# Shaping Elmbridge A New Local Plan









Consultation Statement: Creating our vision, objectives and direction for development management policies (Regulation 18)

**Elmbridge Local Plan** 

March 2020



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### 1 Introduction

- 1.1. This consultation statement provides a record of the consultation methods and community engagement activities that have taken place as part of the vision, objectives and direction for development management policies consultation. This is a regulation 18 consultation which informs the Elmbridge Borough Council's new Local Plan. The consultation was held from 27 January until 9 March 2020.
- 1.2. The content of this document includes how the council has complied with the consultation requirements prescribed in the Town and Country Planning (Local Planning) (England) Regulation 2012 (as amended) and the council's Statement of Community Involvement (adopted December 2018 and updated December 2019) in the preparation of the new Local Plan.
- 1.3. It starts with a brief account of the early consultation preparation including engagement with our Councillors and the wider publicity methods. For more information on this, please see the Consultation Strategy 2020 that was agreed by Councillors at <u>Cabinet on 11 December 2019</u>.
- 1.4. This document also provides a breakdown of who responded to the consultation looking at locations and age groups of participants. It also presents the responses and formal representations that were received during the consultation and looks at the common themes that have emerged.
- 1.5. Respondents individual comments / and formal responses received can be viewed on the <u>consultation homepage</u>.

### Background: A new Local Plan

1.6. Elmbridge's new Local Plan will set out the vision for the borough and the approach to development over a 15-year period. It will set targets for the delivery of different types of development, provide guidance on locations as to where this development will take place, and establish which areas should be protected. It will also set out policies by which future planning applications will be determined.

#### The Strategic Options consultation

1.7. We consulted on the Strategic Options, the first stage in the process for developing a new Local Plan, from Friday 16 December 2016 until Friday 24 February 2017. We received comments from 3,760 respondents. The consultation documentation including the summary of consultation responses are available to view on the Strategic Options webpage.

### **Options Consultation: Regulation 18**

- 1.8. Considering the consultation responses, the new National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG) and in particular the introduction of the new Standard Methodology for calculating housing need, it was considered appropriate to review and re-evaluate the options. The review and re-evaluation, which has included additional technical work, has led to the identification of five options for housing growth. This included the original three options, consulted on in December 2016, which have evolved.
- 1.9. On Monday 19 August 2019, the Options Consultation commenced presenting the findings of the review and re-evaluation and the five options with our communities and stakeholders. A consultation document was prepared for this Regulation 18 consultation and this can be viewed online.

### Creating the vision, objectives and direction for development management policies: Regulation 18

- 1.10. The purpose of this consultation was to seek views on what the vision and objectives for the borough should be and the direction for our development management policies. These have been informed by residents' and stakeholders' views, the emerging Local Plan evidence base, the on-going Sustainability Appraisal and Strategic Environmental Assessment as well as national policy and legislation.
- 1.11. It shared the council's thoughts on what approaches future policies could take in relation to policy topics. The topics have been split into three key themes; protecting and enhancing our natural environment, growing a prosperous economy and ensuring health and wellbeing for all. The themes do overlap as many of the topics are cross- cutting and have relevance across all three themes.
- 1.12. This consultation commenced on Monday 27 January 2020 and asked all those registered on our consultation portal to respond to the online questions and encouraged all those interested in the consultation to register. This document explains the consultation methods we used to ensure as many people as possible participated and were able to feedback their views.

#### Limitations

- 1.13. This report documents the consultation techniques used, provides more information on who responded, summarises the feedback received and includes the council's response to the main themes at section 5.
- 1.14. Consultation provides residents, stakeholders and interested parties with an opportunity to be involved in the Local Plan preparation.
- 1.15. Unlike market research exercises, consultation is not a method of engagement that will ensure participation of a broad representative of the borough's residents.

### 2 Consultation Preparation

### **Engagement with Councillors**

- 2.1. Early and on-going engagement with Councillors on progress with the Local Plan is an important part of the process. The Local Plan Working Group (LPWG) is a cross-party Members group, tasked with assisting the preparation of the new Local Plan. The LPWG are regularly briefed by officers on the key considerations informing the production of the Local Plan and steer the preparation of the new Local Plan, making informal recommendations to Cabinet.
- 2.2. Members of LPWG are keen that all elected Councillors should engage with the preparation of the Local Plan and all Councillors are invited to attend regular briefings, updates and workshops to help shape the Local Plan but also so that there are no misunderstandings when it comes to talking to their communities about consultations and the plan-making process. They want this to come early in the process and therefore Local Plan discussions have been ongoing but in relation to this consultation, commenced in early October 2019 following the conclusion of the Options Consultation on 30 September 2019.
- 2.3. A Local Plan Working Group meeting was held on 19 November 2019 to discuss the consultation document and the approach to consultation. This was open to all Councillors to attend.
- 2.4. Officers organised briefing sessions with all Councillors prior to the Special Cabinet Meeting on 11 December 2019, where approval was sought to publish the consultation document and undertake the six-week consultation.
- 2.5. The Special Cabinet meeting allowed Councillors to discuss the consultation document and determine whether to approve the document for consultation. Local Plan documents were the only matters on the agenda and the consultation document was approved for the purposes of public consultation.
- 2.6. The table below includes key dates for Councillors engagement that relate to this consultation.

**Table 1: Councillor engagement timetable** 

Date	Councillor engagement
8 Oct 19	Local Plan Working Group agenda published to Members
15 Oct 19	Local Plan Working Group meeting: Response to Options Consultation
17 Oct 19	All – Councillors Local Plan Workshop: vision, objectives, Climate Change and design.

22 Oct 19	All – Councillors Local Plan Workshop: economy, town and local centres
4 Nov 19	All – Councillors bitesize session on the Options Consultation feedback
12 Nov 19	Local Plan Working Group agenda published to Councillors
19 Nov 19	Local Plan Working Group meeting: reg.18 draft consultation document (-recommendation to Cabinet)
19 Nov 19	All-Councillors bitesize session on the Local Plan preparation
5 & 10 Dec 19	All-Councillors briefings on consultation document
3 Dec 19	Special Cabinet agenda published
11 Dec19	Special Cabinet Meeting
16 Dec 19	Claygate Parish Council briefing session
16 Dec 19	Surrey County Councillor briefing session
27 Jan 20	Throughout consultation period - Councillors drop in session with officers at Civic Centre
27 Jan 20	Consultation begins 27/01/2020

### **Early Publicity**

- 2.7. It is important that the community was aware of this consultation early so that they could prepare time to read the document, understand the content and answer the consultation questions.
- 2.8. This consultation followed the Options Consultation and therefore publicity of the Local Plan timetable and next steps has been on-going. This included press releases following the close of the Options Consultation, notification of those on the Local Plan database on the publication of the consultation feedback as well as an article in the December 2019 issue of the Elmbridge Review (appendix 2). The Local Plan website was also updated to alert people to a forthcoming consultation starting in January 2020.

### **Planning policy**



The Local Plan options consultation statement and all responses are now published.

Thank you for your replies.

New timetable published and next consultation coming soon.

- 2.9. In order to continue to address residents' concerns regarding lack of knowledge about the consultation start date, we want to build upon our relationship with residents' associations and community groups.
- 2.10. A specific letter was sent to all residents' associations and community groups that are registered on our planning database in November 2019 (appendix 3). The letter detailed the Local Plan progress and that the next consultation will commence in January 2020. It also invited them to attend a community workshops to be held within the consultation period.
- 2.11. This early engagement aims to enable these groups, who are the voice of their community, can speak to their residents and start getting the message out to the community through their leaflets/websites and established channels of communication.
- 2.12. A letter was also sent to Claygate Parish Council to invite their Members to attend a briefing before the consultation started as well as inviting them to attend a community workshop during the consultation.
- 2.13. As residents from neighbouring authorities respond to Elmbridge's Local Plan consultations, neighbouring authorities were given advanced notice of the consultation through the planning alerts.
- 2.14. As well as discussing the consultation in planning service meetings, we also notified internal departments such as Environmental Services and Housing of the upcoming consultation.
- 2.15. Before the consultation started, we briefed frontline staff in customer services, so they were aware of the consultation and could advise residents and stakeholders on how to respond. They were asked to transfer more complicated calls to the Planning Policy team if required.
- 2.16. External e-mail signatures included messages about the consultation and these were used by all planning officers to help publicise the consultation (figure 1).

Figure 1: E-mail signature pre-consultation

# Shaping Elmbridge A new Local Plan



Next consultation starts 27 January. Find out more at elmbridge.gov.uk/planning policy

### 3 The Consultation: Publicity undertaken

- 3.1. The Options Consultation began at 9am on Monday 27 January 2020 and finished at midnight on Monday 9 March 2020.
- 3.2. Table 1 below is taken from Appendix 2 of the Statement of Community Involvement 2018 (updated 2019). This sets out the public/stakeholder involvement arrangements for preparing a draft Local Plan. It states that the draft documents should be published for consultation for a minimum of six weeks and, at the start of the consultation period, should include:

**Table 1: Public Involvement in Local Plans** 

Key stages	Involvement Level	Public/stakeholder involvement arrangements
Preparing a draft Local	Asking what you think?	Publish draft documents for consultation for a minimum of six weeks, and, at the start of the consultation period:
Plan		<ul> <li>Publish the Sustainability Scoping Report or Appraisal as appropriate;</li> </ul>
		inform specific consultation bodies;
		inform relevant consultation bodies, other interested bodies and individuals on the consultation database;
		publish electronic copies of consultation documents on the council's website;
		make hard copies of consultation documents available for inspection at the Civic Centre and borough libraries;
		issue press release in local paper;
		issue public notice in local newspaper;
		add consultation information on council's social media sites; and
		arrange public meetings, exhibitions and focus groups as appropriate.

3.3. The following sections of this chapter set out the consultation methods

adopted in compliance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2018 (updated 2019).

#### Consultation website

- 3.4. A specific consultation webpage was created for the consultation (appendix4). This provided people with an introduction to the consultation, information on how to respond and included the library of consultation documents.
- 3.5. The library of consultation documents included:
  - An interactive online consultation document allowing those registered on the portal a chance to answer the questions online.
  - A PDF version of the consultation document.
  - A Frequently Asked Questions document.
  - A useful summary document which explained the plan preparation to date.
  - Theme overview papers for each policy direction.
  - Sustainability Appraisal.
  - Equality Impact Assessment: Consultation Document.
  - Equality Impact Assessment: Consultation Strategy.
  - Statement of representations procedure.
- 3.6. A press release was issued on the council's homepage throughout the consultation period to publicise the consultation (appendix 6). Links to the consultation homepage were also included in the progress on the local plan homepage.

### **Consultation mail out**

- 3.7. 8168 people registered on our database with an e-mail address were pre-invited to join the consultation on 22 January 2020. They were notified that the consultation would commence on 27 January 2020.
- 3.8. On Monday 27 January 2020, 7924 people registered on the database received an e-mail to inform them that the consultation was open. The letter did provide guidance on how to unsubscribe, which reduced the numbers that received a letter. 136 people without an e-mail address were sent a hard copy letter in the post.
- 3.9. The letter and electronic mailout included specific consultees, residents and key stakeholders in line with regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and Appendix 1 of the 2018 SCI (Updated 2019).
- 3.10. The content of the letter included a brief overview of the consultation, where to access the consultation information and how to respond to the consultation (see appendix 5).

#### Other methods of consultation

- 3.11. All of the borough's public noticeboards included a poster informing residents of the consultation (appendix 7). A formal newspaper notice was published on Friday 31 January 2020 (appendix 8). For those residents registered, a feature was also included in a residents e: newletter (appendix 9).
- 3.12. Social media messages using twitter and facebook were used throughout the consultation to encourage people to respond (appendix 10).
- 3.13. E-mails were sent to all Councillors on 27 January, the day the consultation started. An e-mail was also sent to all staff in Planning Services to ensure that everyone knew the consultation had started. Planning officers e-mail signature image was also updated with the link to the consultation webpage (Figure 2).

Figure 2: E-mail signature during the Consultation



- 3.14. A3 hard copies of the consultation document and the 'Frequently Asked Questions' sheet were available to view at the Civic Centre and the borough libraries throughout the consultation time.
- 3.15. If people did not have access to a computer, hard copy versions of the response sheet were available at the Civic Centre and borough libraries. It was important that the attached privacy notice was signed to comply with GDPR.

