
Regulation 19 Consultation Representations by Policy - Detailed Council Response



Elmbridge Local Plan



Introduction

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

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

Representations Tables Key:

| | |
|------------|---|
| ID | Response ID |
| N | Name |
| Org | Organisation |
| 1 | Question 1: Do you consider this part of the draft Local Plan to be legally compliant? |
| 1a | Comment on response to question 1. |
| 2 | Question 2: Do you consider this part of the draft Local Plan to be sound? |
| 2a | Comment on response to question 2. |
| 3 | Question 3: If you do not consider the draft Local Plan to be sound, please select which test/tests of soundness this relates to. |
| P | Positively prepared (NPPF, para. 35(a)) |
| E | Effective (NPPF, para. 35(b)) |
| J | Justified (NPPF, para. 35(c)) |
| C | Consistent with national policy (NPPF, para. 35(d)) |
| 3a | Comment on response to question 3. |
| 4 | Question 4: Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/or sound, including any revised wording. |
| 4a | Uploaded documents |
| 4b | Council summary of uploaded documents |
| 5 | Question 5: If your representation is seeking a modification to this part of the document, do you consider it necessary to participate in the oral part of the examination? |
| 6 | Question 6: If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary |
| 7 | Council response |

Acronyms

DELP – Draft Elmbridge Local Plan

EBC – Elmbridge Borough Council

SCC – Surrey County Council

LAA – Land Availability Assessment

LHNA – Local Housing Need Assessment

1. Introduction

| ID | N | Org | 1 | 1a | 2 | 2a | 3a | 4 | 4a | 4b | 5 | 6 | 7 | |
|---------|----------------|-----|-----|---|-----|--|---|---|----|----|--|--|--|--|
| 1106830 | Dorothy Ford | | Yes | | Yes | | Paragraphs 1.13-1.15 explains the Local Plan aims to “ balance ”growth/development with conserving and enhancing “Green Belt and open spaces”. This is inconsistent with the NPPF definition of Green Belt as open. The NPPF para 137 clearly states “the essential characteristics of Green Belts are their openness and permanence”. The NPPF section 11, “Sustainable Development”, paragraph b, states “ strategic policies should, as a minimum, provide for objectively assessed needs for housing [...] unless : the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area”. The assets of particular importance referred to include Green Belt. This draft Local Plan should include this paragraph 11b of the NPPF in order to clarify the protection of the Green Belt and make it clearly consistent with the NPPF. By merely stating it aims to balance growth and protection, the Local Plan seems to imply that some Green Belt might be sacrificed for development - in order to achieve a balance. | | | | | Yes, I wish to participate at the oral examination | I wish to participate in the oral part, in order to represent the concerns and interests of the 2495 signatories of the petition addressed to Elmbridge BC to save Green Belt Sub-Area 11 : https://www.chan.ge.org/p/our-green-belt-is-under-threat EBC Head of Planning, Kim Tagliarini, instructed me in writing to submit this petition now - during the Regulation 19 public consultation. | Comment noted. Paragraph 1.13 – 1.15 of the DELP sets out that a brownfield first approach has been taken. No development on the Green Belt and no changes to the Green Belt boundary are proposed. This approach is reflected throughout the DELP and is consistent with NPPF para. 137. It is not necessary to repeat national policy within the introduction of the Local Plan. Paragraph 11(b) has been applied in the formulation of the DELP and its policies. National policy and guidance applies whether or not it is repeated in the Local Plan. |
| 1108098 | Dan Robinson | | No | Your map of the greenbelt areas is inconsistent in that Esher Rugby Club land is designated greenbelt but is not shown on the Elmbridge Greenbelt diagram | No | For reason above. Records may not reflect the true topology of the area. | | Include Esher RFC pitches on back fields as greenbelt in your mapping | | | No, I do not wish to participate at the oral examination | | Comments noted. Esher Rugby Club land is designated Green Belt land and is shown on the interactive policies map and the key diagram. | |
| 1108181 | Judith Spencer | | Yes | | Yes | | | | | | | | Support noted. | |
| 1108248 | Simon Sales | | Yes | | Yes | | | | | | | | Support noted. | |
| 1108283 | Chris Liddiard | | Yes | | Yes | The utilising of brownfield sites and higher density on existing sites as the preferred option to achieving the housing target is the best way. No Green Belt must be sacrificed. | | | | | | | Support for the proposed spatial strategy noted. | |
| 1108300 | Gil Bray | | Yes | | Yes | | | | | | | | Support noted. | |
| 1108507 | John Bamford | | Yes | | Yes | I support the Council's chosen approach to retain the character of the area by safeguarding Green Belt, open spaces etc. and avoiding areas unsuitable for new development. If the last two years have taught us anything, it is the importance of Green Belt and open | | | | | | | Support for proposed spatial strategy noted. | |

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| | | | | | spaces that bring the community together. Efficient use of brownfield sites where much of the necessary infrastructure is already in place will should help to provide suitable dwellings without significantly changing the character of the area. | | | | | | | | |
| 1108947 | Moiya Heyburn | | No | If Building on 'Brown sites ' means the destruction of well used community resources that encourage people to walk, encourage community life and nature without proper and fair consultation of the communities it effects how is this legally compliant? | No | <p>How is it justified to take a well-used community Library that enhances community Life, that is easily accessible for the disabled and parents with prams and pushchairs, that people can easily walk to thereby helping tackle climate change, with beautiful gardens encouraging wildlife that has been a part of the community for over 60 years and is still a busy part of community life be pulled down for a block of flats.</p> <p>From HMRC Website- Councils remain responsible for overseeing the delivery of a 'comprehensive and efficient' library service by listening to and reflecting the changing needs of their communities. Councils have a statutory obligation to provide a library service, The needs assessment should ensure the council has a thorough understanding of the current provision and, critically, local community needs and views. This is to help inform choices about the future strategy and delivery model for the service. Consultation and engagement with users, non-users and local community groups is integral to this work.</p> <p>This has not been done If so I would like to see evidence of when I or my friends were contacted.</p> | <p>How is it justified to take a well-used community Library that enhances community Life, that is easily accessible for the disabled and parents with prams and pushchairs, that people can easily walk to thereby helping tackle climate change, with beautiful gardens encouraging wildlife that has been a part of the community for over 60 years and is still a busy part of community life be pulled down for a block of flats.</p> <p>From HMRC Website- Councils remain responsible for overseeing the delivery of a 'comprehensive and efficient' library service by listening to and reflecting the changing needs of their communities. Councils have a statutory obligation to provide a library service, The needs assessment should ensure the council has a thorough understanding of the current provision and, critically, local community needs and views. This is to help inform choices about the future strategy and delivery model for the service. Consultation and engagement with users, non-users and local community groups is integral to this work.</p> <p>This has not been done If so I would like to see evidence of when I or my friends were contacted.</p> <p>If you have other plans for Walton and Hersham that will affect the residents. Should the users of the facilities or local residents not be informed? If Friends of Hersham Library hadn't contacted us we would be none the wiser you had plans to demolish Hersham Library 'again' and build a block of flats in its place. Pulling down Hersham Library or any changes like this without informing the local community is not justified or consistent with national policy. It is an underhand way of forcing change that will not be Consult the local communities as to changes that will affect them giving them time to think and question and disagree with the proposals if they feel they need to.</p> | <p>Posting things online is not good enough as residents who struggle with technology or can't afford computers and the internet or are just busy with work will not be logging onto the council website to try to find information that is made difficult to find and object to. The sheer volume of the 140 pages and innumerable repeating questions on 45 questionnaires is enough to deter anyone who has a learning disability this is therefore unfair and underhand.</p> <p>To give people a fair chance to know of changes that will affect them or their community they may or may not agree with not take away well used community resources without true and fair consultation.</p> | | | Yes, I wish to participate at the oral examination | To give people a fair chance to know of changes that will affect them or their community they may or may not agree with not take away well used community resources without true and fair consultation. | <p>Comments noted.</p> <p>The Council has met and exceeded its duty to engage with and consult stakeholders on the preparation and contents of the DELP and has done so in accordance with its <u>Statement of Community Involvement</u> and all relevant planning regulations.</p> <p>The Council utilised a range of advertisement and consultation techniques during the Regulation 18 and 19 stages to reach and engage with the widest possible range of stakeholders. Techniques included online advertisement on the Council's website and social media platforms – Twitter, Facebook, LinkedIn, Instagram and Nextdoor, as well as physical advertisement in a local newspaper – the Surrey Advertiser and posters on the Council's noticeboards located throughout the Borough, including within the Walton and Hersham communities. The DELP was also available to view and read at the Civic Centre and Borough libraries. In addition, over 8,200 individuals were directly contacted via letter or email to inform them of the consultation as they were registered on the Elmbridge planning database.</p> <p>The Council's <u>Regulation 22 Consultation Statement</u> fully details the range of techniques used during the consultation period to contact and engage with stakeholders.</p> <p>The Hersham Library site allocation (H15) includes a community use within the allocation. It is intended that to meet the requirements of the allocation a development scheme would be required to redevelop the library at ground level and include flats above.</p> |

allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmsbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another

and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's

position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality. The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's

existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii). In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council acknowledges that Elmbridge is an expensive borough in which to live, with a high affordability ratio and an acute need for affordable homes. Through the preparation of the draft Local Plan, the Council has explored opportunities for increasing the provision of affordable housing over the plan period through increasing the delivery of market housing. However, the Council reached the decision that the exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not fully evidenced and justified. A decision that took full account of the benefit of delivering a greater number of market homes to enable the Council to deliver a greater proportion of its identified affordable housing need of 269 dwelling per annum (dpa), set out in the Local Housing Need Assessment (2020) (LHNA). Concluding that the benefit of doing so did not outweigh the harm in releasing and developing on the Green Belt. The Council acknowledges that it will not be possible to meet the Borough's affordable housing need in full through the approach set out in the

proposed spatial strategy. However, in light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the Draft Elmbridge Local Plan 2037 is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Moreover, national policy and guidance do not require identified affordable housing need to be met in full ([NPPF paragraph 62](#) and [PPG Housing & Economic Needs Assessment paragraph 024](#)). The Council also has additional models/methods of delivering affordable housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal](#) (SA) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes -

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| | | | | | | | | | | | | | 16,300 homes over the plan period through the release of green belt sites and optimisation of development in existing urban areas (see option 3 of Regulation 18 Options Consultation, 2018). Whilst this option would meet development needs, including the need for affordable housing in full, it would fundamentally alter the character of the Borough's towns and villages through coalescence, urban sprawl and encroachment of new development into the countryside due to the release of Green Belt land necessary to achieve the quantum of development. In addition, this option was found to have the most significant negative impacts of all the options considered by the Council, largely due to the impact of distributing development widely across the Borough. |
| 1109009 | Ian Powell | | No | Please see uploaded document at question 4a | No | Please see uploaded document at question 4a | Please see uploaded document at question 4a | Please see uploaded document at question 4a | Bell Cornwell - Regulation 19 - Representation Letter - Mr Ian Powell.pdf https://consult.elmbridge.gov.uk/consultation/1205954/545596/PDF/-/Bell%20Cornwell%20Regulation%2019%20Representation%20Letter%20Mr%20Ian%20Powell.pdf | It is clear that the Council's aim to meet housing demand through a brownfield first approach, while commendable, is entirely unrealistic and will ultimately lead to a continued shortfall in the supply and delivery of housing. Should the allocated sites within existing areas not achieve their full quantum of development then the Council will fall well short of meeting | No, I do not wish to participate at the oral examination | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELDP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is | |

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| | | | | | | | | | <p>their OAN and will continue to under deliver housing for several years. We have also identified that the Council will fail to meet its target mix for housing as a result of this erroneous spatial strategy. We do not support the inclusion draft allocation of ESH11 – 42 New Road, Esher, KT10 9NU and request that this allocation be formally deleted from the submission version of the Draft Plan.</p> | | <p>set out in the Council's <u>Topic Paper 1: How the spatial strategy was formed?</u> (June, 2022).</p> <p>The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of <u>Topic Paper 1: How the spatial strategy was formed?</u></p> <p>Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.</p> <p>Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would</p> |
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negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

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which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality. The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver

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| 1109343 | Sophie Rae | WSP obo The Julien Family Trust | No | x | No | x | x | x | | | Yes, I wish to participate at the oral examination | x | No comments provided. |
| 1109531 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | Support noted. |
| 1109615 | George Brian Howells | | Yes | | Yes | | | | | | | | Support noted. |
| 1109679 | Judith McGuigan | | Yes | | Yes | The plan sets out the context & why it is needed. I support the rationale behind this plan. | | | | | | | Support for the proposed spatial strategy noted. |
| 1109735 | Pauline Simpson | | Yes | | Yes | | | | | | | | Support noted. |
| 1109814 | Catriona Riddell | | Yes | | Yes | | | | | | | | Support noted. |
| 1110151 | Keith Parker | | No | The diagram depicting how the Plan interacts with other entities, clearly identifies that there is more than one Elmbridge. Surely, this is supposed to be a possessive indication, not possessive for multiple occurrences of Elmbridge. Therefore, the apostrophe needs to be placed before the "S", not after it. | Yes | No, for the reasons identified in my answer to Q1. | | Within the diagram indicating how the Plan fits into other council activities: Elmbridges' needs to be replaced by Elmbridge's | | | No, I do not wish to participate at the oral examination | | Comments noted. This minor grammar correction has been included in the Council's Schedule of Proposed Minor Modifications to the DELP which was included within the set of documents submitted to the Inspector for Examination. |
| 1110205 | Sarah Jones | | Yes | | Yes | | | | | | | | Support noted. |
| 1110294 | Martin Baker | | Yes | | Yes | | | | | | | | Support noted. |
| 1110450 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | Support noted. |
| 1110505 | Simon Cherry | | Yes | | Yes | | | | | | | | Support noted |
| 1110541 | Rodney Whittaker | | Yes | | Yes | Use of 'brownfield' is crucial and smaller builders must be enabled to undertake small developments, with financial assistance being provided where necessary. | | | | | | | Comments and support for the proposed spatial strategy noted. |
| 1110628 | Julian Bishop | | Yes | | Yes | | | | | | | | Support noted. |
| 1110630 | Mike Wheeler | VOX | Yes | Please see uploaded document at question 4a | Yes | Please see uploaded document at question 4a | | | https://consult.elmbridge.gov.uk/gf/2/ti/a/1205954/563732/PDF/-/Regulation%2019%20submission%20-%20July%202022.pdf | FEDORA confirms that it is supportive of the draft LP. We believe it is both legally compliant and substantially sound. 1. Climate change (Principle 1 & CC5) Dealing with the effect of climate change is a laudable | Yes, I wish to participate at the oral examination | | Support and comments noted. 1. Climate change (principle 1 & CC5) The Council's Infrastructure Delivery Plan (May 2022) (IDP) and Update (July 2023) detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the quantum of development proposed in the DELP. The IDP and IDP Update have been informed by the preparation of other evidence base documents e.g., Transport Assessment (2022) and via discussions with infrastructure providers as part of the Council's duty to cooperate activities as outlined in the Council's Duty to Cooperate |

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| | | | | | | | | | <p>component of the vision. But there is an inherent contradiction in the draft LP between Principle 1 and the complete absence of any meaningful strategy to reduce the impact of an inevitable increase in traffic resulting from increased housing. There is substantial reliance in many parts of Elmbridge on motor transport for commuting, shopping, schooling, medical care, and social visits. It is simplistic to assume that this will reduce without profound changes in personal behaviour and significant investment in infrastructure.</p> <p>2. Design codes (Principle 3) Reference is made in the draft LP to future Design codes.</p> | | | <p><u>Statement of Compliance (June 2022), Duty to Cooperate Statement of Compliance Update (August 2023) and Statements of Common Ground published with the Core Documents</u> submitted for Examination.</p> <p>The agreed position with our infrastructure delivery partners is that the proposed development strategy can be accommodated within the borough with the mitigation identified / a policy-led approach.</p> <p>In addition, the DELP includes policies to ensure the infrastructure needed to support the delivery of the aspirations of, and quantum of development proposed, in the DELP is provided.</p> <p>Draft policy INF1 – Infrastructure delivery aims to ensure the required infrastructure needed to accommodate and mitigate the impact of new development in the Borough is delivered in a timely manner, whilst acknowledging that the infrastructure provision with a development must be proportionate to the size of the development.</p> <p>Draft policy CC4 sets out how development must contribute to the delivery of an integrated, accessible and safe sustainable transport network and sets out how development should promote active travel and the use of public transport and support a transition away from reliance on private cars.</p> <p>2. Design codes (principle 3) The Council is currently progressing the production of the Borough's design code. A draft of the design code will be published for a public consultation soon and the Council aims to have the design code adopted in 2024 in advance of the DELP adoption.</p> <p>3. Wisley (principle 4) EBC submitted an objection to the application submitted to Guildford Borough Council (GBC) for development of the Wisley Airfield site (planning application ref.: 2023/0072) due to its significant impact on the</p> |
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| | | | | | | | | | <p>These form an integral component of the draft LP and without either the detail or (at least) a summary of their content, consideration of the soundness of the draft LP is made more difficult. The importance of Design codes is referenced in the Levelling Up and Regeneration Bill.</p> <p>3. Wisley (Principle 4)</p> <p>There is no reference in the draft LP to the effect on Elmbridge (and in particular Cobham) of the plan approved by Guildford BC for the construction of about 2,000 new homes at Wisley airfield. This is a surprising and important omission that causes concern about compliance with the duty to cooperate under the Localism Act. The</p> | | <p>Borough's transport infrastructure.</p> <p>The DELP cannot include a policy on sites or schemes that are within a neighbouring authority's district as Local Plans are not cross-boundary unless a joint Local Plan is developed with the neighbouring authority. However, the potential impacts of proposed development at Wisley Airfield on neighbouring boundaries have been considered in the Council's Transport Assessment (2022) and Infrastructure Delivery Plan (May 2022).</p> <p>In addition, the Council's Duty to Cooperate Statement of Compliance (June 2022), Duty to Cooperate Statement of Compliance Update (August 2023) and Statement of Common Ground with GBC (July 2023) detail the Council's Duty to Cooperate discussions with GBC, including the matter of the Wisley Airfield development.</p> <p>4. Cobham Town Centre</p> <p>The justification to designate Cobham to town centre is included in the Council's Retail Centres Review 2020/21 which was published as part of the Local Plan evidence base.</p> <p>5. Flooding (CC5)</p> <p>A Local Plan role is to look forward and can only influence new development that requires planning permission.</p> <p>Surrey County Council (SCC) as Lead Local Flood Authority (LLFA) is the risk management authority responsible for local flood risk defined as flooding from surface water, groundwater, and ordinary watercourses. Joint working between the Council, the LLFA (SCC) and other relevant stakeholders continues to seek to address such issues outside of the plan making process.</p> <p>6. Trees (ENV 1 and ENV2)</p> <p>Draft policy ENV2 seeks to protect the Borough's existing trees stating that development</p> |
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| | | | | | | | | | <p>size of the development at Wisley airfield will have a substantial impact on Cobham and neighbouring settlements and the draft LP should explain how this will be mitigated.</p> <p>4. Cobham Town Centre (Key Diagram 5) Without explanation, Cobham has been recategorised as a Town Centre rather than a District Centre. This change should be reversed so as not to endanger its existing character. Similarly, the description of Cobham and Oxshott as Urban Areas pre-empts the outcome of local Design Codes and they should be redesignated in accordance with National Design codes.</p> <p>5. Flooding (CC5)</p> | | <p>must protect, conserve and enhance existing landscapes and must not result in the loss of or damage to trees, ancient trees and woodlands.</p> <p>As a local authority, the Council has a statutory duty to consider the protection and planting of trees when granting planning permission for proposed development. Trees are considered as part of the planning process, regardless of whether they are protected (by Tree Preservation Order or Conservation Order) or not. To help protect the Borough's trees and woodland, a felling licence from the Forestry Commission is required to fell most trees. Please see https://www.gov.uk/guidance/tree-felling-licence-when-you-need-to-apply</p> <p>7. Green Belt Comments regarding the assessment of site SA-11 noted. The Council has set out within its Topic Paper 1: How the spatial strategy was formed? (June, 2022) that the Green Belt evidence on the whole undervalues the performance of the Borough's Green Belt sites.</p> <p>SA-11 is not included in the DELP as a site allocation for development. The DELP does not propose any development on Green Belt land.</p> <p>8. Enforcement A specific policy on enforcement within the DELP is not required as the enforcement process is dictated by planning regulations set nationally and national guidance. It is a separate system to the Local Plan making process.</p> <p>9. Site optimisation The proposed spatial strategy is considered to be the best, most sustainable solution to meet the Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. As demonstrated through the evidence base, Duty</p> |
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| | | | | | | | | | <p>This policy addresses new development but does not seek to deal with existing flooding issues caused by the failure to consider the effect on localities of previous inappropriate development. These require a stated commitment in the draft LP for resolution in conjunction with third party providers.</p> <p>6. Trees (ENV 1 and 2) Policies need to be changed to mitigate the serious adverse consequences of wholesale site clearance of sites prior to submitting planning applications. TPO's provide only limited protection (particularly in the absence of enforcement of planning conditions) and the destruction of natural landscapes leaves a stain on the</p> | | <p>to Cooperate activities and Statements of Common Ground, the development strategy can also be accommodated without putting undue pressure on the Borough's infrastructure.</p> <p>In addition, draft policies, such as ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located. An option to meet the Borough's identified housing need in full through intensification of urban areas was considered. However, the Council concluded that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).</p> <p>The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities.</p> <p>It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).</p> <p>10. Affordable Housing</p> |
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| | | | | | | | | | <p>character of an area. Similarly, more effective commitment is needed to identify and protect ancient trees.</p> <p>7. Green Belt (ENV 4) The report prepared by Ove Arup on behalf of EBC contains fundamental errors in its assessment of the performance of Site SA-11 in Oxshott. This report forms part of the evidence base to the draft LP. These errors have been drawn to the attention of EBC by BluWav, a grouping of concerned residents who have submitted a petition with over 2,500 supporters. As the draft LP reiterates protection for Green Belt, we consider that the Ove Arup report is no longer relevant and should be removed from the evidence</p> | | | <p>The methodology for calculating affordable housing contributions is set in national guidance. This is not something the DELP can influence.</p> <p>11. Infrastructure While the preference would be for the infrastructure required to mitigate the impacts of development to be delivered first, this is rarely feasible on the scale of sites proposed in the Borough due to the need for providers to finance and deliver the infrastructure. The infrastructure will likely be delivered alongside new development, or where a site may be larger the development and infrastructure will have a phased delivery plan.</p> <p>As Surrey County Council is the local highway authority in the Borough it is reasonable for the Council's IDP to refer to the contents of their LTP4 which has now been published.</p> |
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base.

