. The council will support the delivery of development that makes an important contribution to the borough at the following locations and as identified on the Policies Map" and in respect of the area of the subject site "b) Lower Green for community regeneration".

	It is considered that the Lower Green can accommodate development not only for community regeneration but also to meet a wider housing need.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Please see response referenced and attached document #1109584 Also to amend Policy SS£3 to recognise the wider benefits of residential development in Lower Green.</p> <p>Local Plan Submissions Final.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Please see response referenced and attached document #1109584

Name	John Nicol
User ID	41054753
Organisation	KG Creative Consultancy obo Burnlave Properties Limited (Kevin Goodwin)
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>The plan seeks to displace active employment uses within three areas owned by the Council to deliver housing in years 6-10, when the adjoining land owned by our client is available to deliver housing, including a high proportion of affordable housing now. The density adopted by the Council on one of these three sites is very high, when compared to the other two and we believe there is an error such that it will not deliver the housing numbers suggested.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The Plan relies on releasing employment land for residential use. Some of this employment floorspace is almost fully occupied and some has recently been refurbished and let. The future of the existing tenants of this space is uncertain and therefore delivery of housing here is uncertain and unsound. Our clients own the adjoining land that can be delivered and whilst Green Belt it is used for stabling and horsiculture and is despoiled. In our submissions our clients site is highly suitable for housing development and is deliverable with a significant proportion of affordable housing.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p>

	<p>Justified: []</p> <p>Consistent with national policy: [Y]</p> <p>As noted above we do not consider that the Council will be able to deliver residential use on the proposed sites at Mill Road, Esher, even in years 6-10. If they could it would be to the significant detriment of a number of existing business here, with the potential for loss of jobs and employment floorspace. Further we believe there is an error in the density adopted on one of the sites such that the number of units suggested will not be achievable and the Council would fail to deliver its overall housing numbers in the later years of the plan.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>To delete one or more of the four housing designations at Mill Road and to include our clients land at the northern end of Mill Road as a housing designation instead, as explained in more detail in our written submissions.</p> <p>This site is deliverable and available for housing development with a significant proportion of affordable housing proposed. It has no constraints to delivery and environmental benefits would arise from a riverside walk, open space and biodiversity area.</p> <p>Local Plan Submissions Final.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	It will be important to explain to the Inspector the consequences for employment floorspace and job retention in Elmbridge of the Councils proposed designation of the four areas of land at Mill

	<p>Road for residential. Also the error we believe exists in the density proposed on one of the sites such that overall housing numbers will not be delivered.</p> <p>Further the contribution that development of the subject site can make to housing provision and delivery in Elmbridge and in particular affordable housing in light of the Councils poor performance on delivery and its significant lack of existing housing supply. Further the poor contribution that the site makes to the Green Belt and that the suggestion the site has 'standing water' is erroneous. Given it is in the main grazed by horses its biodiversity value is poor, contrary to the sites designation. There is no evidence base to underpin the suggested Biodiversity Opportunity Area designation should apply to this site.</p>
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Name	John Nicol
User ID	41054753
Organisation	KG Creative Consultancy obo Burnlave Properties Limited (Kevin Goodwin)
Policy / Evidence base/ part of plan:	ENV4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>The draft plan proposes to retain our clients site at Mill Road as Green Belt when it fails to meet the tests on the NPPG for the purposes of designating Green Belt land.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The draft plan proposes to retain our clients site at Mill Road as Green Belt when it fails to meet the tests on the NPPG for the purposes of designating Green Belt land. The site should be released for residential as amplified elsewhere in our representations.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: <input checked="" type="checkbox"/> [Y]</p> <p>Effective: <input type="checkbox"/> []</p> <p>Justified: <input checked="" type="checkbox"/> [Y]</p> <p>Consistent with national policy: <input checked="" type="checkbox"/> [Y]</p> <p>Our clients site is suitable for residential development and does not meet the tests to retain it as such in the NPPF. Therefore it is inconsistent with national policy to do so. We have questioned</p>

	whether the plan can deliver the level of housing suggested on the adjoining sites and therefore meet its housing requirements. It is therefore not positively prepared and justified.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	To remove our clients site from the Green Belt and allocate it for housing. Local Plan Submissions Final.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	It will be important to explain to the Inspector the contribution that development of the subject site can make to housing provision and delivery in Elmbridge and in particular affordable housing in light of the Councils poor performance on delivery and its significant lack of existing housing supply. Further the poor contribution that the site makes to the Green Belt and that the suggestion the site has 'standing water' is erroneous. Given it is in the main grazed by horses its biodiversity value is poor, contrary to the sites designation. There is no evidence base to underpin the suggested Biodiversity Opportunity Area designation should apply to this site.

Name	John Nicol
User ID	41054753
Organisation	KG Creative Consultancy obo Burnlave Properties Limited (Kevin Goodwin)
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Please see response referenced and attached document #1109584
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please see response referenced and attached document #1109584
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [] Consistent with national policy: [Y] Please see response referenced and attached document #1109584
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please see response referenced and attached document #1109584

	Local Plan Submissions Final.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Please see response referenced and attached document #1109584

Name	Jacek Nykis
User ID	26024577
Organisation	
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>I'm not a lawyer however I trust that the local authority is working according to the law.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The plan very negatively affects Hersham area. I think two especially devastating proposals are H3 US379 (Hersham shopping centre) and H5 U7 US380 which will make Hersham village very hard to visit. The car park proposal will also reduce access to Hersham surgery which is already difficult for people with reduced mobility.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: []</p> <p>Consistent with national policy: []</p> <p>The plan will make Hersham village centre less accessible and harder to visit. It will reduce accessibility to Hersham surgery.</p>

	For those reason I believe the plan will not only not benefit the local community but instead it will have devastating effect on it.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Multiple site allocations should be removed from the plan completely. Two most devastating sites are H3 US379 and H7 US380
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Lifestyle Residences Ltd. (John O'Neill)
User ID	24587553
Organisation	Lifestyle Residences Ltd.
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Please refer to attached representation
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please refer to attached representation
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please refer to attached representation
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please refer to attached representation

	LPA290722.pdf Previous 2019 representation.pdf Appendix 1.pdf Appendix 2.pdf Appendix 3. pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We may decide that it is not necessary to participate, depending upon the content of the Local Plan submitted for independent Examination and whether our points are addressed, either by revisions to the Plan or by other responders, but we reserve the right to request to participate in the oral part of the Examination.

Name	Haleon Ltd (GSK CH) Trading Ltd (D Prout)
User ID	41249729
Organisation	Vail Williams LLP obo Haleon Ltd (GSK CH) Trading Ltd - D Prout
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>We support the principle of sustainable development as identified in Chapter 3 (Policy SS2) and the delivery of homes and a prosperous economy. Site Reference WEY 33 (US92) will provide well designed homes to meet local housing needs. See formal response and representations made on behalf of our client to WEY 33 (US92).</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>We believe the Plan would be sound, subject to minor modifications as set out in our papers which are enclosed in line with national policy.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: [Y]</p> <p>See WEY33 response and documents submitted.</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	See WEY33 response and documents submitted. EBC Reg 19 Reps - Site Ref WEY33 - St Georges Avenue Weybridge 28.07.22.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We would like to reserve the right to attend the Examination to fully address the opportunities presented by site WEY33 in terms of capacity unless the suggested increase to approximately 120 units is supported by the Inspector and local authority.

Name	Haleon Ltd (GSK CH) Trading Ltd (D Prout)
User ID	41249729
Organisation	Vail Williams LLP obo Haleon Ltd (GSK CH) Trading Ltd - D Prout
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes .
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No We believe the Plan would be sound, subject to minor modifications as set out in our papers which are enclosed in line with national policy.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: [Y] See WEY33 response and documents submitted.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	<p>See WEY33 response and documents submitted.</p> <p>EBC Reg 19 Reqs - Site Ref WEY33 - St Georges Avenue Weybridge 28.07.22.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We would like to reserve the right to attend the Examination to fully address the opportunities presented by site WEY33 in terms of capacity unless the suggested increase to approximately 120 units is supported by the Inspector and local authority.

Name	Haleon Ltd (GSK CH) Trading Ltd (D Prout)
User ID	41249729
Organisation	Vail Williams LLP obo Haleon Ltd (GSK CH) Trading Ltd - D Prout
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes N/A
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No We believe the Plan would be sound, subject to minor modifications as set out in our papers which are enclosed in line with national policy.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: [Y] Making best use of brownfield land.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	<p>WEY33: It is requested that the capacity of the site is reviewed in light of the site-specific detailed work undertaken by OSP Architecture to ensure that, in accordance with the NPPF, the most efficient use of PDL land is made in the redevelopment of the site for residential, particularly given the need for housing as identified in Policy SS3. The site is capable of accommodating approximately 120 units. See representations in relation to policies on behalf of our clients.</p> <p>EBC Reg 19 Reprs - Site Ref WEY33 - St Georges Avenue Weybridge 28.07.22.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We would like to reserve the right to attend the Examination to fully address the opportunities presented by site WEY33 in terms of capacity unless the suggested increase to approximately 120 units is supported by the Inspector and local authority.

Name	Haleon Ltd (GSK CH) Trading Ltd (D Prout)
User ID	41249729
Organisation	Vail Williams LLP obo Haleon Ltd (GSK CH) Trading Ltd - D Prout
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes .
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No We believe the Plan would be sound, subject to minor modifications as set out in our papers which are enclosed in line with national policy.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: [Y] See WEY33 response and documents submitted.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	<p>See WEY33 response and documents submitted.</p> <p>EBC Reg 19 Reqs - Site Ref WEY33 - St Georges Avenue Weybridge 28.07.22.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We would like to reserve the right to attend the Examination to fully address the opportunities presented by site WEY33 in terms of capacity unless the suggested increase to approximately 120 units is supported by the Inspector and local authority.

Name	Haleon Ltd (GSK CH) Trading Ltd (D Prout)
User ID	41249729
Organisation	Vail Williams LLP obo Haleon Ltd (GSK CH) Trading Ltd - D Prout
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes .
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No We believe the Plan would be sound, subject to minor modifications as set out in our papers which are enclosed in line with national policy.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: [Y] See WEY33 response and documents submitted.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	<p>See WEY33 response and documents submitted.</p> <p>EBC Reg 19 Reqs - Site Ref WEY33 - St Georges Avenue Weybridge 28.07.22.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We would like to reserve the right to attend the Examination to fully address the opportunities presented by site WEY33 in terms of capacity unless the suggested increase to approximately 120 units is supported by the Inspector and local authority.

Name	Haleon Ltd (GSK CH) Trading Ltd (D Prout)
User ID	41249729
Organisation	Vail Williams LLP obo Haleon Ltd (GSK CH) Trading Ltd - D Prout
Policy / Evidence base/ part of plan:	HOU3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes .
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No We believe the Plan would be sound, subject to minor modifications as set out in our papers which are enclosed in line with national policy.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: [Y] See WEY33 response and documents submitted.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	<p>See WEY33 response and documents submitted.</p> <p>EBC Reg 19 Reqs - Site Ref WEY33 - St Georges Avenue Weybridge 28.07.22.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We would like to reserve the right to attend the Examination to fully address the opportunities presented by site WEY33 in terms of capacity unless the suggested increase to approximately 120 units is supported by the Inspector and local authority.

Name	Haleon Ltd (GSK CH) Trading Ltd (D Prout)
User ID	41249729
Organisation	Vail Williams LLP obo Haleon Ltd (GSK CH) Trading Ltd - D Prout
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes .
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No We believe the Plan would be sound, subject to minor modifications as set out in our papers which are enclosed in line with national policy.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: [Y] See WEY33 response and documents submitted.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	<p>See WEY33 response and documents submitted.</p> <p>EBC Reg 19 Reps - Site Ref WEY33 - St Georges Avenue Weybridge 28.07.22.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We would like to reserve the right to attend the Examination to fully address the opportunities presented by site WEY33 in terms of capacity unless the suggested increase to approximately 120 units is supported by the Inspector and local authority.

Name	Pauline O'Sullivan
User ID	7948961
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <ul style="list-style-type: none"> - Oatlands Village is left out of the list of Local Centres in EC03 Para 7.16 but is mentioned in the later associated appendix. - Infrastructure as stated in EC02 para 2.d 'new commercial development should not lead to an unacceptable impact on the surrounding highway network and local amenity'. However this does not include preventing/monitoring one that may be generated by a warehouse or distribution centre added on land immediately adjacent to the Elmbridge boundary that would be dependent on using the Elmbridge road network. This is proposed in Hamm Moor, Weybridge Industrial Park just over the River Wey in Runnymede where a massive increase in HGVs that would use the A317 through the High Street and be hugely detrimental to the already overly congested town. SCC are currently looking at ways to reduce the traffic and its impact on air quality and the life of the town for the community. -The Green Spaces identified for Weybridge excludes a number of those that are already designated as Green Spaces by Elmbridge. These are: Monument Green (both sides of High Street), The Cricket Green (distinct from Boundary Park off Cricket Way), The Heath between Heath Road and Brooklands Way, St Georges Golf Course. Also one that should be included for Thames Street between Grotto Road and Old Palace Gardens due to its size and strategic importance to local residents.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>While I agree with its far reaching ambition it will require a huge amount of monitoring to make sure it is achieved.</p>

	I feel there should also be EBC monitoring of the collective usage and visual impact of green spaces with a town. Without this many of the ambitions relating to wellbeing, connectivity and pride will not be not be maximised and at worst lost.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Michael O'Sullivan
User ID	24271809
Organisation	
Policy / Evidence base/ part of plan:	ENV3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>It is understood that re-designation of Green Belt land can only be achieved during a Local Plan process; hence this comment, which seeks it for two minor pieces of existing Green Belt for the future benefit of Weybridge as a whole.</p> <p>100% of Local Green Belt Area 40 is a tarmac-laid surface car park, as is a very minor piece of land contained within the much larger Area 39. These two parking areas are colloquially known as Heath Road (Station) Car Park South, and North respectively.</p> <p>This comment stems from a principle contained within a future proposal for major development within Brooklands College, which itself forms a highly significant portion of the 73.4ha of Area 39. The College appreciates that Very Special Circumstances will have to be demonstrated before any development will be approved, but it has contended that, due to the continued existence of a concrete base on which a former hangar was located, that specific piece of land has been "wrongly categorised" as being Green Belt.</p> <p>If that wrong categorisation is correct, then the same principle should apply to both aforementioned car parks. There are only two scenarios here: either Local Green Belt Areas 39 & 40 already existed when the car parks were developed on them in the mid/late-1960s, or the car parks were already in existence when the land on which they were located was designated as Green Belt. The former is the more likely, but in either event, both car parks can now be considered as wrongly categorised and so their Green Belt status removed.</p>

	<p>This release will provide an important opportunity for the Town to eliminate the current parking congestion being suffered in its two retail areas, where the Weybridge Society has proved that between 750 and 1,100 commuter vehicle park in residential roads all day, every business day. In turn, this inconveniences local residents and deters visitors to the Town, thereby reducing retail footfall for traders, which seems at odds with national policy of supporting the country's high streets.</p> <p>Specifically in this instance, and in conjunction with free, short-term parking around the Town centre to attract visitors, the Society supports the idea of both car parks being further developed (vertically) to provide additional commuter space, thereby relieving congestion at a stroke, whilst simultaneously providing more net revenue for Elmbridge. It should be noted that, pre-Covid, Weybridge contributed almost 40% of the Borough's £2m annual net surplus gained from parking fees and related penalties.</p> <p>Elmbridge will always retain development control over both car parks after their release from Green Belt status, so none need be carried out unless so desired. Nevertheless, such a release will remove a significant obstacle the Council will encounter when supporting the Society's parking solution; namely the great difficulty it will have in demonstrating the necessary Very Special Circumstances for the development of either. No additional commuter space, no relief of Town centre congestion, and deterioration of the high street, yet it seems that neither car park should ever have been considered as Green Belt land in the first place.</p> <p>On behalf of the Weybridge Society, I request the Inspectorate considers the removal of both car parks from their Green Belt status.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: [Y]</p>

It is understood that re-designation of Green Belt land can only be achieved during a Local Plan process; hence this comment, which seeks it for two minor pieces of existing Green Belt for the future benefit of Weybridge as a whole.

100% of Local Green Belt Area 40 is a tarmac-laid surface car park, as is a very minor piece of land contained within the much larger Area 39. These two parking areas are colloquially known as Heath Road (Station) Car Park South, and North respectively.

This comment stems from a principle contained within a future proposal for major development within Brooklands College, which itself forms a highly significant portion of the 73.4ha of Area 39. The College appreciates that Very Special Circumstances will have to be demonstrated before any development will be approved, but it has contended that, due to the continued existence of a concrete base on which a former hangar was located, that specific piece of land has been "wrongly categorised" as being Green Belt.

If that wrong categorisation is correct, then the same principle should apply to both aforementioned car parks. There are only two scenarios here: either Local Green Belt Areas 39 & 40 already existed when the car parks were developed on them in the mid/late-1960s, or the car parks were already in existence when the land on which they were located was designated as Green Belt. The former is the more likely, but in either event, both car parks can now be considered as wrongly categorised and so their Green Belt status removed.

This release will provide an important opportunity for the Town to eliminate the current parking congestion being suffered in its two retail areas, where the Weybridge Society has proved that between 750 and 1,100 commuter vehicle park in residential roads all day, every business day. In turn, this inconveniences local residents and deters visitors to the Town, thereby reducing retail footfall for traders, which seems at odds with national policy of supporting the country's high streets.

Specifically in this instance, and in conjunction with free, short-term parking around the Town centre to attract visitors, the Society supports the idea of both car parks being further developed (vertically) to provide additional commuter space, thereby relieving congestion at a stroke, whilst simultaneously providing more net revenue for Elmbridge. It should be noted that, pre-Covid, Weybridge contributed almost 40% of the Borough's £2m annual net surplus gained from parking fees and related penalties.

	<p>Elmbridge will always retain development control over both car parks after their release from Green Belt status, so none need be carried out unless so desired. Nevertheless, such a release will remove a significant obstacle the Council will encounter when supporting the Society's parking solution; namely the great difficulty it will have in demonstrating the necessary Very Special Circumstances for the development of either. No additional commuter space, no relief of Town centre congestion, and deterioration of the high street, yet it seems that neither car park should ever have been considered as Green Belt land in the first place.</p> <p>On behalf of the Weybridge Society, I request the Inspectorate considers the removal of both car parks from their Green Belt status.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Removal of both, wrongly-categorised station car parks from Green Belt status.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	The matter I have raised is an important one of principle, and will have a specific and significant impact on the future of Weybridge as a whole.

Name	Alexpo (IOM) Ltd (Robert Lane)
User ID	41230529
Organisation	Rapleys LLP obo Alexpo (IOM) Ltd - Robert Lane
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Object to the draft policy which only seeks to deliver 6,780 homes over the plan period, equating to just 452 homes per annum. The draft policy is unsound, failing to comply with paragraph 35 of the NPPF, which amount other things states that plans must be: (a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; (as well as accommodating unmet need from neighbouring areas where it is practical to do so); (b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based upon proportionate evidence; (c) Effective – deliverable over the plan period; (d) Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y]

Justified: [Y]

Consistent with national policy: [Y]

The draft policy has not been positively prepared as it does not as a minimum seek to meet the area's objectively assessed needs. The Council itself calculates that its objectively assessed housing need for the Borough is 647 dwellings per annum, equating to 9,705 homes over the plan period.

The draft policy does not meet this objectively assessed need. Indeed, it aims to meet less than 70% of the housing need, with just 452 homes per annum, equating to just 6,780 homes over the plan period. This results in a shortfall of 2,925 homes over the plan period.

This approach is not justified and is not consistent with National Policy. The justification put forward by the Council is given in paragraph 6.7 of the draft Local Plan, which explains that required number of homes specified in the draft policy is not based on the identified housing need, but on the Borough's environmental constraints.

Whilst it is accepted that parts of the Borough lie within the Green Belt and there are other environmental constraints, these are not unique to Elmbridge. As at 31 March 2021, 180 local authorities had land designated as Green Belt, which equates to some 57% of all local authorities. If the Government had intended for objectively assessed housing need only to be provided in those boroughs that are not subject to such constraints, then (for such a significant issue affecting the majority of Councils), the NPPF would have explicitly said so. It does not and the draft Local Plan is therefore unsound, failing to be consistent with national policy and not having been positively prepared.

It is also worth noting that even the Council's figure for objectively assessed housing need of 647 dwellings per annum, falls well short of the 770 dwellings that were meant to have been provided in 2020/2021 as set out in the Council's Annual Monitoring Report (which Elmbridge calls "Authority Monitoring Report"). The reason for this higher figure is that Elmbridge has failed to meet its five year housing land supply in any of the last three years and is therefore required to provide a 20% buffer.

Furthermore, the draft policy is not deliverable over the plan period and therefore cannot be said to be effective. This is because of the nature of the housing sites identified and because the

	<p>Council allows for a discount of only 10% in respect of those sites with planning permission and only 15% for those sites without planning permission, not coming forward. Having scrutinised the Council's most up to date Land Availability Assessment 2022, it is clear that even the reduced housing target is most unlikely to be delivered. A very large number of the identified sites are simply not deliverable, with Elmbridge Borough Council identifying community centres and day centres across the Borough, medical centres, libraries, community hospitals, fire and ambulance centres, existing blocks of housing flats, children's homes and private gardens, all being identified for redevelopment and assumed to contribute towards meeting the future housing needs in the Borough.</p> <p>Examples of these include Walton Fire and Ambulance Station (US352) where Surrey County Council has advised Elmbridge Council that it has no plans to redevelop, yet nonetheless the land is identified for 21 new homes. Likewise, the Furnley Day Centre in Walton (US253) is identified as part of the housing land supply, despite Surrey County Council again advising Elmbridge that it has no plans to redevelop.</p> <p>In terms of private gardens, one private dwelling in Esher (US287) that has a large garden in a low density area, has been identified for 55 units, despite not being promoted by the owner and indeed the owner never even replied to the Council when it made enquiries. Likewise, a large home in East Moseley (US296) is identified for 23 new homes, again despite not being promoted by the owner and never replying to a letter from the Council.</p> <p>The Council's own Civic Centre in Esher (US531) is identified for redevelopment for 400 new homes, despite Council members stating in open forum that there were no plans to relocate the Council's administrative functions and that the existing offices continued to be needed. Against this background, it is clear that the Council's housing policies are not deliverable and therefore are not effective, as defined by Paragraph 35 of the NPPF.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>In order to be sound, draft Policy SS3 should increase its housing target to at least 9,705 homes over the plan period, in line with the Council's own objectively assessed housing need.</p>

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Housing numbers go to the root of the local plan making process and with the Council seeking to argue that it does not need meet its objectively assessed housing need, contrary to the NPPF, its approach needs to be fully tested at the Examination.

Name	Alexpo (IOM) Ltd (Robert Lane)
User ID	41230529
Organisation	Alexpo (IOM) Ltd
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Object to the draft policy HOU1, which only seeks to deliver 452 homes per annum, equating to just 6,780 homes over the plan period. The draft policy is unsound, failing to comply with paragraph 35 of the NPPF, which amount other things states that plans must be: (a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; (as well as accommodating unmet need from neighbouring areas where it is practical to do so); (b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based upon proportionate evidence; (c) Effective – deliverable over the plan period; (d) Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y]

Justified: [Y]

Consistent with national policy: [Y]

The draft policy has not been positively prepared as it does not as a minimum seek to meet the area's objectively assessed needs. The Council itself calculates that its objectively assessed housing need for the Borough is 647 dwellings per annum, equating to 9,705 homes over the plan period.

The draft policy does not meet this objectively assessed need. Indeed, it aims to meet less than 70% of the housing need, with just 452 homes per annum, equating to just 6,780 homes over the plan period. This results in a shortfall of 2,925 homes over the plan period.

This approach is not justified and is not consistent with National Policy. The justification put forward by the Council is given in paragraph 6.7 of the draft Local Plan, which explains that required number of homes specified in the draft policy is not based on the identified housing need, but on the Borough's environmental constraints.

Whilst it is accepted that parts of the Borough lie within the Green Belt and there are other environmental constraints, these are not unique to Elmbridge. As at 31 March 2021, 180 local authorities had land designated as Green Belt, which equates to some 57% of all local authorities. If the Government had intended for objectively assessed housing need only to be provided in those boroughs that are not subject to such constraints, then (for such a significant issue affecting the majority of Councils), the NPPF would have explicitly said so. It does not and the draft Local Plan is therefore unsound, failing to be consistent with national policy and not having been positively prepared.

It is also worth noting that even the Council's figure for objectively assessed housing need of 647 dwellings per annum, falls well short of the 770 dwellings that were meant to have been provided in 2020/2021 as set out in the Council's Annual Monitoring Report (which Elmbridge calls "Authority Monitoring Report"). The reason for this higher figure is that Elmbridge has failed to meet its five year housing land supply in any of the last three years and is therefore required to provide a 20% buffer.

Furthermore, the draft policy is not deliverable over the plan period and therefore cannot be said to be effective. This is because of the nature of the housing sites identified and because the

	<p>Council allows for a discount of only 10% in respect of those sites with planning permission and only 15% for those sites without planning permission, not coming forward. Having scrutinised the Council's most up to date Land Availability Assessment 2022, it is clear that even the reduced housing target is most unlikely to be delivered. A very large number of the identified sites are simply not deliverable, with Elmbridge Borough Council identifying community centres and day centres across the Borough, medical centres, libraries, community hospitals, fire and ambulance centres, existing blocks of housing flats, children's homes and private gardens, all being identified for redevelopment and assumed to contribute towards meeting the future housing needs in the Borough.</p> <p>Examples of these include Walton Fire and Ambulance Station (US352) where Surrey County Council has advised Elmbridge Council that it has no plans to redevelop, yet nonetheless the land is identified for 21 new homes. Likewise, the Furnley Day Centre in Walton (US253) is identified as part of the housing land supply, despite Surrey County Council again advising Elmbridge that it has no plans to redevelop.</p> <p>In terms of private gardens, one private dwelling in Esher (US287) that has a large garden in a low density area, has been identified for 55 units, despite not being promoted by the owner and indeed the owner never even replied to the Council when it made enquiries. Likewise, a large home in East Moseley (US296) is identified for 23 new homes, again despite not being promoted by the owner and never replying to a letter from the Council.</p> <p>The Council's own Civic Centre in Esher (US531) is identified for redevelopment for 400 new homes, despite Council members stating in open forum that there were no plans to relocate the Council's administrative functions and that the existing offices continued to be needed. Against this background, it is clear that the Council's housing policies are not deliverable and therefore are not effective, as defined by Paragraph 35 of the NPPF.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>In order to be sound, draft Policy HOU1 should increase its housing target to at least 647 dwellings per annum, equating to 9,705 homes over the plan period, in line with the Council's own objectively assessed housing need.</p>

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Housing numbers go to the root of the local plan making process and with the Council seeking to argue that it does not need meet its objectively assessed housing need, contrary to the NPPF, its approach needs to be fully tested at the Examination.

Name	Alexpo (IOM) Ltd (Robert Lane)
User ID	41230529
Organisation	Alexpo (IOM) Ltd
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No The strategy that the Council is seeking to follow is to limit housing numbers to below its own figure for locally assessed housing need, in order to avoid any Green Belt release. This requires the Council to allocate all suitable and available sites within the urban area, particularly on previously developed land, if its housing figures are going to be deliverable over the plan period - ie effective under the terms paragraph 35 of the NPPF, and be consistent with National Policy.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [Y] The Council removed the former Jolly Boatman and Hampton Court station site as a housing allocation in its June 2022 draft, despite it being included within the March 2022 draft, which both

	<p>the Cabinet and full Council unanimously voted to be published for consultation under Regulation 19. A written explanation for the change has not been given, but at the 13 June Extraordinary Council Meeting the Ward Councillor responsible for the area advised his fellow Councillors that “it would have been wholly reckless” had the allocation been left in, as “we would essentially be undermining our own case” at an appeal on this site, which was being considered at a public inquiry opening the following day. This is not a sound planning reason for the change. At that inquiry, the Inspector allowed the appeal and has granted planning permission for 97 homes as part of a mixed use development on the Jolly Boatman and Hampton Court station site. At the time of writing, the Council is now challenging that permission and it is therefore appropriate for it to continue to be an allocated site.</p> <p>The site is identified in the Core Strategy under Policy CS7 for development and the Council also has an adopted Development Brief which actively seeks to deliver the comprehensive redevelopment of the Jolly Boatman and Hampton Court station site. The principle of development and the quantum of housing was not in dispute with the Council at the Inquiry. It was only the form of that development which gave rise to concerns. With its accessible location around one of the stations within the Borough, that is also served by bus services, and with the land lying within the defined district centre of East Molesey Bridge Road, it is well placed to make a meaningful contribution to the much needed housing supply within the Borough on brownfield land.</p> <p>There were no sound planning reasons for removing that allocation.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>The reinstatement of the allocation of former Jolly Boatman and Hampton Court Station sites for 97 homes, as set out in the March 2022 Reg 19 plan, would overcome this objection.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	<p>Yes, I wish to participate at the oral examination</p>

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	<p>Elmbridge Borough Council has failed to deliver the number of homes required in all of the last five years we have studied.</p> <p>Recent evidence shows that even on acceptable brownfield sites, landowners and developers have had to go to appeal in order to obtain permission for housing. That was also the case for this objector and having been granted permission by a Planning Inspector, the Council is now seeking to challenge his decision.</p> <p>It is therefore important that the new Local Plan allocates appropriate sites, which have found to be acceptable, to help meet the desperate need for housing. This important matter needs to be fully examined at the Local Plan Examination.</p>

Name	Runnymede Borough Council (Georgina Pacey)
User ID	14152289
Organisation	Runnymede Borough Council
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No see attached letter
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: <input type="checkbox"/> [Y] Effective: <input type="checkbox"/> [] Justified: <input type="checkbox"/> [] Consistent with national policy: <input type="checkbox"/> [] see attached letter
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	see attached letter

	Runnymede letter to Elmbridge BC Reg 19 July 2022.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Runnymede Borough Council would like to be given the opportunity to appear in person at the Examination in Public to discuss the matters raised in their letter.