### **Community workshops**

- 3.16. Table 1 on public involvement at this stage of the local plan process, explains that we will arrange public meetings, exhibitions and focus groups as appropriate. It is important to talk to people in Elmbridge about the Local Plan and get them involved in the content of the plan, but this does have to be appropriate to the nature of the consultation.
- 3.17. Given the wide-ranging remit of the consultation document with its presentation of policy directions, it was considered appropriate to undertake relatively focused consultation events. As such, a series of workshops with local community groups and residents' associations were held within the consultation period.
- 3.18. One evening and two-day time workshops were held at the Civic Centre, with the same content to allow flexibility and choice to those invited to attend. The following table sets out the date and time of the events as well as how many people attended. The full attendance list of community groups can be found at appendix 11.

**Table 3: Community workshops** 

Date	Time	Venue	Attendance
Monday 10 February 2020	7pm - 9pm	Civic Centre	21
Thursday 13 February 2020	10am -12pm	Civic Centre	16
Thursday 20 February 2020	10am - 12pm	Civic Centre	17

- 3.19. The objectives for the workshops were:
  - To give the community and residents groups the information to be able to discuss further within their communities.
  - make the communities aware of the consultation,
  - provide a recap of where we are in the plan preparation and next steps,
  - obtain views on the direction of travel for the local plan development management policies on specific local issues; and
  - to discuss with communities any other issues not addressed that could be in Local Plan.
- 3.20. The workshop began with an introduction to the policy and strategy team and an overview of where we are with the Local Plan. The attendees were split into 3 groups to allow for the group exercises as set out below.

#### Part 1: Forming a shared vision

3.21. The first group work exercise was titled forming a shared vision. We gave each group two speech bubbles and ask participants to form a vision for Elmbridge 2036. The responses were fed back to the whole workshop.

### Part 2: Exploring themes and policy directions

- 3.22. Another presentation followed and introduced the three policy direction themes. Each group was allocated a theme- either Health and Wellbeing, Natural Environment or Prosperous Economy. The groups then had to discuss what they would want to see in the future and how the policy direction should move forward. They were also asked to write down anything that had been missed from the policy direction in the consultation document.
- 3.23. A feedback session then allowed all the three groups ideas to be communicated to the whole group. A final 15 minutes was allowed for general questions and answers before the workshop closed.
- 3.24. Appendix 12 sets out the outputs from all three workshops.

### 4 Consultation: Who responded?

#### The Consultation Questionnaire

- 4.1. The online consultation questionnaire was the main response method and 657 completed questionnaires were received in total. In line with the Statement of Community Involvement, the council will not accept any anonymous or confidential responses. No petitions were received to this consultation.
- 4.2. In terms of who responded to the consultation, this is the following breakdown of the 657 questionnaire responses:

**Table 2: Type of respondent** 

Type of Consultee	No. of Responses	Percentage of Total Consultees who responded
Resident	597	93
Residents' Association	19	3
Planning Consultant/Agent	17	3
CAAC/Heritage/Conservation	3	*
Central Government	3	*
Local Government	3	*
Developer/Builder/Landowner	2	*
Housing Association	2	*
Individual outside Elmbridge	2	*
County Council	2	*
Amenity Group	1	*
Architects	1	*
Community Safety (Gatwick)	1	*
Environment	1	*
Parish Council	1	*
Political Parties	1	*
Youth Group	1	*
TOTAL Number of Consultees	657	100

<sup>\*</sup> Represents less than 1%

4.3. A total of 597 questionnaire responses were received from Elmbridge residents. This accounts for 93% of respondents. However, this only equates to 0.4% of the borough's adult population<sup>1</sup>.

<sup>&</sup>lt;sup>1</sup> Elmbridge Population of 16- 64 and 65+ using population estimates by broad age and gender, July 2016, Office for National Statistics.

4.4. Out of the 23 residents' associations that attended the workshop meetings, 16 returned questionnaires. Only 7 groups did not provide a response. All responses can be viewed in full online.

Residents groups that attended workshops	Responded to Consultation?
Albany Close RA	
Beaconsfield Gardens RA	✓
Claygate Parish Council	<b>✓</b>
Cobham and Downside RA	✓
Cobham Green Belt/Oxshott Way RA	✓
Cobham Conservation & Heritage Trust	✓
Ditton Reach RA	
Esher RA	✓
FEDORA	✓
Hinchley Wood RA	
Knott Park RA Limited	✓
Long Ditton RA	✓
Meadway (Esher) RA	
New Road, Esher Ltd	
Portmore Park and District RA	
Ruxley Heights RA	<b>√</b>
Save Cobham Greenbelt	<b>✓</b>
Stoke D'Abernon RA	✓
Thames Ditton & Weston Green RA	✓
Triangle RA	✓
VOX	✓
Weybridge Society	✓
Wey Road and Round Oak RA	

4.5. This consultation did not include a question to find out where people live but we can still report on respondent's postcodes to get an idea on the geographical location of consultees for this consultation.

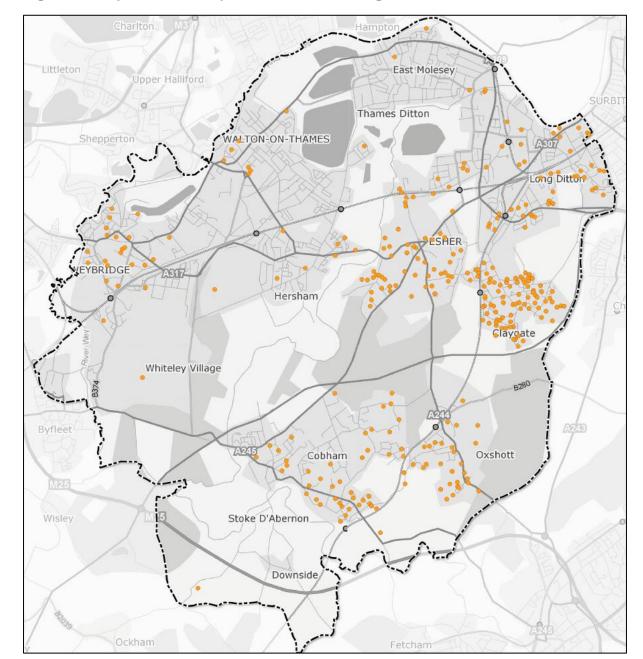
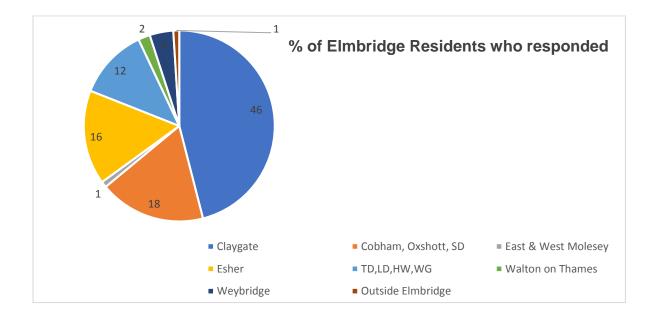


Figure 3: Map to show respondents in Elmbridge

4.6. Claygate (46%) had the highest percentage of people responding in the borough followed by Cobham, Oxshott and Stoke D'Abernon (18%) and Esher (16%). Hersham had only 1 respondent to the consultation.

Settlement Area	Residents Responding	%
Claygate	277	46
Cobham, Oxshott, Stoke D'Abernon	111	18
Esher	95	16
Thames Ditton, Long Ditton, Hinchley Wood & Weston Green	71	12
Weybridge	23	4
Walton on Thames	10	2
East & West Molesey	5	1
Outside Elmbridge	4	1
Hersham	1	*
TOTAL number of Residents responding	597	100



4.7. 554 respondents specified an age bracket when they registered their details on the consultation portal. The following table sets out those numbers and percentages for each age group.

Age Group	No of respondents	%
18-24	1	0.2
25-34	21	3.8
35-44	92	16.7
45-54	112	20.2
55-64	146	26.4
65-74	140	25.3
75+	42	7.6

- 4.8. The age group with the highest number and percentages was the 55 64 year old age group. This was followed closely by the 65-74 age group.
- 4.9. 504 respondents specified a gender when they registered their details on the consultation portal. The following table sets out the numbers and percentages.

Gender	No of respondents	%
Male	259	51.4
Female	245	48.6

### Formal Representations- Question 13 attachments only

- 4.10. There were 19 respondents that submitted a formal representation for question 13 only. These came from:
  - 9 of which are Planning Consultants (defined as an Architect, Planning Consultant/ Agent, Estate Agent or Developer/ Builder/ Landowner- this includes PA Housing)
  - 3 of which are from Residents Associations
  - 2 of which are Government bodies (Surrey County Council and the Environment Agency)
  - 2 local planning authorities (London Borough of Richmond and Epsom and Ewell Borough Council)
  - 2 Heritage (Historic England and Conservation Area Advisory Committee)
  - 1 Transport (Gatwick Airport)

### 5 Consultation: Questionnaire responses

5.1. The next section provides a summary of the responses provided to the questions. There were some respondents that did not answer every question and therefore the total number of respondents vary between questions.

## Question 1. Are these key issues the right ones or are there any key issues that you think have been missed?

5.2. Question 1 asked people whether they agreed with the emerging key issues and challenges facing Elmbridge as outlined in the consultation document and whether any issues had been missed.

### Responses received

- 5.3. In general, there was agreement with the identified key issues. Although some stated there were too many issues to consider and that they could have been grouped together. There were mixed views to whether the issues identified were contradictory or mutually exclusive or not mutually exclusive.
- 5.4. Some respondents provided confirmation of the issues they considered most important. This included the need to improve the road infrastructure, limit through- traffic in villages and increase public transport provision and infrastructure for cyclists and pedestrians. Responding to climate change, improving air quality, biodiversity and flood risk were also highlighted as the key issues facing the borough that needed to be addressed.
- 5.5. There were respondents that agreed that it was important to enhance and maintain the borough's attractiveness and distinctive identity and it was commented that there was a specific need to maintain separate communities and settlement areas. It was stated that the borough should not be treated as a single homogeneous area.
- 5.6. Comments included the need to prioritise the high street but there was concern over high rental and business rates. There were mixed views as to whether there was a need to attract new businesses to the borough or to improve the choice of employment space. General parking provision and congestion was also highlighted as a key issue.
- 5.7. Many respondents sought to maintain and/ or protect the existing Green Belt boundary, open spaces, allotments and village settings were key issues which had been missed.
- 5.8. The issue of affordability of homes was raised several times with respondents highlighting the high property prices within the borough and the need to focus on delivering affordable housing to offset this. The need to attract younger

- residents to the borough and the need for more affordable housing for the less affluent elderly population were also mentioned as issues.
- 5.9. The need to resolve existing infrastructure deficits prior to planning for future growth was also mentioned as well as improving the availability of local school places, mobile phone signal, the condition of the borough's roads, tackling fly tipping and littering.
- 5.10. Several respondents cited issues with the quantity and quality of educational facilities within the borough as well as health related infrastructure such as Dentists and GP Surgeries. These respondents added a concern that with the proposed increase in housing, a minimum of 623 per year, the pressure on these areas of infrastructure is likely to be increasingly acute.

### Council response

- 5.11. Question 1 was intended to find out whether people agreed with the identified emerging key issues facing the borough.
- 5.12. The majority of responses expanded on the identified key issues.
- 5.13. The issue of homogeneity was one that was frequently cited. This document focused on overarching issues effecting the entire borough of Elmbridge. This does not mean the issue of place making and local identity has been lost or forgotten as this is a key facet of plan making.
- 5.14. The strength of respondents' representations towards protecting the Green Belt is acknowledged. One of the key issues facing the borough is the challenge of housing need and land supply and how we balance that pressure with existing land and infrastructure constraints as well as environmental designations. As such, a separate Regulation 18 consultation has been undertaken on this specific issue (Options Consultation 2019).
- 5.15. The Options Consultation 2019 explored the key issue of housing need including an acute need for affordable homes in borough. The consultation set out five approaches/ options for how the Local Plan could respond to housing need given the borough's limited housing land supply in the existing settlement areas. This included consideration of options to remove land from the Green Belt for new homes.
- 5.16. The responses to the Options consultation alongside those received to this consultation and the 2016 consultation will help to shape the proposed strategy and sites put forward in the draft plan. To date there has been no decision made by the council on the future development strategy or the proposed housing target for the new Local Plan. Until the evidence base and documents that support the new Local Plan have been completed, a decision on the objective to maintain the existing Green Belt boundary cannot be made.