8. Enforcement (ENV 9)
The draft LP omits reference to the importance of enforcing planning conditions. Section 59 of the NPPF refers to the importance of effective enforcement in maintaining public confidence. It is admitted by EBC that it neither routinely monitors compliance with planning conditions nor seeks to enforce them. A clear public commitment to effective enforcement should be made in the draft LP.

9. Site optimisation (HOU 2)
It is accepted that higher density housing such as flats and use of infill development should be done in certain defined areas. But the draft LP lacks any commitment

t to protect the character of existing areas. This omission sits at variance with Section 124 (d) of the NPPF which makes clear the desirability of maintaining an area's prevailing character and setting. This is of fundamental concern to residents and the draft LP should explicitly restrict high density schemes to those areas it has defined and permit only progressive densification across the rest of the urban area.

10. Affordable housing (HOU 4)
The provision of affordable housing forms a key part of the draft LP. But performance has historically been poor. In part, this reflects the limited capability to obtain a proper level of

contribution from developers. This is largely due to the use of flawed methodology and the willingness of developers to provide calculations based on misleading information.

11. Infrastructure (INF 1 & INF 3)
The Infrastructure Delivery Plan (published in May 2022) is a very weak document with heavy reliance on LTP 4, a plan that has not yet been produced by Surrey CC. Sections 9 and 10 of the NPPF draw attention to the importance of transport and communication and this is further referenced in the Levelling Up and Regeneration Bill. Inevitably, this means that infrastructure is destined to lag not lead development potentially

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| | | | | | | 11 of the NPPF: Making effective use of land. | | | | | | | |
| 1111035 | A Barry | Molesey Road Land Limited | No | These representations to the Regulation 19 Draft Elmbridge Local Plan 2037 (June 2022) have been prepared by Union4 and are submitted on behalf of Molesey Road Land Limited. The comments and objections made with the aim of helping to achieve a Local Plan that is soundly based, and which meets the needs of the Borough over the Plan Period in a sustainable manner. We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan. Overview – ELP Vision and Key Principles Any objective assessment of the Regulation 19 Draft | No | see comments for question 1 | see comments for question 1 | The Plan should be fundamentally recast to achieve the objectives of sustainable development, meet identified housing need and consider a revised spatial strategy that includes the release of Green Belt land in sustainable locations to meet the needs of the community over the Plan period. | 220728 Representations for Molesey Land.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557508/PDF/-/220728%20Representations%20for%20Molesey%20Land%20Epdf | | Yes, I wish to participate at the oral examination | We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan. | Objection noted. approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's <u>Topic Paper 1: How the spatial strategy was formed?</u> (June, 2022). The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of <u>Topic Paper 1: How the spatial strategy was formed?</u> Like the Secretary of State, the Council attaches great importance to Green Belt. It is |

Elmbridge Local Plan (ELP) must conclude that it clearly and substantially fails the test of soundness. In our view, it is so substantially flawed that it should not progress to Examination without substantial modification. Conspicuous in its absence, is any commitment to seek to meet the needs of community over the Local Plan period. Although the 'Vision' for Elmbridge (page 16) includes a commitment that 'Residents, existing and new, will have the choice of a range of housing types', this statement and the related 'Principle 3' fail to commit to the NPPF requirement of seeking to meet housing need. While the Council are understandably concerned to ensure the protection of the environment of the Borough, they have taken a what is essentially a political decision to oppose the principle of Green Belt release, irrespective of the benefits that a selective and considered approach to such release would bring in terms of the boost to the supply of new homes and a high-quality environment for existing and future residents. The local plan acknowledges (ELP para 2.7) that Elmbridge is one of the most expensive areas in the country to live. It acknowledges that too many young people and families are moving out of the borough to have a realistic prospect of owning or renting their own home. Older residents are

the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place

struggling to affordably downsize in a way that will enable them to continue to live independently or with care packages and remain in their local community. It also acknowledges that this creates problems for the wider economy. The high cost of housing and reliance on people travelling into the borough is also making it difficult for local businesses and services to attract and retain employees. Although the Council prioritises the efficient use of land and optimisation of development, it readily accepts (ELP, para 1.15) that the Plan does not set out to meet needs. Indeed, nowhere does the ELP aspire to do so. The ELP states that they have chosen this approach in response to the need to balance growth with protecting and continuing to conserve and enhance what is important to residents and helps shape communities. It is clear however, that the Council's decision not to meet need is based on an 'in principle' view that all Green Belt should be protected at all costs and an unwillingness to consider the release of any Green Belt land, no matter what the benefits of doing so would achieve. This is evidenced in the withdrawal, prior to committee debate, of a report from the Local Plans Working Group on a Draft Local Plan in 2021 which sought to do exactly that. While National Planning Policy may be in a state of flux in some respects, this is no reason to delay or not to meet identified

that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality. The Council also considers that in order to meet development

needs.
 It is a key requirement that local planning policies should be effective in achieving sustainable development. This means, among other things, meeting the needs of present and future generations. In choosing not to meet these needs in the ELP, the Council fails both present and future generations. The ELP fails the present test of soundness and may be summarised as:

a) Positively prepared – the ELP is not positively prepared. It deliberately sets out a strategy that fails, as a minimum, seek to meet the Borough's objectively assessed needs. Further, it is not informed by any agreements with other authorities (or indeed joint studies or evidence of cross border working) so that unmet need is accommodated where it is practical to do so.

b) Justified – there is a lack of objective evidence to support the Council's decision not to meet housing needs in particular and hence there is no real basis to conclude the ELP sets out an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence;

c) Effective – hence it is clear that the ELP will not be effective in meeting the needs of the community or achieving sustainable development over the plan period, and no evidence that there has been or will be effective joint working on cross-boundary strategic matters that have been dealt with

need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii). In light of the considerations set out above, it is the Council's position that the spatial strategy

rather than deferred;
 d) Consistent with national policy – it is clear that the ELP is inconsistent with the duty to achieve sustainable development enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
 It is clear on the basis of the evidence provided (summarised at ELP para 3.30), that the Council have, in preparing the ELP, failed to deliver on the duty to cooperate with adjoining authorities in meeting housing needs. While the Council have engaged with a wide range of partners as part of their duty to co-operate, there is no real evidence of joint work and no positive outcomes. There is no joint evidence or comparison on constraints and opportunities which are part of a rigorous assessment of alternative strategies and options.

proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council acknowledges that Elmbridge is an expensive borough in which to live, with a high affordability ratio and an acute need for affordable homes. Through the preparation of the draft Local Plan, the Council has explored opportunities for increasing the provision of affordable housing over the plan period through increasing the delivery of market housing. However, the Council reached the decision that the exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not fully evidenced and justified. A decision that took full account of the benefit of delivering a greater number of market homes to enable the Council to deliver a greater proportion of its identified affordable housing need of 269 dwelling per annum (dpa), set out in the Local Housing Need Assessment (2020) (LHNA). Concluding that the benefit of doing so did not outweigh the harm in releasing and developing on the Green Belt.

The Council acknowledges that it will not be possible to meet the Borough's affordable housing need in full through the approach set out in the proposed spatial strategy. However, in light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the Draft Elmbridge Local Plan 2037 is sound and that a strategy that

seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Moreover, national policy and guidance do not require identified affordable housing need to be met in full ([NPPF paragraph 62](#) and [PPG Housing & Economic Needs Assessment paragraph 024](#)). The Council also has additional models/methods of delivering affordable housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal](#) (SA) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes - 16,300 homes over the plan period through the release of green belt sites and optimisation of development in existing urban areas (see option 3 of Regulation 18 Options

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| 1111078 | Sophie Rae | WSP obo The Julien Family Trust | No | Please see uploaded document at question 4a | No | Please see uploaded document at question 4a | <p>Document 6 SGHRA 28.07.22.pdf</p> <p>https://consult.elmbridge.gov.uk/gf/2.ti/a/1205954/557475/PDF/-/Document%20%20SGHRA%2028%2E07%2E22%2Epdf</p> <p>Document 4 - Extract from Inspectors Report.pdf</p> <p>https://consult.elmbridge.gov.uk/gf/2.ti/a/1205954/557476/PDF/-/Document%20%20Extract%20from%20Inspectors%20Report%2Epdf</p> <p>Document 2 - Reps to 2019 Issues and Options Consultation.pdf</p> <p>https://consult.elmbridge.gov.uk/gf/2.ti/a/1205954/557477/PDF/-/Document%20%20Reps%20to%202019%20Issues%20and%20Options%20Consultation%2Epdf</p> <p>Document 3 - Inspectors Decision</p> | The Plan as drafted is unsound. An in-principle prohibition on any GreenBelt release across the Borough ensures that much needed homes for local people will not be delivered. Without adequate justification, this is unsustainable as an approach and is not in accordance with national planning policy. A sensible conversation has to take place to identify suitable sites such as Rodona Road, for Green Belt release so that the housing need can be addressed. | Yes, I wish to participate at the oral examination | Please refer to submitted letter | <p>Objection noted.</p> <p>During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.</p> <p>The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022).</p> <p>The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?</p> <p>Like the Secretary of State, the Council attaches great</p> |
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Document
5 - 9 March
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<https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557479/PDF/-/Document%205%20%2D%209%20March%202020%20letter%2Epdf>

Rodona
Road 29
July 2022
FINAL.pdf

<https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557561/PDF/-/Rodona%20Road%2029%20July%202022%20FINAL%2Epdf>

importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to

the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality.

The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

adequately. In fact, these paragraphs, so early in the LP, confirm that the Council will not meet its housing needs.

step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022).

The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018,

GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmsbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt,

the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality.

The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified

also consider these sections of the Draft Plan to be sound.

alleviation project, the RTS will make a significant contribution to this objective of the Plan, by reducing the risk of flooding for over 11,000 homes and 1,600 businesses across its length. The RTS also acknowledges and is supportive of the other aspects of good growth referenced in this paragraph, such as improvements to health and wellbeing of residents and investment in green and blue infrastructure (bullet points two and three) providing opportunities for tourism, recreation and leisure. The RTS would also create large areas of green open space and improve habitats.
Recommended action: For information only, no action required.

'How are we going to respond to our needs?' (Supporting text paragraph 1.15) Paragraph 1.15 outlines: 'The council, whilst recognising that this efficient use of land will help to respond to demand, it will not meet all of it. The council has chosen this approach in response to the need to balance growth with protecting and continuing to conserve and enhance what is important to our residents and helps shape our places and communities. This includes the Green Belt and our open spaces, as well as safeguarding other areas of recognised importance such as ancient woodland, habitat sites and heritage assets of international and national importance and avoiding areas unsuitable for new development for example, where they are at high risk from flooding.'
The RTS supports this paragraph, however, would like to acknowledge that a flood alleviation scheme by definition needs to be in an area of high flood risk.
Recommended action: For information only, no action required.

2. Vision and Principles

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 | |
|---------|------------------|-----|-----|---|----|--|--------|--------|--------|--------|---|---|----|----|---|---|---|---|
| 1106696 | Siobhan Halliday | | Yes | To reduce reliance on the car, you need to build houses where people have access to public transport and you need to improve cycle lanes etc. | No | I don't think enough thought has been given to how people will travel, get access to GPS and dentists. | | Y | Y | | You are condemning people to live in roads with little access to public transport, which means they will be forced to drive on already over-crowded roads, and this will be very stress everyday. | | | | | | | <p>Comments noted.</p> <p>The Council's Infrastructure Delivery Plan (May 2022) (IDP) and Update (July 2023) detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the quantum of development proposed in the DELP.</p> <p>The IDP and IDP Update have been informed by the preparation of other evidence base documents e.g., Transport Assessment (2022) and via discussions with infrastructure providers as part of the Council's duty to cooperate activities as outlined in the Council's Duty to Cooperate Statement of Compliance (June 2022), Duty to Cooperate Statement of Compliance Update (August 2023) and Statements of Common Ground published with the Core Documents submitted for Examination.</p> <p>The agreed position with our infrastructure delivery partners is that the proposed development strategy can be accommodated within the borough with the mitigation identified / a policy-led approach.</p> <p>In addition, the DELP includes policies to ensure the infrastructure needed to support the delivery of the aspirations of, and quantum of development proposed, in the DELP is provided.</p> <p>Draft policy INF1 – Infrastructure delivery aims to ensure the required infrastructure needed to accommodate and mitigate the impact of new development in the Borough is delivered in a timely manner, whilst acknowledging that the infrastructure provision with a development must be proportionate to the size of the development.</p> |

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| 1107059 | Alan McCann | | Yes | No idea if it is or not | No | Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many. | | | Y | Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many. | | | | | <p>Comments noted.</p> <p>The spatial strategy set out in the DELP aims to balance the often competing and conflicting issue of protecting the environment and address the challenges of climate change, and growth to meet economic, housing and infrastructure needs.</p> <p>The proposed spatial strategy is considered to be the best, most sustainable solution to meet the Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. As demonstrated through the evidence base, Duty to Cooperate activities and Statements of Common Ground, the development strategy can also be accommodated without putting undue pressure on the Borough's infrastructure.</p> <p>In addition, draft policies, such as ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located.</p> <p>An option to meet the Borough's identified housing need in full through intensification of urban areas was considered. However, the Council concluded that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).</p> <p>The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built</p> |
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| | | | | | | | | | | document) imposing this significant inaccuracy is the EBC Green Belt Boundary Review - Supplementary Work, Methodology and Assessment, dated 2018, and drafted by ARUP. | | | | | | | | | | |
| | | | | | | | | | | In addition, the contribution of SA-11 to creating a buffer between the 2 differing settlements Stoke d'Abernon and Oxshott needs to be recognised. The EBCsign marking the border between Stoke d'Abernon and Oxshott is in Blundel Lane, very close to SA-11. The Waverley Road settlement north of SA-11 consists of a range of terraced, semi-detached and detached homes, including formal Council housing. In contrast, the Stoke d'Abernon settlement to the west of SA-11 consists solely of large detached homes (4 and 5 bedroom homes) . In other words, the Stoke d'Abernon settlement on the west boundary of SA-11 is less densely developed than the Oxshott settlement on the north boundary of of SA-11. | | | | | | | | | | |
| | | | | | | | | | | Finally, the stunning landscape of Surrey Hills AONB is visible from the top stories of some of the houses on the western boundary of SA-11, as well as from the ancient Public Footpath in SA-11. | | | | | | | | | | |
| 1107255 | Victor Bradley | | No | I am not legally qualified to confirm this. | No | Under Principle 3 it states: "Improving housing choice and delivering well-designed high-quality homes that we need in a highly sustainable way." There is an implication that 'improving housing choice' could favour smaller dwellings. This may not be consistent with the character of a particular area and may allow unsuitable development (eg back garden development, conversion of larger properties into flats). I suggest the words " Improving housing choice in selected areas....." | Y | Y | | | | | | | | | | | Comments noted. To ensure that a wide choice of high-quality homes can be delivered to provide more opportunities for home ownership and to enable the creation of sustainable, inclusive and mixed communities it is necessary to plan for a mix of housing, including smaller 1 and 2 bed homes, across all settlements of Elmbridge. This approach is in accordance with the requirements of national policy and guidance. | |
| 1107626 | Sara Jamieson | | Yes | | Yes | | | | | | | | | | | | | | Support noted. | |
| 1108284 | Chris Liddiard | | Yes | | Yes | | | | | | | | | | | | | | Support noted. | |
| 1108301 | Gil Bray | | Yes | | Yes | | | | | | | | | | | | | | Support noted. | |
| 1108508 | John Bamford | | Yes | | Yes | The 5 Principles outlined in the Draft Local Plan are completely sound in my opinion. In particular it is essential to deliver housing in a highly sustainable way whilst maintaining strong and thriving communities. | | | | | | | | | | | | | Support noted. | |
| 1108583 | Graham Woolgar | | Yes | | Yes | | | | | | | | | | | | | | Support noted. | |

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| 1108596 | Bhavash Vashi | BVA Planning obo Chalford Property Company Ltd | Yes | | No | We consider that the key challenge facing Elmbridge Borough Council is to achieve sustainable development as made clear by the government in both the NPPF and the Housing White Paper: Fixing our Broken Housing Market. The NPPF states that this can be delivered in three broad roles: economic; social; and environmental which Elmbridge Borough Council have highlighted and sub-divided into more specific and localised challenges. We consider these to be appropriate challenges for Elmbridge Local Plan to address and therefore agree with the Council. However, the Council does not specify which challenge it considers to be most important. We submit that the increased delivery of housing, a fundamental social and economic challenge, should be more encouraged in the Plan given it is the key challenge that shapes all other sectors ie allowing for increased housing numbers means that an enhanced employment growth strategy can be sustained as the increase in employment opportunities needs to be coupled with the provision of a range of good quality housing across the Borough at prices that are affordable, unlike the present situation. This relationship between housing and employment growth is highlighted in the NPPF and more recently, the Housing White Paper as a key inter-related issue. | Y | Y | See above comments under question 2. | We submit that the increased delivery of housing, a fundamental social and economic challenge, should be more encouraged in the Plan given it is the key challenge that shapes all other sectors ie allowing for increased housing numbers means that an enhanced employment growth strategy can be sustained as the increase in employment opportunities needs to be coupled with the provision of a range of good quality housing across the Borough at prices that are affordable, unlike the present situation. | | | No, I do not wish to participate at the oral examination | no | Comments noted. The spatial strategy proposed in the DELP is considered to be the best, most sustainable solution to meet the Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. |
| 1108951 | Moiya Heyburn | | No | You say these are your aims below yet you wish to pull down a well used and loved community library with gardens that attract wildlife, that local schools and people walk to, to build a block of flats. to use Walton library we would have to drive our car, pay exorbitant | No | How is it justified to take a well-used community Library that enhances community Life, that is easily accessible for the disabled and parents with prams and pushchairs, that people can easily walk to thereby helping tackle climate change, with beautiful gardens encouraging wildlife that has been a part of the community for over 60 years and is still a busy part | Y | Y | You State below 2.8 The needs of businesses are also changing, as well as how people shop and spend their leisure time. Our high streets need support to help them adapt to the changing retail market and become distinctive hubs for socialisation, community support, leisure and culture. The Plan seeks to positively respond to these issues and changes whilst protecting and enhancing the qualities and features that not only make Elmbridge a sought-after place to live, work and visit but also sustainable and fit for the future | This plan started on the 17 June with 6 weeks consultation. Local residents have not been informed as to what is happening to/in their community. Without being informed this makes this plan a fait accompli a bit of " Hitch Hikers Guide to the Galaxy" going on here. If you have other plans | | | Yes, I wish to participate at the oral examination | To give people a fair chance to know of changes that will affect them or their community they may or may not agree with not take away well used community resources without true and fair consultation. The sheer volume of the | Objection noted. The Hershams Library site allocation (H15) includes a community use within the allocation. It is intended that to meet the requirements of the allocation a development scheme would be required to redevelop the library at ground level and include flats above. Hence the library use would be retained on the site. In addition, draft policy INF2 – Social and |

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| | | | | treasured by local residents. Our urban open spaces play an important role within our green assets/natural capital and help to shape the character of our communities. However, we must continue to protect and enhance these spaces and work to improve accessibility and strengthen connectivity between them as movement corridors for the benefit of wildlife, climate change mitigation and adaptation as well as for the enjoyment and health and wellbeing of our residents and visitors. | | | | | | | | | | | | |
| 1109210 | Elizabeth Pemberton | | Yes | | Yes | | | | | | | | | | | Support noted. |
| 1109435 | Sophie Rae | WSP obo The Julien Family Trust | No | x | No | x | | | Y | x | | | | Yes, I wish to participate at the oral examination | x | No comments have been provided. |
| 1109532 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | Support noted. |
| 1109683 | Judith McGuigan | | Yes | I strongly support the Spatial Strategy proposed in the Draft Local Plan. I particularly support the Draft Local plan's continued protection of the Green Belt, which is so important for residents' health & wellbeing and for the environment as a whole. I very much agree with the council's justification for continuing to protect our valuable Green Belt. | Yes | I believe the council has a strong justification for continuing to protect our valuable Green Belt, especially with encroaching urbanisation. The Council's 5 principles are to be applauded. | | | | | | | | | | Support noted. |
| 1109770 | Gwen C | | No | It does list principles for planning but so far the observations show that you are only concentrating on principle 3 - | No | It does list principles for planning but so far the observations show that you are only concentrating on principle 3 - creating houses. Have you think about the demand on | | Y | Y | No consideration on the local community needs and the pressure already on facilities and infrastructure. | This is about what you put into consideration when preparing this plan, this is about how to develop the local area to make it a better place to live while encouraging | 9A61BD0E-B03A-43B1-9E77-2DC138C49285.jpeg https://consult.elmbridge.gov.uk/ | No, I do not wish to participate at the oral examination | | | Comments noted. The spatial strategy proposed in the DELP is considered to be the best, most sustainable solution to meet the Borough's need for development and |

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| | | | creating houses. Have you think about the demand on facilities and infrastructure associated with these new dwellings? | facilities and infrastructure associated with these new dwellings? | | | | | economic growth, not just meeting your housing target by swamping any empty land in the area with houses/ flats. | gf2.ti/a/1205954/553034/PJP/-/9A61BD0E%2DB03A%2D43B1%2D9E77%2D2DC138C49285%2Ejpeg | | | additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. The Council's <u>Infrastructure Delivery Plan (May 2022) (IDP) and Update (July 2023)</u> detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the quantum of development proposed in the DELP. The IDP and IDP Update have been informed by the preparation of other evidence base documents e.g., <u>Transport Assessment (2022)</u> and via discussions with infrastructure providers as part of the Council's duty to cooperate activities as outlined in the Council's <u>Duty to Cooperate Statement of Compliance (June 2022)</u> , <u>Duty to Cooperate Statement of Compliance Update (August 2023)</u> and Statements of Common Ground published with the <u>Core Documents</u> submitted for Examination. The agreed position with our infrastructure delivery partners is that the proposed development strategy can be accommodated within the borough with the mitigation identified / a policy-led approach. In addition, the DELP includes policies to ensure the infrastructure needed to support the delivery of the aspirations of, and quantum of development proposed, in the DELP is provided. Draft policy INF1 – Infrastructure delivery aims to ensure the required infrastructure needed to accommodate and mitigate the impact of new development in the Borough is delivered in a timely manner, whilst acknowledging that the infrastructure provision with a development must be proportionate to the size of the development. Draft policy CC4 sets out how development must contribute to the delivery of an integrated, accessible and safe sustainable |
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The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?