Name	Keith Parker
User ID	41164737
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>The diagram depicting how the Plan interacts with other entities, clearly identifies that there is more than one Elmbridge. Surely, this is supposed to be a possessive indication, not possessive for multiple occurrences of Elmbridge. Therefore, the apostrophe needs to be placed before the "S", not after it.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>No, for the reasons identified in my answer to Q1.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Within the diagram indicating how the Plan fits into other council activities: Elmbridges' needs to be replaced by Elmbridge's
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Keith Parker
User ID	41164737
Organisation	
Policy / Evidence base/ part of plan:	ENV6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Why is the River Mole not included as an Elmbridge SNCI, but the rivers Wey and Thames are?
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: <input type="checkbox"/> [Y] Effective: <input type="checkbox"/> [] Justified: <input type="checkbox"/> [] Consistent with national policy: <input type="checkbox"/> [] The River Mole is not identified as an Elmbridge SNCI.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	The River Mole needs to be added to the list of SNCI entries.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Peter Parker CBE
User ID	26065697
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes no comments
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes no comments
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mike Partridge
User ID	24518881
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mike Partridge
User ID	24518881
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mike Partridge
User ID	24518881
Organisation	
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes In response to my request for clarification of how the figure of 320 units for Claygate was derived I received the following response from the Planning Policy Team 'The housing figure of 320 for Claygate comes from planning permissions, sites under constructions, and windfall sites as well as the sites identified through the Land Availability Assessment (2022). You can find the Land Availability Assessment (2022) on the Local Plan Supporting Evidence webpage https://www.elmbridge.gov.uk/planning/local-plan/local-plan-supporting-evidence/ ' Whilst this confirms the categories from which the total is derived and helps identify more detail it still leaves a significant proportion (i.e. 114 units) not accounted for under the Planning permissions / Sites under construction and the LAA (2022). I feel it is important that the plan should clarify whether these 114 are Windfall units or additional in one of the other categories.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: []

	Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mike Partridge
User ID	24518881
Organisation	
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes In response to my request for clarification of how the figure of 320 units for Claygate was derived I received the following response from the Planning Policy Team 'The housing figure of 320 for Claygate comes from planning permissions, sites under constructions, and windfall sites as well as the sites identified through the Land Availability Assessment (2022). You can find the Land Availability Assessment (2022) on the Local Plan Supporting Evidence webpage https://www.elmbridge.gov.uk/planning/local-plan/local-plan-supporting-evidence/ ' Whilst this confirms the categories from which the total is derived and helps identify more detail it still leaves a significant proportion (i.e. 114 units) not accounted for under the Planning permissions / Sites under construction and the LAA (2022). I feel it is important that the plan should clarify whether these 114 are Windfall units or additional in one of the other categories.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: []

	Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mike Partridge
User ID	24518881
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes In Chapter 3 SS3 I have queried how the total number of housing units for Claygate were arrived at. I would suggest the Plan should address this aspect in a little more detail to clarify how the total units in a specific geographic area (i.e. Claygate) is broken down.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Inspired Villages (Ellen Pearce)
User ID	41251585
Organisation	Inspired Villages
Policy / Evidence base/ part of plan:	HOU4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Please see attached letter for full response.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>The National Planning Policy Framework (2018) and Planning Practice Guidance on Viability (2019) set out that affordable housing policies are subject to viability testing at, ideally, the plan making stage and/or the application stage.</p> <p>There is a continuum of reducing viability in relation to housing types with Age Restricted Retirement Housing less viable than General Needs housing and Extra Care Retirement Communities being even less viable than Retirement Housing. Accordingly it is much harder for Age Restricted Developers and in particular those seeking to deliver Extra Care to secure sites for development and meet the housing needs they aim to supply.</p> <p>These difficulties are due to a number of factors, firstly, the net to gross ratio for an Extra Care community is typically around 70-75% in comparison to traditional housing which is 100%, this is also reflected in Paragraph 2.4.10 of the Local Plan and CIL Scoping Viability Assessment Final Report which forms part of the evidence base for the draft Local Plan. This, added to higher construction costs mean the total build cost of a 100sqm extra care unit could be £131,107 compared to £140,645 for a similar sized traditional house. Significantly greater design team input is also required as extra care schemes tend to be individual bespoke products rather than a standard set of house types, increasing costs further.</p> <p>The specialist nature of age restricted developments mean that the sales rates are significantly slower than a standard residential product. Part of this is due to the sale of these units being a 'last move' for the resident(s) and the care needs associated. The additional sales period means that sales costs also increase significantly. This slower sales journey has knock on financial</p>

	<p>impact, because the facilities for residents covered by the service charge have to be fully operational from the first sale. IV has to cover the costs of the unsold units service charge over the sales period. We also will also cover the costs of completed unsold units in relation to Council Tax. These two costs are significant and also impact on the finance costs of the scheme overall. Finally, the land value delivered by the scheme, if required to make a contribution towards affordable housing, will generally not allow IRC providers to compete with general needs housebuilders who can deliver a policy compliant scheme and pay significantly more for the land due to the considerations outlined above.</p> <p>Whilst the Draft Local Plan evidence base does acknowledge some of the viability challenges faced by developers of extra care housing, it has only included one extra care scheme tested in the study, the scheme tested was only a previously developed site of 60 units. This is not reflective of the typical size and nature of integrated retirement communities which are typically between 60 and 250 units (see Figure 1 above), and are developed on both greenfield sites and previously developed sites. We would encourage the viability assessment to consider the information above, and include further evidence on extra care typologies.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	Appendices.zip Elmbridge Regulation 19 Draft Local Plan Consultation Letter Inspired Villages.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Inspired Villages (Ellen Pearce)
User ID	41251585
Organisation	Inspired Villages
Policy / Evidence base/ part of plan:	HOU6
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Please see attached letter for full response.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The cobweb consulting assessment of local housing needs has set a provisional target of 626 dwellings per annum. However, no specific targets or assessments have been made for older persons housing in Elmbridge. The local housing need assessment does not include a proposed provision rate for market extra care units per 1000 75+ population despite acknowledgement at paragraph 6.50 that the number of those age 65 or over in Elmbridge is expected to increase by 37% by 2037 and those over 85 expected to increase by 80%. This goes against best practice advice and the and results in a failure to address local need for specialist older persons accommodation. Nigel Appleton of Contact Consulting (an expert in Extra Care housing provision rates) suggests Councils should plan for future provision of 30 market extra care units per 1000 75+ population, whilst the consultancy DLP's released a report in April 2022 - The Older Persons Housing Needs Model – which proposes a local provision rate of 44 units per 1000 75+ population. A numeric target should be set by SDC for each type and tenure of older persons housing to be delivered within the plan period. It is not sufficient to solely set housing technical standards as set out in draft Policy HOU5.</p> <p>The PPG (ID: 63-006) states that “authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people” and that these policies should set out “how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require”. The same paragraph also recommends that authorities could provide “indicative figures or a range for the units of specialist housing for older</p>

	<p>people needed across the plan area throughout the plan period.” We would therefore suggest a provision rate is included and that allocations made in the Plan sufficient to meet the evidenced forecast population growth and need for various types and tenures of specialist housing.</p> <p>Policy HOU6 is not positively prepared, in that it has not adequately addressed or evidenced the need for housing for older people and is therefore not deliverable. The only identified scheme outlined in Policy HOU6 is for the expansion of Whiteley Village, it is not realistic to expect the borough’s housing needs for older people to be met solely via the expansion of an existing site. Allocations should be made for older persons housing and targets set for each type and tenure of specialist housing for older people.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: <input type="checkbox"/> Y]</p> <p>Effective: <input type="checkbox"/>]</p> <p>Justified: <input type="checkbox"/>]</p> <p>Consistent with national policy: <input type="checkbox"/>]</p> <p>Policy HOU6 is not positively prepared, in that it has not adequately addressed or evidenced the need for housing for older people and is therefore not deliverable. The only identified scheme outlined in Policy HOU6 is for the expansion of Whiteley Village, it is not realistic to expect the borough’s housing needs for older people to be met solely via the expansion of an existing site. Allocations should be made for older persons housing and targets set for each type and tenure of specialist housing for older people.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	The Local Plan should viability test a variety of types of housing for older people (care homes, age restricted, IRCs, retirement housing) to provide a fair and accurate measures of issues

	<p>related to the size of such schemes, significant amounts of non-saleable floorspace, significant time taken to sell each unit and difficult of IRC operators to compete on land values with general needs housing. There are viability challenges for Extra Care housing which should be acknowledged through the Local Plan and then considered through relevant policies. Ultimately, if specific sites are not allocated through the Local Plan for different forms of housing for older people, and the viability challenges for such forms of housing are not acknowledged through policy, retirement community developers will not be able to compete in the market to buy land, and this type of accommodation will not be delivered to meet the existing and forecast significant need for specialist housing in the borough.</p> <p>The only way in which the viability concerns highlighted can be addressed through the planning system is by reducing planning policy requirements including affordable housing. This will give developers of age restricted developments and particularly Extra Care developments a better chance of competing for land in the market and delivering these much needed schemes.</p> <p>The following documents are appended to this letter for your consideration;</p> <ul style="list-style-type: none"> • Appendix 1: Financial Viability Review of Evidence in Connection with the Solihull Local Plan EiP • Appendix 2: Representation by Inspired Villages: To support the practical delivery of much-needed specialist accommodation to meet the needs of an ageing population (version 2) – November 2020. • Appendix 3: 21st Century Care Document by Inspired Villages <p>Appendices.zip</p> <p>Elmbridge Regulation 19 Draft Local Plan Consultation Letter Inspired Villages.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Jane Pearson
User ID	24553633
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No 3 issues: 1. High rise is not in keeping with the characteristics of Claygate village. We need to protect this 2. More houses meaning more footfall but less public parking spaces as a result. We cannot lose 3 key parks. Where would residents park for the local shops, train station when on street parking is already full 3. Gypsy and Roma sites - these communities do not respect the wider community which they are part of. Sadly they are know for anti social behaviour and living beyond the law. Unless our police forces properly police this community and pull them in line (which they don't do right now), there's a real risk of these groups destroying and trashing the villages within which we live which will lead to these villages becoming less safe, less desirable and less prosperous as a result
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y]

	<p>Consistent with national policy: []</p> <p>See answers against point 2</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<ol style="list-style-type: none"> 1. No high rise 2. Protection of public car parks 3. No siting of Roma, traveller sites
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	To ensure our community voice is heard

Name	Elizabeth Pemberton
User ID	16440097
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Alan Pemberton
User ID	16520161
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	David Peters
User ID	41215361
Organisation	
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mandy Phillips
User ID	16478241
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>Having attended meetings by various Elmbridge Councillors I am confident that the Local plan is legally compliant.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>Having attended meetings by various Elmbridge Councillors, followed the process over several years and reading around the subject I am confident that the Local plan is sound.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Michael Phillips
User ID	24621153
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes it is careful researched and all proposals and policies are compliant with the NPPF
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Tom Cole
User ID	41258625
Organisation	Montagu Evans obo Quadrant Repurpose and LaSalle Investment Management (Mark Phillipson)
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>1. Strategic Policy SS3 (Scale and location of good growth) Strategic Policy SS3 sets out the council's ambition for the delivery of development over the plan period. Specifically, the policy confirms the Council will take a 'brownfield first' approach, using opportunities to develop previously developed land within the urban area of the borough as they offer the most sustainable locations. Our Clients support the Council's 'brownfield first' approach, with the aim to promote previously developed land within urban areas, considering such locations to provide significant opportunities for sustainable development. This is a core objective in national policy, where Paragraph 119 makes explicitly clear that strategic policies must make as much use as possible of previously developed land. Part 3 of Strategic Policy SS3 confirms development opportunities within the urban area will be encouraged which enhance the vitality and viability of town and district centres, repurpose/ redevelop/ diversify vacant employment sites, repurpose/ redevelop previously developed sites into mixed uses, and provide an optimisation of development within the urban area to increase the efficient use of land. We support the Council's approach in this regard to the repurposing of previously developed land and optimisation of development in town centres. Notwithstanding the above, the Council appears to be promoting a Plan that does not seek to meet its objectively assessed needs, instead pursuing a 'capped need' strategy. As set out within the Local Plan supporting evidence, specifically 'Establishing Local Housing Need- May 2022', by applying the standard method (2021) the objectively assessed housing need for Elmbridge is 647 dwellings per annum (9,705 dwellings over the 15-year Plan period). The Plan's aim to make the</p>

provision for at least 6,785 net additional homes therefore falls significantly short of the objectively assessed minimum requirement of 9,705 homes.

Paragraph 60 of the NPPF sets out the Government's objective of significantly boosting the supply of homes, and notes that to achieve this it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

Paragraph 61 goes on to stipulate that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.

It is noted that Elmbridge Borough Council have not tested a scenario to meet the minimum objectively assessed needs, but the Council then makes a conclusion that there are no exceptional circumstances to justify Green Belt release which may be required to deliver sufficient housing if the brownfield first approach does not yield sufficient housing sites. The Council must provide robust evidence to justify the current approach to housing requirements in its draft Plan. We note that the Inspector for the Sevenoaks Local Plan Examination raised concerns in the Inspector's Report regarding the soundness of the Plan, specifically with regard to the Council being unable to demonstrate active, constructive and on-going engagement in respect to meeting the objectively assessed housing need. Overall, in line with paragraph 35 of the NPPF, the Inspector concluded the Plan to be unsound, and recommended the Local Plan to not be adopted.

In light of the above, we advise that the Council reviews its evidence provided to date to ensure a robust, evidence- based approach is followed as this is a fundamental soundness matter. Whilst endorsing the Council's approach to the repurposing of previously developed land and optimisation of development in town centres, the highly accessible and sustainable nature of town centre sites such as Hersham Green Shopping Centre should be fully optimised to contribute to the delivery of additional housing for the borough.

In our view sites in town centres should appropriately support a higher density of development compared with less urban locations, subject to robust townscape analysis. This does not

	<p>necessarily mean that existing heights need to be replicated where taller development can be justified.</p> <p>2. Policies CC1 (Energy efficiency, renewable and low carbon energy), CC2 (Minimising waste and promoting a circular economy) & CC3 (Sustainable design standards)</p> <p>Policies CC1, CC2 and CC3 set out the Council’s aim to tackle climate change by reducing carbon dioxide emissions, supporting the transition to a low/zero carbon future, as well as delivering improvements to flood risk, air quality, recycling and waste management in the borough. Any redevelopment would test and adopt current approaches to delivering sustainable development including energy strategies not reliant on gas.</p> <p>We support the Council’s approach to tackling climate change and meet carbon reduction targets, however consider the financial obligations to meeting such targets should be reflected within policy. As such, the wording of policies CC1, CC2 and CC3 should recognise the potential impacts on development viability. Our Clients also understand the embedded carbon in a development needs to be weighed with other factors. The existing Shopping Centre represents an inefficient use of a scarce town centre site which is dominated by a surface-level car park. The existing buildings reflect the time they were constructed when there was not the same knowledge nor technologies available to deliver more efficient buildings over their life cycle.</p> <p>Therefore as well as providing new homes and town centre services, our Clients believe that there will be significant benefits in terms of delivering a more sustainable development through a comprehensive approach. Any policy on the circular economy must therefore be flexible to cater for such circumstances.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>3. Policy HOU1 (Housing Delivery)</p> <p>Policy HOU1 sets out the Council’s aim to respond positively to the housing needs of the borough over the fifteen-year plan period from 2021- 2037. In doing so, the Plan seeks to deliver a minimum of 452 homes per annum over the plan period.</p> <p>Reflecting on the local housing need for Elmbridge as set out within the ‘Establishing Local Housing Need- May 2022’ paper, the delivery of a minimum of 452 homes per annum will fall significantly short of the Objectively Assessed Need of 647 dwellings per annum. As such,</p>

Quadrant Repurpose and LaSalle Investment Management do not consider Policy HOU1 to be positively prepared in accordance with Paragraph 35 of the NPPF, and queries the soundness of the Plan on this basis.

Therefore, by recognising the need for the Plan to be positively prepared in accordance with NPPF Paragraph 35, it is suggested that the minimum delivery of housing over the plan period as stipulated within Policy HOU1, is revised to reflect the objectively assessed need for the borough of 647 dwellings per annum.

4. Policy HOU2 (Optimisation of Sites)

Policy HOU2 confirms development must make the efficient use of land and optimise sites within the urban area of the borough. The policy goes on to confirm:

‘Sites within or on the edge of town, district and local centres and sites adjacent to train stations will deliver additional homes by:

a) Provision of higher density housing such as flats and terraced homes rather than semidetached and detached homes;

b) Infill and backland developments to the rear of existing frontage property(ies);

c) Promoting mixed use development and increased building heights; and

d) Seeking comprehensive development that leads to more efficient and effective site layouts.

We support the Plan’s approach to make the most efficient use of land by optimising key development sites within urban areas of the borough and promoting efficient and effective site layouts with increased building heights.

Notwithstanding this, it is noted that there is balance to be met between optimising the use of previously developed land (of which inherently requires increased building heights and/or massing), and the policy objective to maintain, reinforce and enhance existing characteristics of areas (as per Policy ENV9 (Urban design quality)). Therefore, with the Council’s approach to deliver housing supply focussing primarily on the re-use of previously developed land, an acceptance of increased density in accessible and sustainable locations is required. There should be a recognition of how townscape analysis can assist this approach which avoids the problem of falling back on an approach of solely replicating existing building heights.

Whilst it is noted that further guidance on the optimisation of sites can be found in the forthcoming Elmbridge Design Code (as per paragraph 6.15 of the Draft Plan) given the Council’s key strategy for the delivery of housing will take place through the ‘brownfield approach’, the Design

Code will need to adopt best practice to support higher densities in such town centre locations to deliver this strategy. If the Design Code follows the approach of seeking to replicate existing heights it will be in conflict with HOU2.

5. Policy HOU6 (Specialist accommodation)

Policy HOU6 sets out the need to deliver housing choice in the borough, including specialist forms of accommodation which meets local needs. Part 1 of the Policy notes:

“Development for specialist accommodation, including older person’s housing, will only be permitted where there is

clear and robust evidence that demonstrates a local need for the new accommodation, the type and level of care it

offers, and does not result in an over provision of that particular type of accommodation and care within the borough.”

Supporting text of the Policy states the delivery of specialist accommodation is closely monitored in the Council’s Authority Monitoring Report (AMR). We support this policy approach in order to plan effectively for meeting the needs of the elderly in the Borough, in particular providing a path to avoid existing residents to have to leave the Borough in later life because appropriate accommodation is not available.

The 2020/ 2021 AMR confirms that in light of the competing pressures on development land in the Borough, Use Class C2 proposals are required to be supported by robust evidence to demonstrate that the proposal represents the most efficient use of the site. We also support this objective to ensure consistency with the policy approach of site optimisation being pursued by the Council. In terms of identifying the need for elderly accommodation over the Plan period, the Council’s core evidence base is the Assessment of Local Housing Needs (2020). This sets out the anticipated need for specialist housing for the elderly, which amounts to 1,551 units up to 2035.

Part 2 of the Policy goes on to stipulate that developments providing older persons’ accommodation shall deliver the level of affordable housing required by Policy HOU4. The Council currently has no such policy and so its introduction must be carefully considered and evidence based in order to be justified.

Key to this is the overall viability of the scheme when considering the ability for a scheme to provide affordable in accordance with Part 4b) of Policy HOU4. National policy is clear that all Plans must be prepared positively, in a way that is aspirational but deliverable (NPPF Paragraph

16) and that policies expecting contributions from development should not undermine the deliverability of the plan (NPPF Paragraph 34), for example by making developments unviable. This is reinforced by the NPPG makes clear that:

“It is the responsibility of plan makers... to create realistic, deliverable policies. Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable”.

We express concerns that the introduction of an affordable housing policy for older persons' housing could render development unviable. The Council must provide more detailed evidence of need for affordable housing and that this can be viably delivered by development sites.

The Council must also acknowledge that this will need to be balanced against competing demands for planning gain on mixed use sites in town centres, given the expectation to improve the function of town centres and broaden their appeal beyond conventional retailing post-Covid. The Council's current approach would likely have the undesired effect of stymying development due to viability issues, which is exacerbated by prevailing issues of build cost inflation. This must be avoided at all costs to ensure the Council is able to deliver on its growth requirements.

6. Site Allocations (Hersham)

The Council has identified 15 site allocations within Hersham which allocate land for development including for housing, employment, retail, community uses and infrastructure. This includes Hersham Green Shopping Centre (ref: H3). The site allocation is copied below:

Site Allocation Reference	Site LAA Reference	Site Name	Delivery Period (years)	Allocated for
H3	US379	Hersham Shopping Centre, Molesey Road, Hersham	1-5	200 residential units

Our Clients support the intention to allocate the Site for residential development which evidently shows that it is suitable for a high density development of 200 units, which reflects the Site's highly accessible location and the Council's strategy to make the most efficient use of previously developed land.

Notwithstanding the above, noting the town centre location and existing uses on the Site to include a mix of town centre and retail uses, we suggest that the site allocation should be broadened to reflect the aspiration to deliver mixed-use development on the Site that will support the function and vitality of Hersham Town Centre. As such, the wording of Site Allocation H3 is suggested to include; '200 residential units (C2/ C3) in addition to town centre uses as part of a mixed-use development.'

	<p>We note the remaining allocations in Hershams include New Berry Lane Car Park (Site H7). Our Clients suggest that in the short term the Council should consider identifying the car park as supporting the needs of visitors to the town centre and the parents of the primary school for drop-off/ pick-up. Later in the plan period there may be an opportunity for alternative uses than parking dependent on the speed of change in travel patterns and transport modes. This would enable New Berry Lane Car Park to be fully integrated with the town centre redevelopment proposals, rather than as a standalone allocation resulting in piecemeal development.</p> <p>Quadrant Repurpose and LaSalle Investment Management would therefore welcome discussions with the Council in relation to the comprehensive development opportunities of New Berry Lane Car Park with the Site both in the short and longer terms.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>As above.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>As above.</p> <p>Hershams Green- Regulation 19 Local Plan Representations.pdf</p> <p>7060- PL01 - Location Plan.pdf</p>

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	As above.

Name	Manby Lodge Infant School (Helen Plummer)
User ID	41190273
Organisation	Manby Lodge Infant School
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Manby Lodge Infant School (Helen Plummer)
User ID	41190273
Organisation	Manby Lodge Infant School
Policy / Evidence base/ part of plan:	INF1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes We hope this is legally compliant but would not know if it wasn't.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No The plan does not seem to be specific enough to Weybridge, it seems ambiguous.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [] Consistent with national policy: [] To be effective I would expect to have Elmbridge specific examples of what kind of infrastructure is being planned, rather than just a list which could apply to any region in the country.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	There are identified locations of residential development throughout the borough but no specifics on the infrastructure to support all of these new homes.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	As a school we have grown in size without the carparking facilities for all the staff. We are also aware of local residents struggling to get GP appointments, this includes staff and families of our pupils.

Name	Kenneth Porter
User ID	41183617
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No I have some objections
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No I have some objections
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] I have objections
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	not qualified to provide this

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Epsom and Ewell Borough Council (Victoria Potts)
User ID	8107201
Organisation	Epsom and Ewell Borough Council
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	See letter attached
Question 2	Do you consider this part of the draft Local Plan to be sound?
	See letter attached
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	EBC REG19 response.docx

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Gavin Potts
User ID	24484513
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I believe the plan is well constructed and is completely appropriate for the needs of Elmbridge for the period under consideration. Gavin Potts
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ian Powell
User ID	40301025
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.

	Bell Cornwell - Regulation 19 - Representation Letter - Mr Ian Powell.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ian Powell
User ID	40301025
Organisation	
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.

	Bell Cornwell - Regulation 19 - Representation Letter - Mr Ian Powell.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ian Powell
User ID	40301025
Organisation	
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.

	Bell Cornwell - Regulation 19 - Representation Letter - Mr Ian Powell.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ian Powell
User ID	40301025
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No See letter enclosed at question 4a.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No See letter enclosed at question 4a.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] See letter enclosed at question 4a.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	See letter enclosed at question 4a.

	Bell Cornwell - Regulation 19 - Representation Letter - Mr Ian Powell.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ian Powell
User ID	40301025
Organisation	
Policy / Evidence base/ part of plan:	ENV4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.

	Bell Cornwell - Regulation 19 - Representation Letter - Mr Ian Powell.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ian Powell
User ID	40301025
Organisation	
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.

	Bell Cornwell - Regulation 19 - Representation Letter - Mr Ian Powell.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ian Powell
User ID	40301025
Organisation	
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.

	Bell Cornwell - Regulation 19 - Representation Letter - Mr Ian Powell.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ian Powell
User ID	40301025
Organisation	
Policy / Evidence base/ part of plan:	HOU3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	See letter enclosed at question 4a to general questionnaire as to the entire draft local plan.

	Bell Cornwell - Regulation 19 - Representation Letter - Mr Ian Powell.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ian Powell
User ID	40301025
Organisation	
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>Site Allocation: ESH11 – 42 New Road, Esher, KT10 9NU Chapter 9 of the Draft Plan allocates several brownfield sites for densification in accordance with the preferred spatial strategy. Many of these sites will not achieve the quantum of development alloc</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>See response to question 1 above.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>See response to question 1 above.</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	See response to question 1 above. Bell Cornwell - Regulation 19 - Representation Letter - Mr Ian Powell.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Richard Preston
User ID	41065889
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Fully aligned to the spatial strategy proposed in the draft local plan, it's vital we continue to protect the Green Belt, which the council makes clear justifications for
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Reigate and Banstead Council (Tomas Pugh-Cook)
User ID	41049409
Organisation	Reigate and Banstead Council
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>Dear Planning Policy, Elmbridge Draft Local Plan – Regulation 19 Thank you for engaging with Reigate & Banstead Borough Council (RBBC) and for the opportunity to respond to your Draft Regulation 19 Local Plan. We anticipate that you will be contacting us soon for a Statement of Common Ground to be agreed upon in order to meet the tests of soundness in accordance with the NPPF 2021. Maintaining an up-to-date Statement of Common Ground will help solve strategic issues going forward. Housing We note that you have assessed the need for additional homes over the plan period using the 2014, 2016 and 2018 household projections, and in accordance with the NPPF and PPG, are using the 2014 household projections as part of the governments standard methodology for calculating local housing need. It is therefore understood that the housing need for the borough equates to 647 dwellings per annum and 9,705 homes over the plan period. We appreciate that housing need is not necessarily the same as the local plan’s housing requirement. Within Elmbridge Borough Council’s Land Availability Assessment (2022) and Local Plan Appendices A5, the table displayed highlights a housing land supply shortfall of 2,141 (-22%) using approach 1 and a shortfall of -2,918 (-30%) using approach 2. It is understood that approach 1 sets out the land supply figures taken from the assessment including a windfall site</p>

allowance, whilst approach 2 considers a non-implementation approach to determine ‘under delivery discount’.

As part of our continued Duty to Cooperate work, we received a letter from you titled ‘Elmbridge Borough Council Local Plan: Meeting housing need’ on the 18th October 2021. We responded on the 22nd October 2021 stating our housing position as unchanged. Elmbridge is within a housing market area that includes the Royal Borough of Kingston upon Thames, Epsom and Ewell Borough Council and Mole Valley District Council, as stated within your Land Availability Assessment 2022. We therefore remain unchanged in our position in that Reigate and Banstead Borough Council is not within the same housing market area as Elmbridge and it would serve limited purpose to work together on this issue of housing need.

We understand that EBC are constrained for development within the borough. We support the shift to the provision of smaller units to meet the challenge of housing need. We also support the ‘brownfield first’ approach to development. It is understood that EBC has chosen not to release green belt to accommodate development, and that the evidence gathered in the Green Belt Boundary Review (2019) and supplementary reports, due to a lack of strategic exceptional circumstances to release land from the Green Belt. This is in line with the NPPF 2021 (para 140) which states that: “Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.”

Gypsies and Travellers

Within our representation letter at the regulation 18 stage, titled: ‘Elmbridge Local Plan: Strategic Sites Consultation (Regulation 18)’ dated 24th February 2017, we raised concern that it appears that the needs for sites for caravans, houseboats and mobile park homes for households who do not fall into the government’s “planning” definition of traveller and gypsy. It is therefore pleasing to see that para 6.57 of the Draft Local Plan has considered the need for these types of accommodation as is required.

We note that Opinion Research Services (ORS)’s methodology, used by Elmbridge is a joint methodology, agreed between Elmbridge, RBBC and Tandridge District Council. There are no specific cross-border issues that have been identified, and we welcome use of this joint methodology, ORS have continued their service in producing the 2020 assessment having assessed RBBC’s need in 2017.

	<p>We hope that you find these comments helpful and would be happy to discuss any of the points raised above in more detail. Should you wish to discuss this response, please contact Tomas Pugh-Cook (tomas.pugh-cook@reigate-banstead.gov.uk)</p> <p>We look forward to continuing positive and constructive joint working between our two authorities to deliver shared strategic priorities.</p> <p>Yours sincerely, Andrew Benson Head of Planning Services</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mrs Pulford
User ID	16406561
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>I can see that great effort has been made to create a plan for the residents of Elmbridge that adheres to the various rules and regulations.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>I consider it only in part sound. For example, plan for travel and environment is not sufficient as it does not include and promote the extention of public transport. You plant will please the small number of local cyclist that are using the cycle path to get to work but if you are a young mum with kids or a retired person you need a good local bus service to take you to the nearest town or hospital etc. Our local roads suffer from terrible pollution (child asthma is on the increase) and just offering to extend a cycle path does not tackle pollution. I also feel that there are not enough plans to combat climate change. This could be done by planting or replacing trees(trees that have been chopped down by the Council because of insufficient funds for maintenance) trees in residential roads. We should also encourage the installtion of solar panels in residential homes and maybe make funds available for this. Although I am pleased that no green belt land has been considered for housing, I feel Walton on Thames is the main target for building unsociable flats and big housing estates. Why can't some of these be built in Oxshott or Cobham?</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y]

	<p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p> <p>I do feel that Walton on Thames is taking the brunt of the Governments housing target and having to provide 452 dwellings per year is unacceptable taking into consideration, the congestion and pollution in our towns and the missing infrastructure! Why has our housing target been doubled from previous year?</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>As set out before, we cannot continue to increase and build unsocial flat developments and big housing estates without providing the infrastructure with it. We need to promote and support a better public transport i.e. buses, create more green spaces and plant trees or replace the trees that have been chopped down by the Council. We need to tackle pollution to promote solar panels for residential homes via a Council let plan. It is a waste of public money to increase a cycle path that is only used by a minority of people!</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Peter Quest
User ID	24309505
Organisation	
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes The plan seems to well address the rquirements
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Peter Quest
User ID	24309505
Organisation	
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes The plan seems to heard the views of the residents of Elmbridge and sort to address their preferences while seeking to meet the governments targets.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Peter Quest
User ID	24309505
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes The plan seems to balance the views of Elmbridge residents while seeking to achieve the Government's housing targets.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	WSP (Sophie Rae)
User ID	41016929
Organisation	WSP
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No x
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No x
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [] Justified: [] Consistent with national policy: [Y] x
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	x

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	X

Name	The Julien Family Trust (Sophie Rae)
User ID	41017313
Organisation	The Julien Family Trust
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Please refer to submitted letter
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please refer to submitted letter
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please refer to submitted letter
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please refer to submitted letter

	<p>Document 6 SGHRA 28.07.22.pdf</p> <p>Document 4 - Extract from Inspectors Report.pdf</p> <p>Document 2- Reps to 2019 Issues and Options Consultation.pdf</p> <p>Document 3- Inspectors Decision dated 16.04.82.pdf</p> <p>Document 5- 9 March 2020 letter.pdf</p> <p>Rodona Road 29 July 2022 FINAL. pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Please refer to submitted letter

Name	WSP (Sophie Rae)
User ID	41016929
Organisation	WSP
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No x
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No x
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: [Y] x
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	x

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	X

Name	The Julien Family Trust (Sophie Rae)
User ID	41017313
Organisation	The Julien Family Trust
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Please refer to submitted letter
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please refer to submitted letter
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please refer to submitted letter
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please refer to submitted letter

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Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Please refer to submitted letter

Name	The Julien Family Trust (Sophie Rae)
User ID	41017313
Organisation	The Julien Family Trust
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Please refer to submitted letter
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please refer to submitted letter
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please refer to submitted letter
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please refer to submitted letter

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Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Please refer to submitted letter

Name	The Julien Family Trust (Sophie Rae)
User ID	41017313
Organisation	The Julien Family Trust
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Please refer to submitted letter
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please refer to submitted letter
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please refer to submitted letter
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please refer to submitted letter

	<p>Document 6 SGHRA 28.07.22.pdf</p> <p>Document 4 - Extract from Inspectors Report.pdf</p> <p>Document 2- Reps to 2019 Issues and Options Consultation.pdf</p> <p>Document 3- Inspectors Decision dated 16.04.82.pdf</p> <p>Document 5- 9 March 2020 letter.pdf</p> <p>Rodona Road 29 July 2022 FINAL. pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Yes, please refer to submitted letter

Name	Environment Agency- Thames Sustainable Places Team (Rachel Rae)
User ID	9549857
Organisation	Environment Agency- Thames Sustainable Places Team
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Point of soundness 1: Development vulnerability in relation to flood risk: 3.1. We are pleased to see the inclusion of Policy CC5 – Managing flood risk. However, Policy CC5 does not reflect some of the conclusions within the evidence submitted in the Strategic Flood Risk Assessment (SFRA) Level 1. Therefore, we do not consider this policy to be justified by the evidence base or consistent with the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG).</p> <p>Detailed explanation 3.2. With regards to the developed areas of Flood Zone 3b - Functional Floodplain, page 17 of the Level 1 SFRA states ‘Where redevelopment is proposed in developed areas, schemes should not increase the vulnerability classification of the site. This has not been reflected in Policy CC5.</p> <p>Overcoming point of soundness 1: 3.3. In order to overcome this point of soundness we recommend that Policy CC5 is updated to reflect your SFRA: “Development proposals in the ‘developed’ Flood Zone 3b – Functional Floodplain will only be approved where the footprint of the proposed building(s) is not greater than that of the existing building(s) and there will be no increase in development vulnerability or intensification in use.</p> <p>Point of soundness 2 - quantum of development to be delivered:</p>

(Please note, the following comments should be read in conjunction with the comments in section XX regarding Chapter 9 – Site Allocations.)

9.1. We understand the plan seeks to allocate employment floorspace via five Strategic Employment Land (SEL) sites (Policy ECO2), and four allocated sites detailed in Chapter 9 – Site Allocations. However, it is not clear how much employment floorspace the plan is aiming to deliver, despite the evidence base concluding the borough requires an additional 58,000sqm. This is contrary to paragraph 82 of the NPPF. With regards to our remit, we are concerned that environmental constraints, such as flood risk and biodiversity, will affect how much floorspace each employment site can deliver. We therefore consider the plan to be unsound as it is not consistent with national policy or justified by the evidence base.

Detailed explanation:

9.2. It is not clear how much employment floorspace the plan is required to deliver. We would expect the plan to define the total amount of employment floorspace required and how much each employment allocation will contribute to the overall total. Without this information we cannot be satisfied that each allocation is fulfilling its requirement and the overall need is met.