- 5.17. The existing demographic of residents in the borough shows an older population and future population projections anticipate an increase in the number of older people. The provision of affordable homes and greater opportunities for first time buyers as well as ensuring that our centres and visitor attractions remain vibrant will help to attract younger residents to move to or remain in the borough.
- 5.18. We are aware of the affordability issues in Elmbridge and are striving to deliver as many affordable housing units as we possibly can and will continue to do so. The need to provide appropriate housing for an ageing population is something we are currently reviewing.
- 5.19. The Local Plan is to support the delivery of sustainable growth and development over the next 15 years. The provision of the necessary infrastructure to support that growth is essential and this includes transport, education and utilities. To ensure delivery, an Infrastructure Delivery Plan is produced and monitored alongside the Local Plan. The Local Plan and new development cannot resolve existing or perceived infrastructure deficits.
- 5.20. Concerns relating to the existing condition of local roads have been raised with Surrey County Council as the local highway authority. Incidents of fly-tipping can be reported to the borough council either online or over the phone. These issues fall outside of the remit of the Local Plan.

## Q2. Do you agree with these ambitions? Is there anything else our vision should be aiming for?

5.21. Question 2 asked whether respondents agreed with the ambitions set out as part of the vision for Elmbridge in 2036, and whether there were other elements that should be included in our vision.

### **Responses Received**

- 5.22. In general, many respondents supported the ambitions identified to form a vision for the new Local Plan. There were areas that respondents stated should be either combined into an ambition mentioned or a new priority that should be included in the vision for Elmbridge in 2036. For inclusion in the vision many respondents stated that the explicit protection of all Green Belt should be included, as well as more of an emphasis on the protection of our wildlife and green spaces and woodland areas. Addressing climate change was commented on, with some respondents stating that our response should be strong policies to reduce our carbon footprint.
- 5.23. There were varying responses on growth in the borough from there should not be any growth in the borough and we should not promise to accommodate any level of growth or demand, or that it should be limited as we do not have enough land, or that we should seek to achieve sustainable growth, and that development should be spread evenly across the borough. Comments

- received stated that there should be an infrastructure first approach and areas such as education need better provision.
- 5.24. In any new development some respondents stated that this should be created sustainably and should retain the distinctive identity of individual towns and villages, maintaining the character and appearance, and conserve historic and rural areas. Some respondents also considered that our high streets should be prioritised in the vision.
- 5.25. Specific responses were received on the ambition "housing choice for all" where respondents considered that this was unrealistic, that it should not be a priority, is unrealistic and housing and population growth should be limited. Others considered that providing affordable housing should be a priority, and fairness should not be limited it should be "a fair place to live and work".
- 5.26. Other areas that respondents stated it was important to include in a vision for Elmbridge were around transport including addressing current traffic issues, improving bus services, and infrastructure and facilities for cyclists and pedestrians, as well the provision of more electric charging points. Improving air quality was also raised by respondents, creating a cleaner borough and reducing pollution.

### **Council response**

- 5.27. Many respondents chose to focus on the existing designation and protection of the Green Belt. The council understands the strength of respondent's representations around this issue as housing and land supply is one of the key issues facing the borough in the formation of its Local Plan. A separate Regulation 18 consultation was conducted in 2019, which gave respondents 5 options as to how the borough could utilise land supply to meet housing need. Several of these options included the release of Green Belt land.
- 5.28. The responses to the Options consultation alongside those received to this consultation and the 2016 consultation will help to shape the proposed strategy and sites put forward in the draft plan. To date there has been no decision made by the council on the future development strategy or the proposed housing target for the new Local Plan. Until the evidence base and documents that support the new Local Plan have been completed, a decision on the objective to maintain the existing Green Belt boundary cannot be made.
- 5.29. The council is committed to encouraging measures to contribute to the mitigation and adaptation of climate change and these will be a key consideration in the new Local Plan.
- 5.30. An update to the Strategic Housing Market Assessment is currently being undertaken to understand local housing need in the borough and how the future Local Plan will address the housing needs of our communities. Further work updating our understanding of infrastructure in the borough is also

ongoing and will feed into the production of an updated Infrastructure Delivery Plan that will accompany the new Local Plan.

### Q3. Are the objectives the right ones? Are there any objectives that you think we have missed?

5.31. Question 3 asked whether respondents agreed with the emerging objectives and whether any objectives had been missed for the Local Plan.

### **Responses Received**

- 5.32. There were mixed views on the objectives advanced in the consultation document. This included comments that in practice the objectives were fine or good, however the deliverability of them was questioned if more homes were going to be built. Some respondents commented that the objectives were contradictory and couldn't be achieved together, and that they were too aspirational and therefore not achievable.
- 5.33. Most respondents stated the importance of retaining, protecting and enhancing land designated as Green Belt and that there should be a specific objective to protect the Green Belt and other green spaces.
- 5.34. A need to focus on public transport was commented upon and in particular comments to improve the bus services as well as the requirement to improve infrastructure, particularly for cyclists and pedestrians. This also included a commitment to resolve existing infrastructure deficits prior to planning for future growth, with a focus on health and education.
- 5.35. There were mixed views in relation to new homes and providing affordable homes. A minority of respondents stated the market should decide whilst others stated providing more affordable homes and homes of a smaller size should be a key objective.
- 5.36. There were comments that there was limited mention of the historic environment in Elmbridge, and this along with the character of the borough should be included.
- 5.37. Mitigating climate change was also commented on, with a reference to sustainable homes and to plan and invest to reduce car use. Respondents also stated that the wording of the objective should be reworded to encourage the use of energy sources that minimise carbon usage, as well as including recycling.

#### **Council response**

5.38. A large proportion of respondents chose to focus on the need to include a commitment to ensure the existing designation and protection of the Green Belt within the objectives. The council understands the strength of

- respondent's representations around this issue as housing and land supply is one of the key issues facing the borough in the formation of its Local Plan.
- 5.39. A separate Regulation 18 consultation was conducted in 2019, which gave respondents 5 options as to how the borough could utilise land supply to meet housing need. Several of these options included the release of Green Belt land. The responses to the Options consultation alongside those received to this consultation and the 2016 consultation will help to shape the proposed strategy and sites put forward in the draft plan. To date there has been no decision made by the council on the future development strategy or the proposed housing target for the new Local Plan. Until the evidence base and documents that support the new Local Plan have been completed, a decision on the objective to maintain the existing Green Belt boundary cannot be made.
- 5.40. The council is committed to encouraging measures to contribute to the mitigation and adaptation of climate change and these will be a key consideration in the new Local Plan.
- 5.41. The delivery of the necessary infrastructure to support growth is proposed a key and overarching objective for the new Local Plan. The Local Plan is to support the delivery of sustainable growth and development over the next 15 years. The provision of the necessary infrastructure to support that growth is essential and this includes public transport, education and utilities. To ensure delivery Infrastructure Delivery Plan is produced and monitored alongside the Local Plan. The Local Plan and new development cannot resolve existing or perceived infrastructure deficits.

### Question 4. Protecting and enhancing the natural environment: Do you agree with the proposed policy directions?

5.42. Question 4 asked whether respondents agreed with the policy directions outlined within the theme of 'Protecting and enhancing our natural environment'.

#### Responses received

- 5.43. Most respondents stated the importance of retaining, protecting and enhancing land designated as Green Belt and that there should be a specific objective to protect the Green Belt. Other respondents maintained that all open green space should be maintained and protected and welcomed the local green space designation. Some were of the view that more areas should be included in the open green space assessment.
- 5.44. Many responses were concerned with the biodiversity net gain and the potential loss of habitats and species including, but not limited to, Bats, Robins, Owls, Mice, Voles, Shrews and Rabbits. It was stated that the loss of these potential habitats should not be allowed.

- 5.45. Two people questioned the validity and practicality of imposing water restrictions on residents citing that some families, for various reasons, use a greater volume of water than others. These families will be disproportionally affected by such a policy. There was also a comment relating to water provision and whether our existing reservoirs and water treatment facilities will be able to cope with the projected increase in residents over the plan period. They said that this needs to be reviewed as part of the new Local Plan.
- 5.46. Energy efficiency was discussed by many respondents. Many considered that new builds should be of an elite standard of energy efficiency and encouraging the use of solar panels in new developments. This would not only reduce energy consumption but also in doing so would reduce carbon dioxide emissions. The idea of energy efficient transport was the focus of others with suggestions including more efficient bus routes and services and the investment in electric charging points around the borough to encourage the use of electric vehicles. As well as promoting initiatives that encourage walking and cycling through designated new footpaths and cycle routes.
- 5.47. In relation to transport, some respondents criticised the levels of congestion within the borough and sought ways to mitigate this through reductions in speed limits, prohibiting HGVs and other large vehicles from town centres. A few respondents mentioned problems with fly tipping, littering and general cleanliness of the borough and stated this should be a priority in forming the new Local Plan.

### **Council response**

- 5.48. Many respondents chose to focus on the existing designation and protection of the Green Belt. The council understands the strength respondent's representations around this issue as housing and land supply is one of the key issues facing the borough in the formation of its Local Plan.
- 5.49. A separate Regulation 18 consultation was conducted in 2019, which gave respondents 5 options as to how the borough could utilise land supply to meet housing need. Several of these options included the release of Green Belt land. The responses to the Options consultation alongside those received to this consultation and the 2016 consultation will help to shape the proposed strategy and sites put forward in the draft plan. To date there has been no decision made by the council on the future development strategy or the proposed housing target for the new Local Plan. Until the evidence base and documents that support the new Local Plan have been completed, a decision on the objective to maintain the existing Green Belt boundary cannot be made.
- 5.50. An update to the Local Green Space study is currently being undertaken and locations suggested by communities are being assessed against an established method. Those which perform well against these criteria will be considered for designation. This is a separate designation to Green Belt.

- 5.51. The issue of biodiversity, and the preservation and net gain thereof, is a key consideration for the emerging Local Plan. A policy on biodiversity will be developed for the draft Local Plan and will include information of the net gain percentages.
- 5.52. Proposed water consumption figures are based around building techniques and regulations, including water pressures and shallower bath tubs to make more efficient use of resources without restricting the right of access to water to any family or individual. The issue of water capacity and availability will be considered through the Infrastructure Delivery Plan.
- 5.53. The council is committed to encouraging more efficient use of energy including maximising the usage of sustainable energy sources and are currently exploring means of achieving this. We thoroughly endorse the use of electric vehicles and public transportation and would advocate that people utilise this where possible. In terms of issues such as congestion, speed limits, bus routes and frequency these are controlled by Surrey County Council in their capacity as the local highways' authority. As a result, the borough council has limited influence over these issues.
- 5.54. The specific concerns and incidents relating to fly-tipping, littering and street cleanliness can be reported to the borough council online or via the telephone. These are not issues that can be resolved through the Local Plan.

# Question 5. Do you have any other comments (for example, other issues or we should consider?)

5.55. Question 5 asked whether respondents had any other comments with regards to the theme of protecting and enhancing the natural environment.

### Responses received

- 5.56. The responses covered a wide range of issues, not all relating to the content of this consultation. One of the most frequent responses related to the importance of the function and conservation of the existing Green Belt. There was a clear view that all development in the Green Belt should be opposed by the council as the Green Belt is integral to the success of the objectives around health, wellbeing, climate change and the natural environment.
- 5.57. The issue of transport was also frequently raised with several respondents citing the need for an increase in the quality of public transport to reduce the dependency on private vehicles. Another suggestion was to make electric vehicle charging points a requirement of new developments to encourage the use of more environmentally friendly modes of transportation. These responses also frequently mentioned the congested nature of roads within Elmbridge which are having a negative impact on air quality and some suggest traffic calming measures such as speed bumps, the reduction of speed limits and finding means of diverting traffic away from town, district and local centres.

- 5.58. Several respondents would like to see more green spaces designated to ensure protection and a more extensive programme of tree planting with further Tree Preservation Orders issued to ensure their protection in the long term.
- 5.59. The move towards sustainable energy was the focus for some respondents who would like to see more new developments encouraged to utilise solar panels. The use of wind turbines was also suggested.
- 5.60. There were comments received that discussed a more varied high street offer in the borough. Several respondents suggested that materials used in construction should be sustainable and help mitigate climate change. Rainwater harvesting, heat transfer pumps and good design which includes adaptability and sustainability should also be considered.
- 5.61. There should also be further restrictions on building on floodplains considering increasing flood events in recent years.