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Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmsbridge's existing communities. The borough,

which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

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Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of

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|---------|----------------|---------------------------------|-----|--|-----|--|---|---|---|---|----------------------------------|----------------------------------|---|--|--|----------------------------------|--|
| | | | | | | involved in making meaningful change, delivering high-quality homes for the borough's residents. | | | | | | | | | | | |
| 1111086 | Mike Partridge | | Yes | | Yes | | | | | | | | | | Support noted. | | |
| 1111104 | Sophie Rae | WSP obo The Julien Family Trust | No | Chapter 2: Elmbridge 2037 Para 2.1 sets out the challenges for the Local Plan including delivering more homes and more affordable homes. Para 2.6 recognises that the environment of Elmbridge has evolved around historic estates. We support the LPA's aspiration for good growth and the proposed five Principles, with particular support to Principle 3: Delivering Homes, ensuring high quality, well designed homes to create strong and thriving communities. These principles clearly reflect the wider national agenda to deliver high quality homes and significantly boost the supply of housing. Indeed, the National Planning Policy Framework (NPPF) reinforces the Governments objective to significantly boost the supply of homes in England. As a minimum, the NPPF requires that Local Plans should provide for an area's housing and | No | Chapter 2: Elmbridge 2037 Para 2.1 sets out the challenges for the Local Plan including delivering more homes and more affordable homes. Para 2.6 recognises that the environment of Elmbridge has evolved around historic estates. We support the LPA's aspiration for good growth and the proposed five Principles, with particular support to Principle 3: Delivering Homes, ensuring high quality, well designed homes to create strong and thriving communities. These principles clearly reflect the wider national agenda to deliver high quality homes and significantly boost the supply of housing. Indeed, the National Planning Policy Framework (NPPF) reinforces the Governments objective to significantly boost the supply of homes in England. As a minimum, the NPPF requires that Local Plans should provide for an area's housing and other development needs, as well as any that cannot be met within neighbouring areas, where it is practical to do so and is consistent with achieving sustainable development. In determining the minimum number of homes needed, the plan should be based upon a local housing need assessment. The NPPF requires that this should be "conducted using the standard methodology in national planning guidance" | Y | Y | Y | Y | Please refer to submitted letter | Please refer to submitted letter | Rodona Road 29 July 2022 FINAL.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557564/PDF/-/Rodona%20Road%2029%20July%202022%20FINAL%2Epdf | The Plan as drafted is unsound. An in-principle prohibition on any Green Belt release across the Borough ensures that much needed homes for local people will not be delivered. Without adequate justification, this is unsustainable as an approach and is not in accordance with national planning policy. A sensible conversation has to take place to identify suitable sites such as Rodona Road, for Green Belt release so that the housing need can be addressed. | Yes, I wish to participate at the oral examination | Please refer to submitted letter | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022). The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local |

other development needs, as well as any that cannot be met within neighbouring areas, where it is practical to do so and is consistent with achieving sustainable development. In determining the minimum number of homes needed, the plan should be based upon a local housing need assessment. The NPPF requires that this should be "conducted using the standard methodology in national planning guidance" (paragraph 60). Paragraphs 133, 134, 135, 136, 137, 138 and 139 of the NPPF set out the policies which must be considered in determining whether to modify Green Belt boundaries. Paragraph 136 makes it clear that boundaries can only be altered in exceptional circumstances, through the preparation or review of the Local Plan whilst paragraph 138 sets out the need to promote sustainable patterns of development. Paragraph 139 sets out a range of criteria which must be taken into consideration when defining boundaries, including ensuring consistency with the Local Plan strategy for meeting identified requirements for sustainable development. Elbridge is a

(paragraph 60). Paragraphs 133, 134, 135, 136, 137, 138 and 139 of the NPPF set out the policies which must be considered in determining whether to modify Green Belt boundaries. Paragraph 136 makes it clear that boundaries can only be altered in exceptional circumstances, through the preparation or review of the Local Plan whilst paragraph 138 sets out the need to promote sustainable patterns of development. Paragraph 139 sets out a range of criteria which must be taken into consideration when defining boundaries, including ensuring consistency with the Local Plan strategy for meeting identified requirements for sustainable development. Elbridge is a predominately green borough, and therefore the Local Authority's assessment of available and developable sites is crucial in ensuring a plan which delivers positive 'good growth'. This is explored later within the representation. An overarching aim of the NPPF is to boost housing and ensure a viable and consistent supply of homes. The Elbridge Local Plan fails to achieve this. Elbridge's approach to its Local Plan is far removed from the aspirations of national policy, failing to deliver much needed homes within the Borough when sustainable opportunities exist to do so.

Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the

predominately green borough, and therefore the Local Authority's assessment of available and developable sites is crucial in ensuring a plan which delivers positive 'good growth'. This is explored later within the representation. An overarching aim of the NPPF is to boost housing and ensure a viable and consistent supply of homes. The Elmbridge Local Plan fails to achieve this. Elmbridge's approach to its Local Plan is far removed from the aspirations of national policy, failing to deliver much needed homes within the Borough when sustainable opportunities exist to do so.

borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built

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| 1112000 | Mike Wheeler | VOX | | | <p>1. Climate change (Principle 1 & CC5) Dealing with the effect of climate change is a laudable component of the vision. But there is an inherent contradiction in the draft LP between Principle 1 and the complete absence of any meaningful strategy to reduce the impact of an inevitable increase in traffic resulting from increased housing. There is substantial reliance in many parts of Elmbridge on motor transport for commuting, FEDORA – The Voice for Oxshott CIC shopping, schooling, medical care, and social visits. It is simplistic to assume that this will reduce without profound changes in personal behaviour and significant investment in infrastructure.</p> <p>2. Design codes (Principle 3) Reference is made in the draft LP to future Design codes. These form an integral component of the draft LP and without either the detail or (at least) a summary of their content, consideration of the soundness of the draft LP is made more difficult. The importance of Design codes is referenced in the Levelling Up and Regeneration Bill.</p> <p>3. Wisley (Principle 4) There is no reference in the draft LP to the effect on Elmbridge (and in particular Cobham) of the plan approved by Guildford BC for the construction of about 2,000 new homes at Wisley airfield. This is a surprising and important omission that causes concern about compliance with the duty to cooperate under the Localism Act. The size of the development at Wisley airfield will have a substantial impact on Cobham and neighbouring settlements and the draft LP should explain how this will be mitigated.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | <p>Support and comments noted.</p> <p>1. Climate change (principle 1 & CC5) The Council's <u>Infrastructure Delivery Plan (May 2022)</u> (IDP) and <u>Update (July 2023)</u> detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the quantum of development proposed in the DELP.</p> <p>The IDP and IDP Update have been informed by the preparation of other evidence base documents e.g., <u>Transport Assessment (2022)</u> and via discussions with infrastructure providers as part of the Council's duty to cooperate activities as outlined in the Council's <u>Duty to Cooperate Statement of Compliance (June 2022)</u>, <u>Duty to Cooperate Statement of Compliance Update (August 2023)</u> and Statements of Common Ground published with the <u>Core Documents</u> submitted for Examination.</p> <p>The agreed position with our infrastructure delivery partners is that the proposed development strategy can be accommodated within the borough with the mitigation identified / a policy-led approach.</p> <p>In addition, the DELP includes policies to ensure the infrastructure needed to support the delivery of the aspirations of, and quantum of development proposed, in the DELP is provided.</p> <p>Draft policy INF1 – Infrastructure delivery aims to ensure the required infrastructure needed to accommodate and mitigate the impact of new development in the Borough is delivered in a timely manner, whilst acknowledging that the infrastructure provision with a development must be proportionate to the size of the development.</p> <p>Draft policy CC4 sets out how development must contribute to the delivery of an integrated, accessible and safe sustainable transport network and sets out how development should</p> |
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promote active travel and the use of public transport and support a transition away from reliance on private cars.

2. Design codes (principle 3)

The Council is currently progressing the production of the Borough's design code. A draft of the design code will be published for a public consultation soon and the Council aims to have the design code adopted in 2024 in advance of the DELP adoption.

3. Wisley (principle 4)

EBC submitted an objection to the application submitted to Guildford Borough Council (GBC) for development of the Wisley Airfield site (planning application ref.: 2023/0072) due to its significant impact on the Borough's transport infrastructure.

The DELP cannot include a policy on sites or schemes that are within a neighbouring authority's district as Local Plans are not cross-boundary unless a joint Local Plan is developed with the neighbouring authority. However, the potential impacts of proposed development at Wisley Airfield on neighbouring boundaries have been considered in the Council's [Transport Assessment \(2022\)](#) and [Infrastructure Delivery Plan \(May 2022\)](#).

In addition, the Council's [Duty to Cooperate Statement of Compliance \(June 2022\)](#), [Duty to Cooperate Statement of Compliance Update \(August 2023\)](#) and [Statement of Common Ground with GBC \(July 2023\)](#) detail the Council's Duty to Cooperate discussions with GBC, including the matter of the Wisley Airfield development.

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| 1112465 | Adrian Wise | Cobham Conservation and Heritage Trust | <p>This formal response to the consultation is on behalf of the memberships of the Cobham Conservation and Heritage Trust (the "Trust") as you suggested at the briefing meeting held on 15th July 2022. This response directly represents the c.1200 members of the Trust drawn mainly from the KT11 postcode area of Elmbridge. We have been in communication with other local groups such as the Cobham and Downside Residents Association, the Stoke D'Abernon Residents Association and the Federation of Oxshott Residents Associations and we all share many of the views expressed herein. We fear it may be impertinent and/or prejudicial of the EIP for us to make judgements of the DLP. As such we have not responded directly to the Regulation 19 questionnaire provided, but, as the legislation provides, we give below some comments that may relate to the possible compliance and soundness of the DLP.</p> <p>Please see letter attached.</p> | <p>We wish to emphasise at the outset that the Trust supports the strategies and 'Vision' of the Elmbridge Borough Council (EBC) Draft Local Plan ("DLP"). We must emphasise that it is in the best interests of Elmbridge, EBC and all other stakeholders to see a Local Plan adopted as soon as possible.</p> <p>Overall, we support the DLP as written. We agree with EBC that the borough's objective need for housing over the next 15 years falls well short of the government's algorithmic 9,700 result and that to nonetheless try and meet this number a) would probably fail: the area has never come close to such development volumes, b) would not and could not be supported by our infrastructure or resources like water and roads and c) would require the unacceptable loss of precious green belt, green area and/or historic land.</p> <p>We do have some concerns about some details of the DLP, however. Below we make some comments on these that hopefully will lead to improvements being incorporated into the final submission while perhaps others can lead to final improvements suggested by the Inspector prior to the DLP being passed as sound and then adopted. We have no wish that any of these comments should lead to a rejection of the DLP at the EIP stage.</p> <p>Please see uploaded document at question 4a</p> | | | | | | | | | | | | | | | | | | CCHT REG19.docx https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/566287/DOCX/-/CCHT%20REG19%2Edocx | As per 1a and 2a. | | | | | | | | | | | | | | | | | | | | | | |
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the infrastructure. The infrastructure will likely be delivered alongside new development, or where a site may be larger the development and infrastructure will have a phased delivery plan.

The Council's IDP is part of the evidence base for the DELP. It is intended that the IDP be read alongside the DELP. It is not necessary to refer to the IDP in all policies it is relevant to.

Draft policy HOU4 sets out that contributions towards the provision of affordable housing, either through provision of units of a financial contribution, will be required on all residential proposals on a gross units basis.

Cobham

The justification to designate Cobham to town centre is included in the Council's [Retail Centres Review 2020/21](#) which was published as part of the Local Plan evidence base.

Design Codes

The Council is currently progressing the production of the Borough's design code. A draft of the design code will be published for a public consultation soon and the Council aims to have the design code adopted in 2024 in advance of the DELP adoption.

Housing

Draft policy HOU4(3) sets out that where required, affordable housing should be provided with the mix of tenures identified in the Council's Local Housing Need Assessment (LHNA), including social rented.

HOU1(4) - the Council considers the use of the 'maximise' to be appropriate considering the nature of spatial strategy and the need to make the most of all development opportunities.

HOU2(1) – agreed the Council has included the removal of HOU2(1) in its proposed modifications to the DELP submitted to the Inspector for Examination. Please see main modification ref. M5.1.

HOU2(2a) - - the Council considers the use of the 'maximise' to be appropriate considering the nature of spatial strategy and the need to make the most of all development opportunities.

Flooding

A Local Plan role is to look forward and can only influence new development that requires planning permission.

Surrey County Council (SCC) as Lead Local Flood Authority (LLFA) is the risk management authority responsible for local flood risk defined as flooding from surface water, groundwater, and ordinary watercourses. Joint working between the Council, the LLFA (SCC) and other relevant stakeholders continues to seek to address such issues outside of the plan making process.

Trees

Draft policy ENV2 sets out that the Borough's existing trees stating that development must protect, conserve and enhance existing landscapes and must not result in the loss of or damage to trees, ancient trees and woodlands.

As a local authority, the Council has a statutory duty to consider the protection and planting of trees when granting planning permission for proposed development. Trees are considered as part of the planning process, regardless of whether they are protected (by Tree Preservation Order or Conservation Order) or not. To help protect the Borough's trees and woodland, a felling licence from the Forestry Commission is required to fell most trees.

Please see <https://www.gov.uk/guidance/tree-felling-licence-when-you-need-to-apply>

Green Belt

Comments regarding the Council's Green Belt evidence base noted. The Council has set out within its Topic Paper 1: How the spatial strategy was

of Paragraph 16 of NPPF which sets out that "[Plans should] be prepared positively, in a way that is aspirational but deliverable." In accordance with this, it is imperative that EBC is realistic with what can be delivered through the draft ELP and it's also crucial to be aware of the challenges that often arise from Brownfield development such as viability which can impact main of the goals listed in the vision. It is important to ensure that the principles are balanced appropriately to facilitate sustainable development.

and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a

significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the

pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii). In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

Site allocations
The site allocations include all brownfield sites that are considered achievable in the plan period. The most up to date LAA report provides the evidence for these in terms of suitability, availability and deliverability.

ENV1
Draft policy ENV1 is intended to be a detailed development management policy that will apply to any relevant application. It is not required to allocate land to meet the requirements of the draft policy.

ENV11
Draft policy ENV11 sets out an approach of positive management, stating that "development within Strategic Views will be permitted provided that it has been well designed to take account of the setting, character and amenity value of the view. Proposals must not obscure or adversely affect these views".

Duty to Cooperate

The Council has undertaken active and on-going Duty to Cooperate activities with its partners and statutory consultation bodies in accordance with the requirements of the Duty to Cooperate, including with neighbouring authorities, during the development of the DELP. These activities are detailed in the Council's Duty to Cooperate Statement of Compliance (June 2022), Duty to Cooperate Statement of Compliance Update (August 2023) and Statements of Common Ground published with the Core Documents submitted for Examination. The matter of meeting the Borough's housing need, both within the Borough itself or with assistance from other authorities has been explored. However, this has not been identified as a deliverable option as all neighbouring authorities have confirmed that they cannot assist in meeting some / all of Elmbridge's unmet housing need.

All DtC partners have confirmed that they consider the Council has adequately discharged its duty to co-operate in preparing the plan. As such, the Council considers that it has met its Duty to Cooperate in full and this is detailed within the documents mentioned above.

Promoted Sites

Promoted sites Land at South of Hare Lane, Claygate; Land at Horrington Farm; Land East of Blundel Lane, Oxshott and Land SE of Danes Way, Oxshott have been assessed by the Council and were found to be not suitable for Green Belt release. The assessment is set out in Green Belt Assessment Site Proforma SA-41; SA-23, SA-24, SA-29, and SA-39; SA-11 and SA-14 respectively.

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| 1112923 | Steve Hinsley | Stephen Hinsley Planning obo PA Housing | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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be Principle 1 and should be more strongly worded as follows:
 Principle 1
 Delivering sufficient homes to meet market and affordable housing needs, ensuring housing choice and well-designed homes are delivered.
 Principle 2: We say that to achieve the Overarching Policy Aim and Principle 1 will require the release of Green Belt. A Green Belt Review should be undertaken so that GB land which is not constrained by other environmental designations, and which does not perform well against the reasons for inclusion as GB can be released for housing. Thus, the second bullet of Principle 2 should only apply to GB land remaining after sufficient land has been removed and allocated for housing, following a review.

Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns

from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#).

Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality. The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and

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| | | | | | <p>to reduce carbon dioxide emissions, minimise energy use; improve air quality and protect and enhance our natural environment. To improve the borough's resilience to climate change.' The RTS welcomes and supports this principle. We recommend that this principle includes 'to reduce flood risk' after 'the effects of climate change'. This is because it is likely that flood risk will increase with the effects of climate change.</p> <p>Recommended action: The wording could be updated to the following: 'To adapt to, and mitigate, the effects of climate change (including reducing flood risk); to reduce carbon dioxide emissions, minimise energy use; improve air quality and protect and enhance our natural environment. To improve the borough's resilience to climate change'</p> | | | | | | | | | | |
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3. Spatial Strategy and Delivery

SS1: Responding to the Climate Emergency

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 | |
|---------|-------------|-----|-----|-------------------------|----|---|--------|--------|--------|--------|----|---|----|----|---|---|---|---|
| 1107061 | Alan McCann | | Yes | No idea if it is or not | No | Too much pandering to the environmental lobby. Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many. | | | Y | | | | | | | | | <p>Comments noted.</p> <p>The spatial strategy set out in the DELP aims to balance the often competing and conflicting issue of protecting the environment and address the challenges of climate change, and growth to meet economic, housing and infrastructure needs.</p> <p>The proposed spatial strategy is considered to be the best, most sustainable solution to meet the Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. As demonstrated through the evidence base, Duty to Cooperate activities and Statements of Common Ground, the development strategy can also be accommodated without putting undue pressure on the Borough's infrastructure.</p> <p>In addition, draft policies, such as</p> |

ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located.

An option to meet the Borough's identified housing need in full through intensification of urban areas was considered. However, the Council concluded that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact

on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities.