9.3. We note the Strategic Employment Land Review Addendum November 2021 concludes that the borough requires an additional 58,000sqm of employment floorspace between 2015 and 2035. However, we cannot find this figure, or any other employment floorspace figure, within the plan.

9.4. We understand Policy ECO2 - Strategic Employment Land seeks to safeguard employment land by allocating the following five strategic employment sites (SELs):

- The Heights, Weybridge
- Hersham Place Technology Park, Hersham
- Brooklands Industrial Estate, Weybridge
- Hersham Trading Estate, Walton-on-Thames
- Molesey Industrial Estate, West Molesey

However, Policy ECO2 does not state how much employment floorspace these sites are to provide. We also note The Heights, Weybridge is listed in Chapter 9. It is not clear why The Heights, Weybridge is listed in both Policy ECO2 and Chapter 9.

9.5. We note the Heights Webridge is located in Flood Zone 3. Flood risk can significantly reduce the amount of developable land available. Therefore, the site may not be able to deliver as much

floorspace as it is required to. Please see Chapter 9 for specific details relating to flood risk at The Heights.

9.6. With regards to the other sites listed in Policy 5, no site information has been provided so we are unable to screen these sites for environmental constraints within our remit. Without this information we are unable to confirm if the sites are deliverable.

Overcoming point of soundness 2:

9.7. In order to overcome this point of soundness the plan needs to clearly state how much employment floorspace is required for the plan period. Each site allocation should be detailed on the policy map and clearly state the amount of employment floorspace it is required to deliver, taking into account any environmental constraints which could reduce the amount of developable land.

Point of soundness 3: Sequential Test & Exception Test:

11.1. We understand the plan seeks to allocate housing sites and employment floorspace. According to our Flood Map for Planning 31 residential sites and four employment sites (see tables below) are located in Flood Zone 3 and 2. However, these sites have not been sequentially tested, and the Exception Test has not been applied, in accordance with paragraphs 161-165 of the NPPF. You SFRA and Policy CC5 – Managing flood risk of this plan state these tests must be applied. We therefore consider the plan to be unsound as it is not consistent with national policy or justified by the evidence base.

Detailed explanation

11.2. Flood Zones 3 and 2 are defined by the Planning Practice Guidance (PPG) as having a high and medium probability of flooding, respectively. Paragraph 162 of the NPPF states that the aim of the Sequential Test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites, appropriate for the proposed development, in areas with a lower risk of flooding. A strategic flood risk assessment will provide the basis for applying this test.

11.3. We note a Level 1 SFRA has been produced. However, for site allocations located in Flood Zone 3 and 2 a Level 2 SFRA must be provided. The Level 2 SFRA should detail flood risk at a site-specific level, the proposed use of the allocation and whether the use is compatible in accordance with Table 3 of the Flood Zones and flood risk tables of the PPG. It should also contain the information needed to apply the Exception Test, if relevant, to enable you to decide if development can be made safe for its lifetime without increasing flood risk elsewhere.

11.4. The Level 2 SFRA should then be used to inform the Sequential Test and ranking of sites as the extent of flood risk can be compared to other potential sites.

11.5. Without this we cannot be satisfied that your plan is allocating sites that are at the lowest risk of flooding and whether there are other available sites, appropriate for the proposed development, in areas with a lower risk of flooding.

11.6. It should be noted, in our response to the Regulation 18 consultation (reference WA/2011/110334/PO[1]06/PO1-L01, dated 9 March 2020) we stated that the Sequential Test must be applied, taking into account the current and future impacts of climate change, to guide development to the areas of lowest flood risk in order to avoid flood risk to people and property. If it is determined that sites within the floodplain must be allocated, a level 2 SFRA will be required. Where necessary, part b of the Exception Test must be applied.

11.7. Furthermore, your SFRA level 1 dated February 2019 states 'Should the Sequential Test indicate that land outside flood risk areas cannot appropriately accommodate all necessary development; a further Level 2 SFRA will be undertaken to consider the detailed nature of flood risk within each zone and support the application of the Exception Test.' (para 1.3.3).

11.8. Once the sites have been sequentially tested, and if it is determined that there are no other reasonably available sites, any sites located in Flood Zone 3 must be subjected to the Exception Test, as per paragraphs 163-4 of the NPPF. In accordance with paragraph 165 of the NPPF, both elements of the Exception Test should be satisfied for development to be allocated or permitted. Currently the plan has not fulfilled either test.

11.9. Without this information the deliverability of the allocations is questionable. We cannot be confident that the allocated sites have sufficient capacity to provide the required housing numbers and employment floorspace that they have been allocated for, whilst not increasing flood risk elsewhere.

Overcoming point of soundness 3:

11.10. In order to overcome this point of soundness the proposed allocations in your plan must be sequentially tested and where appropriate the Exception Test must be applied. Guidance on applying the Sequential Test and the Exception Test can be found here: Flood risk and coastal change - GOV.UK (www.gov.uk)

11.11. For more guidance on preparing a level 2 SFRA please visit the Gov.uk website: How to prepare a strategic flood risk assessment - GOV.UK (www.gov.uk)

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>please see comments in previous box.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>please see comments in previous box.</p> <p>EBC Reg 19 comments from EA 290722.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	As a statutory consultee we are happy to participate at the oral examination if it is deemed necessary.

Name	The Julien Family Trust (Sophie Rae)
User ID	41017313
Organisation	The Julien Family Trust
Policy / Evidence base/ part of plan:	ENV4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Please refer to submitted letter
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please refer to submitted letter
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please refer to submitted letter
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please refer to submitted letter

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Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Please refer to submitted letter

Name	The Julien Family Trust (Sophie Rae)
User ID	41017313
Organisation	The Julien Family Trust
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Please refer to submitted letter
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please refer to submitted letter
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please refer to submitted letter
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please refer to submitted letter

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Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Please refer to submitted letter

Name	The Julien Family Trust (Sophie Rae)
User ID	41017313
Organisation	The Julien Family Trust
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Please refer to submitted letter
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please refer to submitted letter
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please refer to submitted letter
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please refer to submitted letter

	Rodona Road 29 July 2022 FINAL. pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Please refer to submitted letter

Name	WSP (Sophie Rae)
User ID	41016929
Organisation	WSP
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Please refer to submitted letter
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please refer to submitted letter
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please refer to submitted letter
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please refer to submitted letter

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Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Please refer to submitted letter

Name	The Julien Family Trust (Sophie Rae)
User ID	41017313
Organisation	The Julien Family Trust
Policy / Evidence base/ part of plan:	HOU3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Please refer to submitted letter
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please refer to submitted letter
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please refer to submitted letter
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please refer to submitted letter

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Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Please refer to submitted letter

Name	The Julien Family Trust (Sophie Rae)
User ID	41017313
Organisation	The Julien Family Trust
Policy / Evidence base/ part of plan:	HOU4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Please refer to submitted letter
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please refer to submitted letter
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please refer to submitted letter
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please refer to submitted letter

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Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Please refer to submitted letter

Name	Brian Rawson
User ID	41217249
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Signature Prime Property (Sean Reardon)
User ID	24246753
Organisation	Signature Prime Property
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The Local Land Availability Assesment document identifies reasons for discounting of various urban sites (located within settlement boundaries, not constriained by conservation areas, high risk of flooding etc)</p> <p>One particular site 'Land opposite Nuffield Health Club and abutting Portsmouth Road, Long Ditton' was discounted for the following reason 'The site adjoins and has physical limitations that cannot be overcome' This statement is factually incorrect. In preapp discussions and a refused planning application (2018/3866) physcial constraints both on an adjoining the site were not identified as reasons for refusal.</p> <p>The site is brownfield, in flood zone 1 & 2, has no tree constraints, a good access point from the Portsmouth Road and can accomodate apartments or commercial uses. The site is being promoted for development by the landowner and has no legal constraints to development.</p> <p>It is the only discounted site that is stated to 'have physical constraints that cannot be overcome' each other discounted site is given a reason e.g. Trees and that this constraint cannot be overcome in the plan period rather than in perpetuity. It effectively states these unspecified contstraints can never be overcome and the site stands alone in this evidence base document. We ask the document is reconsidered and the reasons for exclusion of each of the sites in this document are explored fully before they are discounted.</p>

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p> <p>The Strategic Land Availability 2022 assessment dicounted sites contrary to factual evidence provided to the council</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>The discounted sites in the Strategic Land Availability assessment 2022 must be reassessed and the reasons for discounting sites balanced against former planning applications and evidence based criteria for exclusion. Site U130 was discounted on criteria that has no base in reality and shows that many of these sites were not given proper consideration before they were discounted</p> <p>Proposed residential scheme.pdf</p> <p>2018.3866 reason for refusal.pdf</p> <p>Proposed residential elevations.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination

Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	To outline how sites excluded from the Strategic Housing Land Availability Assessment 2022 were discounted on false grounds without evidence and substantiation

Name	Stephen Reisbach
User ID	16210113
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes Please see comments in relation to question 2 below
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes We support the emphasis in the Draft Local Plan on the conservation of green and blue infrastructure and biodiversity. We would make the following specific points. The first of these, in relation to Chapter 5 (Policy ENV3 and paragraph 5.13) and Appendix A4, constitutes an qualification to our general answers above. The second of them is not a qualification, but relates to the implementation of Policy ENV6 going forward. 1. Chapter 5 (Policy ENV3 and paragraph 5.13) and Appendix A4: Local Green Spaces Although we consider the above parts of the draft Local Plan for the most part to be sound and legally compliant, we would make an exception to this, as set out below. We strongly support the designation of both Area 8: Stokes Field and surrounding community uses (area reference 116 in the Local Green Spaces study 2022) and Area 51: One Tree Hill (area reference 111 in the 2022 study) as Local Green Spaces. However, we consider it is irrational and not in accordance with the evidence to confine designation to two discrete parcels of land within what is in fact a larger area, which in terms of use and biodiversity ought properly to be regarded as a single entity for the purposes of designation as a Local Green Space. In our view the appropriate area for designation as a Local Green Space would be a single site comprising areas 8 and 51 together with (a) the area between Stokes Field LNR and the field at One Tree Hill, and (b) the area of woodland, hedges and scrub immediately to the east of One Tree Hill and extending up to the boundary of the site currently in use by Hill Park Roses.

(We find that the online consultation form does not allow us to upload a plan indicating more precisely the areas in question, and so we shall supply this separately.)

Given that the whole of the area comprising Stokes Field LNR, the One Tree Hill field as delineated in the Local Green Space study, and the additional areas described above (“Area A and Area B”) are effectively used by the public as a single site, and that much of the wildlife and biodiversity value of the area comes from its continuity, size and the diversity of the habitats which make it up, it seems perverse and illogical not to designate the whole as a Local Green Space.

Areas A and B very much form part of a whole with the One Tree Hill field and Stokes Field LNR, both in terms of effective public access and use and biodiversity.

As regards the former, we consider that most members of the public who frequent the area do not make any distinction between, on the one hand, Stokes Field LNR and One Tree Hill and, on the other, Areas A and B; rather, they attribute a single identity to them in terms of "place". The path which is a continuation of Bankside Drive and constitutes the boundary between Stokes Field LNR and Area A is completely unremarkable as compared with the other paths around the area and has no obvious markers to designate its significance. The normal circuits walked by most dog owners and other visitors incorporate parts of one or other or both - in our observation generally both - of the Areas A and B.

From a biodiversity viewpoint Areas A and B are important in terms of (i) the varying areas of habitat contained within them, (ii) the essential connectivity they provide between Stokes Field LNR and One Tree Hill, and (iii) the greater viability for a range of species afforded by the combined areas together as compared with two much smaller discrete pockets in Stokes Field LNR and One Tree Hill. Importantly, the area supports a significant population of the Brown Hairstreak butterfly (*Thecla betulae*), a Biodiversity Action Plan priority species which is classified as Vulnerable (VU) in the recently published Red List of UK butterflies (2022). The butterfly is dependent on its larval foodplant, blackthorn. The majority of the blackthorn hedges suitable for breeding are situated within Areas A and B (indeed, most of them border One Tree Hill, but the demarcation of the Local Green Space by reference to the field alone appears to exclude them). Similarly, the iconic but elusive Purple Emperor butterfly (*Apatura iris*) has been recorded at Stokes Field LNR, but the great majority of its larval foodplant, willow, in the vicinity is found in Area B. Again, Area B includes some of the oldest trees in the complex as a whole, and these

are most likely to support species such as stag beetle (*Lucanus cervus*), another Biodiversity Action Plan priority species.

We believe that a single Local Green Space constituted by the designation of Areas A and B together with Area 8 (Stokes Field and surrounding community uses) and Area 51 (One Tree Hill) would be well within the 30ha. upper limit. Further, although we consider that each of Areas A and B would in themselves in any case satisfy the characteristics and threshold score for designation, it is not necessary to demonstrate that that is the case since, for an area whose characteristics and customary use effectively constitute it as a single space, the correct approach must be to assess that space as a whole.

2. Chapter 5, Policy ENV6 – application in context of Chapter 6, Policy HOU1, paragraph 5/
Chapter 9, paragraph 9.2

We strongly support the policies proposed in Policy ENV6, including those in paragraph 4. We consider that particular attention will need to be paid to the application of these in the context of the Policy HOU1, including paragraph 5, which contemplates “infill” development in large gardens etc.

Residential gardens, especially mature ones of a substantial size, constitute an important element of overall biodiversity, both for the diverse habitats they provide in themselves and for the connectivity they provide. Taken together, a network of such gardens constitutes a landscape-scale ecosystem mirroring many of the characteristics of open woodland. Progressive attrition of this by a succession of smaller developments is liable ultimately to degrade the value of the whole.

It is therefore very important, in considering proposals for infill-type developments, to ensure that the development incorporates measures to maintain and indeed enhance the site’s biodiversity value, including its role in assisting connectivity. This involves rather more than simply the preservation of trees; it entails, for example, emphasis on the quality and complexity of vegetative cover at all levels, and reduction of areas of hard standing and other hard surfaces to the minimum, together with measures to protect the position as to the future. We consider that these issues will need to be addressed in the new Design Code, although ultimately they will also require the continuing and well-informed attention of planning officials on a case-by-case basis.

Stephen Reisbach
Marian Thomas

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Frank Renton
User ID	24425025
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Paul Rew
User ID	24524193
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>The plan has been through an exhaustive process of building from the bottom to be holistic, sustainable and challenging. The consultation with residents has been open and engaging. I understand that all councilors support the plan.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>I believe that the spatial strategy is well thought through and realistic but challenging. I particularly agree with the principle of protecting the green belt from development in maintaining Elmbridge as sustainable communities.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Catriona Riddell
User ID	41097281
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Catriona Riddell
User ID	41097281
Organisation	
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes The priority given to tackling climate change, improving health and wellbeing, protecting the environment and supporting economic resilience is supported and well balanced in relation to the spatial strategy and meeting development needs.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Catriona Riddell
User ID	41097281
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Christopher Riding
User ID	8218945
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes The draft Local Plan covers the key aspects required to be legally compliant
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes The draft Local Plan provides a detailed consideration of the key aspects required for a Local Plan
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Zoe Rikkerink
User ID	25439969
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Woolf Bond Planning (Graham Ritchie)
User ID	41185601
Organisation	Woolf Bond Planning obo Claygate House Investments Ltd and MJS Investments Ltd
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No See attached statement which highlights the plan does not accord with the requirements outlined in the Planning & Compulsory Purchase Act 2004 (as amended) together with The Environmental Assessment of Plans and Programmes Regulations (2004) (as amended).
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No See attached statement and accompanying appendices
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] See attached statement and appendices 1-7. In summary, this indicates that the plan (especially policies SS3 and HOU1):

	<p>a) Are not positively prepared as they do not seek to address the borough’s housing needs, therefore further sites should be allocated;</p> <p>b) Are not positively prepared as they fail to boost the supply of housing by seeking to address the uncapped housing need derived through local housing need;</p> <p>c) Are not positively prepared as they fail to boost the supply of housing by seeking to address even the capped housing need derived through local housing need;</p> <p>d) Are also not positively prepared as it also fails to identify sites to contribute towards addressing unmet need of neighbouring authorities, especially those in Greater London;</p> <p>e) Are not justified with regard to the timeframe that the examination of the Local Plan will take resulting in a delayed adoption of the document;</p> <p>f) Are not effective as it is not based upon joint working cross-boundary strategic matters, especially housing;</p> <p>g) Are not justified with respect of the inclusion of windfalls which duplicates expected supply from LAA sites;</p> <p>h) Are inconsistent with national policy as they do not provide for a strategy that meets the area’s development needs;</p> <p>i) Are inconsistent with national policy as they does not currently provide for at least 15 years post adoption as required by paragraph 22 of the NPPF; and</p> <p>j) Are inconsistent with national policy in the failure to both boost housing supply and make a contribution towards addressing the housing needs of neighbouring authorities as required by paragraph 60 of the NPPF.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>See attached statement which details the changes necessary. These are:</p> <ol style="list-style-type: none"> 1. That policies SS3 and HOU1 are amended to: <ol style="list-style-type: none"> A) ensure that the plan period is from 1st April 2022 to no earlier than 31st March 2040. B) That the housing requirement is increased to a minimum of 860dpa i.e. 15,480 dwellings over the minimum plan period specified; C) That the potential for a higher housing requirement is assessed which can contribute towards unmet needs of neighbouring authorities, especially those in Greater London as obligation by Section 19(2) of the 2004 Act;

	<p>D) That the allowance of small windfalls is reduced to remove any duplication with sites allocated where up to 4 dwellings are proposed; and</p> <p>E) That further allocations are included in the Plan to address the above requirements, including our clients land for around 60 dwellings (land east of Claygate House, north of Raleigh Drive, Claygate.</p> <p>2. That consequential amendments are made to the document to reflect these revisions.</p> <p>App 02 Watford LP Modifications and IR.pdf</p> <p>WBP Reps for Claygate House - 26 July 2022.pdf</p> <p>App 01 WBP Reps for Clagate Mar 2020.pdf</p> <p>App 06 St Albans v Hunston Properties 2013 EWCA Civ 1610.pdf</p> <p>App 03 EXAM 13 - BFC - AP4.1 Response - Plan Period and Housing Numbers.pdf</p> <p>App 04 Maidstone ED2-Inspectors-initial-letter-24May.pdf</p> <p>App 07 Hundal v S Bucks DC 2012 EWHC 7912 Admin.pdf</p> <p>App 05 Calverton v Nottingham City 2015 EWHC 1078 Admin.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	See enclosed statement which details why attendance is necessary

Name	Andrew Roberts
User ID	24482401
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>I object to the inclusion of Hampton Court station 97 units based (see page 33 of Land Availability Assessment) on there being an extant scheme 2008/1600. This issue was addressed in the Planning Inspector's decision in relation to the 2018/3810. scheme. Appeal A Ref: APP/K3605/W/22/3291461</p> <p>See para 10 of the Inspector's report: "At the Inquiry, the appellants accepted that the extant scheme would not be viable under current market conditions. It was not relied on as a fallback position. In my view the appellants were right to</p>

	<p>take that approach".</p> <p>In her 16/03/2022 email me, Elmbridge Council's Head of Planning (Kim Tagliarini) stated: "The owner has confirmed to us that they consider the extant permission viable and until this is proved otherwise at the appeal we must include it". https://www.youtube.com/watch?v=yS0h2ksRFfU See 3:57:36 where representatives for Alexpo confirm that they have not made any representations to Elmbridge in relation to the extant scheme being viable.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Remove Hampton Court Station from the site allocation list.</p> <p>Fwd Draft Local Plan and Hampton Court Station.msg</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Caroline Robins
User ID	12014401
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Several Evidence Base details on Green Belt Sub-Area 11 are incorrect and therefore inappropriate. The draft Local Plan policy on protecting the Green Belt is generally headed in the right direction, given that 85% of respondents to the 2019 Reg 18 consultation opted to protect all Green Belt from inappropriate development; and 2506 people have signed the petition that demands that all SA-11 be saved from development. This clearly shows how much our beautiful landscape, readily visible to passing horse riders, cyclists, walkers, runners and drivers, is treasured and essential for our health, well-being and happiness. We are submitting this petition here:</p> <p>https://www.change.org/p/our-green-belt-is-under-threat</p> <p>ARUP's pro forma setting out evidence for and assessment of SA-11/GB46, to which the EBC 2022 Sustainability Assessment refers, is available in Green Belt Boundary Review Annex 1A(Sub-Area pro formas). SA-11's pro forma contains 3 key errors, and avoids photos of the gorgeous undulating landscape and strategic view :</p> <p>A. The description states : "The Sub-Area is [...] bounded by the built edge of Oxshott to the north and west". This is not correct. The built edge to the west is in Stoke d'Abernon (not Oxshott), as clearly indicated by the Elmbridge Council's village welcome/boundary sign a few steps from the northwest corner of SA-11; and as indicated by the Church of England official parish boundaries map : https://arcgis.com/home/we map/viewer.html?webmap=67bce0ed36dd4ee0af7a16bc079aa09a&extent=-0.4891,51.2975,0.256</p>

The development to the west is a ribbon development of detached 4 & 5 bedroom houses built roughly 95-100 years ago - whereas the development to the north is a more recently built mix of detached, semi-detached and terraced houses - some of which are ,51.6099

former Council housing.

B. On page 24, the assessment of SA-11's role in safeguarding the countryside from encroachment is merely moderate because it fails to recognise that 0% of the land is previously developed (it instead inaccurately claims less than 10% is previously developed); and fails to recognise that SA-11 is characterised by open rural land uses and landscapes, including agricultural land consisting of open fields yielding crops of hay, with many wildflowers on the field edges. Strategic views of Surrey Hills AONB, from the southern end of the SA-11 Public Footpath leading to SA8, have not been recognised. These stunning views need to be recognised in order to assess accurately, and duly recognise, SA-11's high performance in safeguarding the countryside from encroachment.

Furthermore, development of SA-11 would isolate SA-15 (Danes Hill School sports grounds) from the wider countryside. SA-15 is designated as Institutional Spaces to be protected in EBC's Green Infrastructure map. SA-15 therefore needs to be duly protected by safeguarding SA-11 from development. Development of SA-11 would be visible from Bridle Lane, marking the boundary with SA8. Development of SA-11 would also reduce the performance of SA8 by affecting the pretty views to SA8's north.

C. Correction of this inappropriate, inaccurate ARUP evidence would provide clear justification for the conclusion that SA-11 should not be considered further for development - since SA-11 in fact meets the 3 Purposes assessment more strongly than currently indicated. Correction of the Evidence Base inaccuracies for SA-11 is needed in order to save in from development by Savills who, acting on behalf of The Crown Estate landowners, have been lobbying EBC for several years to develop this readily visible, readily accessible open landscape with stunning strategic views.

SA-11 is in the northern part of LF1 in the 2015 Surrey Landscape Character Assessment, conducted by Hankinson Duckett Associates on behalf of Surrey County Council, Surrey LPAs including Elmbridge Council, and Surrey Hills AONB. The LF1 assessment states : page 23 "The northern part of the area is a pleasant rural farmland landscape with less urban influence despite adjoining Built Up areas to the north." The page 23 character assessment duly recognises the

visible, unspoilt rural environment of SA-11 - unlike the ARUP work commissioned by EBC. EBC contradicts/rejects this assessment of clear evidence. EBC's rejection of these key facts is inappropriate, inaccurate and disproportionate. Page 27 : The section on LF1 Built Development recommends that LPAs "Retain gaps in linear development particularly where these allow rural views over farmland." This Built Development policy needs to be adopted. It will save SA-11 in the medium and long term, as so many passersby enjoy the rural views over farmland along Blundel Lane.

The draft Local Plan section "Protecting the Green Belt" should make this proposal more sound, and therefore more readily deliverable, by adopting the following part of the 2011 Elmbridge Development Strategy :

"Protecting the Green Belt : 3.11 Elmbridge is embedded in the London Green Belt and is under a national obligation to protect and maintain it. The success of the Green Belt policy over the years has shaped the pattern of settlements, and separates towns and villages into individual and distinctive communities. The Green Belt permeates all parts of the Borough and has prevented the coalescence of its component settlements. The fragmented nature of the Green Belt distinguishes the Borough from the more developed London boroughs on one side and the more open countryside on the other." This statement is essential since SA-11 is part of the Green Belt that surrounds Oxshott and helps define Oxshott's green, healthy beautiful character.

The draft LP Green Infrastructure map and policy exclude nearly all the Green Belt - in stark contrast to the 2011 Elmbridge Development Strategy (cf page 54) which includes all the Green Belt. The draft LP's exclusion of SA-11/GB46 and nearly all other Green Belt from Green Infrastructure is inconsistent with the NPPF. NPPF Page 67 defines Green Infrastructure as : "A network of multifunctional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and well-being benefits for nature, climate, local and wider communities and prosperity."

In other words, Green Infrastructure is not just a beneficial network of Public Footpaths (as the draft LP proposes), but a range of views from these Footpaths of stunning landscapes and open countryside and fields; clean air; and biodiversity. For example, our SA-11 benefits the local economy by providing unspoilt farmland, hay fields, or pastureland, as the local Esher Arbrook Farm who currently lease the land deem appropriate.

	<p>Therefore in order to make the draft Local Plan’s Green Belt protection policy more sound throughout the 15 coming years, the LP should include all appropriate Green Belt sites in the Green Infrastructure map.</p> <p>This will then make the LP consistent with the NATIONAL POLICY on Green Infrastructure adopted by HMG in December 2021, as proposed by Natural England. The general policy in the draft LP to protect the Green Belt, such as SA-11, is enormously encouraging in the short term, and needs more sound evidence in the medium and long term in order to deliver this policy effectively.</p> <p>This statement is, on behalf of residents living near the SA-11 site, and the 2506 people who have signed the petition to save SA-11 by correcting the evidence base used to assess its performance. Dorothy Ford and Richard Marshall are co-leaders of the BluWav Residents Group, set up to save SA-11. Richard Marshall and Blu-Wav endorse all the comments in this box.</p>
<p>Question 3</p>	<p>If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.</p>
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p>
<p>Question 4</p>	<p>Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.</p>
	<p>The LP section “Protecting the Green Belt - ENV Developing the Green Belt” should strengthen its proposal to conserve the Green Belt by quoting the following section of the 2011 Elmbridge Development Strategy :</p> <p>“Protecting the Green Belt</p>

	<p>3.11 Elmbridge is embedded in the London Green Belt and is under a national obligation to protect and maintain it. The success of Green Belt policy over the years has shaped the pattern of settlements, and separates towns and villages into individual and distinctive local communities. The Green Belt permeates all parts of the Borough and has prevented the coalescence of its component settlements. The fragmented nature of the Green Belt in Elmbridge distinguishes the Borough from the more developed London boroughs on one side and the more open countryside on the other, beyond the M25.”</p> <p>This 2011 statement is essential because Sub-Area 11 is one of the Green Belt sites that surrounds Oxshott and helps to define Oxshott’s distinctive healthy, clean, green character.</p> <p>Picture 1 delete.jpg</p> <p>Picture 2 delete.jpg</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Dan Robinson
User ID	16262689
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Your map of the greenbelt areas is inconsistent in that Esher Rugby Club land is designated greenbelt but is not shown on the Elmbridge Greenbelt diagram
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No For reason above. Records may not reflect the true topology of the area.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: [Y]
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Include Esher RFC pitches on back fields as greenbelt in your mapping

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Dan Robinson
User ID	16262689
Organisation	
Policy / Evidence base/ part of plan:	CC5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No If the greenbelt map is incorrect, then the LP is not compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Inaccuracies in Elmbridge greenbelt mapping
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] With Weylands as well, this plan goes against your policy to reduce Carbon emissions as HGV's from all over the country pile through Walton on Thames 24/7/365 and down Rydens Road deemed unsuitable for HGV's. It also contradicts your statement to make sure it is environmentally and mentally healthy for residents, which plainly it is not.

	When did you last get developers to actually include 30% of affordable houses? How many times was this promised and then renege?
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Get the greenbelt mapping right
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Dan Robinson
User ID	16262689
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes A legal requirement but not necessarily what's required by the community itself
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No It doesn't follow the logical format it should based on geography and layout of the community and infrastructure
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [] Justified: [Y] Consistent with national policy: [] The local plan includes sites that take no consideration of access routes, roads, bridges and towns especially in Walton on Thames

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	I'm not in to legal jargon. That's for the legal people so this is an unfair question.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Sophie Roger
User ID	40309729
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>Being an ordinary resident with no legal training, I cannot answer this question. It is incorrect to ask residents to comment in this fashion. Is the intention to discourage comments altogether?</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>I am a resident of Hersham. I have lived here since February 2002, more than 20 years. I believe there are several severe problems with the Local Plan.</p> <p>A. Reference: Scale and location of good growth, p27.</p> <p>Settlement / No. of units* / % of total Hersham / 560 / 8.3</p> <p>A.1. The target of 560 new dwellings is far too high for Hersham. In 2016 the wards were redrawn, Hersham shrank from 12500 residents to 8500 residents. Have the targets also been shrunk by 1/3? If not, they should have been.</p> <p>A.2. Within the last five years, Hersham has provided an additional 250 dwellings, by using half of the playing field of the previously Rydens school, now the Three Rivers Academy. Has this number been accounted for? These dwellings were being built while the current plan is being drafted. Should these 250 new dwellings not be taken out of the current target to be achieved?</p> <p>A.3. Hersham is 65% Green Belt. There are not enough brown sites left in Elmbridge to satisfy such high targets. There is simply no more space available if Green Belt is to be preserved. Very recently (latest 5th July 2022) Michael Gove, prior to his dismissal from government, stated in parliament that such targets should be scrapped for the South East.</p>

To support my point, please refer to document attached (Michael Gove, Former Housing Secretary)

A.3.1 Extracts, dixit Mr Gove: "[It would be] no kind of success to simply hit a target if the homes that are built are shoddy, in the wrong place, don't have the infrastructure required and are not contributing to beautiful communities."

A.3.2. Also, highlighting unfairness of arbitrary target: "In recent years, the South East has become the nation's new-build hotspot, with London accounting for 22.7% of all affordable housing delivered in England over the past 30 years."

A.3.3. Also, from meeting with Wokingham Council, Berkshire, suffering from high targets it cannot possible achieve:"There is clear opposition to the current figure, which it believes is arbitrary and puts too much pressure on local amenities and the environment...The council also wants to give communities more power to shape where they live for the better."

B. Reference: Shaping Elmbridge / A New Local Plan / Consultation from 19 August to 30 September. Options Document. Options__Web_final_version.pdf. p2

Leader's message: "Residents may recall that in 2016 we asked for your views on how the borough should grow and what issues were important to you."

B.1. The plan has been in a constant state of fluctuation since 2017. Changes were still being made in May 2022. We are told now that this consultation is FINAL but there is almost no time at all to comment. There has been no direct information from the Council to residents during these five years, even though the world has changed immeasurably because of Covid. Yet the plan is not being reviewed with a consultation starting afresh. We are being told that this plan which is necessarily obsolete (started in 2016! see above) is final, which does not make sense. It is based on old information and on measurements taken during Covid, particularly with regard to residents' and business activity and to car parks which stood empty for the better part of two years and are now still not back to normal.

Covid is not over, cases are rising again at the time of writing (July 2022). It would be sound to wait until the situation settles properly before the plan gets restarted from scratch. Telling us that a plan is in its final formal phase, even though it has had major changes in 2018 and 2020 and keeps changing, and has been invisible during the time of Covid when residents were struggling in an unprecedented crisis, is not merely unsound, it is morally wrong.

We are told that the last public consultation occurred in 2017. Five years ago! (Ref: Note at bottom of page: "All feedback can be found in the Elmbridge Local Plan Strategic Option

Consultation (Regulation 18) Summary of Consultation Response, July 2017", p4, Options Document. Options__Web_final_version.pdf). Yet the plan has never stopped changing during these five years with key sites being included, excluded and included again in various waves of changes.

B.2. The consultation period was supposed to open on Friday 17th June 2022. Due to an unexplained website malfunction, the consultation pages were not available until Friday 24th June morning. A week was lost. The deadline should be pushed by at least one week, until Friday 5th August 2022 for the full six weeks to be offered.

B.3. The consultation period is too narrow, There are more than 800 pages worth of documentation. I understand some of the documentation was missing from the website (over 200 pages).It was requested from the council and was finally made available on 4th July 2022. This means the deadline should be pushed back so that these missing pages can be properly consulted.

B.4. The documentation is too lengthy and contains much repeated text, as if a padding exercise has been undertaken. Is the intention to confuse/befuddle/drown ordinary residents with a surplus of unnecessary information to prevent comments from being put forward? There is no attempt to direct residents to simpler, digested content so that comments are welcome and facilitated instead of discouraged.