### Council response

- 5.62. Question 5 was an open question but, was intended to gather views on areas of policy that may have been omitted, or alternate ideas as to how the objectives could be achieved.
- 5.63. Many respondents chose to focus on the designation and protection of the Green Belt. The council understands the strength of respondent's representations around this issue as housing and land supply is one of the key issues facing the borough in the formation of its Local Plan.
- 5.64. A separate regulation 18 consultation was conducted in 2019, which gave respondents 5 options as to how the borough could utilise land supply to meet housing need. Several of these options included the release of Green Belt land. The responses to the Options consultation alongside those received to this consultation and the 2016 consultation will help to shape the proposed strategy and sites put forward in the draft plan. To date there has been no decision made by the council on the future development strategy or the proposed housing target for the new Local Plan. Until the evidence base and documents that support the new Local Plan have been completed, a decision on the objective to maintain the existing Green Belt boundary cannot be made.
- 5.65. The Local Plan is committed to ensuring that appropriate infrastructure is delivered within the 15-year period it covers. This includes transport, education, health, recreation and utilities. The respective needs and priorities will be set out in the Infrastructure Delivery Plan. This is likely to include some means of supporting a modal shift towards the usage of zero carbon private vehicles and increased utilisation of public transport. The scope for the council to engage in this area is limited though as Surrey County Council are the relevant local highways authority. In that capacity they are also responsible for the road network so the comments relating to speed limits, traffic calming

- etc., would fall under their mandate and cannot be remedied through the Local Plan.
- 5.66. The designation of Local Green Space was mentioned several times. The council are currently undertaking a review of the evidence base in relation to Local Green Space within Elmbridge. New sites suggested by communities will be scored against established criteria. The council is actively reviewing the trees within the borough and regularly issue TPO's on trees of significant value which are considered at risk. Outside of the Local Plan and planning system, there has also been a commitment to undertake an extensive programme of tree planting, although these trees will however take several years to reach maturity.
- 5.67. The council is looking at ways to revitalise the high street but have limited control over who takes up the tenancy on a vacated unit. The only intervention the Local Authority has in terms of regulating the tenancy of high street units is where there is a material change of use, as set out in the Town and Country Planning (Use Class) Order.
- 5.68. Sustainable design is something that the council is committed to including, energy efficiency in existing and new buildings, as demonstrated by the declaration of a climate emergency in 2019.
- 5.69. All applications for planning permission for new builds are assessed against flood risk using data produced by the Environment Agency and the council's Strategic Flood Risk Assessment which is regularly updated. Where a proposal is in an identified flood zone, applicants are required to demonstrate that the impacts of flood risk can be mitigated or eliminated and that the risk of flooding is not displaced.

## Question 6. Growing a prosperous economy: Do you agree with the proposed policy directions?

5.70. Question 6 asked whether respondents agreed with the growing of a prosperous economy direction.

### Responses received

- 5.71. Many respondents that supported the policy direction added important points that our town centres/ high streets require enhancement to maintain their character, functionality and vibrancy. To improve the town centres/ high streets, many respondents mentioned that the lowering of business rates, improved broadband networking and more opportunities for start-up businesses were needed.
- 5.72. Some respondents mentioned the importance of protecting and enhancing our remaining Strategic Employment Land designations. Other respondents highlighted the importance for having affordable housing for local workers as there is high cost of housing that is having a negative impact on the community.

- 5.73. There was reference to the importance of maintaining healthy connectivity to town centres. Respondents believed that there was increased pressure on our roads and that alternative modes of transport such as public/ shared transport, cycling and pedestrian access should be hugely improved to create better connectivity and safety, and this linked to improvements in air quality. However, it was also suggested that there should be additional parking in town centres and that town centre parking should be free.
- 5.74. Residents did support the prospect of improved public transport and sustainable travel as it would make it more attractive for local people to work locally and this would reduce the culture of moving between towns by private vehicles. Nonetheless, it is noted that by residents that living and working locally is a challenge due to affordability and the undersupply of homes.
- 5.75. There were respondents that said they supported the policy direction but not at the expense of the Green Belt. It was considered that there should be an objective on the protection of the Green Belt especially considering the response to the previous regulation 18 consultations.
- 5.76. Some respondents said they did not agree with the proposed policy directions but did not provide any information to explain why.

### **Council response**

- 5.77. As part of the Local Plan preparation the council supports the role that town centres/ high streets play at the heart of communities, and the importance of employment areas for existing and new businesses. The economy is interlinked with the other consultation themes on health and wellbeing and the environment (and housing) and maintaining the role and function of town centre/ high streets at the heart of the community for a prosperous future is an important policy area for the local plan, and overall there has been a positive response to this proposed approach in the consultation.
- 5.78. The council has been focusing on how it can support the borough's town and village centres and assist them to adapt to market trends and develop strong local identities where people can live, work, access services and want to shop, socialise and spend their leisure time. Through the Local Plan we are looking at how improvements to connectivity can be made, in our town and local centres. In these areas as well as our employment areas opportunities for start-up business through the flexibility and mixed use of floorspace will be positively explored, based on our evidence.
- 5.79. Further evidence called the Local Market Appraisal has been commissioned to help inform the policy approach in the new Local Plan. It will demonstrate the borough's existing capacity for retail and employment space whilst suggesting improvements for the future.

Question 7. Do you have any other comments (for example, other issues or directions we should consider?)

5.80. Question 7 asked whether respondents had any other comments with regards to the theme of growing a prosperous economy.

### Responses received

- 5.81. There were many respondents that believed that the Green Belt was missed from the content of this consultation question and therefore stressed its importance.
- 5.82. Other comments in response to this question recommended how the council could improve employment and economic growth in the borough. One respondent stated the potential importance of the public libraries and their role with involving the community, and how they could be expanded to include coworking spaces, community cafés or hosting community events. Another respondent stated the importance of connectivity to create thriving town centres/ high streets. It was suggested that cycling links and public transport should be enhanced to facilitate connective links between settlements, but it should be important that residents, cyclist and car users are separated proportionately to prevent accidents. On the other hand, other residents believed that there should be improved parking facilities in our town centres/ high streets and that they should either be more affordable or even free of charge.
- 5.83. Residents did believe it was important to make broadband faster to improve working from home opportunities. Where current permitted developments allow office redevelopment to housing (unless prevented by Article 4 Direction methods) residents believed that more should be done to retain under-utilised employment land and in attracting businesses and industries that meet the values and objectives of Elmbridge. But to improve the vibrancy of high streets many respondents have highlighted that intensifying space above retail units would be the solution. In turn this would also support the council in meeting their housing need.
- 5.84. Nevertheless, residents believed that strategic employment land should be safeguarded future proofing land vital for businesses. Employment land should also be made more accessible through sustainable links that would improve the council's approach to tackling climate change.
- 5.85. Most importantly residents believed that all retail or employment space that is currently underutilised should be made more effective. Respondents believed that this could be achieved through improved start-up businesses, lowering business rates, creating temporary pop areas (in vacant retail units) giving people the opportunity to start-up their businesses and investing in local education centres to provide opportunities to become entrepreneurial and self-employed.

### **Council response**

- 5.86. The strength of respondent's representations towards protecting the Green Belt is acknowledged. The responses to the Options consultation alongside those received to this consultation and the 2016 consultation will help to shape the proposed strategy and sites put forward in the draft plan. To date there has been no decision made by the council on the future development strategy or the proposed housing target for the new Local Plan. Until the evidence base and documents that support the new Local Plan have been completed, a decision on the objective to maintain the existing Green Belt boundary cannot be made.
- 5.87. The emerging Local Plan will continue to support the borough's town and local centres, identify shopping areas and town centre boundaries, as well as policy approaches that may look at diversify uses in centres and creating more flexible floorspace. It is recognised that accessibility and connectivity is important in improving retail and employment areas and as part of our duty to implement climate change initiatives.
- 5.88. A Local Market Appraisal is being prepared to support the Local Plan. This will assess the current capacity of our retail and employment areas whilst recommending improvements for the future.

# Question 8. Health and wellbeing for all: Do you agree with the proposed policy directions?

5.89. Question 8 asked whether respondents agreed with the health and wellbeing policy direction.

### Responses received

- 5.90. Many respondents support the policy direction and added more comment on the importance of quality homes, smaller homes and environmentally sustainable housing. There were many comments reiterating the need for affordable housing. There was also support expressed for ensuring private space for every home so that children have outdoor space to play.
- 5.91. Even though many respondents did support the policy direction, this was only if development is sympathetic to the environment and is not to the detriment of current housing locations and landscapes. There were many comments regarding the design of new development and respondents suggested the use of design committees, design panels, masterplans and design codes. Respondents stated that the character of their local area must be respected and retained. Many respondents stated that the health and well-being of the existing population was only assured by no change and no growth in their local area.
- 5.92. A large majority of respondents stated that the borough's housing need figures were too high and delivering this would impact on the health and well-being of its residents in terms of demand on infrastructure and pressure on green spaces including the loss of the Green Belt. Some respondents stated

- that the Local plan should support local needs and not London's needs. Another said that policy direction was silent on Gypsy, Roma and Travellers facilities.
- 5.93. The lack of public transport was commented upon and many people mentioned the need for bus services especially for school children who attend school at some distance from their homes and older people. Other environmental factors were stated as important to well-being such as the use of trees, wildlife and flood prevention.
- 5.94. Most respondents stated that policy direction was missing reference to the protection of the Green Belt. They considered that an objective on the protection of the Green Belt should be foremost in the plan especially considering the response to the previous Regulation 18 consultations. Many stated that even the visual appreciation of the Green Belt was essential for the health and well-being of residents.
- 5.95. In terms of those respondents that did not agree with the policy direction, their comments were largely regarding housing. There was an objection to the use of the words 'quality homes for all', 'maximise' and 'optimise opportunities to increase the supply of new homes'. It was stated that these words fuel unconstrained population movement to the borough and encourage unchecked development. Many repeated previous consultation responses and stated that the council should challenge the Government's housing targets.
- 5.96. Some were of the view that the policy direction only focused on new build and should include improving and replacing existing housing stock in poor condition. Those that did not support the policy direction discussed the lack of leisure venues and sporting facilities open to the public, lack of public transport and cycle lanes and pressure on health care services. They stated that all these existing issues must be addressed before planning for more housing development.
- 5.97. Some respondents said they did not agree with the proposed policy directions but did not provide any information to explain why.

#### **Council response**

- 5.98. Question 8 was intended to find out whether respondents agreed with the policy direction to ensure health and wellbeing for all.
- 5.99. Positively responding to the borough's local housing need for both market and affordable homes is crucial to the health and well-being of residents. It contributes to key social and economic sustainability objectives as it allows people to live in a home suitable to their needs and which they can afford. Creating high quality residential areas also attracts local businesses and future employees. The creation of sustainable, excellently designed development and spaces will help to support residents' health and wellbeing.

- 5.100. Although most respondents did agree with the principle of this direction, they were concerned that providing homes for all could be at the expense of the Green Belt. The policy direction explains the importance of green space to peoples' health and well being but there appears to be confusion as to the designation of Green Belt. The purposes of Green Belt are explained in national policy and much of the borough's Green Belt is in private ownership without public access. We want to ensure residents have access to green spaces and many of the borough's parks, recreational spaces such as the commons and local nature reserves are in public ownership. These are all important green spaces that are protected from development and are important to peoples' health and well-being.
- 5.101. The Options Consultation 2019 explored the key issue of housing need including an acute need for affordable homes in borough. The consultation set out five approaches/ options for how the Local Plan could respond to housing need given the borough's limited housing land supply in the existing settlement areas. This included consideration of options to remove land from the Green Belt for new homes.
- 5.102. The responses to the Options consultation alongside those received to this consultation and the 2016 consultation will help to shape the proposed strategy and sites put forward in the draft plan. To date there has been no decision made by the council on the future development strategy or the proposed housing target for the new Local Plan. Until the evidence base and documents that support the new Local Plan have been completed, a decision on the objective to maintain the existing Green Belt boundary cannot be made.
- 5.103. Many comments included more information on issues that the policy direction set out. While others stated key issues were missing such as bus services for school children, bus passes for older people and Gypsy, Roma and Traveller facilities. Some of these are outside the scope of the Local Plan such as bus passes and children school buses, but issues, such as Gypsy, Roma and Traveller provision, will be fully addressed when presenting the next Regulation 19 consultation as it will deal with site allocations and specific policies.