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

The allocation of the quantum of development for each settlement area set out in strategic policy SS3 has been driven by the principle of sustainable development, again in accordance with national policy. The Plan seeks to make as much use as possible of existing suitable brownfield sites, including all

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| | | | | | meeting development needs. | | | | | | | | | | |
| 1110197 | Martin Brett | | Yes | | Yes | | | | | | | | | | Support noted. |
| 1110296 | Martin Baker | | Yes | | Yes | | | | | | | | | | Support noted. |
| 1110408 | Katharine Maclean | | Yes | | No | | | | | SS1 1c) I would amend the sentence to read 'providing more SECURE walkable and cyclable neighbourhoods that reduce the demand for private vehicles' Better (possibly low level bollard) lighting is needed for paths, improved vegetation clearance on all streets (including overhanging from gardens) and improved monitored cycle storage is needed if we want to encourage people to use these methods. SS1 2a) To support principle 1 and 2, I would suggest an article 4 directive removing any PD rights to pave front gardens with impermeable paving. This would need to be supported with a publicity campaign and updates to local paving firms. This would prevent flash floods caused by rapid run off, and also ensure protection of biodiversity. Permeable drives would be encouraged. SS12) b) we should encourage the use of drought resistant planting here, and reduction in hard (non permeable) paving which contributes so much to solar glare and over/heating | | | No, I do not wish to participate at the oral examination | | SS1(1c) – Draft policy CC4 sets out how development must contribute to the delivery of an integrated, accessible and safe sustainable transport network. SS1(2a) and SS1(2b) – The Council's forthcoming Design Code will include detailed guidance on enhancing the public realm, street greening and cycle parking. Detail on permeable paving and draught resistant plants would be included in the Climate Change and Renewable SPD. Planning permission is required for non-permeable drives so there is no need for an article 4 direction. |
| 1110688 | Malcolm Clements | | Yes | | Yes | | | | | | | | | | Support noted. |
| 1110712 | John Bamford | | Yes | | Yes | In my opinion the Draft Local Plan gets the right balance between growth and protection of Green Belt, open spaces, ancient woodland and heritage assets. It will retain the underlying character of an area and lead to sustainable places where people will want to live whilst at the same time taking into account measures to minimise climate change. The Plan makes best use of existing developed land in places that are or can | | | | | | | | | Support noted. |

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|---------|-----------------|---------------------|-----|--|-----|--|---|---|---|---|---|--|--|--|--|---|---|
| | | | | | | readily be well served by suitable facilities and infrastructure and avoids overdevelopment and prevents neighbouring towns from merging with one another. The Plan identifies a proportionate level of development for each settlement which fairly corresponds with its existing size and sustainability and will deliver the type of homes needed in the most suitable and sustainable locations. Green Belt defines the character of Claygate where I live as well as playing an important part of other areas in Elmbridge and the Council's evidence database demonstrates that the exceptional circumstances necessary to enable the release of Green Belt has not been demonstrated. The Plan provides an appropriate approach to achieve sustainable development that is consistent with national policy. | | | | | | | | | | | |
| 1110770 | David Jardine | | Yes | Good to see re-purposing of existing buildings | Yes | Some good ideas | | | | | | | | | | Support noted. | |
| 1110872 | Adrian Dilworth | Health at hand | Yes | | Yes | currently there is very little light and carbon emission pollution in and around Telegraph Hill. The suggestion to build 60 units on the green belt will not only affect the pollution levels, it will increase the risk of flooding. Infrastructure needed to service these units will be vastly detrimental to the aspect of the greenbelt. | | | | | | | | | | The DELP does not propose the release of or development on any Green Belt land. | |
| 1110974 | Andrew Munton | Reside Developments | No | | No | We are extremely disappointed and concerned with this Reg 19 local plan, which fails the most vulnerable people in the borough. This plan fails to deliver even its minimum OAN of 9,615 homes year, only providing 6,985 homes, which is 73% of its minimum need. In other words, over 25% of the population needing new homes in Elmbridge is being left without homes. In addition, the council is already failing its | Y | Y | Y | Y | We are extremely disappointed and concerned with this Reg 19 local plan, which fails the most vulnerable people in the borough. This plan fails to deliver even its minimum OAN of 9,615 homes year, only providing 6,985 homes, which is 73% of its minimum need. In other words, over 25% of the population needing new homes in Elmbridge is being left without homes. In addition, the council is already failing its | The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and | | | Yes, I wish to participate at the oral examination | These matters can only be fully explored in person, where our concerns are fully tested against the council's position. | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing |

electorate, where it cannot demonstrate a 5-year supply of housing land (published at 3.96 over a year ago) and has failed the Housing Delivery Test reaching only a meagre 58% and is therefore in a position where the Presumption of sustainable development is engaged. The reason for not meeting the OAN in the revised local plan is cited as being to protect the green belt and to build only building on brownfield land. However, the green belt is not an environmental designation, and the green belt's fundamental aim to prevent urban sprawl (NPPF). However, there is not an embargo on releasing and building on green belt land, where there are exceptional circumstances. In fact it has already helped by steering development to the existing brownfield sites. However, these seem to have been exhausted, otherwise one assumes more brownfield sites would have been included to the meet the OAN. Para 141 of the NPPF specifically points to using brownfield first, but then, once exhausted, there being exceptional circumstances for green belt land release. Not providing sufficient housing to meet its needs and the extremely high affordability ratios are clear exceptional circumstances for releasing green belt land for new homes. This has been tested at many EiPs up and down the country, including locally at neighbouring Guildford, Waverley and Woking to name but a few. To release no green belt land and fail to meet the OAN renders the plan unsound. It has clearly therefore not been Positively Prepared and the choice to not release any green belt land is not Justified. Furthermore, the plan cannot be considered to be Effective, where it is not providing for over 25% of its housing need, and is

meeting the OAN in the revised local plan is cited as being to protect the green belt and to build only building on brownfield land. However, the green belt is not an environmental designation, and the green belt's fundamental aim to prevent urban sprawl (NPPF). However, there is not an embargo on releasing and building on green belt land, where there are exceptional circumstances. In fact it has already helped by steering development to the existing brownfield sites. However, these seem to have been exhausted, otherwise one assumes more brownfield sites would have been included to the meet the OAN. Para 141 of the NPPF specifically points to using brownfield first, but then, once exhausted, there being exceptional circumstances for green belt land release. Not providing sufficient housing to meet its needs and the extremely high affordability ratios are clear exceptional circumstances for releasing green belt land for new homes. This has been tested at many EiPs up and down the country, including locally at neighbouring Guildford, Waverley and Woking to name but a few. To release no green belt land and fail to meet the OAN renders the plan unsound. It has clearly therefore not been Positively Prepared and the choice to not release any green belt land is not Justified. Furthermore, the plan cannot be considered to be Effective, where it is not providing for over 25% of its housing need, and is not Consistent with national policy, which requires councils to meet its OAN. The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective. Since the Reg 18 document, nothing in green belt policy has changed and there are therefore no reasons for the council's retrograde step in its strategy to exclude any green belt land release. This is a political decision, not a planning policy decision. As well as not delivering market housing, this will also have a knock-on effect of delivering much needed affordable housing. In 2019, the council's HHRSS paper report that there were 1,801 applications on its waiting list. In 2019, the same HHRSS report stated that the council has the second highest ratio of house prices to income in the South East at 15.08 (2017). This gap has been widening considerably, where the ratio was 9.65 in 2003. Not only does this point to the need for more housing and meeting the OAN (this would also add to the exceptional

Effective. In addition, the full OAN needs to be met as a minimum.

need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.

The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's [Topic Paper 1: How the spatial strategy was formed?](#) (June, 2022).

The Council reached the conclusion that the necessary exceptional circumstances required to amend

not Consistent with national policy, which requires councils to meet its OAN. The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective. Since the Reg 18 document, nothing in green belt policy has changed and there are therefore no reasons for the council's retrograde step in its strategy to exclude any green belt land release. This is a political decision, not a planning policy decision. As well as not delivering market housing, this will also have a knock-on effect of delivering much needed affordable housing. In 2019, the council's HHRSS paper report that there were 1,801 applications on its waiting list. In 2019, the same HHRSS report stated that the council has the second highest ratio of house prices to income in the South East at 15.08 (2017). This gap has been widening considerably, where the ratio was 9.65 in 2003. Not only does this point to the need for more housing and meeting the OAN (this would also add to the exceptional circumstances for releasing green belt land for housing), but it also points to needing to deliver more than the OAN. This means that the failing to deliver the OAN is even worse than not providing 27% of the need, as more is needed in Elmbridge. This clearly points at the plan being Ineffective, not Positively prepared of Justified and

circumstances for releasing green belt land for housing), but it also points to needing to deliver more than the OAN. This means that the failing to deliver the OAN is even worse than not providing 27% of the need, as more is needed in Elmbridge. This clearly points at the plan being Ineffective, not Positively prepared of Justified and not Consistent with national policy.

the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's

not Consistent with national policy.

assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is

generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that

paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the

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| 1111101 | Sophie Rae | WSP on behalf of The Julien Family Trust | No | Please see uploaded document at question 4a | No | Policy SS1 seeks to ensure development responds to the climate emergency. As a key aspect of this policy, parts (b) and (d) seek to ensure efficient use of land especially on the most accessible sites, along with optimisation of layout and design to reduce energy consumption. The 'brownfield' approach of the Council renders this Policy unsound, in that it has failed to take into account sites within the Green Belt which could deliver new homes in a sustainable manner that are in accessible locations and will not undermine the purposes of including land in the Green Belt. | Y | Y | Y | Y | Please see uploaded document at question 4a | Please see uploaded document at question 4a | Rodona Road 29 July 2022 FINAL.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557559/PDF/-/Rodona%20Road%2029%20July%202022%20FINAL%20Epdf | The Plan as drafted is unsound. An in-principle prohibition on any Green Belt release across the Borough ensures that much needed homes for local people will not be delivered. Without adequate justification, this is unsustainable as an approach and is not in accordance with national planning policy. A sensible conversation has to take place to identify suitable sites such as Rodona Road, for Green Belt release so that the housing need can be addressed. | Yes, I wish to participate at the oral examination | Please refer to submitted letter | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; |
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The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?

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demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued subdivision of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially

transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

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It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities

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| 1112926 | Steve Hinsley | Stephen Hinsley Planning on behalf of PA Housing | | | <p>Spatial Strategy and Delivery</p> <p>Para. 3.1 The previous LP failed to deliver sufficient sustainable development to meet needs.</p> <p>Para. 3.4 This is not true: the scale of growth has not been informed by a proper "balancing" of social, economic, and environmental positive and negative effects. "Responding to the climate emergency" does not mean that needs should not be met; it means that development needs must be met in a way which minimises harm by minimising carbon emissions, mitigating and adapting to the impacts of climate change and promoting renewable and low carbon energy schemes.</p> <p>There is no reason why releasing Green Belt land to meet development needs should conflict with the above.</p> <p>Policy SS1 This is not a Spatial Strategy policy.</p> | | | | | | | | | | | | | | | | | <p>Comments noted.</p> <p>During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.</p> <p>The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context;</p> |
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| | | | | | | | | | | | | | | | | | | | | | existing sites and a criteria based development management policy to guide decision making on any application for additional pitches that come forward over the plan period. This approach is set out in draft policy HOU7. As set out in the Council's Gypsies and Traveller Site Assessment (2022) , this proposed alternative approach will be kept under review to ensure it is effective in meeting the identified needs of gypsies and travellers over the plan period. |
| 1111075 | Zoe Chick | Surrey County Council | Yes | The RTS does not consider, for the sections we have made representations on, that there is anything that is not legally compliant. We also consider these sections of the Draft Plan to be sound. | Yes | The RTS supports this policy, particularly part '2. Mitigating and adapting to the impacts of climate change: a) Conserving water resources and minimising vulnerability to flooding.' Recommended action: For information only, no action required. Policy SS1 – Responding to the climate emergency (Supporting text paragraph 3.9) Paragraph 3.9 states, 'Some of the necessary actions for tackling climate change, such as improving energy efficiency and the provision of green and blue infrastructure, could also have direct benefits for biodiversity and residents, businesses and visitors by reducing energy bills and providing a higher quality environment.' Whilst we agree with this statement, we would suggest the addition of wording to cover flood risk mitigation and climate resilience be added to this paragraph to support earlier sections and paragraphs of the Draft Plan. Recommend action: The | | | | | | | | | | | | | | | Comments noted. The suggested amendments to para. 3.9 are agreed. This is included within the Council's proposed modifications to the DELP submitted to the Inspector for Examination. Please see minor modification MM3.3. |

SS2: Sustainable Place Making

| ID | N | Org | 1 | 1a | 2 | 2a | 3 | 3 | 3 | 3 | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
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| 1108046 | Sally Hunt | | Yes | | No | I have reservations about development in brown belt land being pushed through and over developed come what may because of the pressure not to use green belt and our housing shortfall. Any development on brown belt should be adaptable and resilient to any climate issues such as flooding and not exacerbate these issues elsewhere it should also protect the amenities of local residents and not block light, enclose or impact on privacy | Y | | | | | To protect the identified sites of brown belt land from being over developed in order to ease pressure and protect amenities environment and residents. Sympathetic redevelopment in keeping with the locality is paramount | | | No, I do not wish to participate at the oral examination | | <p>Comments noted.</p> <p>The proposed spatial strategy is considered to be the best, most sustainable solution to meet the Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. As demonstrated through the evidence base, Duty to Cooperate activities and Statements of Common Ground, the development strategy can also be accommodated without putting undue pressure on the Borough's infrastructure.</p> <p>In addition, draft policies, such as ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located.</p> <p>An option to meet the Borough's identified housing need in full through intensification of urban areas was considered. However, the Council concluded that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).</p> |

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The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets

Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into

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In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process,

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| | | | | <p>"sound" a positive spatial strategy would consider bringing forward new highly sustainable site allocations at Stoke Hill, Cobham and Manor Park, Claygate as larger development sites that can be repurposed and released from the Green Belt to enable the comprehensive delivery of new and affordable housing and essential social and physical infrastructure. This would be justified as exceptional circumstances in accordance with the NPPF.</p> | <p>released from the Green Belt to enable the comprehensive delivery of new and affordable housing and essential social and physical infrastructure. This would be justified as exceptional circumstances in accordance with the NPPF.</p> | <p>bedroom smaller homes as required by the housing needs assessment), affordable housing and important essential social and physical infrastructure such as new schools and healthcare services.</p> <p>No agreement has been reached with neighbouring authorities to help provide for the housing needs of the borough and therefore the authority does not meet another fundamental test of soundness as it has also failed in its duty to cooperate.</p> <p>The draft Local Plan in policy SS3 fails in its requirement to meet its objectively assessed housing need calculated using the standard method. The plan explains in paragraph 3.19, that: "Using 2022 as the base year for calculation, the housing need for the borough equates to 647 dwellings per annum and over the plan period 9,705 homes." Policy SS3 (1)(a) explains that the Plan will make provision for 6,785 net additional homes with at least 30% to be affordable new homes. This represents a shortfall of 2,790 homes (or 30% of the objectively assessed housing needs using the standard method).</p> | <p>be repurposed and released from the Green Belt to enable the comprehensive delivery of new and affordable housing and essential social and physical infrastructure. This would be justified as exceptional circumstances in accordance with the NPPF.</p> | | | | <p>approach to delivery by only promoting a range of new small housing sites or redevelopment of existing retail or employment land (that is unlikely to come forward). The spatial strategy is fundamentally flawed and will not be able to deliver the required mix of housing typologies (such as 1, 2 and 3 bedroom smaller homes as required by the housing needs assessment), affordable housing and important essential social and physical infrastructure such as new schools and healthcare services.</p> | <p>meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.</p> <p>The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022).</p> <p>The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of</p> |
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of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#).

Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality. The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As

such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

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In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing

boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council acknowledges that Elmbridge is an expensive borough in which to live, with a high affordability ratio and an acute need for affordable homes. Through the preparation of the draft Local Plan, the Council has explored opportunities for increasing the provision of affordable housing over the plan period through increasing the delivery of market housing. However, the Council reached the decision that the exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not fully evidenced and justified. A decision that took full account of the benefit of delivering a greater number of market homes to enable to the Council to deliver a greater proportion of its identified affordable housing need of 269 dwelling per annum (dpa), set out in the Local Housing Need Assessment (2020) (LHNA). Concluding that the benefit of doing so did not outweigh the harm in releasing and developing on the Green Belt.

The Council acknowledges that it will

the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal](#) (SA) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes - 16,300 homes over the plan period through the release of green belt sites and optimisation of development in existing urban areas (see option 3 of Regulation 18 Options Consultation, 2018). Whilst this option would meet development needs, including the need for affordable housing in full, it would fundamentally alter the character of the Borough's towns and villages through coalescence, urban sprawl and encroachment of new development into the countryside due to the release of Green Belt land necessary to achieve the quantum of development. In addition, this option was found to have the most significant negative impacts of all the options considered by the Council, largely due to the impact of distributing development widely across the Borough.

The Council has undertaken active and on-going Duty to Cooperate activities with its partners and statutory consultation bodies in accordance with the requirements of the Duty to Cooperate, including with neighbouring authorities,

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| | | | <p>generations to meet their own needs. As such, it does not comply with the legal requirement (Planning and Compulsory Purchase Act 2004, s39) on the Council to exercise its planning functions with the objective of contributing to the achievement of sustainable development. In failing to seek to meet the need for new homes over the plan period, the ELP fails to meet the needs of the present generation and substantially compromises the ability of future generations to meet their needs. It increases and perpetuates the growing disparity between need and supply, between those that have access to housing and those that don't. The explanation (at ELP para 3.13 and 3.17) falls short of an explanation for the departure from national policy and the legal commitment set by the Act to seek to deliver sustainable development. this by definition means meeting the needs of the present. The evidence base supporting the ELP falls far short of the threshold required if these needs are not to be met, set out in</p> | <p>statement and the related 'Principle 3' fail to commit to the NPPF requirement of seeking to meet housing need. While the Council are understandably concerned to ensure the protection of the environment of the Borough, they have taken a what is essentially a political decision to oppose the principle of Green Belt release, irrespective of the benefits that a selective and considered approach to such release would bring in terms of the boost to the supply of new homes and a high-quality environment for existing and future residents. The local plan acknowledges (ELP para 2.7) that Elmbridge is one of the most expensive areas in the country to live. It acknowledges that too many young people and families are moving out of the borough to have a realistic prospect of owning or renting their own home. Older residents are struggling to affordably downsize in a way that will enable them to continue to live independently or with care packages and remain in their local community. It also acknowledges that this creates problems for the wider economy. The high cost of housing and reliance on people travelling into the borough is also making it difficult for local businesses and services to attract and retain employees. Although the Council prioritises the efficient use of land and optimisation of development, it readily accepts (ELP, para 1.15) that the Plan does not set out to meet needs. Indeed, nowhere does the ELP aspire to do so. The ELP states that they</p> | | | | | <p>Compulsory Purchase Act 2004, s39) on the Council to exercise its planning functions with the objective of contributing to the achievement of sustainable development.</p> | | <p>duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022).</p> <p>The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?</p> <p>Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in</p> |
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with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process,

which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council acknowledges that Elmbridge is an expensive borough in which to live, with a high affordability ratio and an acute need for affordable homes. Through the preparation of the draft Local Plan, the Council has explored opportunities for increasing the provision of affordable housing over the plan period through increasing the delivery of market housing. However, the Council reached the decision that the exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not fully evidenced and justified. A decision that took full account of the benefit of delivering a greater number of market homes to enable the Council to deliver a greater proportion of its identified affordable housing need of 269 dwelling per annum (dpa), set out in the Local Housing Need Assessment (2020) (LHNA). Concluding that the benefit of doing so did not outweigh the harm in releasing and developing on the Green Belt.

The Council acknowledges that it will not be possible to meet the Borough's affordable housing need in full through the approach set out in the proposed spatial strategy. However, in light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the Draft Elmbridge Local Plan 2037 is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban

areas is a true reflection of the communities' aspirations for the Borough.

Moreover, national policy and guidance do not require identified affordable housing need to be met in full ([NPPF paragraph 62](#) and [PPG Housing & Economic Needs Assessment paragraph 024](#)). The Council also has additional models/methods of delivering affordable housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal](#)

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| | | | | <p>paragraph 11 of the NPPF. As set out in paragraph 7 of the NPPF, this means meeting the needs of the present generation without compromising the ability of future generations to meet their own needs. As such, it does not comply with the legal requirement (Planning and Compulsory Purchase Act 2004, s39) on the Council to exercise its planning functions with the objective of contributing to the achievement of sustainable development. In failing to seek to meet the need for new homes over the plan period, the ELP fails to meet the needs of the present generation and substantially compromises the ability of future generations to meet their needs. It increases and perpetuates the growing disparity between need and supply, between those that have access to housing and those that don't. The explanation (at ELP para 3.13 and 3.17) falls short of an explanation for the departure from national policy and the legal commitment set by the Act to seek to deliver sustainable</p> | | | | | <p>meeting the needs of the present generation without compromising the ability of future generations to meet their own needs.</p> <p>As such, it does not comply with the legal requirement (Planning and Compulsory Purchase Act 2004, s39) on the Council to exercise its planning functions with the objective of contributing to the achievement of sustainable development.</p> | | <p>and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.</p> | <p>areas alongside the release of land from the Green Belt.</p> <p>The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022).</p> <p>The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?</p> <p>Like the Secretary of State, the Council</p> |
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development. this by definition means meeting the needs of the present. The evidence base supporting the ELP falls far short of the threshold required if these needs are not to be met, set out in para 11 part (b) of the NPPF. While the adjoining authorities within Surrey, which are of a similar character and situation, have all tackled the hard decisions necessary in meeting housing and other needs while reconciling this with the objectives of Green Belt policy and other recognised constraints, the Council in this case have taken an in-principle judgement that such constraints provide a de facto rationale for not meeting housing and other needs. This does not meet the requirement of the NPPF to meet need unless i) the application of policies in the Framework that protect areas or assets of particular importance provide a strong reason for restricting the overall scale, type or distribution of development in the area; or ii) the adverse impacts of doing so would significantly and

attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly

demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council acknowledges that Elmbridge is an expensive borough in which to live, with a high affordability ratio and an acute need for affordable homes. Through the preparation of the draft Local Plan, the Council has explored opportunities for increasing the provision of affordable housing over the plan period through increasing the delivery of market housing. However, the Council reached the decision that the exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not fully evidenced and justified. A decision that took full account of the benefit of delivering a greater number of market homes to enable the Council to deliver a greater proportion of its identified affordable housing need of 269 dwelling per annum (dpa), set out in the Local Housing Need Assessment (2020) (LHNA). Concluding that the benefit of doing so did not outweigh the harm in releasing and developing on the Green Belt.