B.5. Similarly the instructions given on the website are draconian, re-iterate the minute detail of procedure and rules that have to be adhered to, threatening that responses will otherwise be disregarded. Indeed, even though the website opened late, we are told on the consultation portal page that "Late responses will not be accepted under any circumstances and individual acknowledgement of receipt will not be possible." Is this punishing tone really necessary? Are comments actively being discouraged?

B.6. Confusing / unnecessary / contradictory rules.

A member of a local organisation called the council to get advice on the procedure to follow and were given misleading information across three attempts, given different instructions as to which details should be ABSOLUTELY included OTHERWISE comments would be disregarded and not included in the final consultation sent to the inspector. Different instructions and details and different email addresses were given and she was also told EXACTLY how 'Regulation 19: Draft Elmbridge Local Plan 2037' should be included, and told that, if not quoted exactly so, would

result in the response being disregarded. Even though she had been told differently on a previous phone call

Under the guise of helping, these differing instructions sent the local organisation into panicked moves to harsh responses required to EXACTLY what could be received whereas the only help given should have been to welcome all comments from residents, concentrating on content rather than form. That would be the sound path to take. Any other draconian and arbitrary rules would only harm the consultation process, unless of course the actual intention was to limit and discourage input from residents.

B.7. Changes to Elmbridge Borough Council website during consultation process

B.7.1. We have also noticed that in the last few days (15th July), as residents are starting to give their opinions and answers, the Elmbridge Borough Council website has changed. The DRAFT LOCAL PLAN was on a prominent picture/button on the right hand-side of the home page which brought you straight to the consultation page.

The link since then has been moved to the top smaller picture/button above heat/temperature warnings. Why move it at this crucial time?

B.7.2. Furthermore, only a couple of days later (17th July), it has vanished altogether and has been moved to the third option on the display of the picture/button on the right-hand side of the home page where, conceivably, no one will find it. You have to click on the third button underneath this mini-menu to find the consultation pages.

We do not understand why things are being changed JUST WHEN residents are trying to respond. Is the intention to discourage comments just when residents are trying to respond?

B.7.3. We have noticed furthermore that the questionnaire links on the consultation page appear to have changed. The two long dark blue buttons at the bottom of the page, which last week (9th July) brought you to the simpler 'Reply to the plan as a whole' questionnaire now have developed into two different pages, the second of which is now a 44 (44!) options list for residents to use to reply to the document paragraph by paragraph. It seems like a particular kind of torture, which will put off even the most resilient and responsible of residents.

B.7.4. New parking / car parks consultation launched by EBC

Reference: Elmbridge Customer Parking Survey - Help us shape the parking strategy for Elmbridge!

On 24th July, a brand new consultation into car parks and parking around Elmbridge was launched by Elmbridge Borough Council, 5 days before the deadline for the Local Plan.

	<p>On the website front page, this brand new 'Elmbridge Customer Parking Survey' has dislodged the Local Plan Draft 19 one further place down in the mini menu even though the deadline is only days away.</p> <p>Again, is the intention to confuse residents further and distract them from responding to the Local Plan by throwing another survey at them?</p> <p>B.7.5. Local Plan Draft 19 is now back on front page</p> <p>I complained to the council about the Local Plan having become invisible on the front page and they re-established it, even though they responded that they had not moved it from the front page.</p> <p>I don't know whether to be happy that they re-established it, so that people can find it, or unhappy that they would not admit to moving it in the first place.</p> <p>Ref:</p> <p>B.7.5.i Letter to EBC about extending deadline.</p> <p>B.7.5.ii Response from EBC refusing to extend deadline</p> <p>The two letters are included in my submission.</p>
<p>Question 3</p>	<p>If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.</p>
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>Continued from previous page.</p> <p>C. Reference: Shaping Elmbridge / A New Local Plan / Consultation from 19 August to 30 September. Options Document. Options__Web_final_version.pdf. p28</p> <p>"Myth: Our views won't be listened to</p>

Fact: We take all peoples views into account. Responding to your comments and feedback has enabled us to look at our options again and add to them."

C.1. The method of response on the website is highly intimidating (the very questionnaire I am answering here), couched in a language that most residents will shy from, feeling they cannot contribute a response in this supposedly FORMAL, LEGAL setting even though as the residents and users of the locations, they are the true experts as to whether or not they can be put on the plan.

The truly relevant part of the consultation document is Chapter 9, which contains the list of locations. With regard to Hersham it's ONE PAGE out of 140 pages. These are the highly significant lists which should have been made obvious and readily accessible to residents instead of being buried between pages 93 and 106.

C3. An attempt from local residents groups to simplify the process by which residents could respond to the plan was distributed throughout Hersham with all the Hersham Locations listed and asking residents to comment and send to the Council.

One day before the deadline, on 28th July 2022, the front page of the Elmbridge Borough Council has changed again, this time telling residents not to use this form:

"The Regulation 19 representation closes on Friday 29 July at 4pm.

Please respond using the official online representation form, with GDPR declaration, rather than unofficial localised forms."

Reference: file attached EBCFrontPage20220728

I find it unhelpful that the Council does not welcome responses from residents, in whichever form the residents find easier to send them. Their opinion should be welcome.

C.4. The consultation period, short as it is, is set up over the summer when people are away. Is this an attempt to impair the opportunity for the public to comment?

D. Positively prepared

I do not think the plan is 'positively prepared' because I am aware of several locations within Hersham which should not have been included and clearly have not been assessed or considered in a proper manner.

One of the targets of the plan is that it should be consistent with the 'Land Availability Assessment' which is defined in the Appendix A2 Glossary of the plan document.

"[It] identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period."

So: SUITABLE, AVAILABLE and ACHIEVABLE

Some examples of locations in the plan which are none of these things are as listed below.

D.1. "H11- US376 Trinity Hall and 63-67 Molesey Road, Hersham 11-15 47 residential units and re?provision of community use", Chapter 9, Page 99.

This site, first of all, is not called Trinity Hall, I think that must be a mistake. Secondly it has a sewage pumping station within it, behind the Barley Mow pub car park. Are new dwellings to be built above it? This UNSUITABLE and UNACHIEVABLE. It needs to be fully accessible and it not a salubrious place to be inhabited. Furthermore the Barley Mow pub is a listed building and cannot be demolished and is one of the few businesses in Hersham who has so far survived the Covid crisis and should be preserved. It needs its car park to function. Similarly, Laithwaite should not be touched. We need the business activity and the employment! How can these site have been included at all? They are UNAVAILABLE.

D.2. In the case of other locations, the owner was unaware the plan included their very own property, marked as ASSESSED, AVAILABLE and ACHIEVABLE even though they had no idea they were in the plan.

Here are two examples. It was confirmed at a local residents meetings in Hersham on Friday 1st July that the owners had no idea their properties were on the plan and none of them wanted it in the plan!

D.2.i. H8 - US389 Hersham sports and social club, 128 Hersham Road, Hersham KT12 5QL

Delivery period (years): 11-15 Allocated for: 8 residential units

D.2.ii. H10 - US390 The Royal George Pub, 130-132 Hersham Road Hersham, KT12 5QJ

Delivery period (years): 11-15 Allocated for: 15 residential units

(Chapter 9, Page 99)

We were told at the local residents meeting on Fri 1st July 2022 by Ms Karen Randolph of the Local Plan Committee that the owners only had to write to the council and their properties would be taken off the plan immediately.

Why were they on the plan in the first place without any prior consultation?

So much for AVAILABILITY.

E. Effective

E.1. Climate Change

E.1.1. One of the targets of the Local Plan is that it has to address the environment and climate change. As a result many assertions of the fact that we will not drive cars but will walk, cycle and use public transport are repeated throughout the document. But nothing is indicated in the document as to the improvements needed in Elmbridge so that public transport can support this miraculous change. There are NO DETAILS at all. No added bus routes, no increased numbers of buses, bus route additions, no new cycling lanes, no budget considerations. The repeated vague statements of improved public transport are merely lip service, not a serious effort, not a genuine plan, In that respect it is wholly INEFFECTIVE as a plan.

E.1.2. Car parks
As everybody will be walking and cycling, we will not need car parks. This is perhaps why every single car park in Hersham is targeted for replacement with new dwellings. The following car parks are included in the plan, 6 out of 15 possible sites. (Chapter 9, p 99 and 100)

H3 US379 Hersham Shopping Centre, Molesey Road, Hersham, car park only. (This might be a mistake, as 200 dwellings are listed, maybe this includes the shopping centre as well, which is inconceivable, as it is the heart of Hersham).

H5 US45 Car park to the south of Mayfield Road, Hersham (Walton Station Car Park, Hersham Side)

H6 US40 Hersham Day Centre and Village Hall, Queens Road, Hersham, KT12- 5LU

H7 US380 New Berry Lane car park, Hersham, KT12 4HQ. Near Burhill School, Doctors', Dentist, Pharmacies, etc.

H11 US376 Trinity Hall and 63-67 Molesey Road, Hersham (Bowling green, inc. Barley Mow pub and car park)

H12 US435 Car Park next to Waterloo Court (overflow Railway car park behind Walton Station new block of new flats)

New dwellings mean new residents, therefore new cars, but due to sky high land prices in Elmbridge, parking is not often addressed in planning applications. No developers want to pay the price of redevelopment with additional parking places. If new dwellings are built in these locations, at the high levels quoted, the existing parking facilities will disappear, parking needs will increase and because of elevated costs, no new parking will be available. This is completely unacceptable.

	<p>This is a key issue for Hersham Library (H15 US374, p 100). It has a very necessary car park with disabled space, making is easily accessible to elderly residents. Many people say that they find Walton Library much less easy to go to. It is essential that Hersham Library retain its car park.</p> <p>E.1.3. Electric cars Reference: Sustainable transport - CC4 - Sustainable transport e) Provide electric vehicle charging facilities situated in convenient and easy to use locations. p 36.</p> <p>As all the car parks in Hersham will have been removed, there will be nowhere to provide electric charging point facilities. These cannot be provided on the street and at lampposts for safety reasons. Street parking is mostly unavailbale in HESham anyway, many pavements have been broken down in front of houses by residents needing to park more than one vehicle at home, as car ownership is on the rise, not falling.</p> <p>Car parks are necessary because people will still drive cars in the near future, but they will be electric.</p> <p>The local plan is a pipe dream, building castles in the air without any realistic precise detail on how it can be achieved. It is INEFFECTIVE as a plan.</p> <p>=====</p> <p>The rest of my response is in document ContinuedQuestionnaire Website20220728 added to the files.</p>
<p>Question 4</p>	<p>Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.</p>
	<p>Please find my answer in addendum document ContinuedQuestionnaire Website20220728 added to my files for submission.</p> <p>MichaelGoveHousingSecretary.docx</p> <p>EBC Response to Local Plan Sub-Committee for Hersham.pdf</p> <p>HershamLocalPlanExtensionDeadline20220718.docx</p>

	<p>HershamFloodMapGetTheData_20220718.png</p> <p>HershamFloodMapWarningArea_20220718.png</p> <p>HershamShoppingCentreGoogleEarthFlood20220728.png</p> <p>HershamFloodMapPaulVansonCourt20220718.png</p> <p>HershamLibraryEBCStatement20220707.png</p> <p>EBCFrontPage20220728.png</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	I feel very strongly about the proposals in the Local Plan and I have serious concerns as its validity in terms of soundness, fairness and respect for the residents. I wish to speak at the Oral Examination and will bring documents to support my arguments.

Name	Sophie Roger
User ID	40309729
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No .
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No .
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [] Consistent with national policy: [] .
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	.

Name	Mike Rollings
User ID	41176129
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Elaine Rollings
User ID	41176193
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Rochard Ross
User ID	41252449
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Abri (Meghan Rossiter)
User ID	38927649
Organisation	Abri
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Affordable Housing Target The identification of a percentage target figure for affordable housing within draft policy SS3 is supported, however the use of a specific numerical target for affordable housing, as informed by the Local Housing Needs Assessment, would provide more focus on delivery. The use of the

numerical target of 269 affordable homes per annum would also permit more directed and effective monitoring the success of policies in meeting local housing need over the plan period, a particularly important issue in an area so constrained by its Green Belt, and allow the Council to respond to shortfalls where this occurs. An affordable housing target should, as with the general housing target, be a net figure, to account for any future losses to the local stock and to ensure that the plan can be used to respond to changes in affordability which may require a further uplift in delivery of affordable housing.

Climate Change

As a provider of affordable housing, Abri is committed to delivering housing that provides a safe, warm and efficient environment for our customers. As part of our commitment as a Strategic Partner of Homes England we are aiming to meet the Future Homes Standard wherever possible, ensuring that homes have a minimal carbon footprint and are future-proofed.

We are therefore very supportive of the aims of draft policy CC1 but ask that this is more targeted to provide more certainty in planning for development. The wording of this policy is not specific enough to be effective; point 1 expects the 'highest levels of energy efficiency' and this loose wording could be used to refuse development that fails to deliver Passivhaus standards. To give development certainty of what is required to achieve planning permission, standards should be set out within the policy itself and not relegated to supplementary planning guidance.

As with our comments above, draft policy ENV9 ambitiously asks that development be fully adaptable and resilient to the impacts of a changing climate, but this is not an effective policy ask, as it could be used to require developments to undertake much more detailed and wide-ranging environmental impact-style assessments. More precise language, or reference to other measures of sustainability, may improve the policy's future use.

Housing Delivery

Draft policy HOU1 is supported in its aim to maximise opportunities to deliver homes to meet local housing needs and the wider housing requirement. As with our comments in response to draft policy SS3, a numerical, annualised, target for affordable housing delivery may assist in better targeting and monitoring the delivery of the range of affordable tenures to meet local needs. We support the intentions and detail of draft policies HOU2, HOU3 and HOU4 as a beneficial steer to maximise the efficiency of land and delivery of affordable housing across the borough. The stepped approach to brownfield and greenfield sites is also supported in ensuring

proper differentiation in the costs associated with each site and the prospects for viable delivery of affordable housing.

Point 3 of HOU4 is useful in responding to site specific circumstances, however the final sentence is not specific enough and would introduce too much uncertainty in determining locally appropriate pricing. Alternative wording, such as costs being set “at least 30% below market prices and rent” would be more appropriate.

As the viability work has demonstrated that only the delivery of 1-bed flats can be provided at a 30% discount as First Homes, it may be challenging to deliver this tenure across the borough, particularly where schemes are not delivering 1-bed flats. The delivery of First Homes almost exclusively as 1-bed flats should be considered in assessing individual schemes to ensure delivery of affordable rented and other affordable sale properties can continue to meet those needs across the borough. The policy aims to achieve affordable housing delivery on all self-contained residential developments, however the viability work did not allow for First Homes within those scheme typologies, and this should be subject to further testing.

Full integration through pepper-potting can make management of affordable housing more difficult, and so point 6 of HOU4 should allow an element of flexibility, to ensure clusters of affordable housing can be delivered where appropriate.

As the Council has identified that such a significant proportion of housing is brought forward across the borough on smaller sites, necessitating financial contributions to the delivery of affordable housing, the Council should consider allocating sites specifically for affordable housing, working in partnership with affordable housing providers.

The threshold test in draft policy HOU5 for delivering single-aspect homes is set very high by requiring exceptional circumstances to be demonstrated. As this plan is largely focused on brownfield sites, and sites in urban areas, there will be a significant proportion of sites that are constrained by existing surrounding or neighbouring developments that, when delivering at scale as required by other policies in this plan, require resourceful architectural responses. This may prevent dual-aspect homes being delivered in many instances across the borough, and this should be encouraged where single-aspect homes can still deliver high quality light and amenity levels, alongside meeting the local housing needs. This element of the draft policy, at point 4, should be reworded to encourage dual-aspect homes wherever possible, with single-aspect homes permissible where site constraints dictate this. This will work well alongside the remaining elements of this policy, such as achieving the minimum average daylight factor targets.

	<p>Infrastructure As the Council is seeking through draft policy INF3 to require submission of a Health Impact Assessment on all major development, a template HIA should be provided either as part of this plan or through the validation checklist to ensure developments can be fairly and proportionately assessed. Health Impact Assessment should be included in the Glossary.</p> <p>Monitoring The monitoring of the delivery of affordable housing should monitor the net affordable homes delivered, as well as linking the level of delivery to the Local Housing Need Assessment target figure of 269 dwellings per annum.</p> <p>07.2022 Elmbridge Local Plan.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Rosamund Rule
User ID	41257889
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No I'm not an expert to be able to opine on this.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No This plan does not seem to be well thought out or to fully consider the impact of removing valuable infrastructure such as station and other car parks from the local area. There are already too many cars and insufficient parking. Removing car parks, especially walton park car park (the one servicing Hersham station) will force more people to park on roads, congestion's them further, and force more drop off and picks ups, also further congesting roads. What plans are there to encourage more sustainable travel to stations to take account of the lack of parking? There is also a huge lack of additional infrastructure planned to service the new homes and families - the trains are already full, the bus routes are not fit for purpose, schools and doctors surgeries are full and drainage can't cope, to name but a few.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y]

	<p>Consistent with national policy: []</p> <p>Please see previous page. There is a lack of thought of the knock-on effect of removing car parks, particularly station car parks, and a lack of investment in other infrastructure needed when creating new homes in an area already full.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Do not remove Parking, especially near railway stations.</p> <p>Create plans for new or improved infrastructure- new primary schools, doctors surgeries, improved drainage etc.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Stephen Russell
User ID	24308129
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No I do not believe that there has been appropriate local consultation on some specific issues relating to planning proposals
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No While some of the plan is undoubtedly sound and can be welcomed some specific planning proposals are not sound and do not comply with local or national policies. Furthermore local consultation has not taken place. Planning ideas need to be strategically planned and not piecemeal responding to individual pro identification especially in response to developers.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [Y]

	I refer specifically to planning proposals for New Road. The specific proposals for flatted developments on New Road have need been prepared with the expressed permission of site owners. And it is very well documented that the residents of the road are unanimously opposed to flats. The proposals are in conflict with the character of the road, consequent local policies and mnational guidelines
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	The proposals for individual sites must always demonstrate the site owners expressed permission and also demonstrate local (consulted) support. This is quite clearly not the case as stated above
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Louise Russell
User ID	24294945
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>Thank you for all the work that has gone into the preparation of the plan. What a huge task for Karen Randolph and everyone involved.</p> <p>I would make one strategic observation: It would be good to know the evidence for the decision that three bed and above homes should be no more than 30% of the total 6785 homes. This would seem restrictive for any family with two kids.</p> <p>I think the site allocations is such an emotive issue - I think it needs to be brought out, reviewed and justified separately as it feels tucked away on page 93.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Simon Sales
User ID	16333377
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Simon Sales
User ID	16333377
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I support the local plan and think it serves the needs of the community
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Victoria Schmidt
User ID	23739521
Organisation	
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I feel that this Plan and this Chapter provides a full and positive policy towards the future. I fully support it.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Joanne Shand
User ID	41259265
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Building new homes has a negative impact on the environment and hastens climate change. The flood plain will be negatively impacted putting us all in danger in the short and longer term. The Library is crucial to the economic strength of the community. Education, literacy and access to online services are only available through the library for some people in the Borough. They must not be disenfranchised. The library is a safe, supportive place for people to find jobs, learn new skills, make friends and de-stress. It has a very positive impact on the community. Retail is critical to encourage people to shop locally and chat to their neighbours. It is not just a place to buy stuff. It is a place to work, a place to browse healthy foods, a place to get broken things fixed or get a haircut. It is more than just a shop.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [Y]

	<p>Consistent with national policy: []</p> <p>There is no evidence that building smaller and cheaper homes will mean that people stay here. It may mean that landlords buy the homes and young people still cannot afford to live here either renting or buying.</p> <p>The area has a village feel, building on brown fields sites will erode that character and it can never be regained.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Invest in the library. Keep the village green and surrounding retail and residential streets as they are now.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Anne Sheppard
User ID	24535425
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I have read the Topic Paper relating to the Spatial Strategy and consider that that paper makes a very clear case for the soundness of the draft Local Plan, explaining and justifying the Council's decision to prioritise continued protection of the Green Belt in terms of overall sustainability and environmental considerations. I strongly support this decision by the Council.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Anthony Sheppard
User ID	7954177
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes The Council have established compliance with the NPPF.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes The Council have rigorously consulted on and evaluated other options, especially relating to Spatial Strategy. Sound arguments are presented against release of Green Belt. Previous consultations on even limited release of Green Belt revealed overwhelming public opposition to such a policy, with concerns about urban sprawl, coalescence of settlements, environmental damage and loss of greenspace amenities. The density of settlement in Elmbridge, coupled with its proximity to Greater London, make its Green Belt of particular importance.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mark Shurmer
User ID	24319809
Organisation	
Policy / Evidence base/ part of plan:	ENV7
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I would like it to go further on electric vehicle charging points, by providing a minimum number of points across the borough, enough to make a genuine difference. I would also like to see a more concrete plan of those being added to all Elmbridge borough facilities
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Susan Shutt
User ID	41178113
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Pauline Simpson
User ID	16339361
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Pauline Simpson
User ID	16339361
Organisation	
Policy / Evidence base/ part of plan:	CC1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No there is no comment about the use of green energy - solar or wind - both of which can be of use in Elmbridge
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [] Consistent with national policy: [] No recommendation for green energy
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Use of solar and wind energy

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Pauline Simpson
User ID	16339361
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Pauline Simpson
User ID	16339361
Organisation	
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes There cannot be 33 residential units at D3 . The site is not big enough. I suggest this is a misprint
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No See above
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [] Consistent with national policy: [] D3 Site allocation - there is not enough space to allocate 33 residential units
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	3 (?) residential units
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Helen Smith
User ID	40933281
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [] Consistent with national policy: [] Hersham Library needs to be protected
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Remove any changes to Hersham Library

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	National Bargee Travellers Association (Pamela Smith)
User ID	41204513
Organisation	National Bargee Travellers Association
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>The south bank of the River Thames forms the entirety of the northern boundary of Elmbridge. This is around eight miles of river bank. Yet the draft Local Plan was prepared without regard to those who live on boats on the River Thames and the pre-submission Local Plan fails to address the needs of those known to be living on so-called 'unauthorised moorings'. The Plan therefore fails to address the specific housing requirements of Boat Dwellers contrary to paragraph 60 of the NPPF.</p> <p>In addition, despite the fact the Council was aware of this issue and agreed in 2019 that the need for moorings should be assessed, the plan was drafted without the benefit of any such assessment, the assessment was not completed until February 2022 and was not put into the public domain and added to the Evidence Base until after a planning appeal in mid-March 2022. Emerging Policy is not informed or shaped by this needs assessment and its findings are not even documented in draft policy such as SS3 Scale and Location of good growth. No new policy is proposed to address the need identified.</p> <p>Furthermore, the public has just one opportunity, now, to comment on the needs assessment published earlier this year. This will be the one and only chance to examine its methodology, assumptions and findings. It was left up to Boat Dwellers to discover that the needs assessment had in fact been published and now formed part of the Local Plan Evidence Base. The approach taken by Elmbridge Council lacks fairness, transparency and proper engagement with those most affected by this matter. It is hard to avoid the conclusion that the February 2022 Boat Dweller Accommodation Needs Assessment was deliberately withheld.</p>

	<p>There appears to be no sustainability appraisal of the policy approach proposed by Elmbridge Council. No change is proposed to the draft Policy and the Council does not seek to add any policy to address the need identified. This failure to complete the Evidence Base in an appropriate and timely fashion, and address or even acknowledge a specific housing need for moorings on the River Thames, is a clear breach of paragraph 62 of the NPPF which states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.</p>
<p>Question 2</p>	<p>Do you consider this part of the draft Local Plan to be sound?</p>
	<p>No</p> <p>The plan is not positively prepared in so far as it fails to consider, let alone address, the needs of Boat Dwellers. The Council has known that boats are occupied on the River Thames within its jurisdiction and are moored on what the Council refers to as ‘unauthorised moorings’ for at least five years.</p> <p>Specifically the Council has failed to consider the accommodation needs of Bargee Travellers – itinerant Boat Dwellers – who do not have or seek a permanent residential mooring, but by virtue of the Public Right of Navigation, codified in Section 79 of the Thames Conservancy Act 1932, have the right to anchor, moor or remain stationary for a reasonable time in the ordinary course of pleasure navigation on the River Thames. According to Moore v British Waterways [2013] EWCA Civ 73, paragraph 63, the length of time that can be considered ‘reasonable’ cannot be determined in advance. This is a Common Law right and cannot be extinguished by Planning Policy, Planning Enforcement or a Local Plan.</p> <p>Section 8 of the Housing Act 1985 places a statutory requirement on local housing authorities to carry out a periodical review of housing needs to assess and understand the needs of people residing or resorting to their district. Section 124 of the Housing and Planning Act 2016 includes a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in, or resorting to, their district with respect to places on inland waterways where houseboats can be moored.</p> <p>‘Houseboat’ in this context means a boat or similar structure designed or adapted for use as a place to live.</p>

Contrary to the Council's assertion in the draft Local Plan that there is no Statutory Guidance regarding this matter, in March 2016 the Department of Communities and Local Government (DCLG) published its draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats. Later in 2016 the DCLG confirmed to the NBTA that the Draft Guidance should be treated as the final guidance until the finalised version was published.

Given that the requirement to determine the accommodation needs of Boat Dwellers was only introduced by the Housing and Planning Act 2016, there is no established method to determine need. In addition, there is no specific policy for Boat Dwellers in national planning policy. Section 5 of the NPPF is concerned with 'Delivering a sufficient supply of homes'. This is unchanged from the July 2018 and 2019 versions. Paragraph 62 of the NPPF 2021 states:

"Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)". This also remains unchanged since 2018.

On 5th June 2019 a report was taken to Elmbridge Cabinet to seek approval to commence stakeholder consultation on a range of options to seek a long-term solution to manage the ongoing issues of [sic] mooring without consent on the River Thames. At the time Elmbridge, Spelthorne and Runnymede Borough Councils were considering options along the specified area of the River Thames due to what was referred to as 'the unreasonable and persistent nature of mooring without consent' which it was claimed was having a detrimental effect on those living in the locality.

It was noted that there had been an increase in the number of boats moored allegedly without permission on the River Thames and that there was a community of regular river users who go about their lives on the river as a way of life. The report claimed that owners who wish to live aboard a boat as a permanent residence need to have an approved residential mooring. The report stated as follows for Elmbridge

"16. Elmbridge has in the region of 50 to 80 boats moored along the River Thames without consent between the boundary with the London Borough of Kingston at Surbiton/ Thames Ditton and Weybridge where the river leaves the Borough. At the time of writing, only a handful of these

boats are currently moored on Elmbridge land (Cigarette Island) and the remainder on a mixture of private and public landowners.”

It is clear from reading the June 2019 Cabinet report that in early 2019 Elmbridge Council was aware of this issue, had received numerous complaints and were investigating this matter with other authorities. The 2019 Cabinet report went on to state as follows:

“49. The Local Plan evidence (in particular the Gypsy and Traveller Accommodation and Assessment) has not identified a need for houseboat dwellers. The need for other affordable housing is contained within the North East Surrey Strategic Housing Market Assessment. This need is being met through the existing local policies, new Local Plan and wider corporate commitments. As part of the review of Development Management policies Officers will review Policy DM13 Riverside Development and Uses and consider introducing specific criteria on mooring and floating structures similar to Richmond’s Policy LP-19. However, this review and adoption will not be completed until late 2020/early 2021.”

This statement is misleading. The Local Plan Evidence Base had not identified a need for Boat Dwellers because no study had been commissioned to address this and the 2017 GTAA by ORS did not interview or include the needs of those living on boats on the river. There is no policy in the current Local Plan to address the needs of Boat Dwellers nor is there a policy in the pre submission Local Plan. There is no evidence that Officers have reviewed Policy DM13 or how that would assist in addressing the issue of residential moorings.

Paragraph 1.2 of the Pre -submission draft Local Plan states that it will form the basis on which planning applications in the borough will be determined, replacing the 2011 Core Strategy and 2015 Development Management Plan. Appendix A1 lists the policies it will replace. They are all 2011 Core Strategy policies. There are no new or updated development management policies in the pre-submission Local Plan. There is no evidence officers have reviewed Policy DM13 in the context of so-called ‘unauthorised moorings’ on the River Thames as stated in the 2019 Cabinet Report.

The 2015 DM Plan includes Policy DM22 for Recreational Uses of Waterways which addresses the need to resist the loss of facilities, encourage new or improved facilities, public access to the river and the bank and (criteria e):

“Permitting further permanent moorings or houseboats provided they protect the appearance of the riverside and do not add to river congestion”.

Noticeably absent from the 2011 Core Strategy, the 2015 Plan or pre-submission Local Plan is any policy for residential use of the waterways and for permanent moorings for residential as opposed to recreational boats.

Also absent from the 2011 Core Strategy, the 2015 Plan or pre-submission Local Plan is any consideration of the accommodation needs of itinerant Boat Dwellers, who by virtue of the Public Right of Navigation, codified in Section 79 of the Thames Conservancy Act 1932, have the right to anchor, moor or remain stationary for a reasonable time in the ordinary course of pleasure navigation on the River Thames.

In addition, the reference to Policy LP19 for the London Borough of Richmond is misleading as this states quite clearly at criteria A:

“There is a presumption against new proposals for houseboats, including extensions to existing houseboats, and other moorings or floating structures designed for permanent residential use”.

Criteria B then lists the criteria that need to be complied with for moorings or other floating structures. It is clear the approach adopted by LB Richmond is not a model that will facilitate the provision of residential moorings.

This statement gives a clear indication in mid 2019 that the policy approach in Elmbridge was to prevent rather than accommodate the needs of boaters on so-called ‘unauthorised moorings’ and this approach was not informed by any assessment or appraisal of the use made of these boats or any appreciation of the need to identify how many of these boats were providing residential accommodation for persons who were homeless, in need of accommodation, choose to live on their boats and/or have resorted to living on boats due to the shortage of other affordable housing. A second report was taken to Elmbridge Cabinet in September 2019 to report back on the Stakeholder consultation. The report noted that any enforcement could have implications on making a liveaboard boater homeless, and that the Council had failed to carry out an assessment of Boat Dwellers needs as required under Section 124 of the Housing and Planning Act 2016 and that an assessment should be carried out before any further action. The work was expected to start in 2019 and the findings would inform the approach taken in the new Local Plan.

It is clear Elmbridge Council understood the process. What is unclear is why it failed to follow its own advice and chose to prepare and consult on the new local plan without first establishing the evidence base which would confirm the need for more temporary and permanent residential moorings. The NPPF makes clear that the development plan is supposed to be the starting point for decision making and the planning system should be genuinely plan led, providing a

	<p>framework for addressing housing needs. Yet in July 2020, the Leader of Elmbridge Council contacted the Chief Executive of the Environment Agency saying: "I am writing to you as a last resort to seek your intervention to resolve a seemingly intractable problem of illegally [sic] moored boats along the Thames</p>
<p>Question 3</p>	<p>If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.</p>
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>The plan fails the soundness test for the following reasons The draft Local Plan is not positively prepared as it fails to address or acknowledge the need for permanent and temporary residential moorings for Boat Dwellers. In the absence of any national policy or guidance it is critical this matter is not omitted from Local Plans where, as in the case of Elmbridge, there is a substantial length of the River Thames within the borough. This is in conflict with the NPPF and draft policy HOU3 Housing Mix which seeks to deliver the right homes to address local housing needs. The pre-submission Local Plan was drafted and submitted for consultation without the benefit of any assessment of the needs of boaters and has not been amended to reflect the need identified as late as February 2022. There has been no proper, thorough, methodical assessment of the availability of suitable sites or new moorings for this use. The draft Local Plan is not justified as the proposed strategy as set out in the June 2022 Boat Dwellers Site Assessment paper, which was added to the pre submission Local Plan Evidence Base at the start of Regulation 19 consultation process, is not drafted to address this matter or the issues relied on at the March 2022 appeal hearings for boaters at West Molesey. The draft Local Plan is not effective as there is no evidence of any effective joint working with other local authorities with boundaries fronting the River Thames (including the north bank of the</p>

River on the boundary with Elmbridge) and no common policy approach by these authorities to make provision for residential boats. This is unacceptable. Whilst there are other joint policy approaches for flood risk and biodiversity along the River Thames, there are none for the provision of moorings for Boat Dwellers. For similar reasons it is questionable whether the Duty to Co-operate has been complied with.

The plan is not consistent with paragraph 62 of the NPPF as it fails to address an identified housing need and in the absence of any national policy for residential boats fails to include a positive policy to address this need.

Continuation of Question 2

... in Elmbridge”.

At this stage Elmbridge Council had still failed to commission a Boat Dweller Accommodation Needs Assessment or make any attempt to address the issue with a bespoke planning policy. The Council’s only action had been to serve Enforcement Notices with a very short compliance period. The planning applications submitted mid 2020 were refused in December 2020. The Council was clearly aware that boats were occupied residentially without planning consent for permanent residential use a full 2 years before the Regulation 19 stage of this Local Plan. It also was of the opinion this was a material change in use of the river bank, inappropriate development in the Green Belt and required special justification to secure planning permission.