# Question 9. Do you have any other comments (for example, other issues or directions we should consider?)

5.104. Question 9 asked whether respondents had any other comments with regards to the theme of health and wellbeing for all.

#### Responses received

5.105. There was a range of different matters discussed for this question and many comments repeated those submitted for question 8. A common theme was that existing infrastructure and the existing built up area must be improved before any further homes are built in the borough. Parking was another

- popular subject with some suggesting creative parking solutions and underground parking for new developments. Ideas for reducing car use included providing better public transport, creating pedestrian only areas and taxing those not using their garages to park.
- 5.106. There were a number of comments regarding the policy directions' inclusion of the historic environment with many wanting heritage assets to be better protected. There was a suggestion that place making is discussed but rarely applied at the planning application stage. Protecting the character of the borough was again cited and respondents stated this needed improvement such as more tree planting which would have additional environmental benefits.
- 5.107. One respondent stated that the provision of play centres for children are vital to support young families and promote health and well-being. Other respondents wanted the Local Plan to include something to excite residents and make people proud to live in the borough.
- 5.108. There were suggestions provided about building quality homes, preventing non-implementation of development and changing timescales to complete development proposals. Other local planning issues such as fixing local traffic problems and not building on the flood plain were cited. One respondent stated strongly that there was a lack of police presence and that a fear of crime existed.
- 5.109. The need for the right infrastructure to be delivered before or at least in parallel with new development was expressed. Some wanted public transport plans to be included in large development proposals, infrastructure reports for development proposing more than 10 dwellings and a commitment to provide cycle paths and pedestrian footpaths. Others questioned the infrastructure required for an older population, the lack of medical services and primary and secondary school places. There were many comments suggesting better working with Surrey County Council and other local, regional and national agencies.
- 5.110. A suggestion to build the new towns and cities in less developed parts of the UK, with new infrastructure to support new communities was made. Other solutions included the use of design statements and design codes for new developments, the creation of new parks and green spaces and intergenerational housing development whereby students and the elderly live together for mental well-being. Another suggestion was that all development proposals with parking spaces must provide EV charging infrastructure. There were comments made that future policies must include the needs of disabled people and wheelchair users.
- 5.111. There were many respondents that stated the wording in the policy direction needed to be stronger with words such as 'ensure' rather than 'encourage'.
- 5.112. Some responses did include reference to recent planning proposals and existing planning policies. Some expressed an objection to high density

development in low density areas. A large proportion of respondents stated that there should be an objective to protect all the borough's Green Belt. Some stated that we should build on brownfield not greenfield land. One respondent stated that the Green Belt should be used rather than high density development in the urban area.

### **Council response**

- 5.113. The Local Plan is to support the delivery of sustainable growth and development over the next 15 years. The provision of the necessary infrastructure to support that growth is essential and this includes transport, education and utilities. To ensure delivery an Infrastructure Delivery Plan is produced and monitored alongside the Local Plan. The Local Plan and new development cannot resolve existing or perceived infrastructure deficits.
- 5.114. Planning permission is subject to a 3 year time limit condition within which the development must begin in accordance with section 91 Town and Country Planning Act 1990. The local planning authority may wish to consider whether a variation in the time-period could assist in the delivery of development. To do this it will be important to assess whether the borough has a large percentage of non-delivery to support this approach.
- 5.115. The Regulation 19 consultation will include draft development management policies, so it will be possible to align the strategic policies such as place making with the detailed policies to make sure that the Local Plan will deliver the development required to ensure the health and well-being of the borough's residents.
- 5.116. As stated previously, the Local Plan's role is to support the delivery of sustainable growth and development over the next 15 years. Supporting documents such as a Design Supplementary Planning Document does have the ability to 'excite' residents with more contemporary and environmentally sustainable design.
- 5.117. The approaches set out in the consultation document are not draft policies, the draft Local Plan will include draft policies and will include detailed requirements for development.
- 5.118. Positively responding to the borough's local housing need for both market and affordable homes is crucial to the health and well-being of residents. It contributes to key social and economic sustainability objectives as it allows people to live in a home suitable to their needs and which they can afford. Creating high quality residential areas also attracts local businesses and future employees. Suggesting that new town and cities be created elsewhere, outside of the region will not address the borough's local housing needs.

Question 10. As this consultation is the last of the early engagement on the Local Plan, do you have any further comments to make on this consultation or any of the previous consultations to date?

5.119. This question asked respondents for any further comments on the direction of Local Plan.

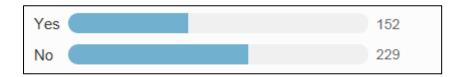
## Responses received

- 5.120. Many of these responses focused on the Options Consultation in 2019. These respondents largely reaffirmed their view that the Green Belt should be protected from development with many citing their preferences and/or the 85% of people who would prefer Option 4.
- 5.121. The next most common comment referred to consultation periods having been done 'backwards' or 'back-to-front'. These respondents considered that the visioning exercise should have come before the options consultation because it could have informed the options consultation. They stated that the options would have been more in line with the views of the residents if this was the case.
- 5.122. There was also a strong concern amongst the respondents that the views of the residents are not being listened to or respected by the council. The omission of references to the Green Belt was seen by some as 'evidence' of this hypothesis.
- 5.123. One respondent stated that there had not been enough focus on the potential impacts of flooding in any of the documents and would like to see a greater focus on this going forward.

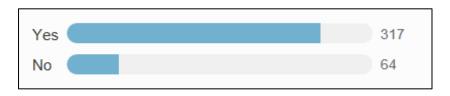
## **Council response**

- 5.124. The strength of respondent's representations towards protecting the Green Belt is acknowledged. The responses to the Options consultation alongside those received to this consultation and the 2016 consultation will help to shape the proposed strategy and sites put forward in the draft plan. To date there has been no decision made by the council on the future development strategy or the proposed housing target for the new Local Plan. Until the evidence base and documents that support the new Local Plan have been completed, a decision on the objective to maintain the existing Green Belt boundary cannot be made.
- 5.125. There is no set guidance as to what order the consultations should take place in. The council made the decision to go with the Options Consultation first to gather this data early and to identify residents' likes and dislikes about their area and how they would like to see them develop in the future. These consultations are equally weighted and the responses to both, alongside the evidence base and 2016 consultation response, will inform the draft Local Plan.
- 5.126. The new Local Plan will continue to include a specific policy on flooding to manage and reduce the overall and local risk of flooding in the borough.

# Question 11. Did you respond to the previous Local Plan Strategic Options Consultation in 2016?



# Question 12. Did you respond to the previous Local Plan Options Consultation in 2019?



5.127. Question 13 allowed people to upload additional files if required. These responses are summarised in the next chapter and are available to view in full online.

## 6 Consultation: Representations received

6.1. This chapter provides summaries for the 19 formal representations that were submitted. There were other respondents that also submitted additional documents but as they also completed a questionnaire, these additional documents are not discussed separately here to avoid duplication. The organisations that submitted formal representations have been grouped by type as explained at paragraph 4.10.

# Planning Consultants (defined as an Architect, Planning Consultant/ Agent, Estate Agent or Developer/ Builder/ Landowner

## PA Housing

- 6.2. PA Housing is a registered provider of social and affordable housing offering more than 23,000 homes across the South East, London and the midlands ranging from housing solutions from affordable rent and independent living to shared ownership and outright for those in need.
- 6.3. PA Housing have identified that the recent Housing Delivery Test results demonstrates a deepening crisis in Elmbridge. It is expected by PA Housing that the Local Plan should prioritise to meet the overarching strategic aim to provide sufficient affordable housing to meet local needs. It was therefore believed by PA Housing that affordable housing should be ranked as the most important objective.
- 6.4. It was perceived by PA Housing that Green Belt should not be included as part of protecting and enhancing our natural environment. This is because it is an urban containment tool and is not related to the environment in the perspective of resource management or landscape quality.
- 6.5. It is important that all strategic employment areas should allow affordable housing. Especially where the quality of employment space is not harmed. They also agree with the council's objectives on ensuring health and well-being but by meeting this, the council should provide affordable housing. Nevertheless, it was suggested that once new Green Belt boundaries have been determined they should be protected against inappropriate development.

## Tetlow King on behalf of Rentplus UK Ltd

6.6. Rentplus UK Ltd are a company that provide affordable rent-to-buy housing and they seek to support the council's role in delivering affordable housing. Rentplus welcome the council's acknowledgement on the importance of delivering homes for ensuring health and well-being. This will help meaningful social and economic gains for the borough and its residents. As the borough is experiencing high affordability Rentplus provide a clear and achievable

- route for people to secure long-term financial stake in the borough whilst also achieving mixed and balanced communities.
- 6.7. Rentplus agree with the council's approach to Theme 3 and have provided a model of affordable rent to buy housing which can help meet the planned objectives set in the consultation document. This will help diversify the mix of units. They believe that the council's SHMA presents an ideal opportunity to identify need and deliver the full range of affordable tenures.

WSP Indigo on behalf of Charterhouse Strategic Land and Moore Place Holdings LLP

- 6.8. Re-promotion of land comprising Moore Place Golf Club for release from the Green Belt. In relation to this consultation the following comments were made:
- 6.9. Need to for the council to acknowledge the high level of housing need in the borough and state that the council will seek to meet this need. Need to recognise specialist housing need. Policies will need to be compliant with the National Planning Policy Framework.

Cluttons (Property consultants) on behalf of Japan Tobacco International UK

- 6.10. This representation provides site, area and policy context information regarding a strategic employment site. They believe the site, may over the new Local Plan period, be appropriate for a wide range of potential uses, including any of the 'B' classes uses, other employment generating uses such as a hotel or conference centre, or C3 residential use. Generally, it asks that the council consider a more flexible and resilient planning policy approach to its existing employment designation in the borough.
- 6.11. In terms of the policy direction 'growing a prosperous economy', they suggest that the council should adopt an overall more responsive approach in the emerging Local Plan. The council needs to carefully consider how it manages its land uses through its planning policies, to ensure that it achieves a balance between ensuring continued economic prosperity, but it is also responsive enough to adapt to changes in market conditions and needs for different land uses. This is particularly important when considering the very significant housing needs within the borough. They believe existing policy is too restrictive and suggest a reduced marketing time for future policy.

Savills on behalf of The Crown Estate (TCE)

6.12. Re-promotion of land comprising Land at South of Hare Lane, Land at Horringdon Farm, Claygate, Land East of Blundel Lane, Oxshott and Land South East of Danes Way, Oxshott for release from the Green Belt for a housing allocation. Highlight representation to previous consultation, being broadly supportive of Options 3 and 5.

In relation to this consultation the following comments were made:

- 6.13. TCE do not pose an objection to any aspect of the consultation document as it stands, or the production of an up to date Local Plan, which the council is required to produce by national planning policy. TCE are generally supportive of the three themes that are addressed in the consultation document but reserves the right to comment further once draft policies have been prepared.
- 6.14. Advise that TCE will strive to be policy compliant in relation to forthcoming policy requirements on climate change, affordable housing and design. Concerned that a preferred approach has not been published yet and potentially we will not have a steer on this until the document is released for discussion at Cabinet, prior to the anticipated consultation in September/ October 2020.
- 6.15. TCE suggests that the council continues the momentum with the preparation of the principal Local Plan so that housing delivery on the allocated sites can commence, assisting the borough with their present housing shortfall (measured against housing needs). They suggest slowing down the production of the Development Management policies to focus attention on the principal Local Plan (e.g. the development strategy and other strategic policies).

Turley on behalf of Taylor Wimpey

6.16. The comments confirm promotion of land north of the A309 and west of Woodstock Lane North as a location for new housing. There are no specific comments on the consultation document. However general comments are made on the role of development management policies and that these should seek to manage the form of development, and should actively facilitate development, and not set targets or requirements that cannot be achieved or render development unviable.

Savills on behalf of Thames Water Utilities Limited

6.17. In relation to water and wastewater infrastructure delivery, Thames Water commented on these issues in response to the September 2019 consultation. It is considered that the development management policies should ensure that the matters raised are addressed and that developers are encouraged to engage in pre-application discussions with Thames Water ahead of the submission of their applications.