The Council acknowledges that it will not be possible to meet the Borough's affordable housing need in full through the approach set out in the proposed spatial strategy. However, in light of the considerations set

out above, it is the Council's position that the spatial strategy proposed in the Draft Elmbridge Local Plan 2037 is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Moreover, national policy and guidance do not require identified affordable housing need to be met in full ([NPPF paragraph 62](#) and [PPG Housing & Economic Needs Assessment paragraph 024](#)). The Council also has additional models/methods of delivering affordable housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development

that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal](#) (SA) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes - 16,300 homes over the plan period through the release of green belt sites and optimisation of development in existing urban areas (see option 3 of Regulation 18 Options Consultation, 2018). Whilst this option would meet development needs, including the need for affordable housing in full, it would fundamentally alter the character of the Borough's towns and villages through coalescence, urban sprawl and encroachment of new development into the countryside due to the release of Green Belt land necessary to achieve the quantum of development. In addition, this option was found to have the most significant negative impacts of all the options considered by the Council, largely due to the impact of distributing development widely across the Borough.

The Council has assessed the suitability of the promoted site – Land East of Molesey Road for release from the Green Belt designation and it was found that the site was not suitable for release. The assessment is set out in Green Belt Site Assessment Proforma SA-72.

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| 1112925 | Miss Beckett | Savills (obo Crown Estate) | | No | Policy SS2: Sustainable place-making – TCE do not object to the principles of this policy, however they question if EBC should be considering how the objectives under this policy can be achieved and delivered, in the context of the requirement for a positively prepared plan – i.e. by allocating land to deliver these principles. | Y | Y | | Draft Policy SS2: Sustainable place-making – Object The draft policy is ineffective and not positively prepared. TCE do not object to the principles of this draft policy, however, they question if EBC should be considering how the objectives under this policy can be achieved, in the context of an overall requirement for a positively prepared plan. For example, it would be best practice if the plan were to assert how it intended to meet its policy requirements, by allocating a sufficient range of land to deliver these principles, justified by evidence of delivery. National policy also requires that the function of a local plan is not solely to make housing allocations. Where the plan has focused on a Brownfield approach, this will mean that the majority of these sites will not have the space or capacity to deliver green infrastructure, increasing the need for wider networks of greenspaces. In addition a Brownfield only approach, risks an unbalanced spatial strategy, reliant on narrow development typologies, for example, higher density Brownfield development would focus on smaller dwelling types, and is typically, owing to existing land values, unable to provide as much affordable housing as Greenfield sites. TCE has further comments on affordable housing delivery, noted in the comments on the site allocations below. It should also be noted that there are opportunities to strengthen and reinforce Green Belt boundaries through appropriate Green Infrastructure enhancements, incorporating landscaping and buffers which can be secured in perpetuity, at the edge of any sustainable urban extensions or modest settlement extensions. TCE pose that a change is made to the draft ELP allocating a better range of suitable land to meet its policy requirements of including green and blue infrastructure, enhanced sustainable transport routes (walking and cycling), enhancing biodiversity and encouraging sustainability. All delivered via the value released from proportionate development. TCE wish for it to be noted that they have land available to assist with the principles noted in this draft policy should it be required. | | 220729 The Crown Estate EBC Reg 19 Local Plan Representation FINAL.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/569686/PDF/-/220729%20The%20Crown%20Estate%20EBC%20Reg%2019%20Local%20Plan%20Representation%20FINAL%20Epdf | As per 2a. | | Objection noted. SS2 and SS3, HOU1 and Site Allocations During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022). The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong |
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reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#).

Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality.

The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of

housing need of 269 dwelling per annum (dpa), set out in the Local Housing Need Assessment (2020) (LHNA). Concluding that the benefit of doing so did not outweigh the harm in releasing and developing on the Green Belt.

The Council acknowledges that it will not be possible to meet the Borough's affordable housing need in full through the approach set out in the proposed spatial strategy. However, in light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the Draft Elmbridge Local Plan 2037 is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Moreover, national policy and guidance do not require identified affordable housing need to be met in full ([NPPF paragraph 62](#) and [PPG Housing & Economic Needs Assessment paragraph 024](#)). The Council also has additional models/methods of delivering affordable housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant

schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal \(SA\)](#) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes - 16,300 homes over the plan period through the release of green belt sites and optimisation of development in existing urban areas (see option 3 of Regulation 18 Options Consultation, 2018). Whilst this option would meet development needs, including the need for affordable housing in full, it would fundamentally alter the character of the Borough's towns and villages through coalescence, urban sprawl and encroachment of new development into the countryside due to the release of Green Belt land necessary to achieve the quantum of development. In addition, this option was found to have the most significant negative impacts of all the options considered by the Council, largely due to the impact of distributing development widely across the Borough.

Site allocations
The site allocations include all brownfield sites that are considered achievable in the plan period. The most up to date LAA report provides the evidence for these in terms of suitability, availability and deliverability.

ENV1
Draft policy ENV1 is intended to be a detailed development management policy that will apply to any relevant application. It is not required to allocate land to meet the requirements of the draft policy.

ENV11
Draft policy ENV11 sets out an approach of positive management, stating that “development within Strategic Views will be permitted provided that it has been well designed to take account of the setting, character and amenity value of the view. Proposals must not obscure or adversely affect these views”.

Duty to Cooperate
The Council has undertaken active and on-going Duty to Cooperate activities with its partners and statutory consultation bodies in accordance with the requirements of the Duty to Cooperate, including with neighbouring authorities, during the development of the DELP. These activities are detailed in the Council's [Duty to Cooperate Statement of Compliance \(June 2022\)](#), [Duty to Cooperate Statement of Compliance Update \(August 2023\)](#) and Statements of Common Ground published with the [Core Documents](#) submitted for Examination. The matter of meeting the Borough's housing need, both within the Borough itself or with assistance from other authorities has been

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| 1111075 | Zoe Chick | Surrey County Council | Yes | The RTS does not consider, for the sections we have made representations on, that there is anything that is not legally compliant. We also consider these sections of the Draft Plan to be sound. | Yes | Part 2(a)ii states: '2. All development proposals will be assessed taking into account the following criteria: (a) Protecting and enhancing our natural, historic and built environment by: ii) conserving and enhancing biodiversity' Whilst we support this policy, particular reference to enhancing biodiversity water dependent habitat would be beneficial. Recommended action: The policy wording be amended to: '2. All development proposals will be assessed taking into account the following criteria: (a) Protecting and enhancing our natural, historic and built environment by: ii) conserving and enhancing biodiversity, through biodiversity net gain and creation of high-quality terrestrial and water dependent habitats' | | | | | | | | | Comments noted and suggested changes agreed. These are included within the Council's proposed modifications to the DELP submitted to the Inspector for Examination. Please see main and minor modification M2.2. | | |
| 1110780 | Matthew Nicholson | Barton Willmore now Stantec obo Audley Group | No | Please see uploaded document. | No | Please see uploaded document. | Y | Y | Y | Y | Please see uploaded document. | SS2: We would suggest that the wording of Policy SS2(v) (Sustainable Development) be expanded to be consistent with ENV4 and National Planning Policy. Both policies should explicitly note that the NPPF allows inappropriate development within the Green Belt where it can be demonstrated that 'Very Special Circumstances' (VSC) exist. The draft plan should explain what circumstances may constitute VSC, and what types of evidence may be needed to support any development proposals coming forwards. | 220726 34309 (Audley Group) Representations v2.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556793/PDF/-/220726%2034309%20%5FAudley%20Group%5F%20Representations%5F%20v2%2Epdf Elmbridge Draft Headline Need Report V2.pdf | Policy SS2(v) (Sustainable Development) should be expanded to be consistent with ENV4 and National Planning Policy. Both policies should explicitly note that the NPPF allows inappropriate development within the Green Belt where it can be demonstrated that 'Very Special Circumstances' (VSC) exist. The draft plan should explain what circumstances may constitute VSC, and what types of evidence may be needed to support any development proposals coming forwards. | No, I do not wish to participate at the oral examination | | Objection noted. Housing need During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and |

stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022).

The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl

by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function,

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a

greater say in what is built in their neighbourhood.

Specialist housing
The DELP sets out an approach that is supportive of proposals for new specialist older persons accommodation where a local need can be demonstrated in draft policy HOU6. The Council considers this approach to be appropriate.

Affordable housing
The Council's [viability assessment \(2022\)](#) which has been prepared in accordance with national policy and guidance found that the DELP taken as a whole, including the approach to affordable housing contributions, will not negatively impact the deliverability and viability of development in the Borough.

Social and Community Infrastructure
Draft policy INF2 and INF3 aren't intended to refer to housing.

It is considered that as drafted policy INF2 and INF3 provide the flexibility to accommodate the suggested circumstances where appropriate if it is demonstrated that proposed provision be it from existing or new facilities will meet identified needs.

Green Belt
This is set out in National policy and does not need to be repeated in the Local Plan.

SS3: Scale and Location of Good Growth

| ID | N | Org | 1 | 1a | 2 | 2a | 3 | 3 | 3 | 3 | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
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| | | | | | | | P | E | J | C | | | | | | | |
| 1107063 | Alan McCann | | Yes | Not sure | No | Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many. | | | Y | | See above | | | | | | <p>Comments noted.</p> <p>The spatial strategy set out in the DELP aims to balance the often competing and conflicting issue of protecting the environment and address the challenges of climate change, and growth to meet economic, housing and infrastructure needs.</p> <p>The proposed spatial strategy is considered to be the best, most sustainable solution to meet the Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. As demonstrated through the evidence base, Duty to Cooperate activities and Statements of Common Ground, the development strategy can also be accommodated without putting undue pressure on the Borough's infrastructure.</p> <p>In addition, draft policies, such as ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes</p> |

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| 1107225 | Dorothy Ford | | Yes | No | <p>Several Evidence Base details on Green Belt Sub-Area 11 are incorrect and therefore inappropriate. The draft Local Plan policy on protecting the Green Belt is generally headed in the right direction, given that 85% of respondents to the 2019 Reg 18 consultation opted to protect all Green Belt from inappropriate development; and 2503 people have signed the petition that demands that all SA-11 be saved from development. This clearly shows how much our beautiful landscape, readily visible to passing horse riders, cyclists, walkers, runners and drivers, is treasured and essential for our health, well-being and happiness. Ms Tagliarini, EBC Head of Planning, instructed me to submit the petition now - during this consultation :</p> <p>https://www.change.org/p/our-green-belt-is-under-threat</p> <p>ARUP's pro forma setting out evidence for and assessment of SA-11/GB46, to which the EBC 2022 Sustainability Assessment refers, is available in Green Belt Boundary Review Annex 1A(Sub-Area pro formas). SA-11's pro forma contains 3 key errors, and avoids photos of the gorgeous undulating landscape and strategic view :</p> <p>A. The description states : "The Sub-Area is [...] bounded by the built edge of Oxshott to the north and west". This is not correct. The built edge to the west is in Stoke d'Abernon (not Oxshott), as clearly indicated by the Elmbridge Council's village welcome/boundary sign a few steps from the northwest corner of SA-</p> | Y | Please see my detailed reply in the previous box - number 2. | Please see my detailed reply in an earlier box - number 2. If you need clarification, please don't hesitate to contact me. | <p>E7546CF2-EEC2-4C17-ABDC-C86933767F24.jpeg</p> <p>https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/549370/PJP/-/E7546CF2%2DEEC2%2D4C17%2DABDC%2DC86933767F24%2Ejpeg</p> <p>Copy of Copy of SA-11 Response to Reg 19 Consultation.docx</p> <p>https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/549371/DOCX/-/Copy%20of%20Copy%20of%20SA%2D11%20Response%20to%20Reg%2019%20Consultation%2Edocx</p> <p>44C3AD65-688C-4424-87A0-43C77730CE68.jpeg</p> <p>https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/549372/PJP/-/44C3AD65%2D688C%2D4424%2D87A0%2D43C77730CE68%2Ejpeg</p> <p>3093897D-DD73-4910-B27F-2809B1FC840E.jpeg</p> <p>https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/551677/PJP/-/3093897D%2DDDD73%2D4910%2DB27F%2D2809B1FC840E%2Ejpeg</p> <p>84E13120-BDEA-4978-9F19-36E9E7424E87.jpeg</p> <p>https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557105/PJP/-/84E13120%2DBDEA%2D4978%2D9F19%2D36E9E7424E87%2Ejpeg</p> <p>6686144F-7B85-4854-BF6C-46C681A24CAE.jpeg</p> <p>https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557106/PJP/-</p> | Yes, I wish to participate at the oral examination | <p>As co-leader of BluWav Residents Group, I owe it to the 2505 people who have signed the change.org petition https://www.change.org/p/our-green-belt-is-under-threat to save all of Green Belt Sub-Area 11/GB46 from development</p> <p>- by correcting the draft Local Plan evidence base relating to this stunning, readily visible Green Belt site; and</p> <p>- by strengthening the enormously encouraging LP policy to protect the Green Belt by making this protection more sound, and more consistent in all respects with national policy as set out in the NPPF</p> <p>The evidence base for this site is disproportionate because it fails to recognise the strengths of the site - such as the valued landscape readily visible from the corner of Blundel Lane/Waverley Road; the strategic views of SurreyHills AONB visible from the SA-11 Public Footpath; and the role this Green Belt plays in separating a diverse Oxshott settlement from a Stoke d'Abernon settlement consisting solely of large, detached houses. The parish boundaries of Stoke d'Abernon have now been published on the website of Stoke d'Abernon Residents Association.</p> <p>This is a once-in-a-</p> | <p>Comments noted.</p> <p>The DELP sets out that a brownfield first approach has been taken. No development on the Green Belt and no changes to the Green Belt boundary are proposed. This approach is reflected throughout the DELP Comments regarding the assessment of site SA-11 noted. The Council has set out within its Topic Paper 1: How the spatial strategy was formed? (June, 2022) that the Green Belt evidence on the whole undervalues the performance of the Borough's Green Belt sites.</p> <p>SA-11 is not included in the DELP as a site allocation for development. The DELP does not propose any development on Green Belt land.</p> <p>The policies map published with the Regulation 19 DELP and submitted to the Inspector for Examination maps all of the Borough's Green Belt and should be read alongside the DELP.</p> |
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is designated as Institutional Spaces to be protected in EBC's Green Infrastructure map. SA-15 therefore needs to be duly protected by safeguarding SA-11 from development. Development of SA-11 would be visible from Bridle Lane, marking the boundary with SA8. Development of SA-11 would also reduce the performance of SA8 by affecting the pretty views to SA8's north.

C. Correction of this inappropriate, inaccurate ARUP evidence would provide clear justification for the conclusion that SA-11 should not be considered further for development - since SA-11 in fact meets the 3 Purposes assessment more strongly than currently indicated. Correction of the Evidence Base inaccuracies for SA-11 is needed in order to save in from development by Savills who, acting on behalf of The Crown Estate landowners, have been lobbying EBC for several years to develop this readily visible, readily accessible open landscape with stunning strategic views.

SA-11 is in the northern part of LF1 in the 2015 Surrey Landscape Character Assessment, conducted by Hankinson Duckett Associates on behalf of Surrey County Council, Surrey LPAs including Elmbridge Council, and Surrey Hills AONB. The LF1 assessment states : page 23 "The northern part of the area is a pleasant rural farmland landscape with less urban influence despite adjoining Built Up areas to the north." The page 23 character assessment duly recognises the visible,

unspoilt rural environment of SA-11 - unlike the ARUP work commissioned by EBC. EBC contradicts/rejects this assessment of clear evidence. EBC's rejection of these key facts is inappropriate, inaccurate and disproportionate. Page 27 : The section on LF1 Built Development recommends that LPAs "Retain gaps in linear development particularly where these allow rural views over farmland." This Built Development policy needs to be adopted. It will save SA-11 in the medium and long term, as so many passersby enjoy the rural views over farmland along Blundel Lane.

The draft Local Plan section "Protecting the Green Belt" should make this proposal more sound, and therefore more readily deliverable, by adopting the following part of the 2011 Elmbridge Development Strategy :

"Protecting the Green Belt : 3.11 Elmbridge is embedded in the London Green Belt and is under a national obligation to protect and maintain it. The success of the Green Belt policy over the years has shaped the pattern of settlements, and separates towns and villages into individual and distinctive communities. The Green Belt permeates all parts of the Borough and has prevented the coalescence of its component settlements. The fragmented nature of the Green Belt distinguishes the Borough from the more developed London boroughs on one side and the more open countryside on the other." This statement is

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| | | | | | <p>essential since SA-11 is part of the Green Belt that surrounds Oxshott and helps define Oxshott's green, healthy beautiful character.</p> <p>The draft LP Green Infrastructure map and policy exclude nearly all the Green Belt - in stark contrast to the 2011 Elmbridge Development Strategy (cf page 54) which includes all the Green Belt. The draft LP's exclusion of SA-11/GB46 and nearly all other Green Belt from Green Infrastructure is inconsistent with the NPPF. NPPF Page 67 defines Green Infrastructure as : "A network of multifunctional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and well-being benefits for nature, climate, local and wider communities and prosperity."</p> <p>In other words, Green Infrastructure is not just a beneficial network of Public Footpaths (as the draft LP proposes), but a range of views from these Footpaths of stunning landscapes and open countryside and fields; clean air; and biodiversity. For example, our SA-11 benefits the local economy by providing unspoilt farmland, hay fields, or pastureland, as the local Esher Arbrook Farm who currently lease the land deem appropriate.</p> <p>Therefore in order to make the draft Local Plan's Green Belt protection policy more sound throughout the 15 coming years, the LP should include all appropriate Green Belt sites in the Green</p> | | | | | | | | |
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| | | | | | <p>Infrastructure map.</p> <p>This will then make the LP consistent with the NATIONAL POLICY on Green Infrastructure adopted by HMG in December 2021, as proposed by Natural England.</p> <p>The general policy in the draft LP to protect the Green Belt, such as SA-11, is enormously encouraging in the short term, and needs more sound evidence in the medium and long term in order to deliver this policy effectively.</p> <p>This statement is from Dorothy Ford, on behalf of residents living near the SA-11 site, and the 2505 people who have signed the petition to save SA-11 by correcting the evidence base used to assess its performance. Dorothy Ford and Richard Marshall are co-leaders of the BluWav Residents Group, set up to save SA-11. Richard Marshall and Blu-Wav endorse all the comments in this box.</p> | | | | | | | | |
| 1108049 | Sally Hunt | | Yes | No | <p>There are so many empty one two bedroom senior living accommodation across the borough. It is almost impossible to find flats suitable for families in affordable housing/private rent. Families need homes not just professional couples and seniors. Families with parents over the age of 55 also don't want to live in retirement villages. The swing towards provision for senior living has gone too far. As has small dwellings not suitable for families. This is a family dominated borough many people come to live here to bring up their families in such pleasant abs safe surroundings</p> | | Y | | <p>Consider a cross section of housing provision do not focus solely on senior living and un family friendly accommodation</p> | | | <p>No, I do not wish to participate at the oral examination</p> | <p>Comments noted.</p> <p>The DELP aims to deliver a range of types of housing, including different sized homes and affordable housing that meets the needs of the Borough's communities.</p> <p>Evidence of the need for different types of housing in the Borough is identified in the Council's Local Housing Need Assessment (2020) (LHNA).</p> <p>Draft Policy HOU3 - Housing Mix sets out that development must aim to deliver a range of housing</p> |

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| | | | | | Spatial Strategy Was Formed - 2022" and support absolutely the arguments supporting the chosen Spatial Strategy. | | | | | | | | | | | | |
| 1109012 | Ian Powell | | No | See letter enclosed at question 4a to general questionnaire as to the entire draft local plan. | No | See letter enclosed at question 4a to general questionnaire as to the entire draft local plan. | Y | Y | Y | Y | See letter enclosed at question 4a to general questionnaire as to the entire draft local plan. | See letter enclosed at question 4a to general questionnaire as to the entire draft local plan. | Bell Cornwell - Regulation 19 - Representation Letter - Mr Ian Powell.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/545610/PDF/-/Bell%20Cornwell%20%2D%20Regulation%2019%20%2D%20Representation%20Letter%20%2D%20Mr%20Ian%20Powell%2Epdf | We consider the Draft Plan to be unsound and should fail at examination. We do not support the inclusion draft allocation of ESH11 – 42 New Road, Esher, KT10 9NU and request that this allocation be formally deleted from the submission version of the Draft Plan. | No, I do not wish to participate at the oral examination | | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance |

context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022).

The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the

important and integral part of the overall character of the borough and its individual settlements. These areas also perform a vital role in preventing the outward sprawl of London and preventing neighbouring towns from merging with one another, as well as safeguarding the countryside from encroachment. By retaining Green Belt land, the spatial strategy of optimisation will be supported by urban regeneration and the encouragement of recycling of derelict and other urban land.