In 2021 Elmbridge Council commissioned ORS to undertake the first survey of liveaboard boats in the district. It is estimated that there were 40 live aboard boats moored on the Thames in Elmbridge which is less than the figure assumed by the Council in 2019. Only 25 interviews were completed (62.5%). The study was published in February 2022 but the Council failed to submit this evidence at the March 2022 appeals for 5 moorings in this Borough, failed to even tell the hearing that the study had been completed and could not tell the Inspector when or how any need would be addressed through future development plan examination. Compared to the numbers quoted in 2019, the study appears to have omitted to even consider the needs of itinerant Boat Dwellers.

The 2022 Elmbridge Boat Dwellers study found a need for 10 permanent moorings on the Thames in Elmbridge for the 25 interviews undertaken. However, if the rough estimate of up to 40 liveaboard boats in the district is accepted, the modelling would suggest a need for up to 16 permanent moorings. This is in addition to a need for temporary mooring space for Bargee

Travellers. The survey also identified a need for improved services such as waste disposal and potable water.

In June 2022 Elmbridge Council published a Site Assessment Paper to explain how the accommodation needs of Boat Dwellers could be met within the Borough as part of the Local Plan (2037). Yet, by this stage the Council was finalising the pre submission version of the Local Plan. The Paper explains how the Council identified the availability of land. In May 2022 it wrote to the owners of public land along the River Thames to ask if they had any land available to accommodate 10 permanent residential moorings. Copies of these letters are not provided with the Site Assessment report. It is not known if those contacted were asked to identify land suitable for 10 moorings, or several smaller sections of bank suitable for fewer moorings. All replied that they were unaware of any suitable sites and Richmond Council referred to its Policy LP19 which contains a presumption against new proposals. The Council failed to contact private landowners or to consider the potential of any unregistered stretches of water. The site assessment failed to establish if there was capacity at existing moorings for extra boats and ignored the availability of the purpose built wharf near Cherry Orchard Gardens, West Molesey. There are many other omissions and the site assessment did not even document the nature of landownership of the river bank.

The pre submission Local Plan was published for public consultation just one month after this very brief report published in June 2022. The Council relies on this very inadequate Site Assessment to claim there was no public land available along the River Thames within Elmbridge or its neighbouring authorities suitable for the allocation of boat dweller accommodation. Yet in February 2022 the ORS study had identified that approximately 40 boaters were moored on the Thames in Elmbridge.

Elmbridge concludes at paragraph 5.2 by stating that whilst the assessed need would not be met through a site allocation policy, draft Policy INF6 would assist in ensuring that any windfall proposals for boat dweller accommodation are considered and this would be kept under review. There is no acknowledgment in Policy INF6 that the Thames provides a home for Boat Dwellers who moor permanently, temporarily or live itinerantly on their boats. Contrary to the claims of Elmbridge Council, Policy INF6-Rivers is not drafted with residential moorings in mind and will not help to address the need identified in the February 2022 assessment for more permanent moorings for residential boats. In addition, it will be read in conjunction with saved Policy DM13 which also fails to support, or help identify, suitable locations for residential moorings. Together

	these policies will thwart speculative applications for new residential moorings which is why a bespoke policy is needed.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Policy SS1 ‘Scale and location of good growth’ should acknowledge and recognise the need for 10-16 permanent residential moorings 2022-2027 and the need to monitor and update this need within 5 years. Issues with the robustness of the 2022 need assessment should be addressed. There is not enough space provided on this online form to include this.</p> <p>The Local Plan should include a bespoke policy, appraised for sustainability, which will:</p> <ol style="list-style-type: none"> 1. Provide, and work with other local authorities with boundaries fronting both the north bank and the south bank of the River Thames to provide, a network of 14 to 56 day temporary residential moorings for itinerant boat dwellers. 2. Identify and safeguard existing moorings where permanent residential occupation is permitted. 3. Provide a presumption of planning consent for the existing residential use of recreational/leisure moorings. 4. Assess the capacity of the above moorings for additional residential boats, extension and/or infill. 5. Identify realistic, achievable and appropriate criteria for the determination of applications for new permanent residential moorings so that such applications are not determined using INF6-Rivers and saved policy DM13. 6. Amend INF6-Rivers to make clear the River Thames also provides potential for residential use of boats and make clear what sections of the River are to have a 10m wide buffer. 7. Commit to a detailed Site Assessment appraisal. As much of the river bank is understood to be in the Green Belt, allocate land or areas of riverbank (including those areas already used by unauthorised moorings on existing wharves and stretches of the river bank which are unregistered) suitable for permanent residential moorings suitable to meet the need identified (ie for low cost, private moorings) which can, if relied on, be taken out of or inset from the Green Belt so that those seeking planning consent can be certain any applications for moorings will not be treated as inappropriate development. 8. Commit to future monitoring and updating of need every five years.

	2022-07-26 NBTA comments Elmbridge local plan 2037.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Gillian Smith
User ID	21477473
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes The officers will ensure its legal
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I know the councillors are honourable elected people and have done their best to be fair and sensible
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Colin Southey
User ID	16189217
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes There has been a huge amount of work put in to ensure legal compliance as well as many other things
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Same answer as 1
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Frederick Spence
User ID	41086913
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>I consider this a strange question for our Council to be asking the public. One would naturally assume that the organisation, staffed by local government professionals reporting to our elected representatives, that was responsible for managing our local affairs would work within the law.</p> <p>Having said that there are a number of areas that concern me:</p> <ol style="list-style-type: none"> 1. There is an overall impression that the Council does not actually want the public to respond and has deliberately made this process 'hard work': <ol style="list-style-type: none"> a. Complexity of this 'comment' process b. Short time for consultation by ordinary members of the public, given that it has taken Council professionals several years to produce this highly detailed document. c. The timing of issue - summer holidays d. Non-availability on website at start of consultation period e. Changes to website during the consultation periodic 2. Some statements regarding ownership of properties are incorrect 3. There are a number of occasions where the document states that property owners have been consulted. I know this is not true in all cases. 4. There have been important changes to the plan that have not been clearly communicated. In particular US379 originally referred to the Waitrose Car Park. It now refers to the Hersham Shopping Centre.

Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>As already covered in my response to Q1 there are a number of demonstrably inaccurate statements within the plan which in my opinion make it unsound. There are also several proposals that I do not believe are justified. As that is the case, it is highly likely that the plan will therefore also be ineffective.</p> <p>Further to my points in Q1, I would add that the inclusion of the Barley Mow Public House within the plan (H11 US 376) is an error, given that it is recognised as a Listed Building.</p> <p>I am also concerned about the possibility that Hersham might be deprived of some important Community Assets - Hersham Library (H15 US374) and the Hersham Village Hall (H6 US40). Similarly I cannot understand why the 63 Queens Road Hersham KT12 5LA (H1 US441) is included when planning permission was recently refused on the grounds that this site was also a Community Asset.</p> <p>I am particular concerned about the content relating to Car Parks:</p> <ol style="list-style-type: none"> 1. General Observations <ol style="list-style-type: none"> a. The car driving population of Hersham has increased significantly in recent times and continues to do so. b. New arrivals moving out of London tend to be younger with a ‘two car need’. c. School leavers, graduates and young workers are now more likely to continue living with their parents which means that 3 or even 4 car dwellings are no longer unusual. d. You only have to glance around the village to see the impact of this with cars parked on pavements and crammed into what used to be ‘front gardens’ – or listen to residents who have been blocked into their own driveways e. Obviously, this plan is aimed at increasing the number of properties which will increase the number residents and therefore the number of vehicles in the area. f. I understand that there is an argument that Residential Units would not necessarily be built on the actual Car Parks but be built in blocks above. That rather misses the point that, not only may these buildings be tall causing issues for neighbours, but the Units will require additional parking spaces of their own. Underground parking may alleviate this issue, but I suspect that will be expensive particularly if impacted by the water table.

g. I also understand that there is an environmental agenda to reduce the amount of vehicle use and encourage people to walk, bicycle and use public transport. While I support that in principle, to build a 'parking plan' on that basis when there are ever increasing constraints on the time of working people and inadequate bus services, is unrealistic.

h. Following on from the above agenda which includes a move to electric cars and a commitment to supply charging points for these, one has to question how that will be facilitated when our car parks will be reduced in size and new residents will be living in flats denying them the option of arranging their own private points.

i. Given the above it does seem rather strange (or to use the appropriate language 'not sound') that a central plank of this plan is to reduce the amount of public parking available to residents and visitors.

2. Site Name Hersham Shopping Centre, Molesey Road
Site Allocation Ref H3
Site LAA Reference US379
Delivery Period 1-5 Years
Allocated for 200 Residential Units

a. This reference was originally allocated to the Waitrose Car Park. It now applies to the Shopping Centre. I assume that the provision is to build 200 Residential Units over the combined Shopping Centre & Car Park areas.

b. The Shopping Centre and its car park are central to the Hersham Community and act as a major attraction for people moving into the village.

c. The Waitrose Car Park also provides for all the village centre shops and amenities. Most particularly it provides for parents delivering children to Burhill School.

d. It may well be possible to deliver 200 Residential Units in this area, while maintaining the current quantity and quality of Shops and Car Parking (allowing for the additional requirements of the 200 new residences). However, if any plans are allowed to progress that fall short of that, then this Council could potentially be responsible for the collapse of our village as we know it. I do not think the community will stand for that!

e. Para 1 f above applies.

f. I am particularly concerned about the short timeframe associated with this case and the inevitable disruption at the heart of our village during this potentially lengthy project.

3. Site Name New Berry Lane car park

	<p>Site Allocation Ref H7 Site LAA Reference US380 Delivery Period 6-10 Years Allocated for 7 Residential Units</p> <ol style="list-style-type: none"> a. Same arguments as for H3 above (they are adjacent) although reduced concerns over timeframe and scale. b. However, this car park was originally retained by the Council to specifically provide for the Doctor's Surgery and Burhill School opposite. c. Once again the level of parking must be maintained (allowing for that associated with the 7 Residential Units) so that sufficient Parking is available for the ever increasing number of people that need to visit the Surgery – more residences implies more people which implies more visits to a doctor. So we will need more Surgery parking not less. <p>4. Site Name Car park to the south of Mayfield Road</p> <p>Site Allocation Ref H5 Site LAA Reference US45 Delivery Period 6-10 Years Allocated for 9 Residential Units</p> <ol style="list-style-type: none"> a. Obviously this car park provides for the railway station and is a necessity in a commuter environment. b. While there are occasions when it is not full, there are others when it is absolutely full and people have to search elsewhere. c. It would appear that the Council assessment regarding utilisation was made during the Covid period. d. It is worth registering that while utilisation has increased as Covid regs have relaxed, we are still not yet back to pre Covid ways of living and working. e. Para 1f applies <p>5. Site Name Car Park next to Waterloo Court</p> <p>Site Allocation Ref H12 Site LAA Ref US435 Delivery Period 11-15 Years Allocated 62 Residential Units</p> <ol style="list-style-type: none"> a. I am not very familiar with this car park and cannot therefore comment specifically.
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b. However, given the degree of focus in your various documents on commuters and the need to provide parking for them, along with the fact this has an 11-15 Years Delivery Period, I conclude that this is not a serious entry, but a way of 'making up the numbers'.

c. Para 1f applies

6. Below are some extracts from Council documents (notably the Parking SPD) which are contradicted by the approach of this Draft Plan

j. "Having a balanced approach to delivering car parking can help stimulate growth in the borough, meet the needs of our residents, whilst also trying to minimise the effect on the environment. It is generally accepted that because of the lack of public transport in many parts of the Borough, many residents rely on their cars as their main form of travel. This SPD aims to deliver effective parking solutions while taking account of other planning considerations."

k. "Whilst the Borough benefits from good/ very good rail links to central London, access to other major centres such as Kingston, Guildford and Woking vary. Outside of the key commuter routes, public transport services are more limited, which leads to greater reliance on the private motor vehicle for internal Borough trips. It is not surprising that the Borough has one of the highest levels of car ownership with 1.5 cars per household and 46% of households owning more than two vehicles. Only 12% of households do not own a car, significantly lower than the South East average of 18.6%"

l. "Commuting still plays a significant part for much of the workforce, with both radial and orbital journeys into London and around the region. The average median gross weekly pay for Elmbridge residents is higher than for those who work in the Borough, indicating that a considerable number of residents' commute to higher-paid jobs within Greater London. Access to a train station is a key consideration for existing and future residents."

m. "Improving transport infrastructure by; Working in partnership with transport providers and Surrey County Council, as the Highway Authority, to support improvements to transport infrastructure. Those relating to new development will be delivered through the collection of developer contributions subject to viability. The Council will support improvements to stations and station parking that facilitate increased public transport use."

n. "Public off-street parking will continue to be provided where it supports the economic or recreational use of the immediate area and provides dual use allowing parking for residents and shoppers/employees, particularly in town centres."

	<p>o. “well-designed car and cycle parking at home and at other destinations is conveniently sited so that it is well used. This could be off-street to avoid on-street problems such as pavement parking or congested streets. It is safe and meets the needs of different users including occupants, visitors and people with disabilities.”</p> <p>p. “All development proposals will be required to provide cycle and vehicle parking and associated facilities, including electric vehicle charging points in line with the standards set out in the Parking Supplementary Planning Document (SPD). 6. Car free development will be encouraged in appropriate locations and where supported by evidence demonstrating that proposals would not lead to parking stress”.</p> <p>q. “Parking Stress - A pressure on local highway network negatively affecting amenities of local residents caused by limited capacity of on-street parking provision in the area. Factors to take into account when considering whether an area experiences on-street parking stress will be the levels of parking on nearby roads, the availability of spaces in public car parks and whether there are any particular pressures caused by existing uses or developments in the area “</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>When I attended a Public Meeting on this subject it was made clear that the Plan is an attempt to meet targets laid down by Central Government. Apparently it falls short, but the hope is that it will be close enough to be accepted centrally and avoid the Borough having responsibility for the plan removed.</p> <p>My concern is that so many of the statements in the plan are wrong and some of the key intentions do not play well for the Hersham Community in the long term.</p>

	<p>The approach conveyed at the Public Meeting seemed to be "trust us - most of these things will never really happen, particularly if there are future changes in central government and its thinking".</p> <p>Regrettably, the 'trust us' concept does not bear scrutiny. Once these ideas are formally ratified as part of the Local Plan they represent a risk to the community because even if a future Planning Request was turned down it will almost certainly be granted on appeal by the Appeals Inspector on the basis that it was included in the Local Plan.</p> <p>There are other parts of the country who do not appear to have the same issues that we have. Maybe Central Government's targets for an already highly populated area are not necessarily that valid. Perhaps our Council should debate that with Central Government rather try to duck the issue, potentially at the expense of residents.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>I have stated that there are a number of unsatisfactory elements to this plan both in the detail within its content and some of its direction. I would ask that once the Council has had feedback from the community it takes a step back and re-considers its overall position, particularly with regard to the Hershams Shopping Centre and Parking generally.</p> <p>I would like to see a written commitment that the quantity and quality of shops in the Shopping Centre will be maintained and that the number of parking spaces in, what is now the Waitrose Car Park, will be maintained with additional spaces provided for the residents of the new Units. Otherwise, as a private resident, I am happy to indicate areas of concern. However, I am afraid that responsibility for re-drafting this document rests entirely with yourselves.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

36 Years ago, I changed my job and had to re-locate my family, at short notice, from the country to somewhere in this general area. It was before the advent of the Internet, Right Move etc and we could only make a limited number of trips to find a property.

We ended up buying a house at 'high speed' in a place called Hersham, of which we had no knowledge whatsoever. We took the view that at least we had a home that would last us for a couple of years and, in the worst case, we could move again in slow time.

19 years later we did eventually move – all of 300 yards to another home in Hersham, where we have lived for a further 17 years. One of our sons lives with his family in Hersham, while the other is close by in Weybridge. Says a lot doesn't it!

Hersham is a really nice place for a family to live and grow up in – that view is shared by many new people moving into the area who love the village atmosphere and the community feel. It would be very sad to see that spoilt.

I would like to participate in the oral examination to represent 'people like me'!

Name	Judith Spencer
User ID	16324993
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Felicity Spencer
User ID	38866145
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>Elmbridge Borough Council have not provided sufficient evidence of having complied with its duty to engage constructively under Section 33A of the PCPA with Surrey County Council regarding the Local Cycling and Walking Infrastructure Plan for the borough.</p> <p>The absence of this plan at the Regulation 19 stage means that certain allocated sites for development, notably station car parks WOT7, WOT31 and CL7, have been allocated without proper consideration of the impact of development. These sites have been allocated with the intent of maximising "the use of sustainable transport modes" (Chapter 4 Local Plan) and have been "located to minimise the need to travel, thereby reducing emissions from road traffic" (Chapter 5 Local Plan). Chapter 8 of the Local Plan (Providing Infrastructure and Connectivity) sets out that "it is essential that an adequate level of appropriate strategic and local infrastructure is delivered to avoid placing undue pressure on existing infrastructure networks and services" and that "national planning policy requires the council to set out how these infrastructure requirements will be met".</p> <p>Surrey County Council has not yet determined which routes or zones to prioritise in the Elmbridge LCWIP and detailed proposals for improvements along them are at the public consultation stage. These station car park site allocations would seem to have been made without sufficient consideration of strategic matters of realistic alternative methods of transport . It is not yet clear whether it will be possible to provide appropriate alternative walking or cycling routes to Hersham, Walton and Claygate stations if these car parks cease to exist. There is no joint evidence base to show that local residents would use these alternative methods of transport should the car parks be developed as the views from residents have not yet been gathered.</p>

Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The proposal in the Local Plan to allocate station car parks for development (WOT7, WOT31 and CL7) does not appear to have been positively prepared. No alternative plans for walking or cycling routes have yet been agreed with Surrey County Council and public opinion has not yet been sought, as the Local Cycling and Walking Infrastructure Plan for Elmbridge is still at the consultation stage. Neither has there been sufficient evidence provided that suitable bus routes to the station could be provided or would even be wanted or used by the public.</p> <p>The proposal to allocate station car parks WOT7, WOT31 and CL7 for development is not justified and does not take into account the reasonable alternative that driving to a train station to commute is already a more sustainable method of transport and helps encourage people to travel by train. Station car parks could become even more sustainable if electric cars continue to increase in popularity. In relation to WOT7 (Walton Park station car park) specifically, consideration does not appear to have been given to prospects such as installing a more modern bike storage shed (like the one at Walton-on-Thames station) at the site of the car park and installing electric car charging points, both of which would decrease the carbon footprint of the site.</p> <p>The proposal in the Local Plan to develop WOT7 (Walton Park station car park) in the next 1-5 years is not effective. It is difficult to see how the plan is deliverable during that time as it would be difficult to implement the required infrastructure. The Local Cycling and Walking Infrastructure Plan has not yet been agreed and no evidence that suitable bus routes could be in place. The Local Plan merely states that "the focus should be on improving connectivity of local railway stations by bus" without any evidence having been provided as to the feasibility of this (not least because the low bridge at Hershams station could be an issue).</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y]

	<p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>Please see my explanation in Question 2</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	I propose to delete CL7, WOT7 and WOT31 from the list of site allocations. At the very least, the delivery period for WOT7 should be amended to 11-15 years in line with CL7 and WOT31 to provide more time for infrastructure issues to be clarified.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Lisa Stamm
User ID	40985025
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Denise Stanczyk
User ID	23390337
Organisation	
Policy / Evidence base/ part of plan:	ENV2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>As part of the local plan, ENV2 should be strengthened by the council committing to creating a formal tree strategy policy for the borough e.g the Enfield local plan, particularly DM80 and DM81 (points outlined below). This would protect our trees and green living environment at pre, post and during the planning process.</p> <p>This would also promote joined up working with planning, developers, landscape professionals and the local community to create a healthy environment, built and natural for us all, now and into the future.</p> <p>-Works to trees covered by a Tree Preservation Order or trees situated within a Conservation or Tree Preservation Area must ensure the long term health of the tree, and retain and enhance amenity value to the locality. Works must comply with current arboreal best practice, guidelines and legislation.</p> <p>- All development and demolition must comply with established good practice, guidelines and legislation for the retention and protection of trees. There must be a high regard for the retention of all trees of amenity and environmental value, taking consideration of both their individual merit and their interaction as part of a group or broader landscape feature.</p> <p>- All development including subsidiary or enabling works, that involve the loss of or harm to trees covered by Tree Preservation Orders, or trees of significant amenity or biodiversity value, should be refused. If there are exceptional circumstances which require their removal, adequate replacement trees must be provided.</p>

	<ul style="list-style-type: none"> - A repeating 5-year permission notice introduced to planning permissions. Where trees with TPO or within 5 year protection scheme have been removed, replacement orders can be followed through for a rolling set five year periods. This is manageable with a simple log of permissions with such initial five year protection clauses. - All applications should include a landscape plan and statement of tree/shrub removal and retention for approval as part of the application process - All applications and preplanning consultations must -- Retain and protect trees of amenity and biodiversity value on the site and in adjacent sites that may be affected by the proposals; Ensure that the future long term health and amenity value of the trees is not harmed; Provide adequate separation between the built form and the trees including having regard to shading caused by trees and buildings - Applications and preplanning, must outline how the development will contribute to the protection, enhancement or restoration of the ecological value of the site and the surrounding area, including the provision of living landscaping and the formation and enhancement of waterways, wildlife corridors and green chains - In applications and preplanning, provision must be made to increase tree and hedge(non-Laurel) cover on the development site and new tree planting and living landscape schemes included with the emphasis on planting mature, large, shade and oxygen producing trees, native trees and hedges and flora of high ecological value. - All trees contained within approved development should be considered as protected indefinitely. Any future works to the trees should only be allowed with given permission following a planning application and assessment by The Tree Officer. - Where trees are removed etc without permission, the developer/owner and tree surgery company should be heavily penalised and council tree and compliance officers should feel able to pursue this.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: []

	<p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p> <p>I cannot answer this question</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please see my response to 5.2
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Len Steer
User ID	41061633
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Philip Steer
User ID	16425377
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>In particular, as the Chair of the Southborough Residents' Association, I wish to support the proposal to preserve One Tree Hill and the Stokes Field nature reserve as Green belt, as this area is well-used by Southborough Residents. I would also support preserving the surrounding scrub land as this is an integral part of the area in terms of a joined up patch for wild life, and for access.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>In particular, as the Chair of the Southborough Residents' Association, I wish to support the proposal to preserve One Tree Hill and the Stokes Field nature reserve as Green belt, as this area is well-used by Southborough Residents. I would also support preserving the surrounding scrub land as this is an integral part of the area in terms of a joined up patch for wild life, and for access.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p>

	Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Karl Steidl
User ID	23432065
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>There is an inherent contradiction between a stated commitment to managing the effects of climate change and any meaningful strategy to reduce the impact of increased traffic. The impact on Elmbridge of the large Wisley housing development represents an important omission.</p> <p>There are fundamental errors in the reports assessing the performance of Green Belt sites. Most importantly, site SA-11 next to Waverley Road and Blundel Lane has been incorrectly assessed. There is no recognition of the need for densification of urban areas such as Oxshott to be progressive and avoid the character of areas of comparatively low density being damaged by individual high-density schemes.</p> <p>While areas close to local centres and train stations are targeted for flats and infill development, the converse should apply so that the character of other areas (such as most of residential Oxshott) is protected.</p> <p>There are no design codes available to provide protection for local character and ensure excellent buildings.</p> <p>Calculations of developer contributions for affordable housing continue to be based on flawed methodology that has been subject to continual abuse.</p> <p>The Infrastructure Delivery Plan is weak with heavy reliance on a document that has not yet been produced by Surrey County Council. Key to successful development must be the recognition that</p>

	infrastructure must precede development. A noteworthy omission is the lack of commitment to install cycle lanes alongside trunk roads thereby promoting road safety and improving traffic flow.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Linda Stotesbury
User ID	24362241
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I fully support the draft local plan and think that its principles are sound, and it contains a good a balance between climate, environment, housing and business. I particularly support the priority given to the protection of the Greenbelt and other green spaces in Elmbridge.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Kathryn Strangeway
User ID	24453313
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Having seen the presentation which explained the Spatial Strategy proposed within the Draft Local Plan, I would like to express my support for it. The Green Belt is an intrinsic, vitally important part of life within Claygate and, indeed, all of Elmbridge, and I would therefore also like to highlight my support for continued protection of the Green Belt and agree with the council's justification for doing so.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Nicholas Strauss
User ID	16253217
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>I object to the proposed development of the area SA11 at Blundel Lane/Waverley Road.</p> <p>This would destroy a view of outstanding beauty, by far the best if not the only such view in the Oxshott/Cobham area.</p> <p>It is also the beginning, and most attractive, part of much used walks to Cobham and the Danes Hill area of Oxshott.</p> <p>Whoever has assessed this as suitable by reference to the statutory criteria has got it wrong and it is open to legal challenge.</p> <p>N. Strauss</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>See above at 1.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p>

	<p>Justified: []</p> <p>Consistent with national policy: [Y]</p> <p>As at 1 above</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Remove the offending development at SA11
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Strong views

Name	Martin Stride
User ID	24233377
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>This draft Local Plan is not sound because the anticipated number of units of social housing and affordable homes is totally inadequate and does not take account of the housing crisis in this country.</p> <p>Originally , the planners were thinking in terms of using some of the weakly-performing Green Belt for new housing settlements and associated infrastructure and that there were 'exceptional circumstances' to justify this proposal but the planners came under a lot of pressure from the Members because the residents were opposed to encroaching on any part of the Green Belt. So , the planners were forced to reconsider and to produce an amended Local Plan which does not meet the number of new dwellings as per the Standard Methodology.</p> <p>The Planning Inspector needs to throw out this Local Plan and insist that a proper Plan is produced for a larger number of housing units , etc instead of trying to fit little pockets of units on tiny parcels of land which will be unsatisfactory because the settlements will not allow for decent-size 2- and 3-bedroomed houses with a reasonable piece of garden land.</p> <p>The planners realise that this Plan is unsatisfactory and that the Council is 'trying it on' with the Planning Inspector and hoping that they will get away with avoiding having to use any of the Green Belt!!</p> <p>No less than 57% of Elmbridge is Green Belt! Do we really need that much Green Belt? Really?</p>

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [Y] Justified: [] Consistent with national policy: [Y] As already indicated.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	As already indicated.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Stringer
User ID	24531009
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mark Sugden
User ID	8245569
Organisation	
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I believe this policy will ensure the right balance between growth and protecting the environment .
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mark Sugden
User ID	8245569
Organisation	
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I consider that this takes an appropriate approach to development of achievable, sustainable places that people will want to live in while protecting assets that are important to the character of the borough and its individual distinct settlement areas.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mark Sugden
User ID	8245569
Organisation	
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes EBC evidence base indicates the need to protect Green Belt and Green Open Spaces as they are significantly important to the borough The spatial strategy of optimisation will support urban regeneration and the effective use of brownfield land and is consistent with national policy.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mark Sugden
User ID	8245569
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mark Sukiennik
User ID	23432353
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <ul style="list-style-type: none"> • There is an inherent contradiction between a stated commitment to managing the effects of climate change and any meaningful strategy to reduce the impact of increased traffic. • There are fundamental errors in the reports assessing the performance of Green Belt sites. Most importantly, site SA-11 next to Waverley Road and Blundel Lane has been incorrectly assessed. • There is no recognition of the need for densification of urban areas such as Oxshott to be progressive and avoid the character of areas of comparatively low density being damaged by individual high-density schemes. • While areas close to local centres and train stations are targeted for flats and infill development, the converse should apply so that the character of other areas (such as most of residential Oxshott) is protected. • There are no design codes available to provide protection for local character and ensure excellent buildings. • Calculations of developer contributions for affordable housing continue to be based on flawed methodology that has been subject to continual abuse. • The Infrastructure Delivery Plan is weak with heavy reliance on a document that has not yet been produced by Surrey CC. Key to successful development must be the recognition that infrastructure must precede development.

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Janet Swift
User ID	24213857
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Frankie Tan
User ID	40833665
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No The Plan focuses too much on building residential units in any open spaces and green belts. For example, WOT13 US59 Halfway Car Park, Hersham Road, Walton-on-Thames. Where are shoppers supposed to park their vehicles when they go shopping in that area? I always park in that car park and I can always see that it is 80% utilised. There are more than enough residential units in the immediate vicinity, for example the recently completed units beside Halfway Green and the upcoming units on the old Birds Eye HQ. The Council must now leave open spaces and green belts as they stand to prevent overcrowding to the area. I know of families in Weybridge who deliberately drive & park at Walton-on-Thames train station to catch the train because the two carparks (H5 US45 car park south of Mayfield Road & WOT 31 US356 Station Avenue Car Park) are more convenient and comfortable than the overcrowded Weybridge train station.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [] Justified: []

	<p>Consistent with national policy: []</p> <p>The Plan discusses the importance of Principle 4: distinctive places of socialisation, community support, events & culture. Yet, the Council wants to abolished existing and well-established community places e.g. H3 US379 Hersham Shopping Centre, H6 US40 Hersham Day Centre and Village Hall, H13 US378 All Saints Catholic Church Hall, H15 US 374 Hersham Library. I regard Hersham Green and the surrounding area, with the existing Hersham Shopping Centre, Hersham Day Centre and Village Hall & All Saints Catholic Church Hall as a very peaceful and tranquil area. And, for the Council to abolish this well built up area will be truly sad and will rip the fabric of the local community apart.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>The Plan is not sound to local businesses when it is taking so many parking spaces away from the general public. Where are the general public supposed to park their vehicles when they shop in these local businesses?</p> <p>appendix 1.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Rosie Tarboton
User ID	40824609
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes This local plan takes account of the priorities of the community to protect the greenbelt, and ensure that the design of future development is inline with sustainable requirements
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes This local plan takes account of the priorities of the community to protect the greenbelt, and ensure that the design of future development is inline with sustainable requirements
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Richard Tarboton
User ID	24377537
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes Yes it is legally compliant as it address the key requirements of the community and the environment. The spacial strategy meets all necessary requirements.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Yes it is sound as it ensures we persevere the greenbelt which is essential for the long term prosperity of the planet
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Shirley Tarboton
User ID	24377633
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes It's really important that we consider the short and long term impact when building new houses and this plan takes these impacts into account. We want to preserve green belt space and biodiversity and actually re-wild those spaces already lost to overdevelopment. So building new small affordable homes on brownfield sites is what we need more than large houses. With the move to more remote and hybrid working, there is no longer as strong a need to be able to commute into London, and the spatial strategy of this plan helps us keep London healthy and in turn can boost other parts of the country.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	ANDREW TARCY
User ID	24504801
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>There was proper consultation when all stakeholders had a chance to participate, discuss and comment on the plan and it was then properly formulated.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>I strongly support the Spatial Strategy mentioned in the plan and also the continued protection of Green Belt in Elmbridge which is so vital to maintain the unique nature of the borough and the mix of business-work-home-leisure that this area provides.</p> <p>This had support of the vast majority of residents and businesses and the inclusion of this therefore makes it a sound plan</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Felicity Tarcy
User ID	24504865
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I support the local plan as it aligns with the Spatial Strategy. In particular as Claygate has busy roads surrounding it but still has a "village" atmosphere . This should be retained so there should be no building on the Green Belt in Elmbridge. The local plan has been properly prepared with lots of consultation where our local community participated and I therefore fully support it.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Erica Taylor
User ID	23731649
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Guildford Borough Council (Planning Team)
User ID	20429921
Organisation	Guildford Borough Council
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>1. Policy SS3 – Scale and location of good growth 1.1. We note that the plan provides for a minimum of 6,785 homes across the plan period. Against an objectively assessed need (OAN) figure of 9,705 across the same period, this represents a shortfall of 2,920 dwellings. We note that you consider that exceptional circumstances do not exist to justify amending Green Belt boundaries. Notwithstanding this, Government’s objective is that local planning authorities should significantly boost the supply of homes and national policy requires that the local plan should provide a strategy which, as a minimum, seeks to meet OAN. As part of exploring all opportunities, consideration needs to be given to the extent that Green Belt may be necessary in order to meet needs, as Guildford has had to do in its adopted Local Plan: strategy and sites (2019). This approach to Green Belt release has also been tested through the High Court which has confirmed that housing need can and should form part of the exceptional circumstances test. For these reasons we consider that a thorough and robust approach will be necessary in demonstrating that Elmbridge’s housing needs cannot be met in full. Having unmet housing need places increased pressure on neighbouring authorities whom all have similar constraining factors as Elmbridge.</p> <p>1.2. Policy SS3 1b) of the Draft Elmbridge Local Plan (DELP) states ‘Provision for Gypsy, Roma and Traveller pitches’ This is broad and specific details should be set out, on par to the approach to housing in 1a), such as the number of pitches and plots to be provided over the plan period. We have concerns regarding whether the current approach could be considered sound.</p>

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Guildford Borough Council (Planning Team)
User ID	20429921
Organisation	Guildford Borough Council
Policy / Evidence base/ part of plan:	CC4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes 2. Policy CC4 - Sustainable transport 2.1. In relation to 2a) and b), reference could be made to SCC's Elmbridge Cycling Plan, and/or forthcoming Local Cycling and Walking Infrastructure Plan. This inclusion would provide a focus for investment in walking and cycling infrastructure, with the network contained within the plan(s) a starting point for identifying routes and infrastructure to be funded and/or provided by developers.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Guildford Borough Council (Planning Team)
User ID	20429921
Organisation	Guildford Borough Council
Policy / Evidence base/ part of plan:	HOU7
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>3. Policy HOU7 - Gypsy, Roma, Traveller and Travelling Showpeople accommodation</p> <p>3.1. The provision of Traveller accommodation is a cross boundary issue, and it is important that needs are assessed and planned for through the plan making process. The Council welcomes the fact that Elmbridge have assessed their traveller accommodation needs in the Gypsy and Traveller Accommodation Assessment (GTAA) 2020.</p> <p>3.2. We are aware that the Elmbridge GTAA only achieved 29 interviews with the local traveller community. It identified the need for 18 pitches for travellers meeting the PPTS definition, 0-1 pitch for travellers of unknown planning status and 9 pitches for travellers who do not meet the PPTS traveller definition. Whilst there is a travelling showperson site in Elmbridge it was found to be occupied by non-travellers. The Elmbridge Gypsy, Roma and Traveller Site Assessment March 2022 states that planning permission has been granted for 8 pitches, leaving a net need for 10 pitches for travellers meeting the PPTS definition over the plan period.</p> <p>3.3. The Council is concerned that the DELP does not identify a target for pitches nor allocate any pitches to meet the identified accommodation needs of travellers in Elmbridge borough as identified in the Elmbridge GTAA.</p> <p>3.4. Planning Policy for Travellers Sites (paragraph 9) states that local planning authorities should set pitch targets for gypsies and travellers as defined in Annex 1 and plot targets for travelling showpeople as defined in Annex 1 which address the likely permanent and transit</p>

accommodation needs of travellers in their area. Neither Policy SS3 or Policy HOU7 sets a target and as such this approach does not seem to be consistent with national policy.