Woolf Bond on behalf House Investments Ltd and MJS Investments Ltd

- 6.18. Re-promotion of land comprising Land at east (rear) of Claygate House for release from the Green Belt as a housing allocation. Highlight representation to previous consultations, noting that only Options 3 and 5 from the 2019 consultation could be considered compliant with the National Planning Policy Framework.
- 6.19. In relation to this consultation the following comments were made: Support for those elements of Theme 3 (Ensuring health and well-being for all) where the

council has identified the need to provide quality homes for all. Agree with the policy directions. Consider that the promoted site would achieve many of the aims under the 'Quality homes for all' of the consultation document.

Union 4 Planning on behalf of Molesey Road Land Limited

- 6.20. The comments relate to the objectives and themes in general and also in relation to the site located to the east of Molesey Road, previously promoted in the Options consultation and Land Availability Assessment (LAA).
- 6.21. Union 4 Planning believe that the Vision and strategy for the Local Plan should aim to meet the full needs of the community over the life of the Local Plan and should aim to do so in a manner consistent with a sustainable spatial strategy. They feel it is not possible to meet the needs of the community without the selective release of some Green Belt land for housing and other needs. They state that it is possible to achieve this however, in a manner that is both sustainable and assists in the process of urban intensification, by combining Green Belt release for housing alongside the creation of new areas of largescale public open space or SANG that can serve as a sustainable local recreational resource for the community in areas that are accessible by foot, cycle and public transport. In this way, the necessary Green Belt release can be minimised and the benefits to the community from such release can be maximised while delivering a sustainable spatial strategy.

## **Residents Associations and resident**

Clare Hill (Esher) Association Limited (CHEA)

- 6.22. CHEA state in their representation that while many of the proposals in the document are positive, four of the five objectives are focused on more building, whether it be homes, businesses, infrastructure or development. In the absence of specifics, these are potentially at odds with the objectives of CHEA, which are to preserve and enhance the character and amenities of the Estate.
- 6.23. CHEA strongly opposes all policies that might result in new developments of any kind in its vicinity that: -
  - Will damage the amenities, quality of life, communication aspects of the area
  - Will be on Green Belt Land
  - Will reduce or damage existing open spaces
  - Will be on areas of Special Scientific Interest or natural beauty
  - Will result in the loss or risk to significant, mature and ancient trees
  - Will threaten established and protected legal covenants

## Weybridge Society

6.24. The Weybridge Society believes the vision for the borough should be a simple statement that can be appreciated by all. They comment that the document recognised the borough's issues, but these have not been quantified and there are no substantive plans as to how these issues will be solved. The

Society feel that the increase in housing will only make matters worse and believe there must be accountability and performance of policies must be monitored.

- 6.25. Two key issues are discussed in the representation. These are traffic congestion and the lack of affordable/social housing. Information is provided about the problems and various solutions are suggested.
- 6.26. In terms of the consultation document, the society have provided the following comments:
  - Good growth is not specified.
  - Medical services are stretched.
  - More development will worsen situation.
  - Government targets need to be challenged.
  - Current policies and guidance are open to interpretation.
  - Improve air quality by reducing traffic congestion.
  - Spatial delivery framework requires definition.
  - Sustainable and congestion needs definition.
  - Car clubs would not be viable in the borough.
  - Pride in community should be encouraged.
- 6.27. The society also stated that the council needs to plan with other organisations, monitor and amend plans to provide solutions.

### Resident

- 6.28. Submitting their response via an attachment only, this resident agrees that a significant number of houses will need to be built over the plan period. They also note that the council challenged the minister on this and were advised to comply with national policy. It is their reasoning that the only way the themes can be achieved is by undertaking a significant programme of housebuilding. Much of the content reflects upon the options consultation undertaken in 2019.
- 6.29. They strongly objected to building on green space in the 'Urban and Semi-Urban' as these are the green spaces that people engage with on a daily basis. They state that these are being sacrificed to protect the Green Belt and that this thinking runs counter to the possibility of achieving the policy ambitions of Theme 1. Therefore, developing poorly performing areas of Green Belt is the best option and would satisfy the policy ambitions of theme 2 (economy) and theme 3.
- 6.30. The rationale is by developing Green Belt land you provide everyone with access to green space by virtue of being in the Green Belt whilst not developing green spaces in the urban area. This also prevents overcrowding of existing dwellings within the borough.

## **Government Bodies**

## The Environment Agency

- 6.31. The comments of the Environment Agency (EA) are in relation to Flood Risk, Biodiversity, Ground Water, Contaminated Land and Water Resources and Quality.
- 6.32. They are pleased to see that the council have demonstrated a commitment to environmental sustainability but would like to see this expanded to include biodiversity net gains and additional flood storage and have provided a number of more detailed comments to this effect.
- 6.33. The EA state that following the River Thames modelling work in 2019 we are required to update our SFRA in order to accord with national policy, this can also form part of our evidence base once completed. They are keen to stress that we should not just be thinking about flooding from fluvial sources but also groundwater, surface, sewer and reservoir flooding.
- 6.34. If we receive any applications within Flood Zone (FZ) 2 than a sequential test must be applied, and it must clearly be demonstrated that the development will not be at risk from flooding during its lifetime but also, ideally, would provide additional flood storage to reduce flood risk elsewhere. This can also be done in the form of recreational facilities. The EA would not support any intensification of development in FZ3.
- 6.35. The EA would like to see the council designating particular areas for conservation and enhancement. They would also like to see a target of at least 20% for biodiversity net gain and have suggested Natural England's Biodiversity Metric 2.0 as a way of measuring this.
- 6.36. They also suggested that the council should impose a 10-metre buffer zone from the river bank which should be protected from development as these provide recreation spaces which benefit health but are also potentially ideal ecosystems and would accord with Article 10 of the Habitats Directive. This stresses the importance of linked corridors to allow the movement of species between habitats, rivers are ideal for this.
- 6.37. It is mentioned that there is no reference of the Water Framework Directive (WFD)\_in the document, this means ensuring all water bodies reach a 'good' standard by 2027. As a result, they recommend the following policy directives to help achieve this:
  - Protecting watercourses from pressures of invasive non-native species e.g. floating pennywort in the Rivers Wey, Mole and Thames.
  - Reductions in barriers to fish passage in Rivers Wey and Mole.
  - De-culverting and restoring rivers, particularly in urban areas.
- 6.38. They would also like to see a policy on the use and/or re-use of foul water from new developments and a new water cycle study to show the requirements for coping with new development. Further to managing the efficiency of water use EA would like to see the water usage threshold reduced to a lower level than that included in the consultation.

6.39. The prioritisation of brownfield sites is endorsed but this is also an opportunity to remediate contaminated sites and improve water quality of the wider area.

## Surrey County Council

- 6.40. Surrey County Council provided a response that centred around their role as infrastructure provider and public health and well-being authority. It is suggested that the vision could also seek to promote carbon neutral new development and biodiversity. An aspiration to provide well connected homes and opportunities for sustainable travel should be included; (ii) none of the objectives appear to seek to conserve, protect or enhance environmental resources of heritage assets.
- 6.41. Theme 1 should include protection of the built environment and heritage to provide a policy framework for protecting the character, appearance and historic integrity of the built environment and heritage resource in both the urban and rural areas. Whilst the inclusion of "excellently designed development and spaces" is welcomed within Theme 3, such matters would seem to extend beyond the theme of ensuring health and well-being for all.
- 6.42. The use of public transport should also be mentioned as a sustainable alternative to car travel. The incorporation of minimum parking standards appears contrary to the statutory duty to include policies in the Local Plan that are designed to tackle climate change and its impacts, referred to in the section on responding to climate change. Neither does it sit well within the theme of health and well-being.
- 6.43. It is suggested that consideration is given to the healthy planning principles set out in the recent guidance: Creating Healthier Built Environments Guidance for health and local planning in Surrey (Jan 2020). Particularly in relation to:
  - Food environments
  - Electric vehicle charging points
  - Pedestrian environments
  - Active travel routes linking to public transport facilities to encourage mixed modes of transport for all levels of mobility
  - Energy generation in developments

## Epsom and Ewell Borough Council

6.44. Epsom and Ewell had no particular comments to make on the themes and objectives set out in the latest consultation document. The identified themes and objectives are consistent with national policy and capable of delivering sustainable development. As there is no direction of growth within the con Epsom and Ewell could not comment constructively on the potential cross boundary issues. Epsom and Ewell have made it clear that they do not have the capacity for any offsetting of housing need that not cannot be

accommodated in Elmbridge. However, they will positively engage and welcome future opportunities to work with Elmbridge.

## Richmond and Wandsworth Council

6.45. Richmond and Wandsworth support the emphasis to protect the environment and tackling climate change. Though, they believe there are no cross-boundary issues to raise at this stage of the consultation. It is suggested that a meeting later in the year would be appropriate to continue discussions under the Duty to Cooperate.

## Heritage

## Historic England

- 6.46. Historic England comment that they note the inclusion of 'Protecting and enhancing the borough's historic and cultural assets' as a key issue which they welcome. A more explicit reference to the historic environment and heritage assets could be included in the vision.
- 6.47. A link could be made to the above key issue (the inclusion of 'Protecting and enhancing the borough's historic and cultural assets) in either/or first and third objectives; e.g. 'Deliver sustainable development and vibrant places that are excellently designed and conserved to achieve a better quality of life...' and/or 'Where our locally distinctive centres and historic areas offer a vibrant place to live...'.
- 6.48. The historic environment of the borough should be recognised as fundamental to achieving sustainable development (ref. definition in NPPF para 8c)).
- 6.49. In terms of growing a prosperous economy, Historic England state that historic buildings are highly adaptable to new uses and have been found to provide good environments for start-up and SME businesses; listed buildings and that conservation areas are attractive to many companies seeking to establish or project their 'brand' or image and location in heritage assets helps to support attraction and retention of staff.

## Cobham Conservation and Heritage Trust

6.50. The Cobham Conservation and Heritage Trust (CCHT) makes points on housing, transport, climate change, working with other authorities, policy relating to the council's assets and the community. When talking about housing, the CCHT believe that the development of housing should not be at the expense of removing land from the Green Belt. The CCHT believe that new housing should be built in the most sustainable locations. They also believe the council should be proactive into bringing properties into full occupation, taxing empty and dilapidated houses and second/ holiday homes where necessary.

- 6.51. The issue of on-road parking has been raised and they have suggested that continued work with Surrey Country Council and their modelling on traffic should be done to prevent congestion in the borough. They also believe that 20 mph should be enforced more throughout the borough especially in homes zones and we should be using more sustainable modes of transport rather that private journeys. This would improve carbon emissions and pollution and help the environment. The CCHT believe that more trees should be planted, and existing trees protected to capture the pollution offset from vehicle emissions.
- 6.52. The CCHT have said that there should further discussions with neighbouring authorities especially with Guildford with regards the Wisley Airfield redevelopment which will put pressure on the local area of Cobham. It has been suggested that the council has failed to listen to the feedback of residents and is failing to promote neighbourhood plans to provide opportunities for policy change.
- 6.53. Other points should include relieving congestion and improving connectivity, enhancing access to open spaces, management of water supply, improving choice of water supply, enhancing and maintaining attractiveness and distinctive identity. The CCHT also mentions how the provision of the right type of homes to ensure housing choice meets needs and address the affordable housing shortage whilst delivering the strategic and local infrastructure to sustain the future growth in the borough.

## **Transport**

## Gatwick Airport Limited

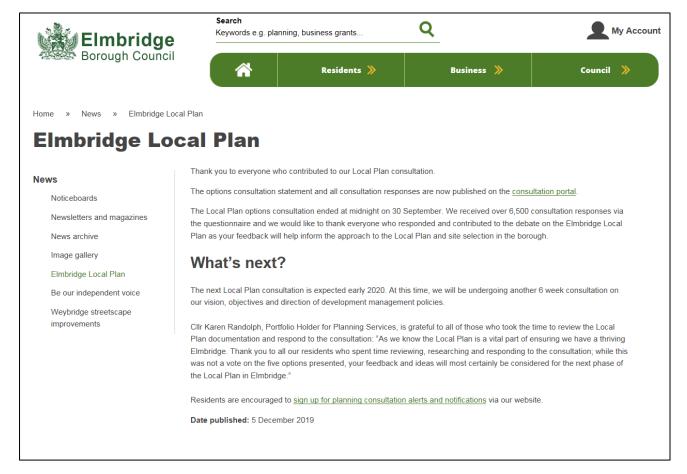
6.54. No comments to make regarding the consultation in relation to the direction of the policies from an aerodrome safeguarding perspective. Request to be consulted with regard to the draft Local Plan.