The policy has identified an appropriate and proportionate level of development for each settlement which fairly corresponds with its existing size and sustainability. This is particularly the case with Claygate which the Parish Council acknowledges contains a good level of local services and facilities as reflected in the Council's Settlement Assessment. This approach is supported by the non-strategic policies which require the most effective use of brownfield land compatible with the area in which it is located, thus further supporting the 'optimisation' approach of the plan. These broad locations for growth together with the sites identified will bring forward an appropriate level of 'good growth' which will deliver the type of homes needed in the most suitable and sustainable locations. At the same time, this policy encourages and supports the evolution / growth of the town and village centres in a way that will ensure they remain vital and viable to

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| | | | | | <p>support that growth.</p> <p>Claygate Parish Council believes this is justified on the basis that it is an appropriate strategy based on a full balancing of all environmental, social and economic objectives and taking into account reasonable alternatives. The release of Green Belt land has been considered as part of this and Claygate Parish Council believes that Elmbridge Council's evidence base demonstrates (through the consideration of individual sites) that the exceptional circumstances necessary to enable the release of such land has not been fully evidenced and demonstrated given the important role that these areas perform.</p> <p>Therefore, Claygate Parish Council believes this policy meets the tests of soundness and will provide an appropriate and flexible approach to the achievement of sustainable development in a way that is positive, justified, effective and consistent with national policy.</p> | | | | | | | | | | |
| 1109760 1109943 | James Waterhouse | Iceni Projects obo Northumberland Estates Ltd | Yes | No | <p>The policy fails to identify or positively plan for an objectively assessed need for employment in the borough. The policy is not positively prepared, justified or consistent with national planning policy (a, b and d soundness test as set out in NPPF Para 35) due to a failure to identify the objectively assessed need nor plan positively for it.</p> <p>The Council commissioned GL Hearn to produce a commercial property report in 2014 and 2017, which the Council's Employment Land Review Addendum in November 2021</p> | Y | Y | Y | <p>The policy is not positively prepared, as it is not derived from or based upon the Borough's objectively assessed need for employment (which identifies the need for 16Ha of land to 2030).</p> <p>The policy is not justified, as a key component of the evidence has been ignored. In this regard, the 2017 market report identifies the need for 16Ha of land and the Council Employment Land Reviews of 2019 and 2021 profile the contracting economic floorspace in the Borough. The policy has not considered reasonable alternatives, such as the utilisation of a major waste and employment site at Weylands Treatment Works, which provides an obvious opportunity to strengthen the role and function of the adjoining Hershams Trading Estate and accommodate some of the new floorspace identified in the Council's own assessment of need.</p> <p>The policy is inconsistent with national</p> | <p>The Strategic Policy should be amended to plan positively for economic growth, rather than be allowed to remain as is, which arguably promotes decline. The former Weylands Treatment Works site, which adjoins the Hershams Industrial Estate and which constitutes a significant piece of previously developed land in the Green Belt that currently gives rise to numerous local issues through its existing established uses, should be identified as a key component of a positive economic strategy for the Borough</p> | | | Yes, I wish to participate at the oral examination | <p>The Plan's ability to plan positively for economic growth is a key issue that should be tested as part of the Examination into the soundness of the Plan, especially given the Plan does not allocate any land for economic development despite an assessment of objectively assessed need indicating 16 HA should be allocated in the period to 2030.</p> <p>Weylands Treatment Works is an obvious employment site that has been overlooked for employment allocation and for</p> | <p>Objection noted.</p> <p>The Council's economic/employment evidence includes a strategic employment land review (2021/2019), retail centres review (2020/2021), commercial property review (2017), retail assessment (2016) and commercial market study (2014). These were all submitted with the evidence base that supports the DELP to the Inspector for Examination and are available on the Council's Local</p> |

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| | | | | | identifies as "an important part of the Council's evidence base". That evidence, which only considered employment requirements to 2030, identified a need of 16ha of employment land to provide the floorspace needed to support growth, with around 7ha required for warehouse/distribution use and 9ha for office use (along with a forecast net loss of around 2ha of industrial land and 1ha of Sui Generis uses). The Plan has seemingly ignored its own evidence base and failed to identify new employment provision. A major opportunity for new employment growth exists at the allocated waste site Weylands Treatment Works, which adjoins the Hershams Trading Estate (one of only 5 Strategic Employment Land sites in the Borough). This site comprises previously developed land in the Green Belt and could enable high quality employment floorspace to be delivered that could support and strengthen the function of the adjoining SEL. | | | | planning policy due to a failure to identify the objectively assessed need nor plan positively for it. The policy approach is wholly inconsistent with Section 6 of the NPPF (Building a strong competitive economy) for the following reasons: - the strategic policy fails to create the conditions in which businesses can invest, expand and adapt. By not allocating land for new economic development, the policy does not allow the area to build on its strengths, counter its weaknesses and address the challenges of the future (NPPF para 81) - the strategic policy does not set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration (NPPF para 82, criterion a) - the strategic policy does not set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period (NPPF Para 82, criterion b) - the strategic policy is not flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances (NPPF Para 82, criterion d). | | | | which a planning application is being prepared seeking employment-led redevelopment. This makes Icen a logical party to attend the examination to enable debate of the approach and the respective merits. | Plan Examination webpage. Draft policies within chapter 7 of the DELP set out the Council's proposed approach to protecting existing employment uses and supporting economic and employment growth in the Borough. The Council has assessed the suitability of the promoted site - Weylands Treatment Works for release from the Green Belt designation and it was found that the site was not suitable for release. The assessment is set out in Green Belt Site Assessment Proforma SA-68. | | |
| 1110161 | John Nicol | KG Creative Consultancy obo Burvale Properties Ltd | No | Please see uploaded document. | No | Please see uploaded document. | Y | Y | Y | Please see uploaded document. In addition Draft Policy SS3 states that "5. The council will support the delivery of development that makes an important contribution to the borough at the following locations and as identified on the Policies Map" and in respect of the area of the subject site "b) Lower Green for community regeneration". It is considered that the Lower Green can accommodate development not only for community regeneration but also to meet a wider housing need. | Please see uploaded document. Also to amend Policy SS3 to recognise the wider benefits of residential development in Lower Green. | https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/552645/PDF/-/Local%20Plan%20Submissions%20Final%20Epdf | We seek the following: • Deletion of the site designation as Green Belt as it does not meet the purposes within the NPPF for retention as such; • Deletion of the site designation as part of the wider BOA as it does not have the characteristics that it is claimed it does and there is no evidence base to support its designation as BOA; • We consider that the Council has not made adequate provision for the employment uses that will be displaced | Yes, I wish to participate at the oral examination | Please see response referenced and attached document #1109584 | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. |

Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and

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| 1110376 | Planning Team | Guildford Borough Council | Yes | | Yes | <p>1. Policy SS3 – Scale and location of good growth</p> <p>1.1. We note that the plan provides for a minimum of 6,785 homes across the plan period. Against an objectively assessed need (OAN) figure of 9,705 across the same period, this represents a shortfall of 2,920 dwellings. We note that you consider that exceptional circumstances do not exist to justify amending Green Belt boundaries. Notwithstanding this, Government's objective is that local planning authorities should significantly boost the supply of homes and national policy requires that the local plan should provide a strategy which, as a minimum, seeks to meet OAN. As part of exploring all opportunities, consideration needs to be given to the extent that Green Belt may be necessary in order to meet needs, as Guildford has had to do in its adopted Local Plan: strategy and sites (2019). This approach to Green Belt release has also been tested through the High Court which has confirmed that housing need can and should form part of the exceptional circumstances test. For these reasons we consider that a thorough and robust approach will be necessary in demonstrating that Elmbridge's housing needs cannot be met in full. Having unmet housing need places increased pressure on neighbouring authorities whom all have similar constraining factors as Elmbridge.</p> <p>1.2. Policy SS3 1b) of the Draft Elmbridge Local Plan (DELP)</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | <p>Comments noted.</p> <p>The Council has set out its response to the comments/issues raised by Guildford Borough Council in their representation in its Statement of Common Ground.</p> |
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states 'Provision for Gypsy, Roma and Traveller pitches' This is broad and specific details should be set out, on par to the approach to housing in 1a), such as the number of pitches and plots to be provided over the plan period. We have concerns regarding whether the current approach could be considered sound.

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| 1110561 | Mr Harris | Nexus Planning obo Kingacre Estates Ltd | Yes | N/A | No | Please see attached documents | Y | Y | Y | Y | Please see attached documents | Please see attached documents | <p>SS3 Appendix 3 - Cabinet Report March 2022.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/555539/PDF/-/SS3%20Appendix%203%20%2D%20Cabinet%20Report%20March%202022%2Epdf</p> <p>SS3 Appendix 4 - Guildford Local Plan Inspector's Report.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/555540/PDF/-/SS3%20Appendix%204%20%2D%20Guildford%20Local%20Plan%20Inspector%20Report%2Epdf</p> <p>Elmbridge Policy SS3.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/555541/PDF/-/Elmbridge%20Policy%20SS3%2Epdf</p> <p>SS3 Appendix 2 - Minutes of the Local Plan Working Group Meeting held on 22 June 2021.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/555542/PDF/-/SS3%20Appendix%202%20%2D%20Minutes%20of%20the%20Local%20Plan%20Working%20Group%20Meeting%20held%20on%2022%20June%202021%2Epdf</p> <p>SS3 Appendix 1 - Elmbridge and Surrey London Fringe Housing Needs.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/555541/PDF/-/Elmbridge%20Policy%20SS3%2Epdf</p> | Policy SS3 is fundamentally unsound, providing a level of housing in the borough that is very significantly and unjustifiably below that required by the standard method and, therefore, adding further to the already chronic housing affordability issues in the borough that the Council itself already acknowledges at paragraph 6.24 of the Local Plan. This is evidenced through the Elmbridge and Surrey London Fringe Housing Needs Review undertaken by Nexus Analytics and Research (July 2022). | Yes, I wish to participate at the oral examination | We represent a developer with significant land interests in the borough and to whom the housing strategy in Elmbridge as a whole, and the release of land from the Green Belt, is of fundamental importance. Accordingly, it is essential that we are able to participate in all relevant hearing sessions. | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial |
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required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii). In light of the considerations set out above, it is the Council's position that the spatial

clear discrepancies between ARUP's conclusions, and the Council's own conclusions and recommendations.

In consideration of the above, we contend that the housing requirement identified within Policy SS3 is unsound and ineffective, insofar that it will result in a substantial shortfall against EDC's objectively assessed housing need.

allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required

Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is

is in the same HMA. This has resulted in a final housing requirement of 590 homes per annum from 2013 to 2032 which totals 11,210 new homes over the plan period. Looking forward, we anticipate that the housing need in Waverley will continue to be extremely challenging. Waverley also has significant constraints such as Green Belt, the Surrey Hills Area of Outstanding Natural Beauty, the Area of Great Landscape Value, a number of Conservation Areas and European sites, including the Thames Basin Heath and two Wealden Heaths Special Protection Areas. We therefore consider that Waverley would not be in a position to accommodate any unmet housing need arising from the Kingston and North Surrey HMA.

We do not anticipate that any of the other policies would have any strategic impacts.

Yours faithfully,

Andrew Longley
Planning Policy Manager
(Interim)

is set out in the Council's [Topic Paper 1: How the spatial strategy was formed?](#) (June, 2022).

The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban

currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an

be aware of this and were hence be put off completing the consultation and submitting it. Some elements of the consultation in relation to the boundary of land under consideration were not clear. In particular the area covered by the Hershams Green shopping Centre has been described as just the car park and then as the whole site. This could create confusion as to what the housing target numbers refer to – which could be exploited by those who would wish to suggest the target for the whole site just applied to the car park. There was also confusion about the inclusion of the Barley Mow within the triangle of land proposed for housing in that area (even though the Barley Mow has a grade II listing status protecting it from development). There was also confusion in describing a building on that site as Trinity Court even though local people don't recognise this name.

Overall (rightly or wrongly) we might draw the conclusion that the council were not really serious about inviting comments at this stage, and

addition, over 8,200 individuals were directly contacted via letter or email to inform them of the consultation as they were registered on the Elmbridge planning database.

The Council's [Regulation 22 Consultation Statement](#) fully details the range of techniques used during the consultation period to contact and engage with stakeholders.

Site allocations for development of sites that are home to existing community uses, including those in Hershams, such as Hershams Library, seek to ensure these are retained or re-provided on site where appropriate. This is set out in more detail in the Council's [Land Availability Assessment \(2022\)](#). In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protected.

The Council's [Infrastructure Delivery Plan \(May 2022\) \(IDP\)](#) and [Update \(July 2023\)](#) detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the quantum of development proposed in the DELP.

instead wanted a way of 'rubber stamping' the consultation process to (erroneously) claim full engagement with the public.

The IDP and IDP Update have been informed by the preparation of other evidence base documents e.g., Transport Assessment (2022) and via discussions with infrastructure providers as part of the Council's duty to cooperate activities as outlined in the Council's Duty to Cooperate Statement of Compliance (June 2022), Duty to Cooperate Statement of Compliance Update (August 2023) and Statements of Common Ground published with the Core Documents submitted for Examination.

The agreed position with our infrastructure delivery partners is that the proposed development strategy can be accommodated within the borough with the mitigation identified / a policy-led approach.

In addition, the DELP includes policies to ensure the infrastructure needed to support the delivery of the aspirations of, and quantum of development proposed, in the DELP is provided.

Draft policy INF1 – Infrastructure delivery aims to ensure the required infrastructure needed to accommodate and mitigate the impact of new development in the Borough is delivered in a timely manner, whilst acknowledging that

For my area of residence, Long Ditton, Thames Ditton, Hinchley Wood and Weston Green does not have space for 635 residential units without radically altering the character of the district. If the development is to be located on brown field sites or by the demolition of existing properties such as is occurring in Manor Road North and is proposed for Sugden Road then the new properties are unlikely to be on a scale to properly and effectively provide for the space and equipment needs of modern family living.

activities as outlined in the Council's [Duty to Cooperate Statement of Compliance \(June 2022\)](#), [Duty to Cooperate Statement of Compliance Update \(August 2023\)](#) and Statements of Common Ground published with the [Core Documents](#) submitted for Examination.

The agreed position with our infrastructure delivery partners is that the proposed development strategy can be accommodated within the borough with the mitigation identified / a policy-led approach.

In addition, the DELP includes policies to ensure the infrastructure needed to support the delivery of the aspirations of, and quantum of development proposed, in the DELP is provided.

Draft policy INF1 – Infrastructure delivery aims to ensure the required infrastructure needed to accommodate and mitigate the impact of new development in the Borough is delivered in a timely manner, whilst acknowledging that the infrastructure provision with a development must be proportionate to the size of the development.

Draft policy CC4 sets out how development must contribute to the delivery of an integrated,

would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality. The Council also considers that in order to meet

delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's

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| 1110784 | Maria Long | | Yes | <p>We support this aspect of the draft plan in particular. We were very concerned about any proposal to release greenbelt in our area. The greenbelt areas surrounding Claygate give the village a unique character and are used by all for walking and playing (in the case of our children). There is a variety of wildlife inhabiting these areas: foxes, deer, birds, rabbits and many other species. It is unlikely that affordable housing (which we understand is a national priority) would result in any development of greenbelt around Claygate. It is far more likely that affordable housing would arise out of the development of brownfield sites and increased density sites in town centres. These areas are also likely to have better communications and facilities for lower income families. So we were very pleased to learn of this aspect of the plan and the intention to develop these sorts of sites instead of releasing greenbelt.</p> | Yes | | | | | | | | | | | Support noted. |
| 1110817 | John Bamford | | Yes | | Yes | | | | | | | | | | | Support noted. |

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| 1110878 | Adam Kindred | CBRE obo Ashill Land Ltd | Yes | No further comments. | No | Please see uploaded document at question 4a | Y | Y | Y | Y | Please see uploaded document at question 4a | Please see uploaded document at question 4a | Burwood Road - Reg 19 - FINAL.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556903/PDF/-/Burwood%20Road%20%2D%20Reg%2019%20%2D%20FINAL%20Epdf | We consider the draft policy to be unsound and not positively prepared. Ashill suggest EBC revise their OAN to reflect Government's standard method i.e. 641 homes per annum and should identify increased housing delivery for Hersham from the Green belt. | Yes, I wish to participate at the oral examination | Policy SS3 as drafted is unsound. We wish to be given the opportunity to elaborate upon this at the Examination in Public to advance the Local Plan. | Objection noted. SS3, HOU1 and ENV4 The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's <u>Topic Paper 1: How the spatial strategy was formed?</u> (June, 2022). The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong |
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of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality.

The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the

[Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what

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| 1110965 | Nigel Rankine | GL Hearn Green Kite Homes and ACAP Advisory | No | The local plan fails to positively plan for a comprehensive approach to delivery by only promoting a range of new small housing sites or redevelopment of existing retail or employment land (that is unlikely to come forward). The spatial strategy is fundamentally flawed and will not be able to deliver the required mix of housing typologies (such as 1, 2 and 3 bedroom smaller homes as required by the housing needs assessment), affordable housing and important essential social and physical infrastructure such as new schools and healthcare services. No agreement has been reached with neighbouring authorities to help provide for the housing needs of the borough and therefore the authority does not meet another fundamental test of soundness as it has also failed in its duty to cooperate. No Green Belt release is planned which is a reversal of the positive approach proposed at the Reg. 18 stage. It | No | Objection to policy SS3 The draft Local Plan is considered to be "unsound". The draft Local Plan in policy SS3 fails in its requirement to meet its objectively assessed housing need calculated using the standard method. The plan explains in paragraph 3.19, that: "Using 2022 as the base year for calculation, the housing need for the borough equates to 647 dwellings per annum and over the plan period 9,705 homes." Policy SS3 (1)(a) explains that the Plan will make provision for 6,785 net additional homes with at least 30% to be affordable new homes. This represents a shortfall of 2,790 homes (or 30% of the objectively assessed housing needs using the standard method). | Y | Y | Y | Y | The draft Local Plan is considered to be "unsound". The draft Local Plan in policy SS3 fails in its requirement to meet its objectively assessed housing need calculated using the standard method. The plan explains in paragraph 3.19, that: "Using 2022 as the base year for calculation, the housing need for the borough equates to 647 dwellings per annum and over the plan period 9,705 homes." Policy SS3 (1)(a) explains that the Plan will make provision for 6,785 net additional homes with at least 30% to be affordable new homes. This represents a shortfall of 2,790 homes (or 30% of the objectively assessed housing needs using the standard method). | It is suggested that to make the plan "sound" a positive spatial strategy would consider bringing forward new highly sustainable site allocations at Stoke Hill, Cobham and Manor Park, Claygate as larger development sites that can be repurposed and released from the Green Belt to enable the comprehensive delivery of new and affordable housing and essential social and physical infrastructure. This would be justified as exceptional circumstances in accordance with the NPPF. | Stoke Hill- Location Plan.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/563604/PDF/-/Stoke%20Hill%2D%20Location%20Plan%2Epdf Manor Farm- Location Plan.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/563605/PDF/-/Manor%20Farm%2D%20Location%20Plan%2Epdf 220725 Representations to Reg 19 Local Plan Review - Manor Park.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/563606/PDF/-/220725%20Representations%20to%20Reg%2019%20Local%20Plan%20Review%20%2D%20Manor%20Park%2Epdf 220729 Representations to Reg 19 Local Plan Review - Stoke Hill.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/563607/PDF/-/220729%20Representations%20to%20Reg%2019%20Local%20Plan%20Review%20%2D%20Stoke%20Hill%2Epdf | Manor Park site should be considered for inclusion in the review of the Elmbridge Local Plan for approximately 300 new dwellings and a range of supporting physical and social infrastructure. The 9 hectare site is suitable, available, achievable and deliverable for a residential-led redevelopment for approximately 300 new dwellings. Stoke Hill site should be considered for inclusion in the review of the Elmbridge Local Plan for approximately 700 new dwellings and a range of supporting physical, social, educational and sporting infrastructure. The 90+ hectare site is suitable, available, achievable and deliverable for a residential-led redevelopment for approximately 700 new dwellings. | Yes, I wish to participate at the oral examination | A further review of the plan is needed as it is current "unsound" and not positively prepared. It is suggested that to make the plan "sound" a positive spatial strategy would consider bringing forward new highly sustainable site allocations at Stoke Hill, Cobham and Manor Park, Claygate as larger development sites that can be repurposed and released from the Green Belt to enable the comprehensive delivery of new and affordable housing and essential social and physical infrastructure. This would be justified as exceptional circumstances in accordance with the NPPF. | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the |
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is suggested that to make the plan "sound" a positive spatial strategy would consider bringing forward new highly sustainable site allocations at Stoke Hill, Cobham and Manor Park, Claygate as larger development sites that can be repurposed and released from the Green Belt to enable the comprehensive delivery of new and affordable housing and essential social and physical infrastructure. This would be justified as exceptional circumstances in accordance with the NPPF.

Council's [Topic Paper 1: How the spatial strategy was formed?](#) (June, 2022).

The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping

policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and

Council's Duty to Cooperate Statement of Compliance (June 2022), Duty to Cooperate Statement of Compliance Update (August 2023) and Statements of Common Ground published with the Core Documents submitted for Examination. The matter of meeting the Borough's housing need, both within the Borough itself or with assistance from other authorities has been explored. However, this has not been identified as a deliverable option as all neighbouring authorities have confirmed that they cannot assist in meeting some / all of Elmbridge's unmet housing need.

All DtC partners have confirmed that they consider the Council has adequately discharged its duty to co-operate in preparing the plan. As such, the Council considers that it has met its Duty to Cooperate in full and this is detailed within the documents mentioned above.