3.5. No site allocations are proposed in the DELP to meet the identified traveller accommodation needs. Whilst we note a document has been produced in March 2022 called 'Gypsy, Roma and Traveller site assessment' it proposes to meet need by allowing additional touring caravans, static caravans, tourers and day rooms on existing sites. The Council are not convinced that this is a satisfactory approach towards meeting the identified accommodation needs of travellers in Elmbridge borough.

3.6. The Council are concerned that should Elmbridge BC not effectively plan to meet their full need for traveller accommodation that this may result in cross boundary impacts.

3.7. We also note that Elmbridge Borough Council do not plan to meet the identified accommodation needs for 7 pitches for travellers who do not meet the PPTS definition (as identified in the Elmbridge 2022 Gypsy, Roma and Traveller Site Assessment).

3.8. Whilst we recognise it is not a requirement of the PPTS we feel that it is important to work towards identifying suitable traveller pitches to meet that identified need. The Equalities Act 2010 requires Councils to take steps to meet the needs of people who have relevant protected characteristics, such as Romany Gypsies and Irish and Scottish Travellers, some of whom may not meet the PPTS definition of a traveller, so planning to meet their needs is important and failure to do so will result in a shortfall of appropriate accommodation.

3.9. PPTS paragraph 4 states that local planning authorities should develop fair and effective strategies to meet need through the identification of land for sites. The draft plan as it stands does not appear to plan for or identify sufficient land for sites. We think it is important to identify specific sites at this stage. There may be an opportunity for Elmbridge BC to include specific allocation of pitches, relating to the intensification or expansion of existing sites (as per the GTAA at para 8.7) or potentially within some of the proposed site allocations which would help achieve sustainable and mixed communities whilst meeting the shortfall in providing accommodation for all travellers regardless of their planning status.

3.10. We consider that this under provision could have potential cross boundary impacts should the full need not be met as it could result in increased pressure on traveller sites within other boroughs. Guildford Borough Council have only allocated sufficient sites to meet the needs arising from our borough in the Guildford borough Local Plan: strategy and sites 2019 (LPSS). Our ability to meet the future needs of travellers residing in Guildford may be compromised if

	other boroughs such as Elmbridge do not plan to meet the accommodation needs arising from travellers in their areas.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Green Kite Homes and ACAP Advisory (Nigel Rankine)
User ID	41000769
Organisation	GL Hearn obo Green Kite Homes and ACAP Advisory (Nigel Rankine)
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>No Green Belt release is planned which is a reversal of the positive approach proposed at the Reg. 18 stage. It is suggested that to make the plan “sound” a positive spatial strategy would consider bringing forward new highly sustainable site allocations at Stoke Hill, Cobham and Manor Park, Claygate as larger development sites that can be repurposed and released from the Green Belt to enable the comprehensive delivery of new and affordable housing and essential social and physical infrastructure. This would be justified as exceptional circumstances in accordance with the NPPF.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>It is suggested that to make the plan “sound” a positive spatial strategy would consider bringing forward new highly sustainable site allocations in larger development sites that can be repurposed and released from the Green Belt to enable the comprehensive delivery of new and affordable housing and essential social and physical infrastructure. This would be justified as exceptional circumstances in accordance with the NPPF.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p>

	<p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>The local plan fails to positively plan for a comprehensive approach to delivery by only promoting a range of new small housing sites or redevelopment of existing retail or employment land (that is unlikely to come forward). The spatial strategy is fundamentally flawed and will not be able to deliver the required mix of housing typologies (such as 1, 2 and 3 bedroom smaller homes as required by the housing needs assessment), affordable housing and important essential social and physical infrastructure such as new schools and healthcare services.</p> <p>No agreement has been reached with neighbouring authorities to help provide for the housing needs of the borough and therefore the authority does not meet another fundamental test of soundness as it has also failed in its duty to cooperate.</p> <p>The draft Local Plan in policy SS3 fails in its requirement to meet its objectively assessed housing need calculated using the standard method. The plan explains in paragraph 3.19, that: "Using 2022 as the base year for calculation, the housing need for the borough equates to 647 dwellings per annum and over the plan period 9,705 homes." Policy SS3 (1)(a) explains that the Plan will make provision for 6,785 net additional homes with at least 30% to be affordable new homes. This represents a shortfall of 2,790 homes (or 30% of the objectively assessed housing needs using the standard method).</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>It is suggested that to make the plan "sound" a positive spatial strategy should consider bringing forward new highly sustainable site allocations at Stoke Hill, Cobham and Manor Park, Claygate as larger development sites that can be repurposed and released from the Green Belt to enable the comprehensive delivery of new and affordable housing and essential social and physical infrastructure. This would be justified as exceptional circumstances in accordance with the NPPF.</p>

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Elmbridge is the 4th most unaffordable location in the UK and 1st across the UK (excluding London). The local plan fails to positively plan for a comprehensive approach to delivery by only promoting a range of new small housing sites or redevelopment of existing retail or employment land (that is unlikely to come forward). The spatial strategy is fundamentally flawed and will not be able to deliver the required mix of housing typologies (such as 1, 2 and 3 bedroom smaller homes as required by the housing needs assessment), affordable housing and important essential social and physical infrastructure such as new schools and healthcare services.

Name	Green Kite Homes and ACAP Advisory (Nigel Rankine)
User ID	41000769
Organisation	GL Hearn obo Green Kite Homes and ACAP Advisory (Nigel Rankine)
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>The local plan fails to positively plan for a comprehensive approach to delivery by only promoting a range of new small housing sites or redevelopment of existing retail or employment land (that is unlikely to come forward). The spatial strategy is fundamentally flawed and will not be able to deliver the required mix of housing typologies (such as 1, 2 and 3 bedroom smaller homes as required by the housing needs assessment), affordable housing and important essential social and physical infrastructure such as new schools and healthcare services.</p> <p>No agreement has been reached with neighbouring authorities to help provide for the housing needs of the borough and therefore the authority does not meet another fundamental test of soundness as it has also failed in its duty to cooperate.</p> <p>No Green Belt release is planned which is a reversal of the positive approach proposed at the Reg. 18 stage. It is suggested that to make the plan “sound” a positive spatial strategy would consider bringing forward new highly sustainable site allocations at Stoke Hill, Cobham and Manor Park, Claygate as larger development sites that can be repurposed and released from the Green Belt to enable the comprehensive delivery of new and affordable housing and essential social and physical infrastructure. This would be justified as exceptional circumstances in accordance with the NPPF.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Objection to policy SS3</p>

	<p>The draft Local Plan is considered to be “unsound”. The draft Local Plan in policy SS3 fails in its requirement to meet its objectively assessed housing need calculated using the standard method. The plan explains in paragraph 3.19, that: “Using 2022 as the base year for calculation, the housing need for the borough equates to 647 dwellings per annum and over the plan period 9,705 homes.” Policy SS3 (1)(a) explains that the Plan will make provision for 6,785 net additional homes with at least 30% to be affordable new homes. This represents a shortfall of 2,790 homes (or 30% of the objectively assessed housing needs using the standard method).</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>The draft Local Plan is considered to be “unsound”. The draft Local Plan in policy SS3 fails in its requirement to meet its objectively assessed housing need calculated using the standard method. The plan explains in paragraph 3.19, that: “Using 2022 as the base year for calculation, the housing need for the borough equates to 647 dwellings per annum and over the plan period 9,705 homes.” Policy SS3 (1)(a) explains that the Plan will make provision for 6,785 net additional homes with at least 30% to be affordable new homes. This represents a shortfall of 2,790 homes (or 30% of the objectively assessed housing needs using the standard method).</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>It is suggested that to make the plan “sound” a positive spatial strategy would consider bringing forward new highly sustainable site allocations at Stoke Hill, Cobham and Manor Park, Claygate as larger development sites that can be repurposed and released from the Green Belt to enable</p>

	<p>the comprehensive delivery of new and affordable housing and essential social and physical infrastructure. This would be justified as exceptional circumstances in accordance with the NPPF.</p> <p>Stoke Hill- Location Plan.pdf</p> <p>Manor Farm- Location Plan.pdf</p> <p>220725 Representations to Reg 19 Local Plan Review - Manor Park.pdf</p> <p>220729 Representations to Reg 19 Local Plan Review - Stoke Hill.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	<p>A further review of the plan is needed as it is current "unsound" and not positively prepared.</p> <p>It is suggested that to make the plan "sound" a positive spatial strategy would consider bringing forward new highly sustainable site allocations at Stoke Hill, Cobham and Manor Park, Claygate as larger development sites that can be repurposed and released from the Green Belt to enable the comprehensive delivery of new and affordable housing and essential social and physical infrastructure. This would be justified as exceptional circumstances in accordance with the NPPF.</p>

Name	Green Kite Homes and ACAP Advisory (Nigel Rankine)
User ID	41000769
Organisation	GL Hearn obo Green Kite Homes and ACAP Advisory (Nigel Rankine)
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>The local plan fails to positively plan for a comprehensive approach to delivery by only promoting a range of new small housing sites or redevelopment of existing retail or employment land (that are unlikely to come forward). The spatial strategy is fundamentally flawed and will not be able to deliver the required mix of housing typologies (such as 1, 2 and 3 bedroom smaller homes as required by the housing needs assessment), affordable housing and important essential social and physical infrastructure such as new schools and healthcare services.</p> <p>No agreement has been reached with neighbouring authorities to help provide for the housing needs of the borough and therefore the authority does not meet another fundamental test of soundness as it has also failed in its duty to cooperate.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The local plan fails to positively plan for a comprehensive approach to delivery by only promoting a range of new small housing sites or redevelopment of existing retail or employment land (that are unlikely to come forward). The spatial strategy is fundamentally flawed and will not be able to deliver the required mix of housing typologies (such as 1, 2 and 3 bedroom smaller homes as required by the housing needs assessment), affordable housing and important essential social and physical infrastructure such as new schools and healthcare services.</p> <p>No agreement has been reached with neighbouring authorities to help provide for the housing needs of the borough and therefore the authority does not meet another fundamental test of soundness as it has also failed in its duty to cooperate.</p>

	<p>Objection to policies SS1, SS2, SS3, HOU1 No Green Belt release is planned which is a reversal of the positive approach proposed at the Reg. 18 stage. It is suggested that to make the plan “sound” a positive spatial strategy would consider bringing forward new highly sustainable site allocations at Stoke Hill, Cobham and Manor Park, Claygate] as larger development sites that can be repurposed and released from the Green Belt to enable the comprehensive delivery of new and affordable housing and essential social and physical infrastructure. This would be justified as exceptional circumstances in accordance with the NPPF.</p> <p>Objection to policy SS3 The draft Local Plan is considered to be “unsound”. The draft Local Plan in policy SS3 fails in its requirement to meet its objectively assessed housing need calculated using the standard method. The plan explains in paragraph 3.19, that: “Using 2022 as the base year for calculation, the housing need for the borough equates to 647 dwellings per annum and over the plan period 9,705 homes.” Policy SS3 (1)(a) explains that the Plan will make provision for 6,785 net additional homes with at least 30% to be affordable new homes. This represents a shortfall of 2,790 homes (or 30% of the objectively assessed housing needs using the standard method).</p> <p>Objection to policy HOU1 Policy HOU 1 sets out a minimum housing provision figure of 452 dwellings per annum against the calculation set out in the standard method of 647 dwellings per annum and an identified need of 269 dwellings per annum of affordable housing. Policy HOU1 is therefore “unsound” as it fails to positively plan for its housing need by proposing only 70% of the standard method requirement, i.e. it will therefore only deliver 6,785 homes against a housing need of 9,705 homes.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p>

	<p>Consistent with national policy: [Y]</p> <p>No Green Belt release is planned which is a reversal of the positive approach proposed at the Reg. 18 stage. It is suggested that to make the plan “sound” a positive spatial strategy would consider bringing forward new highly sustainable site allocations at Stoke Hill, Cobham and Manor Park, Claygate as larger development sites that can be repurposed and released from the Green Belt to enable the comprehensive delivery of new and affordable housing and essential social and physical infrastructure. This would be justified as exceptional circumstances in accordance with the NPPF.</p> <p>The draft Local Plan is considered to be “unsound”. The draft Local Plan in policy SS3 fails in its requirement to meet its objectively assessed housing need calculated using the standard method. The plan explains in paragraph 3.19, that: “Using 2022 as the base year for calculation, the housing need for the borough equates to 647 dwellings per annum and over the plan period 9,705 homes.” Policy SS3 (1)(a) explains that the Plan will make provision for 6,785 net additional homes with at least 30% to be affordable new homes. This represents a shortfall of 2,790 homes (or 30% of the objectively assessed housing needs using the standard method). Policy HOU 1 sets out a minimum housing provision figure of 452 dwellings per annum against the calculation set out in the standard method of 647 dwellings per annum and an identified need of 269 dwellings per annum of affordable housing. Policy HOU1 is therefore “unsound” as it fails to positively plan for its housing need by proposing only 70% of the standard method requirement, i.e. it will therefore only deliver 6,785 homes against a housing need of 9,705 homes.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>No Green Belt release is planned which is a reversal of the positive approach proposed at the Reg. 18 stage. It is suggested that to make the plan “sound” a positive spatial strategy would consider bringing forward new highly sustainable site allocations at Stoke Hill, Cobham and Manor Park, Claygate as larger development sites that can be repurposed and released from the Green Belt to enable the comprehensive delivery of new and affordable housing and essential</p>

	<p>social and physical infrastructure. This would be justified as exceptional circumstances in accordance with the NPPF.</p> <p>Stoke Hill- Location Plan.pdf</p> <p>Manor Farm- Location Plan.pdf</p> <p>220725 Representations to Reg 19 Local Plan Review - Manor Park.pdf</p> <p>220729 Representations to Reg 19 Local Plan Review - Stoke Hill.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	It is suggested that to make the plan “sound” a positive spatial strategy would consider bringing forward new highly sustainable site allocations at Stoke Hill, Cobham and Manor Park, Claygate as larger development sites that can be repurposed and released from the Green Belt to enable the comprehensive delivery of new and affordable housing and essential social and physical infrastructure. This would be justified as exceptional circumstances in accordance with the NPPF.

Name	Green Kite Homes and ACAP Advisory (Nigel Rankine)
User ID	41000769
Organisation	GL Hearn obo Green Kite Homes and ACAP Advisory (Nigel Rankine)
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>The draft Local Plan is considered to be “unsound”. The draft Local Plan in policy SS3 fails in its requirement to meet its objectively assessed housing need calculated using the standard method. The plan explains in paragraph 3.19, that: “Using 2022 as the base year for calculation, the housing need for the borough equates to 647 dwellings per annum and over the plan period 9,705 homes.” Policy SS3 (1)(a) explains that the Plan will make provision for 6,785 net additional homes with at least 30% to be affordable new homes. This represents a shortfall of 2,790 homes (or 30% of the objectively assessed housing needs using the standard method).</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Objection to policy HOU1 Policy HOU 1 sets out a minimum housing provision figure of 452 dwellings per annum against the calculation set out in the standard method of 647 dwellings per annum and an identified need of 269 dwellings per annum of affordable housing. Policy HOU1 is therefore “unsound” as it fails to positively plan for its housing need by proposing only 70% of the standard method requirement, i.e. it will therefore only deliver 6,785 homes against a housing need of 9,705 homes.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y]

	<p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>Policy HOU 1 sets out a minimum housing provision figure of 452 dwellings per annum against the calculation set out in the standard method of 647 dwellings per annum and an identified need of 269 dwellings per annum of affordable housing. Policy HOU1 is therefore “unsound” as it fails to positively plan for its housing need by proposing only 70% of the standard method requirement, i.e. it will therefore only deliver 6,785 homes against a housing need of 9,705 homes.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	It is suggested that to make the plan “sound” a positive spatial strategy would consider bringing forward new highly sustainable site allocations at Stoke Hill, Cobham and Manor Park, Claygate as larger development sites that can be repurposed and released from the Green Belt to enable the comprehensive delivery of new and affordable housing and essential social and physical infrastructure. This would be justified as exceptional circumstances in accordance with the NPPF.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	The local plan fails to positively plan for a comprehensive approach to delivery by only promoting a range of new small housing sites or redevelopment of existing retail or employment land (that is

	<p>unlikely to come forward). The spatial strategy is fundamentally flawed and will not be able to deliver the required mix of housing typologies (such as 1, 2 and 3 bedroom smaller homes as required by the housing needs assessment), affordable housing and important essential social and physical infrastructure such as new schools and healthcare services.</p>
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Name	Paul Thatcher
User ID	41154369
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Having read the report there are errors with in it that make it inaccurate, without the required survey reports they are not able to provide a basis for the future
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No There are too many errors that fail to adequately provide for the needs of boaters
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] The ors report has been ignored and the obligations that carries
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	Additional information from this survey is needed
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Open forum for discussion with relevant bodies and local people

Name	Graham Thompson
User ID	16254561
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No there is still no guarantee of not building on the green belt.Needs more guaranteed commitment. there is no mention of promoting roadbuilding to relieve congestion -the most important factor in air quality. there is no mention of controlling burning wood and garden waste in the borough -in particular a policy for wood burning stoves.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y]

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	see my previous comment
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Peter Thompson
User ID	24517441
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I am particularly pleased that the council has listened to the residents feedback and continued to protect the green belt and they have taken a proactive stance on the spacial strategy which is important for everyone who lives here. I feel they have come up with a plan which is robust and carefully considered for all.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Louise Tippett
User ID	40394881
Organisation	
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>I am taking a human rights based approach to the law - eg. right to clean air, right to health, rights of nature - in the sense of protecting biodiversity against threat of ecocide.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Too much intensification of housing without provision for more infrastructure such as new GP surgeries.</p> <p>H15 - US374 - Hersham library - it is well used and vital part of community. If it is closed - even if the idea of temporary closure - I do not believe it will ever open again. This would impact particularly on children, older people, poorer people, those without cars.</p> <p>H15 US 390 - Royal George - the pub is a local hub and should remain, it is being taken over by a local brewery - sustainable and forward looking economic development</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p>

	<p>Consistent with national policy: [Y]</p> <p>As in my previous comments: the Government has policies on climate crisis, biodiversity, sustainability and "leveling-up", but the intensity of dwellings without new infrastructure such as buses at a London-type level, proper cycle lanes, new GP surgeries does not comply with the national policies.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>1. vastly improved PUBLIC transport; 2 new GP surgeries; 3. commitment in law to maintain Hersham public library; 4. specific climate mitigations for new housing including but not limited to: insulation, solar panels; 5. specific biodiversity mitigations including but not limited to: new and existing areas of land managed for biodiversity</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	David Tipping
User ID	14438657
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	CPRE (Keith Tothill)
User ID	7926593
Organisation	CPRE
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>Please see full PDF letter response.</p> <p>Conclusion The preferred Option which became the central plank of the Spatial Strategy of the Draft Plan, of building approximately 70% of the Standard Method figure is the most appropriate, given the many individual circumstances of the Borough and the careful rejection of other Options, after due consideration. The preferred strategy is strongly sustainable, retains the character of the urban areas, meets the NPPF at paragraph 11b with the proviso of the words” meets objectively assessed need “UNLESS”, takes account of the many constraints existing and when it comes to possible Green Belt releases; the Council does not consider that exceptional circumstances have been fully evidenced and justified to allow any releases.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>Please see full PDF letter response.</p> <p>Conclusion The preferred Option which became the central plank of the Spatial Strategy of the Draft Plan, of building approximately 70% of the Standard Method figure is the most appropriate, given the many individual circumstances of the Borough and the careful rejection of other Options, after due consideration. The preferred strategy is strongly sustainable, retains the character of the urban areas, meets the NPPF at paragraph 11b with the proviso of the words” meets objectively</p>

	assessed need “UNLESS”, takes account of the many constraints existing and when it comes to possible Green Belt releases; the Council does not consider that exceptional circumstances have been fully evidenced and justified to allow any releases.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	CPRE Surrey.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mark Tricker
User ID	41247681
Organisation	
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No One proposed site in the local plan (Wey 13) does not take account of the fact that there is a right of way to the rear of my property from the identified car park.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No One proposed site in the local plan (Wey 13) does not take account of the fact that there is a right of way to the rear of my property from the identified car park. Furthermore, the plan removes essential and well-utilised car parking from a shopping area and an area of increasing housing density.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: [Y] As above

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Wey 13 should be removed from the local plan
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Stuart Turnbull
User ID	41247201
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No Putting on Local locations to destroy the community in Hersham
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Why should sites that are in use from the community be demolished for the local plan.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [Y] Consistent with national policy: [] To demolish key parts of Hersham isn't sound
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	If a site is being used by the community it shouldn't be considered.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Roger Turner
User ID	24385537
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>To the best of my knowledge Elmbridge Council have been meticulous in their approach and have recognised and fulfilled all their legal obligations.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>I applaud the Council in their adoption of a holistic approach to the methodology used to develop this plan. In my opinion all the main elements that, together, form the quality of life in Elmbridge have been addressed and this plan represents a blueprint for sensible and pragmatic future for the Elmbridge community as a whole.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ruxley Heights Residents Association (Surrey) Limited (Roger Turner)
User ID	24522433
Organisation	Ruxley Heights Residents Association (Surrey) Limited
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes We believe that the Elmbridge team have done a pragmatic and professional job of developing a New Local Plan for Elmbridge which takes account of the short, medium and long term objectives
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ian Turvill
User ID	41204353
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>I have said yes but I can not say definitely if it is legal as I do not have that knowledge - this first question is thus pointless! There are many area's that are just crazy being put into it. I sometimes wonder what I have actually voted for.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>A draft plan is required - whether it is sound again is mute point - There are many locations that just want to fill Hersham with Houses and not provide any amenities or encourage people to shop local.</p> <p>H1 US441 - This is in the middle of an existing domestic area and so is suitable for development. - INCLUDE</p> <p>H3 US379 - This is the main car park for the Hersham Centre. Should be developed where will people park. Do not say they should walk - You live in dream land - The centre will die - IT MOST DEFINATELY SHOULD NOT BE INCLUDED</p> <p>H5 US45 - With the world returning to normal - encouragement to use trains - where will everyone park - IT MOST DEFINATELY SHOULD NOT BE INCLUDED</p> <p>H6 US40 - This amenity should be enhanced not demolished - IT MOST DEFINATELY SHOULD NOT BE INCLUDED</p> <p>H7 US380 - Similar comment to H3 US379 - IT MOST DEFINATELY SHOULD NOT BE INCLUDED</p> <p>H8 US389 - This is a popular local venue - IT MOST DEFINATELY SHOULD NOT BE INCLUDED</p>

	<p>H10 US390 - This is a popular local venue - IT MOST DEFINATELY SHOULD NOT BE INCLUDED</p> <p>H11 US 376 - This is a popular local venue - IT MOST DEFINATELY SHOULD NOT BE INCLUDED</p> <p>H15 US 374 - This is a valuable asset to the community. Should this be included in the local plan it must only be done so with the Caveat that A NEW LIBRARY MUST FORM THE GROUND FLOOR - Flats above maybe but where will people park?</p> <p>H2 US489 - This should be included</p> <p>H4 US517 - An block of apartments already exist - So a few extra is OK -This should be included</p> <p>H9 - US375 - A Local employment spot !! - IT MOST DEFINATELY SHOULD NOT BE INCLUDED</p> <p>H14 US43 - Agree to develop this for more chances of local employment.</p> <p>H12 US45 - Agree to develop</p> <p>H13 US378 - If you use this and the proposed Village hall - they will be no halls left to hold functions and encourage local activities - IT MOST DEFINATELY SHOULD NOT BE INCLUDED</p> <p>Hersham Hounds - Turner Lane - NO - Keep it under local Green belt area.</p> <p>Vaux Mead - Burwood Road - Should be kept as Green space.</p> <p>Burhill School - IT MOST DEFINATELY SHOULD NOT BE INCLUDED - Where will all the children go should all the above dwellings be built.</p> <p>Hersham Golf Club - This forms part of the flood plan - The Molesey Road is heavily used already - increased traffic - more congestion - more accidents - IT MOST DEFINATELY SHOULD NOT BE INCLUDED</p> <p>Longmore Estate - The two green spaces on the estate - where will children play - the roads!!</p> <p>Brampton Gardens - again a green space in a domestic area - where will children play - IT MOST DEFINATELY SHOULD NOT BE INCLUDED</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: []</p>

	<p>Justified: []</p> <p>Consistent with national policy: []</p> <p>Its shows the way the council is thinking - same about its soundness - there is no mention of infrastructure development</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	I do not not have the knowledge for this
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Leonora Tye
User ID	40896353
Organisation	
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Leonora Tye
User ID	40896353
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Chloe Unwin
User ID	41154433
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Chalford Property Company Ltd (bhavash vashi)
User ID	40191329
Organisation	Chalford Property Company Ltd obo Chalford Property Company
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No We consider that the key challenge facing Elmbridge Borough Council is to achieve sustainable development as made clear by the government in both the NPPF and the Housing White Paper: Fixing our Broken Housing Market. The NPPF states that this can be delivered in three broad roles: economic; social; and environmental which Elmbridge Borough Council have highlighted and sub-divided into more specific and localised challenges. We consider these to be appropriate challenges for Elmbridge Local Plan to address and therefore agree with the Council. However, the Council does not specify which challenge it considers to be most important. We submit that the increased delivery of housing, a fundamental social and economic challenge, should be more encouraged in the Plan given it is the key challenge that shapes all other sectors ie allowing for increased housing numbers means that an enhanced employment growth strategy can be sustained as the increase in employment opportunities needs to be coupled with the provision of a range of good quality housing across the Borough at prices that are affordable, unlike the present situation. This relationship between housing and employment growth is highlighted in the NPPF and more recently, the Housing White Paper as a key inter-related issue.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: []

	<p>Effective: [Y]</p> <p>Justified: []</p> <p>Consistent with national policy: [Y]</p> <p>See above comments under question 2.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>We submit that the increased delivery of housing, a fundamental social and economic challenge, should be more encouraged in the Plan given it is the key challenge that shapes all other sectors ie allowing for increased housing numbers means that an enhanced employment growth strategy can be sustained as the increase in employment opportunities needs to be coupled with the provision of a range of good quality housing across the Borough at prices that are affordable, unlike the present situation.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	no

Name	Chalford Property Company Ltd (bhavash vashi)
User ID	40191329
Organisation	Chalford Property Company Ltd obo Chalford Property Company
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Elmbridge Borough Council's own evidence base as set out in the Land Availability Assessment is 647 homes PA over the next 15 years, equating to 9,705 total. This is a significant increase from the current Core Strategy target of 225 dwellings per annum and the Council estimates that that it can identify sites for 6,780 new homes over this time period. This leaves the Council with the challenge of providing for a further 2,925 new homes to meet their OAN which the Council has not identified sites for other than those urban sites listed in the draft plan. However, the Council have acknowledged that even the release of these areas will not meet this unmet need and that ion adoption its 5 year HLS position will be somewhere around 4.3 years. How is this positive and effective planning.</p> <p>The fact is that many of the sites identified for allocation are under 10 units which will not deliver any affordable housing, and with all in urban areas which typically will mean they are likely to be flatted schemes rather than provide much needed family homes. When assessing housing needs, Elmbridge Borough Council examined need across an area that included Kingston upon Thames, Epsom and Ewell and Mole Valley and formed a Housing Market Area as these Districts share similar house prices and pressure for new development. The Strategic Housing Market Assessment (SHMA) produced in conjunction with all these authorities concluded that between 2015 and 2035 2,000 new homes per annum would be needed. Each of these authorities, therefore, saw a significant uplift in what they are currently planning for (Elmbridge: 180%: Kingston: 155%; Epsom and Ewell: 130%; and Mole Valley: 107%) and are all in the process or</p>

	<p>about to enter the process of conducting new Local Development Schemes and so it is yet to be seen if and where this housing need will be located. Given these authorities are all heavily constrained either by the Metropolitan Green Belt or Surrey Hills AONB, it places a greater pressure on Elmbridge Borough Council to meet its own OAN as we know that the neighbouring LPAs cannot meet any unmet need arising from Elmbridge under the Duty to Cooperate. The Green Belt boundaries of the borough also make housing delivery a particular challenge. Given the Council should already have identified all developable brownfield sites, having established their proposed Green Belt boundary review and in line with NPPF, should now seek to amend the boundaries of the Green Belt as it is clear there is no other option if the Council is to meet its housing shortfall of 2,835 homes over the plan period. This Consultation document, therefore, seems to echo exactly what the Housing White Paper cited as a reason for the under delivery of housing and what the NPPF is seeking to address. This is why housing should be considered the most important challenge for the borough; it is clear that the politically driven motive that all GB should not be considered for development seriously undermines the soundness of the draft Plan and offers no answers as to why the OAN cannot be met within the Borough boundary. We consider that Elmbridge Borough Council could accommodate more of its unmet need than that is currently being planned for.</p> <p>Accordingly, we believe further work should be carried out to fully explore all of the development potential options across the district including possible Green Belt releases, as the LPA has suggested before (under the Reg.18 Plan), and until such time it does this then we are of the opinion that the Council is not fully (or even significantly) meeting its key objectives which in turn raises the question of whether the draft Plan can be considered to meet the test of 'soundness' as set out in the NPPF.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p>

	<p>Consistent with national policy: [Y]</p> <p>See response to Qu.2</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>We believe further work should be carried out to fully explore all of the development potential options across the district including possible Green Belt releases, as the LPA has suggested before (under the Reg.18 Plan), and until such time it does this then we are of the opinion that the Council is not fully (or even significantly) meeting its key objectives which in turn raises the question of whether the draft Plan can be considered to meet the test of 'soundness' as set out in the NPPF.</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	<p>Yes, I wish to participate at the oral examination</p>
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	<p>The issue of delivery of houses raises fundamental issues with regard to the soundness of the draft Plan. We believe that we can assist the Inspector at EIP where more detailed discussions about Soundness and our concerns can be explored alongside other participants.</p>

Name	BVA Planning (Bhavash Vashi)
User ID	31150145
Organisation	BVA Planning obo Chalford Property Company
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No No as we do not believe the Council has done enough to secure new housing sites across the Borough as detailed in our representations on Chapters 2,3,6 and 9.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] see responses to Chapter 2,3,6 and 9.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	see responses to Chapter 2,3,6 and 9.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	Through our representations on Chapter 2,3,6 and 9, we believe that we can assist the inspector in examining the Plan at the EIP and contribute further to the fundamental inadequacies that have led to the Plan (in our opinion) being unsound.