## 7 Conclusion and next steps

- 7.1. Place-making should be at the centre of the new Local Plan and it must have a strong shared vision and objectives at its heart. This consultation has allowed us to understand stakeholders vision for the borough and views on the direction of policies. These must be considered against the requirement of the NPPF on matters such as employment, the environment, heritage, infrastructure as well as housing. We will now have to "marry up" these with our own evidence on those subjects which has identified where we can grow, our strengths and weakness as well as recommended policy approaches. This is an iterate process to identify an appropriate vision and objectives for the Local Plan.
- 7.2. In terms of the responses received, this consultation has allowed an understanding of residents' and other stakeholders views. As Section 5 highlights, Elmbridge residents had shared views on a number of issues throughout the consultation questions. We know that place-making should be at the core of the new Local Plan and it must have a strong shared vision and objectives at its heart. The fact that so many residents had shared and common views on many issues is helpful to achieve this.
- 7.3. The responses to the Vision Consultation in conjunction with those received in the Options Consultation 2019 and the Strategic Options 2016/17, along with the emerging evidence base documents, including infrastructure, the ongoing Sustainability Appraisal and the requirements of the National Planning Policy Framework (NPPF) 2019, will inform the subsequent preferred approach for the Local Plan and site selection.
- 7.4. At this stage in the plan-making preparations, it is not known what development approach / strategy will underpin the Local Plan or the sites that will or will not be included. Work will now progress on the draft Local Plan. This consultation statement was prepared before the Covid 19 situation which has had an impact on the local plan timetable. Please see the <a href="Local Development Scheme">Local Development Scheme</a> for the most up to date timetable and Council's position statement.
- 7.5. The responses received to the <u>Vision Consultation</u>, <u>Options Consultation</u> and <u>Strategic Options consultation</u> are available to view online.

## 8 Appendices

## Appendix 1: Early publicity- Press release 5 December 2019



## Appendix 2: Elmbridge Review Article- December 2019



## Appendix 3: Residents Association / Groups invite to community workshops



Civic Centre High Street, Esher Surrey KT10 9SD 01372 474474 contactus@elmbridge.gov.uk elmbridge.gov.uk

contact:: Planning Policy & Strategy

phone: 01372 474474

email: localplan@elmbridge.gov.uk

my ref: REG18-2020

Date: 29 November 2019

Dear Sir/Madam,

## RE: Local Plan update and invitation to a community workshop

Thank you for your engagement in the preparation of Elmbridge's new Local Plan. Since the close of the Options Consultation at the end of September, officers have been reviewing the responses and preparing the next consultation document.

The feedback from the Options Consultation is due to be published in December and we will be contacting all those that responded to thank them for participating and to advise where the findings of the consultation including the responses can be viewed.

You may recall that during the Options Consultation officers advised that as part of the early engagement on the Local Plan that a further consultation would take place in early 2020. This consultation is expected to commence in late January 2020 and will focus on the vision and objectives for the new Local Plan. The consultation document will also share out thoughts on the direction for policies including the detailed day-to-day policies.

As part of this six-week consultation we are inviting members of residents' associations and local community groups to attend a workshop at the Civic Centre, Esher with officers.

The purpose of the workshops will be to discuss the consultation document and the direction of travel for policies in the new Local Plan. It will also provide an opportunity for you to ask questions on the Local Plan preparation and the next steps.

We hope that the sessions will help us in sharing the new Local Plan and policies as well as enabling you to advise your wider members and help them respond to the consultation.

Workshops will be held on the following dates:

- Monday 10 February 2020, 7pm-9pm
- Thursday 13 February 2020, 10am-12pm
- Thursday 20 February 2020, 10am-12pm

The agenda for the workshops will be the same and each will last approximately two hours. Light refreshments will be provided.

We would be grateful if you could let us know if your group/association wishes to attend, number of attendees and indicate your preferred date. We will confirm your booking. Please note that depending on the level of interest for each workshop, we may have to restrict the number of attendees from each community/residents' group.

We would be grateful if you would respond as soon as possible to localplan@elmbridge.gov.uk and at the latest by Friday 10 January 2020.

We look forward to hearing from you.

Kind regards

The Planning Policy Team

Planning Policy Planning Services

## **Appendix 4: Consultation Webpage**





Home » Planning » Planning Policy » Creating our vision, objectives and the direction for development management policies 2020

## Creating our vision, objectives and the direction for development management policies 2020

Register Log in Closed Future Search Consultation Home

## Shaping Elmbridge A New Local Plan



### What is this consultation about?

This consultation is to seek views on the vision, objectives and the direction for development management policies as part of the preparation of a new Local Plan to replace the Core Strategy and Development Management Plan.

### Where can I find more information?

This consultation webpage includes the consultation document and all the supporting documents in the consultation library below.

A hard copy version of the consultation document is also available to view at the Civic Centre and the borough's local libraries Unfortunately, we are unable to provide hard copies to take way at the Civic Centre reception, but you can print out the document from the

We have produced 3 topic papers to help assist with understanding the content of the consultation. These are located in the consultation library below. If you would like to view the full technical documents that have informed the document, please see the evidence base to inform

If you would like to read any of the evidence base documents in hard copy you will need to book an appointment at the Civic Centre. Please e-mail localplan@elmbridge.gov.uk to request this

### Let us know your views

We would like to know your views on the vision, objectives and the direction for development management policies. Please use the consultation document to submit your response to the questions.

If you are aware of anyone without internet access, hard copies of the response form are available at the Civic Centre and the borough libraries. Hard copy response forms will not be processed and will be sent back if the attached privacy notice is not ticked when returning

We are unable to accept anonymous responses and your name and responses will be published after the consultation finishes. Please see our Planning Policy Privacy Notice for more information.

If you require any assistance filling out the online consultation questions please e-mail localplan@elmbridge.gov.uk or call us on 01372474474

### What happens next?

The Consultation responses will be reviewed and considered as we prepare the more detailed draft plan. We will issue a log of the consultation responses received along with the council's consideration of the issues raised.

## Timeline



Opened 27 Jan 2020 at 09:00



Closes

9 Mar 2020 at 23:59

## **Documents**



Consultation document

Please use this online consultation document to add your comments to the relevant section.



The Consultation Document

This is the PDF version of consultation document that sets out the vision, objectives and direction for development management policies 2020.



Frequently Asked Questions



Useful Summary: Plan Preparation to date



Theme Overview Paper 1 - Natural Environment



Theme Overview Paper 2 - Growing a prosperous economy



Theme Overview Paper 3 - Ensuring health and wellbeing for all



Sustainability Appraisal



Equality Impact Assessment: Consultation Document



Equality Impact Assessment: Consultation Strategy



Statement of representations procedure

## Respond

Respond by making comments on the consultation document

## **Appendix 5: Consultation Letter**



Civic Centre High Street, Esher Surrey KT10 9SD Switchboard: 01372 474474 DX: 36302 Esher Website: www.elmbridge.gov.uk

contact: Planning Policy telephone: 01372 474474 e-mail: localplan@elmbridge.gov.uk

your ref: VObD/2020 date: 27 January 2020

### Dear

Local Plan Consultation - Creating our vision, objectives and the direction for development management policies 2020

Elmbridge Borough Council is seeking views on 'Creating our vision, objectives and the direction for development management policies 2020'. This is another regulation 18 consultation and this will help to inform the policies for the new Local Plan.

### How can I get involved?

If you would like to comment, the consultation starts at 9am on 27 January and ends at midnight on 9 March 2020. You can read the document online at elmbridge.gov.uk/localplan2020 or alternatively hard copies are available to view at:

- the Civic Centre, High Street, Esher, Surrey, KT10 9SD between 8.45am- 5pm (Monday to Thursday) and 8.45am- 4.45pm (Friday).
- All libraries in the Borough see the Surrey County Council website (www.surreycc.gov.uk) or call 0300 200 1001 for locations and opening times.

## How can I comment?

Please use the online consultation portal at elmbridge.gov.uk/localplan2020 and submit your comments by midnight on 9 March 2020. If you require assistance filling out the online consultation document, please e-mail us on localplan@elmbridge.gov.uk or call us on 01372474474.

If you do not have access to the internet, hard copies of the response form will be available at the Civic Centre and borough libraries or this can be posted out to you on request. Please tick the attached privacy notice when submitting your response form otherwise your comments will not be processed and your form will be posted back to you.

Please note that your comments, including your name and organisation if applicable, will be published after the consultation ends. Please see the Planning Policy Privacy Notice for more information. This is available online at elmbridge.gov.uk/privacy-notices/planning-services/planning-policy/ or in hard copy at the Civic Centre.

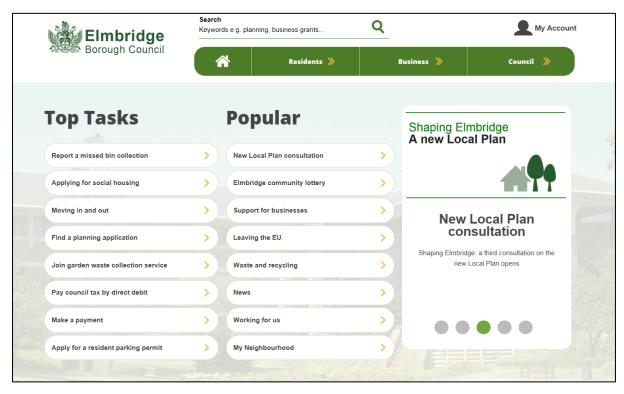
For further information on the Local Plan, please see our webpage at elmbridge.gov.uk/localplan

Yours sincerely,

Mrs Kim Tagliarini, Head of Planning Services

Note: If you wish to stop receiving information about the Elmbridge Local Plan or other planning policy consultations please write to us at the address above or email us at localplan@elmbridge.gov.uk and ask us to remove your details.

## Appendix 6: Press Release on 27 January 2020





## A third consultation on the new Local Plan opens

The new Local Plan will replace the council's Core Strategy (adopted in 2011) which contains strategic planning policies and the Development Management Plan (adopted in 2015). The Development Management plan contains detailed day-to-day planning policies. The first two Local Plan consultations held in 2016 and 2019 were focused on the strategic issues, such as the location of new homes and what should be included in the vision for the Local Plan. The purpose of this third Local Plan consultation is twofold

- The first part of the document shares the council's proposed objectives and themes for the Local Plan, it looks ahead to what the borough might be like in 15 years' time.
- 2. The second part of the document is asking for your views on the approach to the detailed policies.

Our Local Plan will have a central role in reducing carbon dioxide emissions and supporting the transition to a low carbon future. As well as delivering improvements to flood risk, air quality, recycling and waste management. We would like your views on the proposed policy directions. The consultation also has questions on the Elmbridge economy and the health and wellbeing of our communities through environments that promote and support your physical and mental wellbeing.

Cllr Karen Randolph, Portfolio Holder for Planning Services, would like to encourage residents to take part in this latest Local Plan consultation:

"Previously you told us what made your area special and what you would like to see happen over the next 15 years, including responding to climate change, another key challenge for the council. During the last consultation we promised to use your responses to shape our thoughts of what our vision for the borough should be and what should be the key priorities for the new Local Plan. These have been incorporated in this consultation document. I would encourage all those with a stake in the future of Elmbridge to read the documentation and to give us their views on the themes and topics in the document."

The consultation opened on Monday January 27 and will close at midnight on Monday 9 March. You can <u>view the document and complete the consultation</u> by 11:59pm.

You will need to register, and your comments along with you name will be published. Printed copies of this document are available to view at the Civic Centre in Esher and at libraries across the borough. For those without internet access, hard copies of the comments form are available at the Civic Centre and in the borough libraries or upon request by calling 01372 474 474.

## **Next steps**

This consultation forms part of the early engagement with residents and stakeholders and is the third of five in the plan-making process and will run for 6 weeks.

We will collate all of the responses, and these will be published on our website in spring.

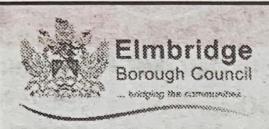
After that we will consider the feedback, along with the responses to the Strategic Options 2016 and Options 2019 consultations and prepare a draft plan known as the 'pre-submission draft'.

You will also be asked for your views on the draft plan before it is submitted to the Planning Inspectorate for examination.