The Council notes the information submitted in relation to sites Stoke Hill and Manor Farm. These are located within Green Belt sub-area 2 and 3 which were not identified as sub-areas needing further consideration for release in the

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| | | | <p>the green belt's fundamental aim to prevent urban sprawl (NPPF). However, there is not an embargo on releasing and building on green belt land, where there are exceptional circumstances.</p> <p>In fact it has already helped by steering development to the existing brownfield sites. However, these seem to have been exhausted, otherwise one assumes more brownfield sites would have been included to the meet the OAN. Para 141 of the NPPF specifically points to using brownfield first, but then, once exhausted, there being exceptional circumstances for green belt land release.</p> <p>Not providing sufficient housing to meet its needs and the extremely high affordability ratios are clear exceptional circumstances for releasing green belt land for new homes. This has been tested at many EiPs up and down the country, including locally at neighbouring Guildford, Waverley and Woking to name but a few.</p> <p>To release no green belt land and fail to meet the OAN renders the plan unsound. It has clearly therefore not been Positively Prepared and the choice to not release any green belt land is not Justified. Furthermore, the plan cannot be consider to be Effective, where it is not providing for over 25% of its housing need, and is not Consistent with national policy, which requires councils to meet its OAN.</p> <p>The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective.</p> <p>Since the Reg 18</p> | <p>OAN. Para 141 of the NPPF specifically points to using brownfield first, but then, once exhausted, there being exceptional circumstances for green belt land release.</p> <p>Not providing sufficient housing to meet its needs and the extremely high affordability ratios are clear exceptional circumstances for releasing green belt land for new homes. This has been tested at many EiPs up and down the country, including locally at neighbouring Guildford, Waverley and Woking to name but a few.</p> <p>To release no green belt land and fail to meet the OAN renders the plan unsound. It has clearly therefore not been Positively Prepared and the choice to not release any green belt land is not Justified. 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This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective.</p> <p>Since the Reg 18 document, nothing in green belt policy has changed and there are therefore no reasons for the council's retrograde step in its strategy to exclude any green belt land release. This is a political decision, not a planning policy decision.</p> <p>As well as not delivering market housing, this will also have a knock-on effect of delivering much needed affordable housing. In 2019, the council's HHRSS paper report that there were 1,801 applications on its waiting list.</p> <p>In 2019, the same HHRSS report stated that the council has the second highest ratio of house prices to income in the South East at 15.08 (2017). This gap has been widening considerably, where the ratio was 9.65 in 2003. Not only does this point to the need for more housing and meeting the OAN (this would also add to the exceptional circumstances for releasing green belt land for housing), but it also points to needing to deliver more than the OAN.</p> <p>This means that the failing to deliver the OAN is even worse than not providing 27% of the need, as more is needed in Elmbridge. This clearly points at the plan being Ineffective, not Positively prepared of Justified and not Consistent with national policy.</p> | | | | | | | <p>is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022).</p> <p>The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?</p> <p>Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban</p> |
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release. This is a political decision, not a planning policy decision.

As well as not delivering market housing, this will also have a knock-on effect of delivering much needed affordable housing. In 2019, the council's HHRSS paper report that there were 1,801 applications on its waiting list.

In 2019, the same HHRSS report stated that the council has the second highest ratio of house prices to income in the South East at 15.08 (2017). This gap has been widening considerably, where the ratio was 9.65 in 2003. Not only does this point to the need for more housing and meeting the OAN (this would also add to the exceptional circumstances for releasing green belt land for housing), but it also points to needing to deliver more than the OAN.

This means that the failing to deliver the OAN is even worse than not providing 27% of the need, as more is needed in Elmbridge. This clearly points at the plan being Ineffective, not Positively prepared of Justified and not

renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Consistent with national policy.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of

policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its

urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council acknowledges that Elmbridge is an expensive borough in which to live, with a high affordability ratio and an acute need for affordable homes. Through the preparation of the draft Local Plan, the Council has explored opportunities for increasing the provision of affordable housing over the plan period through increasing the delivery of market housing. However, the Council reached the decision that the exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not fully evidenced and justified. A decision that took full account of the benefit of delivering a greater number of market homes to enable to the Council to deliver a greater proportion

that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal](#) (SA) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes -

shortfall and this is not addressed in the level of provision proposed in the ELP. While part 2) of the policy also commits to a 'brownfield first' approach, in effect the ELP does not allow development outside of the urban area and effectively limits development almost exclusively to previously developed land in the urban area, including no greenfield allocations outside the urban area. In considering the potential for development involving Green Belt land, the Council concluded that 'exceptional circumstances have not been fully evidenced and justified to make changes to the Green Belt boundaries in the borough'. It is not clear on what basis this judgement was made. It is clear that the Council had previously concluded the opposite, that 'exceptional circumstances' did exist that justified the release of Green Belt land to meet housing need. This was set out in the previous Reg 18 consultation stages. It is also clear that before the current Reg 19

provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the

Draft ELP, officers were also still of the view that exceptional circumstances did indeed exist and justified Green Belt release. This had been discussed at the Local Plan Working Group of councillors. A draft ELP was presented to members of that Group in June 2021. The content of the plan and the agenda papers have not been published. However, the Cabinet member for Planning is recorded at the time as stating that councillors asked officers to look again and '... considered that the officer recommended draft Plan and the proposed release of Green Belt was not supported by the exceptional circumstances as set out in the evidence base documents'. There is no substantive evidence for the change of heart which appears to be a wholly political decision contrary to previous officer advice and represents an 'in principle' judgement not to countenance the release of Green Belt land to meet a proportion of housing need, no matter what the benefits or merits of the case. The purposes of the Green Belt are well

Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites

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

would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots

this will increase every year through the plan period. This need affects market homes and is compounded by the failure to meet the need for affordable homes. The affordability ratio is one of the worst in England and comparable to some of the highest priced central London Boroughs and is worsening over time. It is acknowledged that this is affecting life chances and equality by limiting access to decent homes and adversely impacting employment and the local economy, as people cannot afford to live in the Borough. Topic Paper 1 identifies unmet needs in the surrounding areas of the South East and London. This reinforces the need for Elmbridge to do its utmost to meet its own needs and consider contributing to meeting those wider needs. It is relevant in this regard that the adjoining London Borough's have capacity driven housing targets because of the nature of the urban area and the level of unmet need has been a substantial concern for the GLA and

beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality.

The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields

Secretary of State that must be tackled in the next review of the Plan and is an issue for adjoining authorities. The old Core Strategy was based on the SE Plan, which was not a needs based assessment for Elmbridge. It relied on the regional spatial strategy which sought to balance need and supply across the wider region. The core strategy figure for Elmbridge was consequently below the level of need within the Borough, as evidenced in the more recent needs assessments and the worsening affordability position over many years. The position is worse than identified in this Topic Paper however, and the HBF have identified that the actual housing need in Elmbridge using the standard method and including what the Government consider to be the full amount necessary to address past shortfalls in delivery is 859 dwellings each year. This is over 200 homes more each year than the capped figure and itself indicates that the need for homes in Elmbridge. The Council have

required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local](#)

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

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

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

[Housing Need Assessment \(2020\).](#)

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what

as would be necessary in considering individual proposals and their impact on the Green Belt and overall spatial strategy. On the basis of the original evidence, the Council had previously considered exceptional circumstances exist and it is clear therefore, that this then needs to be considered at a detailed, site specific level to be able to form a reasoned judgement over whether these circumstances are met in any individual case, which may justify the release of Green Belt in light of the relevant planning considerations. Indeed, it is clear from the work on SANGs, that the deficiencies in supply of alternative green space can only reasonably be met by corresponding Green Belt release to enable the provision of sufficient SANG for the wider Borough. This benefits development in accordance with the overall spatial strategy, supporting densification and development in the urban areas within the 5km and 7km SPA zones. These and other environmental and biodiversity

is built in their neighbourhood.

The Council acknowledges that Elmbridge is an expensive borough in which to live, with a high affordability ratio and an acute need for affordable homes. Through the preparation of the draft Local Plan, the Council has explored opportunities for increasing the provision of affordable housing over the plan period through increasing the delivery of market housing. However, the Council reached the decision that the exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not fully evidenced and justified. A decision that took full account of the benefit of delivering a greater number of market homes to enable the Council to deliver a greater proportion of its identified affordable housing need of 269 dwelling per annum (dpa), set out in the Local Housing Need Assessment (2020) (LHNA). Concluding that the benefit of doing so did not outweigh the harm in releasing and developing on the Green Belt. The Council acknowledges that it will not be possible to meet the Borough's affordable housing need in full through the approach set

benefits could be derived by taking a more pro-active view of Green Belt release as an agent for positive change which can maximise the benefits to the community and environment over the plan period. In this regard, it is clear from the evidence base that:

1. When considering housing need in Elmbridge it is acute.
2. There are inherent constraints on supply that mean that housing needs cannot be met from within the existing urban areas or land sustainably located outside the Green Belt. The legal requirement to pursue sustainable development means that sustainable patterns of development, with accessibility to the main centres of population and transport accessibility, providing goods and services within balanced, accessible communities, need to be overlain over any assessment of Green Belt. this favours those locations on the edge of the main urban areas and accessible to rail and other transport modes.
3. It is evident that sustainable development

out in the proposed spatial strategy. However, in light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the Draft Elmbridge Local Plan 2037 is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Moreover, national policy and guidance do not require identified affordable housing need to be met in full ([NPPE paragraph 62](#) and [PPG Housing & Economic Needs Assessment paragraph 024](#)). The Council also has additional models/methods of delivering affordable housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could

cannot be achieved, indeed needs would not be met which impact on the economy, social equity and the environment, without consideration of Green Belt release. Access to decent housing is a priority and the socio-economic impacts of not meeting need have not been properly weighted in the Sustainability Appraisal that accompanies the ELP.

4. It is evident that the extent of Green Belt release can be limited both in quantum and in the nature of proposed release. It is clear from the assessments previously carried out in the plan process and from considering the example of the Land east of the Molesey Road as an example, that targeted Green Belt release can achieve significant benefits and minimise the impact of development on the openness of the Green Belt.

5. It is also evident the consequences for the Green Belt can include local enhancements to both accessibility and the function of the Green Belt in respect of its key purposes that minimise the

deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal](#) (SA) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes - 16,300 homes over the plan period through the release of green belt sites and optimisation of development in existing urban areas (see option 3 of Regulation 18 Options Consultation, 2018). Whilst this option would meet development needs, including the need for affordable housing in full, it would fundamentally alter the character of the Borough's towns

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| | | | | <p>overall effect of such release.</p> <p>If these circumstances do not amount to 'exceptional circumstances' then it is not clear what circumstances would do? The position of the Council is both inconsistent with their previous view, with what appears to be the initial officer advice on this Reg 19 Draft and flies in the face of the NPPF</p> | | | | | | | | | | | <p>and villages through coalescence, urban sprawl and encroachment of new development into the countryside due to the release of Green Belt land necessary to achieve the quantum of development. In addition, this option was found to have the most significant negative impacts of all the options considered by the Council, largely due to the impact of distributing development widely across the Borough.</p> <p>The Council has assessed the suitability of the promoted site – Land East of Molesey Road for release from the Green Belt designation and it was found that the site was not suitable for release. The assessment is set out in Green Belt Site Assessment Proforma SA-72.</p> |
| 1111034 | Lauren Manoharan | High Consulting Sorbon Estates | Yes | | Yes | <p>Policy SS3 – Scale and location of good growth</p> <p>Comments on Policy SS3 – Scale and location of good growth: Sorbon Estates is supportive of the Council seeking opportunities to develop previously developed land within the urban areas of the borough and that development in urban areas should be optimised to increase the efficient use of land. They are also supportive of Weybridge being identified as an urban location to deliver 1,200 units (17.7% of the borough's total housing) as part of the Borough's housing targets. However, the 1,200 units</p> | | | | | | | | | <p>Support and comments noted.</p> <p>The quantum of development identified in each settlement area within strategic policy SS3 are not considered to be maximum figures and they do not preclude the delivery of additional homes beyond these figures through the development process.</p> |

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| | | | | | | proposed should not be considered to be a maximum number, as there may be opportunities to deliver a higher number of units in Weybridge subject to available sites coming forward. | | | | | | | | |
| 1111066 | Mark Sugden | | Yes | | Yes | EBC evidence base indicates the need to protect Green Belt and Green Open Spaces as they are significantly important to the borough. The spatial strategy of optimisation will support urban regeneration and the effective use of brownfield land and is consistent with national policy. | | | | | | | | Support noted. |
| 1111087 | Paul Manning | Newsteer Real Estate Advisors obo Leos International Holding Group (Chris Pittock) | Yes | | No | Our client is supportive of this policy and looks forward to supporting the Council in delivering the 6,785 net homes required through to 2037. They also support the 'brownfield first' approach, and prioritising land in the urban areas. Notwithstanding this, our client proposes the following alterations to Section 3 of the policy wording, to allow for both underutilised and now vacant sites in employment use, to be considered for residential redevelopment. | Y | | This amendment will ensure that the Policy continues to accord with proposed Policy HOU2 concerning the optimisation of sites. | Development opportunities will be encouraged within the urban areas which accord with other policies in the Plan and meet the following strategic aims: a. Enhancing the vitality and viability of town and district centres. b. Repurposing/redevelopment/diversification of specific sites now vacant and/or underutilised in employment use. c. Repurposing/redevelopment of previously developed sites into residential and/or mixed uses. | 220729_Leos_Elbridge Local Plan Repls_v1.0.pdf https://consult.elbridge.gov.uk/qf2.ti/a/1205954/557521/PDF/-/220729%5FLeos%5FElbridge%20Local%20Plan%20Repls%5Fv1%2E0%2Epdf | It is considered that in the absence of a five-year housing supply and a Green Belt Review, that this Site should be allocated for residential use within the emerging Local Plan. The above has demonstrated that it is available, suitable and deliverable and should therefore be included within the calculations of the five-year housing supply. The Site already has Permitted Development approval for residential use and allocating the Site will allow for additional housing units to be provided. | No, I do not wish to participate at the oral examination | Support and comments noted. The proposed modifications are not considered to be necessary. Permitted development rights already make it possible to change the use of employment uses to residential use without planning permission. The Council seeks to promote mixed use redevelopment of sites where possible, the wording of SS3(3)(a) – (c) is considered appropriate. St George's Business Park, Brooklands Road, Weybridge is listed in the extant planning permissions and forms part of the housing trajectory. It would result in double counting to include it as a LAA site/site allocation. |

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| #111110 3 | Mike Partridge | | Yes | Yes | In response to my request for clarification of how the figure of 320 units for Claygate was derived I received the following response from the Planning Policy Team 'The housing figure of 320 for Claygate comes from planning permissions, sites under constructions, and windfall sites as well as the sites identified through the Land Availability Assessment (2022). You can find the Land Availability Assessment (2022) on the Local Plan Supporting Evidence webpage https://www.elmbridge.gov.uk/planning/local-plan/local-plan-supporting-evidence/ ' Whilst this confirms the categories from which the total is derived and helps identify more detail it still leaves a significant proportion (i.e. 114 units) not accounted for under the Planning permissions / Sites under construction and the LAA (2022). I feel it is important that the plan should clarify whether these 114 are Windfall units or additional in one of the other categories. | | | | | | | | Comments noted. The housing figure for Claygate set out in strategic policy SS3 (4) using a 31 st March 2022 there were 219 sites expected to be delivered in Claygate these included sites under construction, sites with planning permission and LAA sites. In addition, 101 units were identified in windfall development (sites of 1 -4 units), giving 6 or 7 net additional homes per year. To improve clarity an amendment to the footnote under strategic policy SS3 (4) changing the text with the to "to include windfall" has been included in the Council's proposed modifications to the ELP submitted to the Inspector for Examination. Please see minor modification MM3.10. |
| 1111890 | Mr Crickett | Boyer Planning obo Antler Homes PLC | | No | 3. POLICY SS3 – THE SCALE & LOCATION OF GROWTH The Plan Period The Plan is unsound. 3.1 The DLP addresses a Plan-period between 2021 and 2037, and is anticipated by the Council to be adopted in the Summer of 2023. 3.2 The NPPF (paragraph 22) includes an express requirement for strategic policies to look ahead over a minimum 15-year period from adoption. If the DLP is to be adopted on the programme anticipated by the Council, and set out on page 7 of the DLP, in the Summer of 2023 the plan period ending in 2037 will only | Green Belt as justification for proposed housing delivery approach 3.16 In respect of Green Belt, the NPPF confirms that Green Belt boundaries can be altered, and that Local Plans are an appropriate vehicle for doing so. The NPPF states that such alterations should be made only where exceptional circumstances are fully evidenced and justified (paragraph 136). 3.17 Whilst exceptional circumstances are intentionally not defined, there is case law which provides a framework for the consideration of the issue. In particular, the judgments in Calverton4 and Compton5. Calverton considered the issue of exceptional circumstances and came to the view that planning judgments over exceptional circumstances should involve consideration of: • The scale and acuteness of the objectively assessed need; • The inherent constraints on supply/availability of land prima facia | -see letter | 220727 Elmbridge Reg19 Representations obo Antler Homes.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/563433/PDF/-/220727%20Elmbridge%20Reg19%20Representations%20obo%20Antler%20Homes%2Epdf | Raises the following concerns: • Failure to take positive steps through the Duty to Co-operate to seek to resolve the unmet development needs of the Borough through co-operation with neighbouring authorities • Failure to take positive steps through the DtC to seek to resolve the unmet development needs arising across the HMA and adjoining authorities • Concern the plan will not provide strategic policies to address a | Yes, I wish to participate at the oral examination | Should the DLP be submitted for examination, Antler Homes would welcome the opportunity to participate in the Examination Hearings in order to ensure our concerns with the DLP are presented to the appointed Inspector(s) in person | Objection noted. The Council has undertaken active and on-going Duty to Cooperate activities with its partners and statutory consultation bodies in accordance with the requirements of the Duty to Cooperate, including with neighbouring authorities, during the development of the DELP. These activities are detailed in the Council's <u>Duty to Cooperate Statement of Compliance</u> (June | |