Name	Chalford Property Company Ltd (Bhavash Vashi)
User ID	40191329
Organisation	Chalford Property Company Ltd
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The Council is fundamentally not positively looking to address its significant housing needs both market and affordable. Therefore, we consider there are exceptional circumstances to allow alterations to GB boundaries to accommodate more housing given the background issues set out below:</p> <ul style="list-style-type: none"> • “One of the worst levels of affordability in the country coupled with an under supply of affordable homes; • Need to deliver a better mix of new housing away from current delivery focussed on houses of four or more bedrooms; and • The land that is being kept open for the purposes of Green Belt is no longer meeting those purposes.” <p>Whilst we believe that these issues should be considered as exceptional circumstances with regard to Green Belt release, a further consideration is the level of housing needed in the borough over the next plan period. While this unmet need on its own is not considered exceptional, in conjunction with the above issues, it is considered a significant material issue. Currently the borough’s distinct character is a patchwork of towns and villages being separated by open land which is designated as Green Belt (around 57%). There remains very few developable brownfield sites situated in non-designated Green Belt areas. Therefore, this leaves very few expansion opportunities that are not in the Green Belt, which in our view constitutes</p>

	<p>very strong exceptional circumstances given that the draft level of provision only equates to 6,780 homes (with many on small below 10 unit sites compared to the OAN of 9,615 homes. Even with the Council's own figures, the Land Availability Assessment (P.24) recognises that the will be insufficient land coming forward within the borough's urban areas to meet its development needs over the plan period. It goes onto state that the Council will also not meet its first 5 year HLS target which will be just 4.36 years. The Council need to re-consider its political position with regard to excluding GB sites from allocation and look to review sites (such as my clients at Hinchley Wood) for allocation if it is to effectively and positively plan for the next 15 years or so. Without such a reconsideration, our fear is that the pressures highlighted above will be further increased and lead to chronic housing shortages across both the private and public sectors leading to a cap on the potential economic growth of the area also.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>See response to Qu.2</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>The Council need to plan for more homes than currently it is and review the politically driven approach to exclude GB sites from allocation as there are exceptional circumstances as outlined in our response.</p>

	Land off heathside Vision Doc.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We believe we can assist the Inspector in exploring the issues around GB review, housing numbers and impact upon local communities.

Name	Chalford Property Company Ltd (Bhavash Vashi)
User ID	40191329
Organisation	Chalford Property Company Ltd
Policy / Evidence base/ part of plan:	Site allocations
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Given the Council's reluctance to allocate any GB sites despite the overwhelming need for additional land to meet its OAN figure we consider that the delivery of housing and overall quantum is flawed especially as many of the suggested allocations are below 10 units which will not deliver infrastructure and/or affordable housing so needed in the Borough.</p> <p>Given the above, we consider that our clients land off Heathside, Hinchley Wood (northern part of parcel 45 in the ARUP Green Belt Boundary Review) should be considered for Green Belt removal. The land is suitable for development and within a sustainable location being in close proximity to existing services and facilities within Hinchley Wood. It is also a logical location for development given its relationship to the existing built-up edge of the settlement; and the land is available for development now.</p> <p>Our client's site forms part of the much larger parcel 45. While parcel 45 has been assessed as performing 'strongly' against the Green Belt, we consider that the northern piece of land at Heathside, Hinchley Wood (our client's site) could form a discrete area separate from the wider Green Belt in this area. If a more dispersed spatial strategy was implemented for Green Belt release, which focused on or included, smaller pieces of land being removed from the Green Belt to meet Elmbridge's OAN, then the northern part of parcel 45 could be considered as weakly performing combined with being a sustainable location and having no known constraints.</p> <p>Our client's site is located at the edge of Hinchley Wood's urban area and would be a logical location in relation to the existing built up edge of the town. Therefore, it would pass GB purpose</p>

1(a). The development of the site would also prevent any further outward sprawl of Hinchley Wood as it would serve as a barrier to the settlement due to being contained on all 4 sides by durable boundaries. The land is tucked behind a housing estate to the north east, borders onto Littleworth Common to the north west, the London-Guildford rail line to the south and rugby fields to the west (segregated by existing planting). Any loss of countryside would only be perceived in the local context. We consider this site to be unobtrusive and will not result in further outward sprawl as there would be nowhere further for expansion to go. New landscaping could be planted as part of any development proposal to ensure that a defensible soft landscape boundary would exist along the site's north west edge which fronts onto Littleworth Common, a densely forested area.

In relation to purpose 2 of the Green Belt, preventing neighbouring towns from merging, parcel 45 was scored the highest (5) against the criteria. While we agree with the Council that the wider area of parcel 45 does include an 'essential gap' between Hinchley Wood and the surrounding countryside, we consider our client's site to not form part of this. This is because our client's site is located north of a narrow Green Belt section which seeks to prevent coalescence of Hinchley Wood and Claygate. Given the site's defensible boundaries, described above, this site cannot encourage further development around it and therefore will not impact this 'essential gap'. As a result, we consider this site could be considered not to be a strongly performing in respect of purpose 2.

Purpose 3 of the Green Belt is to assist in safe guarding the countryside from encroachment and thereby protecting the openness of the countryside. The ARUP Green Belt Boundary Review methodology and assessment scored parcel 45 3 out of 5 meaning it 'contains less than 10% built form and/or possesses a largely rural character'. Again, while we agree with the general score for the parcel, we consider our client's site to score differently. The site we are representing does not contain any built form within its boundaries, however it does boarder residential development to the north east and the far side of the rail line which borders the south of the site is also built up. This particular part of parcel 45 does not possess a largely rural character.

The ARUP methodology and assessment fails to assess the sustainability argument, in fact no recommended area is really considered in terms of sustainability. In the current draft Strategy, Hinchley Wood is regarded as a suburban settlement area and provides a limited range of uses and services but nevertheless, has the capacity to accommodate new development. It is noteworthy that the land at Heathside is 8 minutes and under ½ a mile to Hinchley Wood Station

	<p>which serves the London-Guildford rail line. There is also good pedestrian access into Hinchley Wood. Esher is 1.5 miles away and there are schools within a 2-mile radius making our client's site a sustainable location. Further supporting evidence detailing the site's sustainability merits is set out in the accompanying Vision Document for the site. Although a small section of the site falls within the flood zone, the site is otherwise unencumbered and could be delivered immediately and well within the first 5 years of the Plan, which we know as it currently stands does not.</p> <p>In summary, it is submitted that the land at Heathside (northern part of parcel 45) should be given much greater consideration by Elmbridge Borough Council as the land is suitable for development, is available and does not have any significant deliverability issues. The Council need to explore further all options, including Green Belt releases, if it is to truly meet or come close to meeting its OAN and pass the tests of Soundness. It is our view, that the Council's, ideological stance of not considering any GB sites has resulted in a defensive and containment strategy that neither delivers the housing the area so desperately needs nor contributes to the economic growth of the borough given the inter-dependency of both housing and economic strategies.</p> <p>To support our response we have prepared a Vision Document for the clients site which is provided and should be read in conjunction with this response.</p>
<p>Question 3</p>	<p>If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.</p>
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>See response to Qu. 2 above</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>To allocate more sites for development in order to really meets its OAN housing need. In summary, it is submitted that the land at Heathside (northern part of parcel 45) should be given much greater consideration by Elmbridge Borough Council as the land is suitable for development, is available and does not have any significant deliverability issues. The Council need to explore further all options, including Green Belt releases, if it is to truly meet or come close to meeting its OAN and pass the tests of Soundness. It is our view, that the Council's, ideological stance of not considering any GB sites has resulted in a defensive and containment strategy that neither delivers the housing the area so desperately needs nor contributes to the economic growth of the borough given the inter-dependency of both housing and economic strategies.</p> <p>Land off heathside Vision Doc.pdf</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We believe that the Council is not doing enough to meet its OAHN and so needs to allocate further sites including our clients at Heathside, Hinchley Wood which has been assessed as set out in our Vision Document. We believe we can contribute to the debate on this issue at EIP and assist the Inspector in his deliberations.

Name	Rex Walden
User ID	41190817
Organisation	Residential Boat Owners' Association
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>With regard to the provision of Residential Moorings the Need Assessment which forms part of the Evidence Base and will inform policy is fatally flawed therefore the Plan cannot be legally compliant.</p> <p>ORS failed to consult with organisations who have specific knowledge of the situation and terminology on the river Thames. Instead they spoke to Canal & River Trust who have no direct knowledge of, or responsibility for, the Thames. ORS did not consult the Environment Agency Thames Waterway Management who are the Navigation Authority. Neither did they consult the Residential Boat Owners' Association (RBOA) to contribute to their report. A simple Google search would have told them of RBOA's existence, Founded over 50 years ago, RBOA are regularly consulted by local and central government departments on all matters concerning residential boating and moorings. The RBOA partnered with British Waterways to help them develop the residential moorings policy that is still being used by BW successor organisation the Canal & River Trust (CRT). Similarly, RBOA were involved in the development of the current residential mooring policy adopted by the Port of London Authority (PLA) for the tidal Thames. The same is true of the waterways in East Anglia where the RBOA were consulted by the Broads Authority and the Middle Levels Navigation Commissioners to advise and guide their respective residential moorings policy.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Because the ORS report is seriously flawed the needs of the local live aboard community are inadequately assessed. ORS talk about "Licensed" moorings. There is no such thing. Moorings,</p>

on the Thames are not “Licensed”. Because the ORS report does not indicate the specific locations of the boaters interviewed it is impossible to know precisely what they are referring to. The only “official” visitor moorings on the Elmbridge side of the river are EA moorings at Hurst Park, the Weir Pub. Gridley Miskin (Walton), Walton Towpath Moorings (which includes moorings outside the Anglers Pub) Desborough Island Mooring (which is where the Trawler referenced in the report is sited) and finally Weybridge Moorings.

There are a small number of permanent moorings bankside which are owned by the riparian hereditaments who could, of course, have private arrangements with boaters. It should be noted that there is no equivalent of the landlord and tenant act so the boater will have no protection in law.

There are also moorings available in marinas and boatyards. The vast majority of these are classified as leisure moorings and typically they are on 12 month rolling contracts. These contracts will have a clause that specifically excludes their use by a vessel that is the boaters home. Consequently, anyone who is living on their boat is in breach of the contract and likely to be removed at a moments notice. It is a fact that the operators of these moorings are extremely sensitive about this issue to the extent that many of them refused access to ONS staff conducting the Census in 2021.

There are however, residential moorings at D’Oyle Carte Eyot which is sited in Weybridge just downstream from Shepperton Lock. There are circa 30 residential moorings on the island. All of the boaters were removed in 2015-16 when the then owner put the island up for sale. It was eventually sold, and the current owner tidied up the island, cleared vegetation from the moorings, and let it be known in 2021 that they were once again available.

It took about 3 months before every mooring was taken. Interestingly at least one of the vessels had hitherto been moored for several years in Desborough Cut, moored without consent at no cost to the owner. One of the arguments used against those of us trying to persuade authorities to provide long term moorings is “they will never pay”. Here is a clear demonstration that that is not the case, if there is suitable provision in the right location people will pay. In this case pay handsomely, the fee is in the order of £450 per metre per annum.

At one point ORS reference “Inhabited” moorings, they don’t make it clear what they mean by that term. It seems ORS probably do not understand that a residential mooring is a specific class of mooring, they talk about permanent moorings without further description. ORS use terms to describe moorings that are not familiar to Thames boaters. Had ORS consulted the EA they

	<p>would have learnt that they have Base Moorings, Transient Moorings, Visitor Moorings and Residential Moorings. Base Moorings are long term moorings, most are floating pontoons or if not, they are designed to be safe in strong stream conditions and are provided with electrical power and fresh water points however, they specifically refuse to allow them to be used by residential boaters. Transient Moorings are at locks and intended for overnight use by boaters in the course of navigation, there are no restrictions on their use. Visitor Moorings are intended for overnight use and boaters are allowed to use them free of cost for 24 hours and thereafter for a maximum of two more days for a fee of £5.50 a day. Again there are no restrictions on their use. Finally, the EA have one Residential Mooring it is in Kingston on Thames, it has space for just 12 vessels and has existed, unaltered since Thames Conservancy days. ORS conducted their survey in January, arguably trying to conduct a survey of this type in the winter is of questionable value. Many live aboard boaters, probably the majority, find a “safe haven” for the winter months so they are unlikely to be bankside unless they have found a very secure mooring. During the period of the ORS survey the river was moving on and off Yellow and Red Boards indicating strong stream conditions. The Plan attached to the ORS report is of very limited, if any, value. There is no key it just claims to show the area covered so one assumes that is depicted by the dark blue line. If that is the case the upstream (left hand side) shows they didn’t survey anywhere near the Weybridge mooring (where coincidentally the Vice Chairman of the RBOA was moored during part of the period when ORS claimed they carried out the survey) If the plan is to be believed the ORS survey followed the course of the Old River around Desborough Island but ignored Desborough Cut where there were at that time at least 12 vessels which are peoples homes. Finally, again if the plan is to be believed, most of the time the ORS researcher was on the opposite side of the river to Elmbridge. The most worrying aspect is that Elmbridge appear to have accepted this very flawed plan.</p>
<p>Question 3</p>	<p>If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.</p>
	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p>

	<p>Justified: []</p> <p>Consistent with national policy: [Y]</p> <p>Please see previous comments - the ORS report on which the local plan relied with regards to the needs of the boating community is fatally flawed therefor the plan as a whole cannot be deemed to be Positively prepared or Effective. Neither can it be considered to be Consistent with national policy as there is no provision for or consideration of the needs of those who live afloat.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	The Need Assessment which forms part of the Evidence Base should be revisited in conjunction with organisations who have knowledge of the situation on the Thames and terminology with a proper detailed plan of the location and status of moorings referred to.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	n

Name	Fiona Walmsley
User ID	12067585
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Xingang Wang
User ID	16441697
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes I would like to express my support of "Spatial Strategy" proposed in the Draft Local Plan, this is because I would like to show my support for continued protection of the Green Belt and agree with the council's justification for doing so.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	James Waterhouse
User ID	24481729
Organisation	Iceni Projects on behalf of Northumberland Estates
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>The policy fails to identify or positively plan for an objectively assessed need for employment in the borough. The policy is not positively prepared, justified or consistent with national planning policy (a, b and d soundness test as set out in NPPF Para 35) due to a failure to identify the objectively assessed need nor plan positively for it.</p> <p>The Council commissioned GL Hearn to produce a commercial property report in 2014 and 2017, which the Council's Employment Land Review Addendum in November 2021 identifies as "an important part of the Council's evidence base". That evidence, which only considered employment requirements to 2030, identified a need of 16ha of employment land to provide the floorspace needed to support growth, with around 7ha required for warehouse/distribution use and 9ha for office use (along with a forecast net loss of around 2ha of industrial land and 1ha of Sui Generis uses). The Plan has seemingly ignored its own evidence base and failed to identify new employment provision.</p> <p>A major opportunity for new employment growth exists at the allocated waste site Weylands Treatment Works, which adjoins the Hershams Trading Estate (one of only 5 Strategic Employment Land sites in the Borough). This site comprises previously developed land in the Green Belt and could enable high quality employment floorspace to be delivered that could support and strengthen the function of the adjoining SEL.</p>

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: <input checked="" type="checkbox"/> [Y]</p> <p>Effective: <input type="checkbox"/> []</p> <p>Justified: <input checked="" type="checkbox"/> [Y]</p> <p>Consistent with national policy: <input checked="" type="checkbox"/> [Y]</p> <p>The policy is not positively prepared, as it is not derived from or based upon the Borough's objectively assessed need for employment (which identifies the need for 16Ha of land to 2030). The policy is not justified, as a key component of the evidence has been ignored. In this regard, the 2017 market report identifies the need for 16Ha of land and the Council Employment Land Reviews of 2019 and 2021 profile the contracting economic floorspace in the Borough. The policy has not considered reasonable alternatives, such as the utilisation of a major waste and employment site at Weylands Treatment Works, which provides an obvious opportunity to strengthen the role and function of the adjoining Hersham Trading Estate and accommodate some of the new floorspace identified in the Council's own assessment of need.</p> <p>The policy is inconsistent with national planning policy due to a failure to identify the objectively assessed need nor plan positively for it. The policy approach is wholly inconsistent with Section 6 of the NPPF (Building a strong competitive economy) for the following reasons:</p> <ul style="list-style-type: none"> - the strategic policy fails to create the conditions in which businesses can invest, expand and adapt. By not allocating land for new economic development, the policy does not allow the area to build on its strengths, counter its weaknesses and address the challenges of the future (NPPF para 81) - the strategic policy does not set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration (NPPF para 82, criterion a)

	<ul style="list-style-type: none"> - the strategic policy does not set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period (NPPF Para 82, criterion b) - the strategic policy is not flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances (NPPF Para 82, criterion d).
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	The Strategic Policy should be amended to plan positively for economic growth, rather than be allowed to remain as is, which arguably promotes decline. The former Weylands Treatment Works site, which adjoins the Hershams Industrial Estate and which constitutes a significant piece of previously developed land in the Green Belt that currently gives rise to numerous local issues through its existing established uses, should be identified as a key component of a positive economic strategy for the Borough
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	<p>The Plan's ability to plan positively for economic growth is a key issue that should be tested as part of the Examination into the soundness of the Plan, especially given the Plan does not allocate any land for economic development despite an assessment of objectively assessed need indicating 16 HA should be allocated in the period to 2030.</p> <p>Weylands Treatment Works is an obvious employment site that has been overlooked for employment allocation and for which a planning application is being prepared seeking employment-led redevelopment. This makes Icen a logical party to attend the examination to enable debate of the approach and the respective merits.</p>

Name	Barbara Waters
User ID	16417025
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes A very thorough job by the Council, all checked against legal requirements and properly consulted upon within the community, definitely support it
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Very thorough
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mr Waterworth
User ID	16347969
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Anna Wathen
User ID	41171585
Organisation	Friends of Hersham Library
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>The Friends of Hersham Library request that the plan to build 13 units and re-provision of community use at the Hersham Library site be removed from the Local Plan on the following grounds.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Section SS1(a) and (e) Hersham Library in its present form is valuable as it is one of the few local libraries that provides easy parking for users. The Library is particularly well suited for disabled people as a space is available right next to the ramp into the building. Parents (or other carers) with pre-school age children and elderly people will be affected as they are the groups who are less likely to walk or cycle any distance. These people will then have to use cars to travel a few miles to the next Library, and the people who walk to the Library may well now have to use their cars to travel whereas before they walked. Many parents/carers with children at Primary Schools nearby - viz Bell Farm, Burhill and Cardinal Newman - often bring their children in after school on the way home. This again will not be easy for them if the Library is not there in its present form with or without available parking.</p> <p>f) If the Units are built alongside the existing Library then green space - the garden at the back, front and side - will be lost. If the Library is to be demolished as well to rebuild this is also against Section (f).</p>

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p> <p>Section ENV9 (b) The Library as it stands at the moment provides a necessary 'community togetherness'. There are many events run in the Library - Knit and Natter groups, Rhyme Time for pre-school age children, Scrabble groups, Story Reading for the slightly older children, entertainment in the school holidays which includes Magic and Science show, Bug Hunting and Craft Work. Tea and coffee mornings/afternoons, book sales and author events are also available on a fairly regular basis. Some of these have been held in the garden when the weather has been good and it is safe for children with their parents/carers. A recent Tea Party resulted in over 130 visits by all age groups to the Library. Last but not least is the general lending out of books to the public - an extremely important service to all age groups.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Section ENV10 We consider Hersham Library to be a heritage asset as it has been in existence since the 1960's. It is part of the appeal of living in Hersham that both young and old have memories of using the Library for so many years. The Library is particularly light and airy which, together with the garden, makes it very welcoming. Together with other reasons in this submission - particularly the Covenant on the land - we therefore ask that Hersham Library should be removed from the Local Plan and remain open in its present form.</p>

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	<p>It cannot be claimed that the Library is no longer needed in its present form. The services cannot be provided in a better quality on the existing site as space will be needed for the 13 proposed units as well as a loosely termed 're-providing of community use' - not Library. On the 21st July 1961 according to Title Number SY271312 from the Land Registry Department a conveyance was made between the Urban District Council of Walton and Weybridge (known as the Vendors and later becoming Elmbridge Borough Council) and the County Council of the Administrative County of Surrey which contained the following covenant:</p> <p>For the benefit of the Vendor's adjoining land the Purchasers hereby covenant that the land hereby conveyed shall be used for the purpose of erecting a Public Library and for no other purpose without first obtaining the consent of the Vendors such consent not to be unreasonably withheld. This covenant is now to be broken by building 13 units and 'community use' which is not specified. The Friends of Hersham Library feel very strongly that it is both ethically and morally wrong to break a covenant of this nature when land was specifically acquired for the purpose of erecting a Library which was built for that purpose alone.</p>

Name	Mrs Suzanne Wells
User ID	24537601
Organisation	
Policy / Evidence base/ part of plan:	ENV2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Please strengthen this by including the following within Env2 to strengthen those paragraphs other than that in relation to street trees:</p> <p>"Works to trees covered by a Tree Preservation Order or trees situated within a Conservation or Tree Preservation Area must ensure the long term health of the tree, and retain and enhance amenity value to the locality. Works must comply with current arboreal best practice, guidelines and legislation.</p> <ul style="list-style-type: none"> - All development and demolition must comply with established good practice, guidelines and legislation for the retention and protection of trees. There must be a high regard for the retention of all trees of amenity and environmental value, taking consideration of both their individual merit and their interaction as part of a group or broader landscape feature. - All development including subsidiary or enabling works, that involve the loss of or harm to trees covered by Tree Preservation Orders, or trees of significant amenity or biodiversity value, should be refused. If there are exceptional circumstances which require their removal, adequate replacement trees must be provided. - A repeating 5-year permission notice introduced to planning permissions. Where trees with TPO or within 5 year protection scheme have been removed, replacement orders can be followed through for a rolling set five year periods. This is manageable with a simple log of permissions with such initial five year protection clauses.

	<ul style="list-style-type: none"> - All applications should include a landscape plan and statement of tree/shrub removal and retention for approval as part of the application process - All applications and preplanning consultations must -- Retain and protect trees of amenity and biodiversity value on the site and in adjacent sites that may be affected by the proposals; Ensure that the future long term health and amenity value of the trees is not harmed; Provide adequate separation between the built form and the trees including having regard to shading caused by trees and buildings - Applications and preplanning, must outline how the development will contribute to the protection, enhancement or restoration of the ecological value of the site and the surrounding area, including the provision of living landscaping and the formation and enhancement of waterways, wildlife corridors and green chains - In applications and preplanning, provision must be made to increase tree and hedge(non-Laurel) cover on the development site and new tree planting and living landscape schemes included with the emphasis on planting mature, large, shade and oxygen producing trees, native trees and hedges and flora of high ecological value. - All trees contained within approved development should be considered as protected indefinitely. Any future works to the trees should only be allowed with given permission following a planning application and assessment by The Tree Officer. - Where trees are removed etc without permission, the developer/owner and tree surgery company should be heavily penalised and council tree and compliance officers should feel able to pursue this."
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: [Y]</p> <p>Justified: []</p>

	<p>Consistent with national policy: []</p> <p>The paragraph is not strong enough to protect trees which are vital to mitigating the effect of Climate Change in what the Council recognises is a Climate Emergency.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>Works to trees covered by a Tree Preservation Order or trees situated within a Conservation or Tree Preservation Area must ensure the long term health of the tree, and retain and enhance amenity value to the locality. Works must comply with current arboreal best practice, guidelines and legislation.</p> <p>All development including subsidiary or enabling works, that involve the loss of or harm to trees covered by Tree Preservation Orders, or trees of significant amenity or biodiversity value, should be refused. If there are exceptional circumstances which require their removal, adequate replacement trees must be provided.</p> <p>A repeating 5-year permission notice introduced to planning permissions. Where trees with TPO or within 5 year protection scheme have been removed, replacement orders can be followed through for a rolling set five year periods. This is manageable with a simple log of permissions with such initial five year protection clauses.</p> <p>Applications must enhance or restore the ecology.</p> <p>Consultation amendment to ENV2.docx</p>
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Frank Whately
User ID	41047617
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Ruby Wheelan
User ID	24391969
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mike Wheeler
User ID	16336257
Organisation	VOX
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>Yes</p> <p>See attached letter dated 29 July 2022. Additionally, comments are been included in the relevant policy questionnaire.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>This is the response from FEDORA – The Voice for Oxshott (FEDORA) to the Regulation 19 consultation being conducted by Elmbridge Borough Council (EBC) in connection with its draft Local Plan (LP).</p> <p>FEDORA was established some 35 years ago to act as the representative body for residents in Oxshott.</p> <p>Through use of social media, e-mail updates to supporters and liaison with constituent residents associations, FEDORA has a close understanding of the views of a major part of the population of Oxshott.</p> <p>We consider that the questionnaires issued by EBC in respect of the Regulation 19 consultation do not provide a satisfactory basis for comment on a matter as important as the draft LP and we are therefore writing this letter by way of formal response. Each of the matters referred to in this letter is cross referenced back to the appropriate part of the draft LP.</p> <p>During the formulation of the draft LP, FEDORA has worked closely with residents associations in neighbouring settlements most particularly in Cobham & Downside and Stoke D’Abernon. We have also had regular meetings with our local councillors. We have provided EBC with regular comment on the way in which the draft LP has been created and have responded in detail to previous consultations.</p>

	<p>We are therefore fully informed on the background to the development of the draft LP. We recognise that the draft LP has taken six years of debate and local negotiation. Inevitably, it can not satisfy all requirements in a diverse borough, but we consider that it has sought to reconcile competing interests and represents a sensible plan for the future development of Elmbridge. In particular, the draft LP takes a pragmatic approach to determining housing numbers and provides a welcome commitment to preserving Green Belt. FEDORA confirms that it is supportive of the draft LP. We believe it is both legally compliant and substantially sound. But there are inevitable reservations in respect of various matters that we believe should be addressed by way of minor modification.</p> <p>The reservations set out in the feedback on the policies are matters that we consider should have received more explicit attention in the draft LP. Their omission though does not invalidate our opinion that the draft LP should be considered both legally compliant and substantially sound. Please note our request for a presence at the hearing for oral representation.</p> <p>Finally, on behalf of Oxshott residents, thank you for all the work done to date on the development of the draft LP.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

	Regulation 19 submission - July 2022.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mike Wheeler
User ID	16336257
Organisation	VOX
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>1. Climate change (Principle 1 & CC5) Dealing with the effect of climate change is a laudable component of the vision. But there is an inherent contradiction in the draft LP between Principle 1 and the complete absence of any meaningful strategy to reduce the impact of an inevitable increase in traffic resulting from increased housing. There is substantial reliance in many parts of Elmbridge on motor transport for commuting, FEDORA – The Voice for Oxshott CIC shopping, schooling, medical care, and social visits. It is simplistic to assume that this will reduce without profound changes in personal behaviour and significant investment in infrastructure.</p> <p>2. Design codes (Principle 3) Reference is made in the draft LP to future Design codes. These form an integral component of the draft LP and without either the detail or (at least) a summary of their content, consideration of the soundness of the draft LP is made more difficult. The importance of Design codes is referenced in the Levelling Up and Regeneration Bill.</p> <p>3. Wisley (Principle 4) There is no reference in the draft LP to the effect on Elmbridge (and in particular Cobham) of the plan approved by Guildford BC for the construction of about 2,000 new homes at Wisley airfield. This is a surprising and important omission that causes concern about compliance with the duty to cooperate under the Localism Act. The size of the development at Wisley airfield will have a substantial impact on Cobham and neighbouring settlements and the draft LP should explain how this will be mitigated.</p>

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mike Wheeler
User ID	16336257
Organisation	VOX
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>4. Cobham Town Centre (Key Diagram 5) Without explanation, Cobham has been recategorised as a Town Centre rather than a District Centre. This change should be reversed so as not to endanger its existing character. Similarly, the description of Cobham and Oxshott as Urban Areas pre-empt the outcome of local Design Codes and they should be redesignated in accordance with National Design codes.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mike Wheeler
User ID	16336257
Organisation	VOX
Policy / Evidence base/ part of plan:	CC1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>1. Climate change (Principle 1 & CC5) Dealing with the effect of climate change is a laudable component of the vision. But there is an inherent contradiction in the draft LP between Principle 1 and the complete absence of any meaningful strategy to reduce the impact of an inevitable increase in traffic resulting from increased housing. There is substantial reliance in many parts of Elmbridge on motor transport for commuting, FEDORA – The Voice for Oxshott CIC shopping, schooling, medical care, and social visits. It is simplistic to assume that this will reduce without profound changes in personal behaviour and significant investment in infrastructure.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mike Wheeler
User ID	16336257
Organisation	VOX
Policy / Evidence base/ part of plan:	CC5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	This policy addresses new development but does not seek to deal with existing flooding issues caused by the failure to consider the effect on localities of previous inappropriate development. These require a stated commitment in the draft LP for resolution in conjunction with third party providers.
Question 2	Do you consider this part of the draft Local Plan to be sound?
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mike Wheeler
User ID	16336257
Organisation	VOX
Policy / Evidence base/ part of plan:	ENV2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Policies need to be changed to mitigate the serious adverse consequences of wholesale site clearance of sites prior to submitting planning applications. TPO's provide only limited protection (particularly in the absence of enforcement of planning conditions) and the destruction of natural landscapes leaves a stain on the character of an area. Similarly, more effective commitment is needed to identify and protect ancient trees.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mike Wheeler
User ID	16336257
Organisation	VOX
Policy / Evidence base/ part of plan:	ENV4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>The report prepared by Ove Arup on behalf of EBC contains fundamental errors in its assessment of the performance of Site SA-11 in Oxshott. This report forms part of the evidence base to the draft LP.</p> <p>These errors have been drawn to the attention of EBC by BluWav, a grouping of concerned residents who have submitted a petition with over 2,500 supporters. As the draft LP reiterates protection for Green Belt, we consider that the Ove Arup report is no longer relevant and should be removed from the evidence base.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mike Wheeler
User ID	16336257
Organisation	VOX
Policy / Evidence base/ part of plan:	ENV9
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	The draft LP omits reference to the importance of enforcing planning conditions. Section 59 of the NPPF refers to the importance of effective enforcement in maintaining public confidence. It is admitted by EBC that it neither routinely monitors compliance with planning conditions nor seeks to enforce them. A clear public commitment to effective enforcement should be made in the draft LP.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mike Wheeler
User ID	16336257
Organisation	VOX
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>It is accepted that higher density housing such as flats and use of infill development should be done in certain defined areas. But the draft LP lacks any commitment to protect the character of existing areas. This omission sits at variance with Section 124 (d) of the NPPF which makes clear the desirability of maintaining an area's prevailing character and setting. This is of fundamental concern to residents and the draft LP should explicitly restrict high density schemes to those areas it has defined and permit only progressive densification across the rest of the urban area.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mike Wheeler
User ID	16336257
Organisation	VOX
Policy / Evidence base/ part of plan:	HOU4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	The provision of affordable housing forms a key part of the draft LP. But performance has historically been poor. In part, this reflects the limited capability to obtain a proper level of contribution from developers. This is largely due to the use of flawed methodology and the willingness of developers to provide calculations based on misleading information.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Mike Wheeler
User ID	16336257
Organisation	VOX
Policy / Evidence base/ part of plan:	INF1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	The Infrastructure Delivery Plan (published in May 2022) is a very weak document with heavy reliance on LTP 4, a plan that has not yet been produced by Surrey CC. Sections 9 and 10 of the NPPF draw attention to the importance of transport and communication and this is further referenced in the Levelling Up and Regeneration Bill. Inevitably, this means that infrastructure is destined to lag not lead development potentially resulting in fragmented and incoherent development. It is noted in particular that there is no articulated strategy for road transport and no commitment provided for the provision of cycle lanes both in urban areas and alongside trunk roads.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Peter Whitehead
User ID	8137057
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes I consider it to have been researched and prepared in enormous detail and with great care to ensure its legal compliance.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes It achieves a balance of the stated aims and requirements by accounting for assessed housing requirements, protection of the environment and sustainability of communities.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Rodney Whittaker
User ID	7931457
Organisation	
Policy / Evidence base/ part of plan:	Chapter 1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Use of 'brownfield' is crucial and smaller builders must be enabled to undertake small developments, with financial assistance being provided where necessary.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Rodney Whittaker
User ID	7931457
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes Preservation of the green belt is an important part of the Plan.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Jo Williams
User ID	16537953
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Agnieszka Williams
User ID	24555265
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Richard Williams
User ID	24247201
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Gavin Wilson
User ID	24386945
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>I am very concerned about how the process is being manipulated in Claygate:</p> <ol style="list-style-type: none"> 1. The Parish Council has been told that its response will represent every household in Claygate. This is ridiculous because a. only one of the parish councillors has actually been voted in; all the others got in simply because they put their names forward; b. attendance by parish councillors at meetings, except possibly in the past two months, has been pretty poor. The consequence of this is that the CPC response is highly likely to be largely the thoughts of the consultant CPC has hired, and the Tory-dominated coterie of councillors friendly with the chairman. 2. The Parish Council has not generally canvassed opinion. It seems to see its role as telling inhabitants how to vote. At the two public meetings I have attended, it has been difficult to speak up in favour of the large groups of people who cannot afford to live here. 3. I believe residents have been encouraged by the Parish Council to stake all on a gamble that an Elmbridge submission which fulfils only 70% of what central government has requested will, for reasons entirely unclear, be accepted. 4. Over 90% of Claygate adults did not attend either of the two meetings of the past week. How can the Parish Council represent their views?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>How can it be sound when it is taking so much amenity away from Claygate residents? Car parks: going. Day Centre: going, but somehow being replaced. Youth Centre: going. The Plan is being portrayed to residents by councillors as the least worst option. The only benefit seems to be that it is 'sustainable' without anyone clarifying what on earth that means.</p>

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	I believe the Parish Council should be completely excluded from the communications process. It makes almost no attempt to understand the views of residents, and only one of the 10 councillors has been voted in. It is not representative.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Jacqueline Wilson
User ID	41229185
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Neil Wilson
User ID	24534465
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Yes</p> <p>My only comments for consideration are as follows: There is an inherent contradiction between a stated commitment to managing the effects of climate change and any meaningful strategy to reduce the impact of increased traffic. The impact on Elmbridge of the large Wisley housing development represents an important omission. There are fundamental errors in the reports assessing the performance of Green Belt sites. Most importantly, site SA-11 next to Waverley Road and Blundel Lane has been incorrectly assessed. There is no recognition of the need for densification of urban areas such as Oxshott to be progressive and avoid the character of areas of comparatively low density being damaged by individual high-density schemes. While areas close to local centres and train stations are targeted for flats and infill development, the converse should apply so that the character of other areas (such as most of residential Oxshott) is protected. There are no design codes available to provide protection for local character and ensure excellent buildings. Calculations of developer contributions for affordable housing continue to be based on flawed methodology that has been subject to continual abuse. The Infrastructure Delivery Plan is weak with heavy reliance on a document that has not yet been produced by Surrey CC. Key to successful development must be the recognition that</p>

	infrastructure must precede development. A noteworthy omission is the lack of commitment to install cycle lanes alongside trunk roads thereby promoting road safety and improving traffic flow.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Wise
User ID	37589057
Organisation	Cobham Conservation and Heritage Trust
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>This formal response to the consultation is on behalf of the memberships of the Cobham Conservation and Heritage Trust (the "Trust") as you suggested at the briefing meeting held on 15th July 2022. This response directly represents the c.1200 members of the Trust drawn mainly from the KT11 postcode area of Elmbridge.</p> <p>We have been in communication with other local groups such as the Cobham and Downside Residents Association, the Stoke D'Abernon Residents Association and the Federation of Oxshott Residents Associations and we all share many of the views expressed herein.</p> <p>We fear it may be impertinent and/or prejudicial of the EIP for us to make judgements of the DLP. As such we have not responded directly to the Regulation 19 questionnaire provided, but, as the legislation provides, we give below some comments that may relate to the possible compliance and soundness of the DLP.</p> <p>Please see letter attached.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>We wish to emphasise at the outset that the Trust supports the strategies and 'Vision' of the Elmbridge Borough Council (EBC) Draft Local Plan ("DLP"). We must emphasise that it is in the best interests of Elmbridge, EBC and all other stakeholders to see a Local Plan adopted as soon as possible.</p> <p>Overall, we support the DLP as written. We agree with EBC that the borough's objective need for housing over the next 15 years falls well short of the government's algorithmic 9,700 result and</p>

	<p>that to nonetheless try and meet this number a) would probably fail: the area has never come close to such development volumes, b) would not and could not be supported by our infrastructure or resources like water and roads and c) would require the unacceptable loss of precious green belt, green area and/or historic land.</p> <p>We do have some concerns about some details of the DLP, however. Below we make some comments on these that hopefully will lead to improvements being incorporated into the final submission while perhaps others can lead to final improvements suggested by the Inspector prior to the DLP being passed as sound and then adopted. We have no wish that any of these comments should lead to a rejection of the DLP at the EIP stage.</p> <p>Please see letter attached.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	<p>CCHT REG19.docx</p>

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	This response is a positive initiative to improve the DLP and avoid mishap in advance of the EIP. We do however wish to reserve the right to speak at the EIP on the matters raised above but hope that this will not be necessary and that they can be resolved by EBC in advance.