Date published: 27 January 2020

## **Appendix 7: Poster on Elmbridge Noticeboards**





# Creating our vision, objectives and the direction for development management policies 2020- Regulation 18

Elmbridge Borough Council is inviting comments on the above consultation for a six-week period from Monday 27 January until Monday 9 March 2020. This consultation is to seek views on the vision, objectives and the direction for policies for preparation of a new Local Plan to replace the Core Strategy 2011 and Development Management plan 2015.

The consultation document is available to view online at elmbridge.gov.uk/localplan2020

Alternatively, you can view the consultation document at the Civic Centre, between 8.45am- 5pm (Monday to Thursday) and 8.45am- 4.45pm (Friday). A hard copy is also available to inspect at the Borough libraries.

Responses should be made via the council's online consultation system available on the website at: elmbridge.gov.uk/localplan2020. Response forms will be available at the Civic Centre and libraries for those without internet access.

All comments must be received by midnight on Monday 9 March 2020.

For further information, please e-mail localplan@elmbridge.gov.uk, or telephone 01372 474474.

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Stategic Director

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## Appendix 9: E: newsletter to Elmbridge residents

e:review February 2020

## In this issue:

- · New local plan consultation
- · Calling all landlords!
- · Affordable housing/shared ownership
- · 75th anniversary of VE Day
- · Elmbridge Community Lottery
- Business news think like and astronaut masterclass, digital high street awarded
- Leisure and culture healthy walks, flowerbed competition, half-term family activities
- Health and wellbeing could you foster a child, i-access drug and alcohol service, GP referral scheme
- · Social media channels
- · My Account how to sign-up or unsubscribe

Shaping Elmbridge A new Local Plan



## Appendix 10: Consultation- Social media messages (Facebook and twitter)















## **Appendix 11: Community Workshop Attendance List**

Monday 10 February 19.00-21.00
Beaconsfield Garden Residents Association
Cobham & Downside Residents Association
FEDORA
Hinchley Wood Residents Association
Knott Park Residents Association Limited
Long Ditton Residents Association
New Road, Esher Limited
Thames Ditton & Weston Green Residents
Association
Triangle Residents Association
VOX

Thursday 13 February 10am-12noon
Abbotswood Residents Association
Beaconsfield Garden Residents Association
Claygate Parish Council
Cobham & Downside Residents Association
Cobham Green Belt/ Oxshott Way Residents
Association
Esher Residents Association
Portmore Park & District Residents Association
Save Cobham Green Belt
Stoke D'Abernon Residents Association
Triangle Residents Association

Thursday 20 February 10am-12noon
Albany Close Residents Association
Claygate Village Association
Ditton Reach Residents Association (DRRA)
Meadway (Esher) Residents Association
Ruxley Heights Residents Association
Wey Road & Round Oak Road Residents
Association
Weybridge Society
Cobham Conservation and Heritage Trust
Portmore Park & District Residents Association

## **Appendix 12: Community workshops Feedback**

## Suggestions for 'The Vision'

- Elmbridge to have its own unique character, independent of Greater London.
- Maintain the individual communities in Elmbridge, avoiding merger and urban sprawl.
- Infrastructure to support the whole community of Elmbridge developed in anticipation of future growth.
- Healthy environment for all Elmbridge residents.
- Greater joined up accountability amongst authorities influencing Elmbridge life.
- Preserve our Green Belt which is already fragmented and therefore even more important, and in doing so preserve openness and separation.
- Ensure appropriate infrastructure at the right time and in advance.
- Allow sensible building on greenfield sites.
- Improve air quality and health and well-being (A3, Gatwick, Heathrow M25...)
- People and place not numbers form a vision and strategy with sensible numbers given demand bordering GLA is insatiable.
- Council to take a hand in regenerating and dying high streets / town centres residential mix. Community Hub – not necessarily retail centric.
- Climate change policies should be woven into all policies and plans.
- To improve and maintain the communities by improving infrastructure at all levels – transport, schools etc. This itself would help develop a more sustainable and healthy community.
- Greater and better communication between the governing bodies.
- To maintain the historic communities and to do so by retaining historic green spaces now defined as Green Belt. These spaces are what make Elmbridge attractive and should be retained at all costs.
- To protect the character of Elmbridge as a distinct set of settlements within the greenbelt while allowing it to grow sustainably while mitigating the effects of climate change.
- Maintain green spaces and open environment and preserve green belt.
- Retain character of area in terms of separate settlements.
- Support climate change and manage through traffic (limit) in our areas.
- Focus affordable homes in urban centres.
- Local needs should override national needs in terms of housing and preserve quality of living for our residents.
- Maintain and enhance the distinctive communities which comprise the borough.
- Unique environment individual characteristics of town, maintain open character, enhance local high streets, public car parks- promote short term visits.
- Traffic and transport- density close to transport hubs/schools etc. discourage through traffic, protected cycle of pedestrian access/facilities and air quality.
- People on pavements not in vehicles and children walking to school.
- Air quality- cycle lanes/ tracks away from roads

- Avoid through traffic.
- Each community to maintain and improve on its existing individual characteristics/ aesthetics.
- Housing to be 'centred' around transport hubs / bus routes- integrated?
- Vibrant 'High Street' but not at the expense of local residents.
- Sustainable Development- new build less reliant on transport and low energy tech.
- Climate change- preserve Green Belt and green spaces, river management, respect flood plains and more tree planning (urban and green land)
- Prosperous economy- encourage small business, live/ work premises, business rates.
- Health and well-being- reduce pollution (air/traffic) and youth centres.
- Infrastructure- connectivity (better public transport) and cottage hospitals.

## **Key theme 1: Natural Environment**

- Protecting Green Belt
- Air quality strategy
- Transport strategy including convenient and affordable transport.
- Sustainable housing
- Conjunction of public health and road safety.
- Enforcing development policies
- A clear environmental plan from Elmbridge to improve natural environment e.g. plastic free, tree planting, cycle paths, transport investment, legal protection for land, trees and wildlife.
- Proactive approach to maintaining green areas and increasing green areas in our borough.
- Separation of settlements. Increase the formal designation of green spaces (local) within settlements.
- Protect and increase wildlife corridors in urban areas or next to roads including greenbelt land (trees).
- Legal protection is essential of our green spaces and conservation areas e.g. tree conservation.
- Our green spaces and riverside are key to the character of the borough.
- Improving council services e.g. to address fly-tipping and recycling.
- Changing behaviour- how much is Elmbridge actually working with community and schools to improve environment and foster cleaner, greener borough?
- Targets for pollution reduction.
- Specific wildlife protection strategies.
- Light pollution e.g. hour light limiting
- Noise pollution e.g. road surface and tree planting.
- Flooding- forethought, planning and resources.
- Measurable targets for increasing tree planting, whether there is development or not within the borough. Specific % and planned forethought. Mixed trees / greenery.
- Consider widening the theme. 'Natural' should be extended to embrace historic and built environment.

- Proper green amenity spaces within any new development.
- Brownfield / town centre/ transport links
- Put houses least worst place.
- Don't build on flood plains (Article 4 Direction?)
- Trees on high street to soften views
- More and replacement trees.
- Infrastructure- low tech can make a big difference. Community ownership.
- Cycle tracks
- Walking paths- safety and lighting
- Use common land better.
- Appropriate use of Green Belt (not sacrosanct but...)
- Public footpaths useable
- Riverbank, Tow paths
- Use of the rivers

## **Key theme 2: Prosperous Economy**

- Joined up thinking (working together) between Surrey and Elmbridge. Surrey Place Ambition 2050 (Rob Moran is leading).
- Size of housing to encourage key workers and incentive to downsize.
- Encourage right infrastructure in right place which will encourage people to work in Elmbridge air quality/traffic/green spaces.
- Lower business rates
- Developers control market land banking.
- Area most suitable for SMEs. No new large-scale employment because of lack of housing for employees and congested transport links.
- Affordable housing in appropriate locations for local employees is a top priority.
- Public transport- improve links to London, longer trains, new /reopened lines (tube extension)
- Railway carpark pricing to encourage local station use.
- Build over existing car parks (residential)
- Improve bus service routing, frequency, bus passes for school children or dedicated school buses.
- High street- encourage small businesses, improve pavements, replace all parking charges with "hour" bays.
- Charging points
- Live/ work, flat over shop builds, tree planting
- Cycle lanes/ parking.

## Key theme 3: Health and well-being

- The ability for residents to enjoy and take exercise in pleasant green places ie the Green Belt.
- The ability for our children to grow up in a green and pleasant land and that provides a healthy and environmentally sound community.

- To challenge the government on the number of houses a proper plan with limits is needed.
- Think clearly about initiatives that will expand the economy but might suck even more people into Elmbridge i.e. attempt to manage population growth.
- We need real pro-active thinking about how we can ensure health and wellbeing for all.
- To think clearly how Elmbridge fits into the reality of climate change.
- Our positive suggestion is to establish a Lido in Sandown Park.
- Maintaining our historic / heritage assets which promotes well-being.
- Policies should protect existing assets.
- Understand specific needs of community, reflect stand up for local needs.
- Concerned about losing natural spaces- fields and woodland replaced with man-made "excellently designed and well-maintained spaces"
- Surrounded by open natural spaces is what is key for all.
- Missing- investing in well-being of youth and facilities for youth.
- Cooperate with other boroughs to achieve these aims, joined up approach as development of the localities impact.
- Increased density in urban areas need this sensitivity and well-being.
- Missing realistic assessment of population need.
- Communities already exist all about growth in population and new homes why is that health and well-being?

The following comments were provided by a member of table 3 after the event held on 20 February 2020.

## **VISION FOR ELMBRIDGE up to 2036**

- To maintain the unique character of Elmbridge that makes it such an attractive place to live whilst addressing the huge impact of traffic.
- To instil a pride in local communities (this vision came out of table 3 discussions on Theme 3)

Discussion highlighted the diversity of Elmbridge and the variety of current and potential impacts on towns and villages, rural and residential areas. It focused on existing traffic congestion and the associated air pollution, the permanent impact that could result from a loss of farmland, the need for very strong and clearly defined planning regulations that force developers to maintain/improve the character of Elmbridge, and the need for a plan with and estimated number and mix of developments required per town including affordable housing targets to be met.

## **EXPLORING THEME 3 and associated POLICY DIRECTIONS**

Policy Directions: Excellently Designed Development and Spaces,

Quality Homes for all,

Connectivity, Movement & Parking, Social & Community Infrastructure

Following discussion, the overriding view of the Theme 3 policy direction was that they need to instil a pride in communities with initiatives to stimulate involvement and a sense of responsibility for how towns/villages develop and are maintained. The introduction of Community Hubs were seen as very important in helping to create more vibrant high streets and provide services and places for all ages to meet. Also, more residents should live in high streets, perhaps by including affordable housing. Also discussed was the value of Residents Associations and possibly introducing more Parish Councils or town/village community groups that can help residents to connect and work with EBC.

MISSED POLICY DIRECTION - Car ownership was stated to be embedded in for the lifestyles of Elmbridge residents and therefore adequate parking must be provided. Better public transport options and car shares are only seen as important but mainly as a way of reducing traffic, especially during 'rush hours', but not as a means to substantially reduce car ownership. The definite need identified in the last Local Plan for more off-street carparks, particularly for business users, has still not materialised. This and addressing traffic congestion needs to be highlighted as a prerequisite to have any chance of meeting the Government housing target, and Elmbridge remaining an attractive place to live.

## How should policies move forward to meet the future vision?

Policy direction needs to be more be more specific. Words like promoting, supporting and encouraging are not sufficiently precise to ensure that developers meet policy directions that are likely to cost them time and money. More prescriptive policies and measures will be needed to ensure the achievement of the far-reaching interrelated requirements which have been correctly identified in the Plan as fundamental to maintaining the much-prized character of Elmbridge. It was suggested that a minimum standard is set for building design, meeting environmental and climate change etc as an integral part of both the Planning and Building Regulations. However, when setting the operational imperatives EBC need to also incorporate an agreed vision for each town/village which has the backing of local residents and councillors. Perhaps individual Neighbourhood Plans could provide the mechanism for this and give residents confidence in EBC that catastrophic eyesores such as Bridge House cannot get through the planning process. This single planning decision completely undermines all the aims and polices stated as vital in this new Local Plan and will forever blight Weybridge High Street and the vision for its improvement.