Name	Adrian Wise)
User ID	37589057
Organisation	Cobham Conservation and Heritage Trust
Policy / Evidence base/ part of plan:	SS1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	The DLP is an opportunity to strengthen EBC's commitment to net zero by 2030. This is not featured in the DLP. We would encourage the addition of building standards on all new housing that will minimise energy consumption (better insulation) and maximise energy self-reliance (solar panels et al).
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Wise
User ID	37589057
Organisation	Cobham Conservation and Heritage Trust
Policy / Evidence base/ part of plan:	SS2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Key Diagram 5 identifies Cobham as a Town Centre. The existing Local Plan identifies it as a District Centre. No justification is given for this. Cobham should be reinstated as a District Centre to ensure its character and diversity of local shops and services is not endangered. The description of Cobham and Oxshott as Urban Areas also pre-empts the outcomes of their description in local detailed Design Codes and they should be re-designated by area/neighbourhood in accordance with the National Design Codes as appropriate, e.g., inner suburb, outer suburb, local designated et al.</p> <p>It is unfortunate that agreed local Design Codes are not available to help interpret the DLP in time for the EIP. Perhaps this can be expedited? It is important that when produced they should assist developers and residents in understanding what is required by way of character, scale, streetscape and landscaping as well as excellent design of individual buildings. We urge EBC to produce them in advance of the EIP.</p> <p>These design codes will help resolve issues we have with SS2, SS3 and HOU1, 2 and 3. However, the NPPF emphasises the desirability of retaining the character and scale of existing built areas so, without restraining efficient use of land, each of these policies should specifically address that principle. It would also help smooth delivery of sustainable development rather than encourage one-off high-density development sites with no transitional consideration to existing character. Policy should be clear that housing need, local character and building forms are to be balanced as per National Planning Guidance notes and National Design Codes. Local confidence in this will smooth the application process and speed up delivery of new homes.</p>

Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Wise
User ID	37589057
Organisation	Cobham Conservation and Heritage Trust
Policy / Evidence base/ part of plan:	SS3
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>Our biggest concern is the impact of the Wisley Airfield Development (WAD) on Elmbridge, particularly on the Cobham settlement area (including Downside, Stoke D'Abernon and Oxshott). The DLP is strangely quiet of this. The WAD is technically within the Guildford Borough but as all can see from a practical point of view this is within Elmbridge. WAD's impact on infrastructure and resources will, for the most part, be on Elmbridge. This development is so significant and so short term that its impact must be assessed and catered for as part of the Elmbridge DLP. This development is now to be in three tranches. The first tranche is already the subject of a planning application for 1700 dwellings on Cobham's doorstep. With the other two tranches this will lead to over 2300 dwellings being catered for by Elmbridge during the term of the DLP. This is a third of the entire EBC plan and dwarfs EBC's allocation to the Cobham settlement of 870 dwellings. The WAD impacts on Elmbridge in terms of health provision, secondary education, travel, transport, water, sewerage, highways, byways, etc. as well as the amenities and other services in Cobham, etc. should have been but have not been allowed for in the DLP and its supporting evidence.</p> <p>Surely EBC's house development plan must be reduced downward to reflect this WAD load and urgent plans to specifically bolster Elmbridge's infrastructure and lessen its drain on resources because of the WAD must be added to the DLP to mitigate it.</p> <p>The Arup Green Belt Assessment which forms part of the evidence base is not relevant to the DLP process and should be deleted. There is no case or mechanism in the NPPF or guidance to suggest that there are degrees or a hierarchy of Green Belt effectiveness. It is either Green Belt in the Local Plan or it is not. The defining line should be clear and unambiguous. The provisions</p>

	of the NPPF can then be applied impartially should development proposals of whatever nature come forward.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Wise
User ID	37589057
Organisation	Cobham Conservation and Heritage Trust
Policy / Evidence base/ part of plan:	CC5
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	CC5 addresses surface water flooding with regard to new development and reuse of existing sites but does not acknowledge or address existing issues such as the Plough Corner flooding in Cobham. We request a policy that EBC will work with third party providers to resolve existing chronic surface water flood management issues and actively seek permanent resolution as part of the overall environmental provisions of the DLP. There is no obvious reason why such existing matters are omitted and only new development covered.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Wise
User ID	37589057
Organisation	Cobham Conservation and Heritage Trust
Policy / Evidence base/ part of plan:	ENV2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>It is appreciated that it is very difficult to protect trees from felling prior to applications being made where no TPO exists, and we have no intention of thwarting development in this regard. However, we strongly recommend that the matter is addressed by an addition to ENV1 and/or ENV2 to create a presumption in favour of replacement of non-TPO mature trees felled prior to development by the landowner and the developer. This can be registered against the property and, at least, gives the council teeth to demand replacement within any new development's landscaping proposals. The matter can then be clearly identified at application stage. It is not perfect but would provide some protection against wholesale loss of trees in the suburbs as the Local Plan growth is implemented. All tree felling could be subject to an application regardless of TPO.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: []</p> <p>Effective: []</p> <p>Justified: []</p> <p>Consistent with national policy: []</p>

Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Wise
User ID	37589057
Organisation	Cobham Conservation and Heritage Trust
Policy / Evidence base/ part of plan:	HOU1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	HOU1 (4) uses the term 'maximise opportunities' in respect of supply of additional homes on unallocated sites. This can be interpreted in a number of ways which is not in line with guidance. Better wording would be 'all opportunities identified to increase supply of homes will be considered in line with detailed Planning Policies'. There is no mention of 'maximising' opportunity in the NPPF.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Wise
User ID	37589057
Organisation	Cobham Conservation and Heritage Trust
Policy / Evidence base/ part of plan:	HOU2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	HOU2 (1) appears to repeat of HOU1 (5) and the word 'optimise' is open to interpretation: replace with 'in accordance with detailed planning policies and local design codes.' HOU2 (2a) should not be restrictive on semi-detached homes as small sites often have that capacity but are unable to accommodate flats or terraces so opportunities to double densities would be missed.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Wise
User ID	37589057
Organisation	Cobham Conservation and Heritage Trust
Policy / Evidence base/ part of plan:	HOU4
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Our principal concern is that delivery of real affordable homes is finally achieved. While the DLP makes this a commitment the means of achievement are unclear. Notably how delivery of the key worker homes and the social element of affordable housing (the element that the SHMA makes clear is in the most, even dire) need, will be achieved is silent. Cannot the affordable homes contribution not require a portion of such housing within each development's affordable homes quota?
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Adrian Wise
User ID	37589057
Organisation	Cobham Conservation and Heritage Trust
Policy / Evidence base/ part of plan:	INF1
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>All aspects of the Infrastructure Delivery Plan (IDP) which supports the DLP are, almost without exception, reliant on developer contributions to fund infrastructure for the planned growth. This means that, even if fully successful in raising sufficient funds, infrastructure will always lag growth and is unlikely ever to catch up. Policy INF1 (6) should therefore be more positively worded i.e. 'new development must make provision for sufficient capacity in all infrastructure impacted by the development either on site or through a financial mechanism unless existing infrastructure can be shown by the developer to fully accommodate the development into the future.'</p> <p>Policies INF1 to INF6, SS2, and CC4 should also make specific provision for and reference to the IDP strategy to deliver the required public transport connectivity to train stations and community/social amenities. The IDP states that modal shift will not be achieved by new bus provision but that the bus connectivity to stations is needed to reduce use if the car and we agree. This is in addition to better walking and cycling provision which cannot deliver the modal shift required in isolation. Otherwise the car parking policies and environmental policies and strategies would not be deliverable or effective and result in increased on-street parking stress. Travel Plans for developments, schools and businesses are helpful but again will not in themselves deliver necessary modal shift. There should also be recognition that different areas of the Borough require and can accommodate different travel and transport solutions to reduce reliance on the car. One size does not fit all in this respect.</p> <p>If we are to rely on development contributions for most infrastructure the rules as proposed for the must be strengthened over those proposed. Collection should be up-front not after the fact. Exemptions must be almost eliminated, e.g., why are those for commercial developments of any</p>

	kind allowed (rental properties, care homes, etc.)? By extension the rules for affordable home contributions must be extended to include all building, even one-for-one replacement building.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Cobham & Downside Residents Association and Stoke D'Abernon Residents Associa...
User ID	8721729
Organisation	Cobham & Downside Residents Association and Stoke D'Abernon Residents Association
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>CDRA and SDRA support the strategies and 'Vision' of the Elmbridge Borough Council (EBC) DLP and believe it to be legally compliant with the following modifications which we trust will be accommodated:-</p> <p>Legal Compliance</p> <p>Formal Response to The Schedule 19 Consultation on Draft Local Plan (DLP) Cobham & Downside Residents' Association (CDRA) Stoke D'Abernon Residents' Association (SDRA)</p> <p>This formal response to the consultation is on behalf of the memberships of the two local groups listed above. You will recall the briefing meeting, attended by our representatives and held on 15th July 2022, in which we were advised that responses could be made by representative bodies on behalf of a number of individuals and households.</p> <p>This response directly represents 617 household memberships of the two residents' associations, some 1200 individuals, and many more non-members from their joint catchment area which covers the majority of the KT11 postcode areas of Elmbridge a population of some 12,000.</p> <p>Omission of a formal policy to deal with the impact of the Wisley Airfield Development (WAD) means that the DLP is not legally compliant with the Duty to Cooperate. There is no policy for this strategic site which impacts two Planning Authority areas and there is no extant agreement for mitigation with Guildford Borough Council (GBC).</p>

	<p>We do not believe that EBC have cooperated with GBC on the WAD in the spirit or meaning of the Planning & Compulsory Purchase Act as amended by the Localism Act. There has been no consideration of joint plan-making arrangements. A loose indication of future discussions in the Statement of Compliance as part of the, as yet unformed, Surrey 2050 Place Ambition, does not satisfy this obligation. No statement of common ground on the subject is in the public domain.</p> <p>This requires modification now rather than risk rejection of the DLP at the outset.</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>CDRA and SDRA support the strategies and 'Vision' of the Elmbridge Borough Council (EBC) DLP and believe it to be sound with the following modifications which we trust will be accommodated:-</p> <p>Formal Response to The Schedule 19 Consultation on Draft Local Plan (DLP) Cobham & Downside Residents' Association (CDRA) Stoke D'Abernon Residents' Association (SDRA)</p> <p>This formal response to the consultation is on behalf of the memberships of the two local groups listed above. You will recall the briefing meeting, attended by our representatives and held on 15th July 2022, in which we were advised that responses could be made by representative bodies on behalf of a number of individuals and households.</p> <p>This response directly represents 617 household memberships of the two residents' associations, some 1200 individuals, and many more non-members from their joint catchment area which covers the majority of the KT11 postcode areas of Elmbridge a population of some 12,000.</p> <p>The issues detailed in section 3 are the exceptions to the Soundness of the DLP and we trust will be made good by minor modifications to the DLP in advance of the Examination in Public (EIP). If not they constitute our formal request for such modifications.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.

	<p>Positively prepared: [Y]</p> <p>Effective: [Y]</p> <p>Justified: [Y]</p> <p>Consistent with national policy: [Y]</p> <p>1. A specific strategic policy is necessary to deal with mitigation of the Wisley Airfield Development on Cobham, Downside, Stoke D'Abernon and Oxshott. Its omission renders the DLP unsound in addition to the legal compliance points above. The GBC Local Plan and recently submitted WAD planning application allows the impact to be fully assessed so that mitigation can be planned for should WAD receive consent. EBC limiting themselves to representations to GBC on the WAD application is not a plan. The outline provisions of the GBC Local Plan are unlikely to be met in full by the developer and extra provision may well be required of EBC. The development impacts on health provision, secondary education, travel, transport, local rural lanes and highways and the amenities in Cobham High Street. None of which have been assessed in the DLP or supporting evidence. For example, over one third of the traffic journeys generated by Wisley, as modelled by the developer, come to and through Cobham and Downside.</p> <p>2. All aspects of the Infrastructure Delivery Plan (IDP) which supports the DLP are, almost without exception, reliant on developer contributions to fund infrastructure for the planned growth. This means that, even if fully successful in raising sufficient funds, infrastructure will always lag growth and is unlikely ever to catch up. Policy INF1 (6) should therefore be more positively worded i.e. 'new development must make provision for sufficient capacity in all infrastructure impacted by the development either on site or through a financial mechanism unless existing infrastructure can be shown by the developer to fully accommodate the development into the future.'</p> <p>3. Policies INF1 to INF6, SS2, and CC4 should also make specific provision for and reference to the IDP strategy to deliver the required public transport connectivity to train stations and community/social amenities. The IDP states that modal shift will not be achieved by new bus provision but that the bus connectivity to stations is needed to reduce use if the car and we</p>
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agree. This is in addition to better walking and cycling provision which cannot deliver the modal shift required in isolation. Otherwise the car parking policies and environmental policies and strategies would not be deliverable or effective and result in increased on-street parking stress. Travel Plans for developments, schools and businesses are helpful but again will not in themselves deliver necessary modal shift. There should also be recognition that different areas of the Borough require and can accommodate different travel and transport solutions to reduce reliance on the car. One size does not fit all in this respect.

4. Key Diagram 5 identifies Cobham as a Town Centre. The existing Local Plan identifies it as a District Centre. No justification is given for this and Cobham should be reinstated as a District Centre to ensure its character and diversity of local shops and services is not endangered. The description of Cobham and Oxshott as Urban Areas also pre-empts the outcomes of their description in local detailed Design Codes and they should be re-designated by area/neighbourhood in accordance with the National Design Codes as appropriate e.g. inner suburb, outer suburb, local designated et al.

5. It is unfortunate that agreed local Design Codes are not available to help interpret the DLP in time for the EIP. Perhaps this can be expedited? It is important that when produced they should assist developers and residents in understanding what is required by way of character, scale, streetscape and landscaping as well as excellent design of individual buildings. We urge EBC to produce them in advance of the EIP.

6. The NPPF emphasises the desirability of retaining the character and scale of existing built areas so, without restraining efficient use of land, each of these policies should specifically address that principle. It would also help smooth delivery of sustainable development rather than encourage one-off high-density development sites with no transitional consideration to existing character. Policy should be clear that housing need, local character and building forms are to be balanced as per National Planning Guidance notes and National Design Codes. Local confidence in this will smooth the application process and speed up delivery of new homes.

7. HOU1 (4) uses the term 'maximise opportunities' in respect of supply of additional homes on unallocated sites. This can be interpreted in a number of ways which is not in line with guidance. Better wording would be 'all opportunities identified to increase supply of homes will be considered in line with detailed Planning Policies'. There is no mention of 'maximising' opportunity in the NPPF.

	<p>8. HOU2 (1) appears to be a repeat of HOU1 (5) and the word ‘optimise’ is open to interpretation. It can be replaced with ‘in accordance with detailed planning policies and local design codes.’</p> <p>9. HOU2 (2a) should not be restrictive on semi-detached homes as small sites often have that capacity but are unable to accommodate flats or terraces so opportunities to double densities would be missed.</p> <p>10. CC5 addresses surface water flooding with regard to new development and reuse of existing sites but does not acknowledge or address existing issues such as the Plough Corner flooding in Cobham. We request a policy that EBC will work with third party providers to resolve existing chronic surface water flood management issues and actively seek permanent resolution as part of the overall environmental provisions of the DLP. There is no obvious reason why such existing matters are omitted and only new development covered.</p> <p>11. It is appreciated that it is very difficult to protect trees from felling prior to applications being made where no TPO exists, and we have no intention of thwarting development in this regard. However, we strongly recommend that the matter is addressed by an addition to ENV1 and/or ENV2 to create a presumption in favour of replacement of non-TPO mature trees felled prior to development by the landowner and the developer. This can be registered against the property and, at least, gives the council teeth to demand replacement within any new development’s landscaping proposals. The matter can then be clearly identified at application stage. It is not perfect but would provide some protection against wholesale loss of trees in the suburbs as the Local Plan growth is implemented. All tree felling could be subject to an application regardless of TPO.</p> <p>12. The Arup Green Belt Assessment which forms part of the evidence base is not relevant to the DLP process and should be deleted. There is no case or mechanism in the NPPF or guidance to suggest that there are degrees or a hierarchy of Green Belt effectiveness. It is either Green Belt in the Local Plan or it is not. The defining line should be clear and unambiguous. The provisions of the NPPF can then be applied impartially should development proposals of whatever nature come forward. This evidence could render SS2 a (v) ineffective.</p>
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Formal Response to The Schedule 19 Consultation on Draft Local Plan (DLP) Cobham & Downside Residents' Association (CDRA)

Stoke D'Abernon Residents' Association (SDRA)

This formal response to the consultation is on behalf of the memberships of the two local groups listed above. You will recall the briefing meeting, attended by our representatives and held on 15th July 2022, in which we were advised that responses could be made by representative bodies on behalf of a number of individuals and households.

This response directly represents 617 household memberships of the two residents' associations, some 1200 individuals, and many more non-members from their joint catchment area which covers the majority of the KT11 postcode areas of Elmbridge a population of some 12,000.

CDRA and SDRA support the strategies and 'Vision' of the Elmbridge Borough Council (EBC) DLP and believe it to be legally compliant and sound with the following modifications which we trust will be accommodated:-

Legal Compliance

Omission of a formal policy to deal with the impact of the Wisley Airfield Development (WAD) means that the DLP is not legally compliant with the Duty to Cooperate. There is no policy for this strategic site which impacts two Planning Authority areas and there is no extant agreement for mitigation with Guildford Borough Council (GBC).

We do not believe that EBC have cooperated with GBC on the WAD in the spirit or meaning of the Planning & Compulsory Purchase Act as amended by the Localism Act. There has been no consideration of joint plan-making arrangements. A loose indication of future discussions in the Statement of Compliance as part of the, as yet unformed, Surrey 2050 Place Ambition, does not satisfy this obligation. No statement of common ground on the subject is in the public domain. This requires modification now rather than risk rejection of the DLP at the outset.

Soundness

The following issues are the exceptions to the Soundness of the DLP and we trust will be made good by minor modifications to the DLP in advance of the Examination in Public (EIP).

1. A specific strategic policy is necessary to deal with mitigation of the Wisley Airfield Development on Cobham, Downside, Stoke D'Abernon and Oxshott. Its omission renders the DLP unsound in addition to the legal compliance points above. The GBC Local Plan and recently submitted WAD planning application allows the impact to be fully assessed so that mitigation can be planned for should WAD receive consent. EBC limiting themselves to representations to GBC on the WAD application is not a plan. The outline provisions of the GBC Local Plan are unlikely to

be met in full by the developer and extra provision may well be required of EBC. The development impacts on health provision, secondary education, travel, transport, local rural lanes and highways and the amenities in Cobham High Street. None of which have been assessed in the DLP or supporting evidence. For example, over one third of the traffic journeys generated by Wisley, as modelled by the developer, come to and through Cobham and Downside. This is a wide-ranging omission and we cannot suggest specific wording in any one policy to rectify it but request that officers make a comprehensive adjustment.

2. All aspects of the Infrastructure Delivery Plan (IDP) which supports the DLP are, almost without exception, reliant on developer contributions to fund infrastructure for the planned growth. This means that, even if fully successful in raising sufficient funds, infrastructure will always lag growth and is unlikely ever to catch up. Policy INF1 (6) should therefore be more positively worded i.e. 'new development must make provision for sufficient capacity in all infrastructure impacted by the development either on site or through a financial mechanism unless existing infrastructure can be shown by the developer to fully accommodate the development into the future.'

3. Policies INF1 to INF6, SS2, and CC4 should also make specific provision for and reference to the IDP strategy to deliver the required public transport connectivity to train stations and community/social amenities. The IDP states that modal shift will not be achieved by new bus provision but that the bus connectivity to stations is needed to reduce use of the car and we agree. This is in addition to better walking and cycling provision which cannot deliver the modal shift required in isolation. Otherwise the car parking policies and environmental policies and strategies would not be deliverable or effective and result in increased on-street parking stress. Travel Plans for developments, schools and businesses are helpful but again will not in themselves deliver necessary modal shift. There should also be recognition that different areas of the Borough require and can accommodate different travel and transport solutions to reduce reliance on the car. One size does not fit all in this respect.

4. Key Diagram 5 identifies Cobham as a Town Centre. The existing Local Plan identifies it as a District Centre. No justification is given for this and Cobham should be reinstated as a District Centre to ensure its character and diversity of local shops and services is not endangered. The description of Cobham and Oxshott as Urban Areas also pre-empts the outcomes of their description in local detailed Design Codes and they should be re-designated by

area/neighbourhood in accordance with the National Design Codes as appropriate e.g. inner suburb, outer suburb, local designated et al.

5. It is unfortunate that agreed local Design Codes are not available to help interpret the DLP in time for the EIP. Perhaps this can be expedited? It is important that when produced they should assist developers and residents in understanding what is required by way of character, scale, streetscape and landscaping as well as excellent design of individual buildings. We urge EBC to produce them in advance of the EIP.

6. The note in (5) above would help resolve issues we have with SS2 and SS3. However, the NPPF emphasises desirability of retaining the character and scale of existing built areas so, without restraining efficient use of land, each of these policies should specifically address that principle. It would also help smooth delivery of sustainable development rather than encourage one-off high-density development sites with no transitional consideration to existing character. Policy should be clear that housing need, local character and building forms are to be balanced as per National Planning Guidance notes and National Design Codes. Local confidence in this will smooth the application process and speed up delivery of new homes.

7. HOU1 (4) uses the term 'maximise opportunities' in respect of supply of additional homes on unallocated sites. This can be interpreted in a number of ways which is not in line with guidance. Better wording would be 'all opportunities identified to increase supply of homes will be considered in line with detailed Planning Policies'. There is no mention of 'maximising' opportunity in the NPPF. See also wording of SS3 on the same topic which is a much better expression of the point.

8. HOU2 (1) appears to be a repeat of HOU1 (5) and the word 'optimise' is open to interpretation. It can be replaced with 'in accordance with detailed planning policies and local design codes.'

9. HOU2 (2a) should not be restrictive on semi-detached homes as small sites often have that capacity but are unable to accommodate flats or terraces so opportunities to double densities would be missed.

10. CC5 addresses surface water flooding with regard to new development and reuse of existing sites but does not acknowledge or address existing issues such as the Plough Corner flooding in Cobham. We request a policy that EBC will work with third party providers to resolve existing chronic surface water flood management issues and actively seek permanent resolution as part of the overall environmental provisions of the DLP. There is no obvious reason why such existing matters are omitted and only new development covered.

	<p>11. It is appreciated that it is very difficult to protect trees from felling prior to applications being made where no TPO exists, and we have no intention of thwarting development in this regard. We strongly recommend that the matter is addressed by addition to ENV1 and/or ENV2 to create a presumption in favour of replacement of non-TPO mature trees felled prior to development by the landowner and the developer. This can be registered against the property and, at least, gives the council teeth to demand replacement within any new development's landscaping proposals. The matter can then be clearly identified at application stage. It would provide some protection against wholesale loss of trees in the suburbs as the Local Plan growth is implemented. All tree felling could be subject to an application regardless of TPO.</p> <p>12. SS2 a (v). The Arup Green Belt Assessment which forms part of the evidence base is not relevant to the DLP process and should be deleted. It undermines this policy. There is no case or mechanism in the NPPF or guidance to suggest that there are degrees or a hierarchy of Green Belt effectiveness. It is either Green Belt in the Local Plan or it is not. The defining line should be clear and unambiguous. The provisions of the NPPF can then be applied impartially should development proposals of whatever nature come forward.</p> <p>Head of Planning REG19.docx</p>
<p>Question 5</p>	<p>If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?</p>
	<p>Yes, I wish to participate at the oral examination</p>
<p>Question 6</p>	<p>If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.</p>
	<p>This response process does not allow sufficient scope to fully explain and justify all of the modifications we have proposed. In particular the Wisley Airfield issues are complex and further evidence of this and other matters raised for modification are emerging. This should be expressed at the oral examination. The Council have been asked to make modifications and if implemented or varied it is appropriate for them to be commented on orally as the only remaining route available to do so. Issues such as the status of Cobham Town Centre in Plan 5 and</p>

	definition and implication of use of the term 'urban area' as a blanket categorisation can be better and more succinctly evidenced orally.
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Name	Sheena Woods
User ID	40935425
Organisation	MaByLand Ltd
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Jennifer Woods
User ID	41052673
Organisation	Lichfields
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes Clicked yes to complete form. Not covered within Representations.
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No Please refer to Representations Covering Letter.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y] Please refer to Representations Covering Letter.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Please refer to Representations Covering Letter.

	Elmbridge Borough Council Local Plan. Representations on behalf of Brooklands College and Cala 29.07.2022.pdf
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	Yes, I wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
	We wish to be able to continue the engagement with the Local Plan process. The Local Plan has not taken a sound approach to meeting its identified housing need including not adequately considering Green Belt release to meet these needs. Having reviewed th

Name	Graham Woolgar
User ID	8248449
Organisation	
Policy / Evidence base/ part of plan:	Chapter 2
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Glyn Wright
User ID	23439489
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	<p>No</p> <p>Certain areas submitted as suitable for future development have not been agreed by their occupants / owners. Examples include H8, H9, H10, H13. Also several car parks are included eg H3, H5, H7, without any explanation of alternative parks in the vicinity or how the residential units will be co-located without loss of parking spaces. Perhaps raised on pillars with parking beneath?</p>
Question 2	Do you consider this part of the draft Local Plan to be sound?
	<p>No</p> <p>Given the lack of agreement over designated development sites, the plans cannot be regarded as proper or legal.</p>
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	<p>Positively prepared: [Y]</p> <p>Effective: []</p> <p>Justified: [Y]</p> <p>Consistent with national policy: []</p>

	Given the lack of attention paid to resident's objections to the above designated development sites and the lack of agreement of occupants/owners to their listing the plan lack coherence and legitimacy and is unfit for submission.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Drafting staff must pay attention to resident's objections to the above designated development sites and provide evidence of agreement by occupants/owners to the listing on the plan.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Nathan Wroughton
User ID	41045697
Organisation	Ruxley heights residents association
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	Yes
Question 2	Do you consider this part of the draft Local Plan to be sound?
	Yes
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [] Effective: [] Justified: [] Consistent with national policy: []
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.

Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Name	Jon Yeomanson
User ID	41222273
Organisation	
Policy / Evidence base/ part of plan:	DELP
Question 1	Do you consider this part of the draft Local Plan to be legally compliant?
	No I am not sure of legal compliancy of the draft plan
Question 2	Do you consider this part of the draft Local Plan to be sound?
	No The locations mentioned on the plan seem to take away all of Hersham's public buildings and meeting places to turn into housing. There are already too many houses and not enough services here in Hersham. Trying to say that Hersham residents should find alternative services in neighbouring towns is crazy as these are also stretched well beyond capacity already. Not to mention the increase in traffic (which mainly is at a standstill for most of the day at the moment), it cannot be a green solution that you are proposing, or a sustainable one. We need these services to remain local in Hersham.
Question 3	If you do not consider the draft Local Plan to be sound, please select which test/ tests of soundness this relates to.
	Positively prepared: [Y] Effective: [Y] Justified: [Y] Consistent with national policy: [Y]

	I do not believe any thought has gone into any of these proposals except for how much money the council will make. Once these services are lost, then they will be gone forever, which cannot be legal.
Question 4	Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/ or sound, including any revised wording.
	Any future housing in the area needs to consider the amount of housing already in the area, and whether or not this area can cope with all the people seeking medical services, social care or other services such as libraries. The infrastructure of the area also needs to be considered and whether or not it can cope with the extra cars, parking rail and bus services that would be required to support an expanding population. At the moment, Hershams fails in all these areas as years of house building has left it almost impossible to move around the area in a timely and fit manor and be able to access medical services when required.
Question 5	If your representation is seeking a modification to the document, do you consider it necessary to participate in the oral part of the examination?
	No, I do not wish to participate at the oral examination
Question 6	If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.