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| | | | | | <p>be looking forward over a 14-year period. This clearly being in conflict with the NPPF.</p> <p>3.3 To redress this shortcoming, we recommend the Plan-period should be extended by at least 12 months ending in 2038. And with additional sites identified to meet the additional year's supply (in full) requirement.</p> <p>3.4 Furthermore, there are recent examples where the duration of time between the Submission of an emerging local plan, the commencement of the Examination in Public, undertaking of the Main Modification consultation before finally then achieving Adoption of a new local plan exceeds the Council's anticipated timings. Page 7 of the DLP sets out this process is expected to occur between the Autumn 2022 – and Summer 2023. A duration of approximately 12-months.</p> <p>3.5 However, in our opinion, given the contentious nature of the DLP's spatial strategy and planned level of delivery, matters we will address further in this representation, we consider the Examination to Adoption time period may very easily become extended by the requirement to undertake significant main modifications to the DLP, including the need for identification and agreement on further sites (including appropriate release of Green Belt land) to be allocated to ensure the Borough's minimum housing needs are met. In this context, even a small delay of 6-months to the Examination period will result in the DLP's adoption extending to an overall duration of 18-</p> | | | <p>with the potential to accommodate sustainable development;</p> <ul style="list-style-type: none"> • Consequent difficulties in achieving sustainable development without impinging on the Green Belt; • The nature and extent of the harm to the Green Belt (or the parts of it which would be lost if boundaries were reviewed); and • The extent to which impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practical level. <p>3.18 Compton also clarified that the general planning needs, such as ordinary housing, are not precluded from the scope of exceptional circumstances. Furthermore, it clearly established that meeting ordinary housing needs is often part of the necessary judgement that exceptional circumstances exist. The phrase exceptional circumstance in this context is therefore not limited to an unusual form of housing nor is it particular to a specific intensity of need.</p> <p>3.19 The Council have presented in the evidence base, specifically Topic Paper 1 (TP1), positions regarding the headline matters set out by Calverton which we consider below.</p> <p>The scale and acuteness of the housing needs</p> <p>3.20 With regard to acuteness of need, the Borough's SM OAN of 647 homes per annum, or 9,705 homes over the plan period, represents a significant step change from the adopted Core Strategy target of 225dpa, and the net new dwellings delivered in the Borough since 2011 (presented in Table 5 of TP1) – at 330 per annum. This delivery rate having achieved approximately 70% of the SM OAN. In addition there is significant unmet need arising across the neighbouring and housing market authorities. The council's own 'best estimate' being that alongside the DLP there would be an unmet need of circa 11,500 homes generated over the fifteen-year period. Yet despite these facts, the Council consider it is undesirable for the DLP to deliver more than 70% of the SM OAN given this will require amendment to the Green Belt to provide sufficient land. Furthermore, the Council have set out they do not consider their local housing need to be any more intense/acute when compared to neighbouring Local Planning Authorities.</p> <p>3.21 We consider this aspect of the Council's rationale perplexing. The presented evidence on delivery demonstrates that the Borough's ability to achieve its minimum housing needs within the existing urban areas is limited – capable of achieving 70% of today's local housing needs. This therefore</p> | | | <p>period of at least 15-years from the likely adoption date of the DLP</p> <ul style="list-style-type: none"> • Failure to meet the Borough's minimum housing needs in accordance with national policy and guidance • Failure to recognise the very clear exceptional circumstances in the Borough and to accordingly undertake and review the existing Green Belt boundaries to ensure at least minimum housing development needs are met in full • Failure to offer a justified and clearly evidenced basis for the proposed housing allocations, and concerns that the DLP will not be effective in meeting even the lower housing requirement identified by the Council • Failure to propose an effective strategy capable of meeting specialist accommodation needs • Failure to adequately consider reasonable alternatives in the SA and the selection of a preferred option which does not perform well • Likelihood that the DLP as currently proposed will necessitate review of the Green Belt boundaries before the end of the plan period, undermining one of the essential characteristics of the Green Belt – its permanence <p>It is important to recognise that the Council should only submit a plan for examination once it</p> | | | <p><u>2022), Duty to Cooperate Statement of Compliance Update (August 2023)</u> and Statements of Common Ground published with the <u>Core Documents</u> submitted for Examination. The matter of meeting the Borough's housing need, both within the Borough itself or with assistance from other authorities has been explored. However, this has not been identified as a deliverable option as all neighbouring authorities have confirmed that they cannot assist in meeting some / all of Elmbridge's unmet housing need.</p> <p>All DtC partners have confirmed that they consider the Council has adequately discharged its duty to co-operate in preparing the plan. As such, the Council considers that it has met its Duty to Cooperate in full and this is detailed within the documents mentioned above.</p> <p>When the Council commenced preparation of the DELP it was intended that it would have a 15-year plan period. However, due the impact of the Covid 19 pandemic, as well as the uncertainty around the Government's proposed changes to national policy and the need to consider the implications of these proposed</p> |
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| | | | | | <p>months from submission, resulting in adoption in the Spring 2024. Thus, the DLP's Plan-period will effectively be reduced to just 13 years.</p> <p>3.6 In order to ensure this issue does not arise, we suggest the plan period should be extended by at least two years from that proposed by the DLP. And with additional sites identified to meet the additional years supply (in full) requirements.</p> <p>3.7 As a final comment on the Plan-period, we would question the appropriateness of the DLP commencing in 2021, some 2 years prior to its intended adoption. The Standard Method for assessing minimum housing need is presently based on the affordability ratio for 2022 and is a forward-looking assessment. It therefore seems at odds to have a Plan-period commencing prior to the point at which the local housing needs assessment is undertaken.</p> <p>The Proposed Housing Target The Plan is unsound. It is not positively prepared, justified, effective or consistent with national policy</p> <p>3.8 The NPPF explains (paragraph 60) that the minimum number of homes needed should be informed by a Local Housing Needs Assessment. The Planning Practice Guidance (PPG) clarifies that housing need is the unconstrained assessment of the number of homes needed in the area. It goes on to state that it is the first step in the process of deciding the number of new homes to be planned for1.</p> <p>3.9 The NPPF (paragraph 61) states the Standard Method (as per the PPG) is to be</p> | | | | | | <p>demonstrates that in order to meet the minimum need in full there is clear justification to look to amendments to the Green Belt to release and safeguard sufficient land for the Borough to meet its minimum needs in full. Specifically given the level of unmet that is otherwise generated during the DLP plan period by the needs of the Borough itself and the unmet needs of neighbouring authorities where these might be capable in some part of being accommodated within the Borough.</p> <p>3.22 The Council's position that the Borough's housing need is not more intense or acute when compared with other neighbouring LPAs, and that this in some way demonstrates a lack of intensity and acuteness as paragraph 6.28 of TP1 seems to state, is confusing. Especially when it is noted that across these comparable LPAs there is clear evidence that minimum housing needs are not being met through adopted and emerging local plan reviews.</p> <p>Conversely, we are firmly of the opinion that in the context that presently the best estimate is that over the DLP plan period there will be unmet needs of circa 11,500 homes resulting it is evident that across the neighbouring LPAs there is clearly an intensity and acuteness of need. Need which needs to be met. Or at least significantly reduced by each LPA through local plan reviews individually and or collectively through a strategic level solution.</p> <p>3.23 The current undersupply of homes and consequences of this are also evident in the worsening affordability in the Borough. The latest affordability ratios demonstrate that affordability continues to worsen. The current median affordability ratio stands at 17.78 having risen from 6.44 in 1997. This is striking when compared to the average ratio in England which stands at 9.1. Indeed, TP1 at paragraph 6.41 acknowledges that the Borough has one of the highest average house prices in the South East and that affordability levels are amongst the highest in Surrey.</p> <p>3.24 Notwithstanding, paragraph 6.43 of TP1 states'...the Council consider the Government has incorrectly assumed that delivering more homes within the borough will improve affordability'. Citing research published by Reading University in 2011 for this conclusion TP1 sets out that delivering the DLP's unmet '2,918 homes' will not have any material effect on reducing either the average house price in the Borough or the unaffordability levels. We have been unable to identify any such evidence in the DLP's evidence base which quantifiably demonstrates that this position is indeed correct, i.e. an</p> | | | <p>considers it to be sound. This includes the requirement to have robust evidence to support the strategy being proposed by the submitted plan.</p> <p>In our view, the council cannot reasonably claim that it considers the DLP and its evidence base to be sound. Particularly once the issues raised within our representation (and doubtless the representation of others) have been taken into account and objectively considered.</p> <p>We would encourage the Council to seek to address the issues we have raised and to reconsider its current direction of travel regarding the DLP. And not to submit this plan for Examination.</p> | | | <p>changes, for the DELP preparation, the anticipated timeframe in which the Local Plan would be adopted has been delayed. Leading to the publication of a draft plan with a plan period of less than 15 years.</p> <p>Taking a pragmatic and proportionate approach to the evidence base, the Council is mindful that to extend the plan period to 15 years would require various elements of the evidence base to be revisited and updated, which has significant time and cost implications. Moreover, a 15-year plan period is not a legal requirement but guidance. Neither the Examining Inspector, nor the Council, are bound to follow guidance and may depart from it provided that its done consciously and with reasons.</p> <p>The Council is among a minority of local authorities that are continuing to bring forward their local plans in the current planning climate and it is considered that adopting a local plan should be the priority in light of the Government's national objective to ensure all local authorities have a local plan in place.</p> <p>During the development of the Draft Elmbridge Local Plan 2037 (DELDP) several options for the approach to the spatial strategy</p> |
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delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's

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| 1112153 | Victoria Potts | Epsom and Ewell Borough Council | | Please see uploaded document at question 4a | | | | | | EBC REG19 response.docx https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/564395/DOCX/-/EBC%20REG19%20response%2Edocx | We are of the opinion that wider unmet needs should be appropriately considered in determining whether exceptional circumstances apply to justify altering Elmbridge's Green Belt boundaries to meet the boroughs housing needs (whilst protecting the character of its existing communities) and not continue to add to the wider unmet housing needs and if possible, assist to help in meeting the wider unmet need as well. | | | Comments noted. The Council has set out its response to the comments/issues raised by Epsom and Ewell Borough Council in their representation in its Statement of Common Ground . |
| 1112160 | Beata Ginn | National Highways | | Please see uploaded document at question 4a | | | | | | National Highways FORMAL RESPONSE #17039 reg19 Elmbridge Local Plan Regulation 19 Representations Consultation.msg https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/564433/BIN/-/National%20Highways%20FORMAL%20RESPONSE%20%5F17039%20reg19%20Elmbridge%20Local%20Plan%20Regulation%2019%20Representation%2Emsg | In the case of the Draft Elmbridge Local Plan 2022-2037, National Highways is primarily interested in the impacts of the development plan on the M25 – more particularly, M25 Junctions 9 to 11 – and the A3 between M25 Junction 10 and its junction with the A309. Having reviewed the materials available via Elmbridge Borough Council's consultation page, we offer the following comments: Elmbridge Local Plan, Transport Assessment, May 2022 & Elmbridge Local Plan, Infrastructure Delivery Plan, May 2022 The supporting Transport Assessment (TA) sets out the associated highway and transport matters. To identify the impacts of the draft spatial strategy on both the SRN and the local highway network (LRN), the SINTRAM model has been used. Two modelling scenarios are presented and | | | Comments noted. The Council has set out its response to the comments/issues raised by National highways in their representation in its Statement of Common Ground . |

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| | | | | | | | | | | | delivery of the Elmbridge Local Plan 2022-2037. | | | |
| 1112176 | Ellie Laws | Stride Treglown on behalf of The Whiteley Village Trust | Please see uploaded document at question 4a | Whiteley Homes Trust observations: Draft Local Plan The Trust is pleased that the Council recognise the vital role played by the Trust in helping to meet the growing needs of older people in providing affordable housing, and specialist care for older people in the Borough. The Trust welcomes that the emerging Local Plan has identified Whiteley Village as a "broad location for development" under Policy SS3 "Scale and Location of Growth". The Trust acknowledges that the scale and location of growth set out in Strategic Policy SS3 has been informed by "careful consideration of the evidence and the balancing of the social, economic and environmental positive and negative effects which could arise from growth and development" as presented by the Council. Strategic Policy SS3 sets out the quantum and spatial distribution of development in the borough, including setting out the preferred location for growth, as required by national policy. It is noted that Strategic Policy SS3 promotes the principle of growth and development within a defined location within the Green Belt (Whiteley Village). Policy SS3 is strategic in nature and therefore it is entirely appropriate to conclude that the scale of development envisaged by this policy is of a greater scale that merely isolated infilling of individual development plots as suggested by Adopted Core Strategy CS6 (2011) and the | | | | | | 220728_The Whiteley Homes Trust Local Plan Representations.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/564486/PDF/-/220728%5FThe%20Whiteley%20Homes%20Trust%20Local%20Plan%20Representations%2Epdf | As per 2a. | | | Support and comments noted. At this time there are no detailed plans for the site that would require a specific site allocation or policy for continued development of Whiteley Village. Criterion (5)(c) of strategic policy SS3 clearly states that the Council supports the delivery of development that makes an important contribution to Whiteley Village for specialist care facilities and is working with the Trust to produce a Masterplan for the site. |

subsequent Conservation Area Appraisal and Management Plan (2012).
 The Trust and Council are committed to work in a collaborative manner to develop a Masterplan for the Village, on the understanding that the Masterplan principles will need to reflect and align with the charitable and operational requirements of the Trust. Clarification as to the status of the emerging Masterplan required by Policy HOU6, and its future role as a material planning consideration in the determination of planning applications is considered appropriate and necessary.
 The Trust is keen to ensure that the future development context at Whiteley Village is presented as a site-specific policy within the emerging Local Plan. Such a policy can address the opportunities in the Village, and refer, in supporting text, to the importance of the concept of "very special circumstances" applicable to a Green Belt location.
 Given the reference to Whiteley Village within Policy SS3, we consider that the Village should therefore be identified within the Site Allocations list and on a Site Allocation Map.
 In summary, while the Draft Local Plan includes supportive statements towards appropriate long-term development within Whiteley Village, the absence of a site-specific policy, and loss of importance references to the original development principles (which inform the broad location and scale of development within the Village reflecting the policy sentiment of Policy SS3), is such that

the Trust must object to the current wording. The Trust is committed to working with the Council to find a suitable alternative wording which captures the disparate supportive statements within the Draft Plan, and which acknowledges the importance of prudent and positive planning through the vehicle of a site-specific Masterplan for the Village.

A new site-specific policy and supportive text is presented for consideration:

Policy ** Whiteley Village

In recognition of Whiteley Village's unique and very special circumstances, its charitable status, the evolving needs of the elderly population in the Borough, the desire to conserve and enhance its character and function, and the importance of safeguarding a sustainable long term future for the Village, the Council will support the long-term ambition to expand the almshouses and care provision in Whiteley Village.

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A long-term development aspiration will be delivered via a Masterplan to be prepared collaboratively between the Council and the Trust. The Masterplan will set out a modern interpretation of the original development principles of the Village as promoted by the founder William Whiteley in a way which does not cause detrimental harm to interests of acknowledged importance and which

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| | | | | | <p>has regard to contemporary living standards, design quality, and updated sustainable development objectives.</p> <p>Supporting text alongside the Policy</p> <p>Founded in 1907, Whiteley Village is unique in that it forms a completely self-contained settlement devoted entirely to older people. It continues to play a vital role as a provider of a range of specialist accommodation and care for older people of 'limited means'.</p> <p>The village is located within the Green Belt, is a designated Conservation Area and the vast majority of buildings are listed.</p> <p>The unique nature of Whiteley Village means that it should be protected and its future supported, to enable it to continue to make an important contribution to the provision of accommodation and care for older people. In this regard the Village is identified in Policy SS3 Scale and Location of Growth as a development and location which makes an important contribution to the borough.</p> <p>The Whiteley Homes Trust accommodation is targeted at those of 'limited means' in accordance with the wishes of its founder.</p> <p>The Trust has recently applied to become a Registered Provider of affordable accommodation. It is recognised that, in order for the village to continue this role and to support its long-term sustainability, a more comprehensive approach is necessary to plan for its future to ensure the special significance and integrity of the village as a whole, together with its</p> | | | | | | | | | |
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| | | | | | <p>constituent parts, is protected. This comprehensive approach will be delivered through a Whiteley Village Masterplan. The Masterplan will have regard to the 2012 Conservation Area Appraisal and Management Plan prepared jointly between the Council and the Trust. The Management Plan identified an infill boundary at the time to acknowledge how well considered development plots could be brought forward around the Village heart.</p> <p>In looking to the future and to accommodate increasing pressure facing society in relation to the care of a growing elderly population, the comprehensive approach will look beyond the infill boundary and consider ways in which specialist accommodation can be delivered which does not harm the Conservation Area, but which endeavours to progress the evolution of the Village as originally conceived. While the majority of new accommodation is likely to involve almhouses (bungalows) a modern interpretation of the original development principles offers the opportunity to deliver new quality homes which can adapt to residents needs and which meet modern living and energy efficiency standards.</p> <p>The Council and Trust accept that a very special circumstances case will need to be made as part of the submission of future planning applications. The identification of the Village as a broad location for development acknowledges the Council's support for a comprehensive</p> | | | | | | | | | |
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development strategy. The Council acknowledges that the issues pertinent to the very special circumstances facing proposals across the Village are likely to include, but not be limited to the following issues:

- The unique origins of village and its underlying ethos.
- Focusing on the delivery of affordable and specialist accommodation without significant impact on the public purse.
- The demonstrable need for specialist and elderly accommodation for those in need.
- The desirability of preserving the integrity of the heritage assets.
- Opening up the village, its setting and amenities, to the wider community.
- The suitability of the site given existing community and infrastructure.
- The unique status and role of the Trust
- The extended life expectancy of residents of the Village
- The identification of an infill development boundary within the 2012 Conservation Area Management Plan
- Safeguarding the long-term operational future of the Trust.

These issues will be developed, as appropriate, through the preparation of a Masterplan for the Village.

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The policy will help to deliver the aims of the Elmbridge Sustainable Community Strategy (SCS11) by helping older people to remain

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| | | | | | | independent in their own home. | | | | | | | | | | | | |
| 1112282 | Peter Davis | Turley obo Taylor Wimpey | | | No | Please see uploaded document at question 4a | Y | Y | Y | Y | In our submission, and for the reasons we highlight above, drawn from the Council's own text, this is not a Local Plan which positively contributes to the achievement of sustainable development. In our submission, the Local Plan fails the four 'tests of soundness' at paragraph 35 of the NPPF. | See letter attached | Elmbridge Reps obo Taylor Wimpey ISSUE_organized.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/565232/PDF/-/Elmbridge%20Reps%20obo%20Taylor%20wimpey%20ISSUE%5Forganized%2Epdf | In Taylor Wimpey's submission, the revised draft Local Plan for Elmbridge Borough is flawed and unsound. The Council's own evidence collated for previous consultation stages indicates that a greater level of development can be accommodated in the Borough whilst delivering sustainable development. In doing so, the Council could have produced a Plan which achieves the housing requirement and seeks to address other housing-related considerations including affordability and associated economic factors. | | | | Objection noted. When the Council commenced preparation of the DELP it was intended that it would have 15-year plan period. However, due the impact of the Covid 19 pandemic, as well as the uncertainty around the Government's proposed changes to national policy and the need to consider the implications of these proposed changes, for the DELP preparation, the anticipated timeframe in which the Local Plan would be adopted has been delayed. Leading to the publication of a draft plan with a plan period of less than 15 years. Taking a pragmatic and proportionate approach to the evidence base, the Council is mindful that to extend the plan period to 15 years would require various elements of the evidence base to be revisited and updated, which has significant time and cost implications. Moreover, a 15-year plan period is not a legal requirement but guidance. Neither the Examining Inspector, nor the Council, are bound to follow guidance and may depart from it provided that its done consciously and with reasons. The Council is among a minority of local authorities that are continuing to |

bring forward their local plans in the current planning climate and it is considered that adopting a local plan should be the priority in light of the Government's national objective to ensure all local authorities have a local plan in place.

The Council has undertaken active and on-going Duty to Cooperate activities with its partners and statutory consultation bodies in accordance with the requirements of the Duty to Cooperate, including with neighbouring authorities, during the development of the DELP. These activities are detailed in the Council's [Duty to Cooperate Statement of Compliance \(June 2022\)](#), [Duty to Cooperate Statement of Compliance Update \(August 2023\)](#) and Statements of Common Ground published with the [Core Documents](#) submitted for Examination. The matter of meeting the Borough's housing need, both within the Borough itself or with assistance from other authorities has been explored. However, this has not been identified as a deliverable option as all neighbouring authorities have confirmed that they cannot assist in meeting some / all of Elmbridge's unmet housing need.

public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks

homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a

Need Assessment (2020) (LHNA).

Concluding that the benefit of doing so did not outweigh the harm in releasing and developing on the Green Belt.

The Council acknowledges that it will not be possible to meet the Borough's affordable housing need in full through the approach set out in the proposed spatial strategy. However, in light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the Draft Elmbridge Local Plan 2037 is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Moreover, national policy and guidance do not require identified affordable housing need to be met in full ([NPPF paragraph 62](#) and [PPG Housing & Economic Needs Assessment paragraph 024](#)).

The Council also has additional models/methods of delivering affordable housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's

the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the

to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality.

The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and

plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal](#) (SA) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes - 16,300 homes over the plan period through the release of green belt sites and optimisation of development in existing urban areas (see option 3 of Regulation 18 Options Consultation, 2018). Whilst this option would meet development needs, including the need for affordable housing in full, it would fundamentally alter the character of the Borough's towns and villages through coalescence, urban sprawl and encroachment of new development into the countryside due to the release

their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality.

The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to

paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the

NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

Site allocations
The site allocations include all brownfield sites that are considered achievable in the plan period. The most up to date LAA report provides the evidence for these in terms of suitability, availability and deliverability.

ENV1
Draft policy ENV1 is intended to be a detailed development management policy that will apply to any relevant application. It is not

required to allocate land to meet the requirements of the draft policy.

ENV11

Draft policy ENV11 sets out an approach of positive management, stating that "development within Strategic Views will be permitted provided that it has been well designed to take account of the setting, character and amenity value of the view. Proposals must not obscure or adversely affect these views".

Duty to Cooperate

The Council has undertaken active and on-going Duty to Cooperate activities with its partners and statutory consultation bodies in accordance with the requirements of the Duty to Cooperate, including with neighbouring authorities, during the development of the DELP. These activities are detailed in the Council's Duty to Cooperate Statement of Compliance (June 2022), Duty to Cooperate Statement of Compliance Update (August 2023) and Statements of Common Ground published with the Core Documents submitted for Examination. The matter of meeting the Borough's housing need, both within the Borough itself or with assistance from other authorities has been explored.

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| | | | | <p>intention to discourage comments altogether?</p> | <p>location of good growth, p27. Settlement / No. of units* / % of total Hersham / 560 / 8.3</p> <p>A.1. The target of 560 new dwellings is far too high for Hersham. In 2016 the wards were redrawn, Hersham shrank from 12500 residents to 8500 residents. Have the targets also been shrunk by 1/3? If not, they should have been.</p> <p>A.2. Within the last five years, Hersham has provided an additional 250 dwellings, by using half of the playing field of the previously Rydens school, now the Three Rivers Academy. Has this number been accounted for? These dwellings were being built while the current plan is being drafted. Should these 250 new dwellings not be taken out of the current target to be achieved?</p> <p>A.3. Hersham is 65% Green Belt. There are not enough brown sites left in Elmbridge to satisfy such high targets. There is simply no more space available if Green Belt is to be preserved. Very recently (latest 5th July 2022) Michael Gove, prior to his dismissal from government, stated in parliament that such targets should be scrapped for the South East.</p> <p>To support my point, please refer to document attached (Michael Gove, Former Housing Secretary)</p> <p>A.3.1 Extracts, dixit Mr Gove: "[It would be] no kind of success to simply hit a target if the homes that are built are shoddy, in the wrong place, don't have the infrastructure required and are not</p> | <p>Fact: We take all peoples views into account. Responding to your comments and feedback has enabled us to look at our options again and add to them."</p> <p>C.1. The method of response on the website is highly intimidating (the very questionnaire I am answering here), couched in a language that most residents will shy from, feeling they cannot contribute a response in this supposedly FORMAL, LEGAL setting even though as the residents and users of the locations, they are the true experts as to whether or not they can be put on the plan.</p> <p>The truly relevant part of the consultation document is Chapter 9, which contains the list of locations. With regard to Hersham it's ONE PAGE out of 140 pages. These are the highly significant lists which should have been made obvious and readily accessible to residents instead of being buried between pages 93 and 106.</p> <p>C3. An attempt from local residents groups to simplify the process by which residents could respond to the plan was distributed throughout Hersham with all the Hersham Locations listed and asking residents to comment and send to the Council.</p> <p>One day before the deadline, on 28th July 2022, the front page of the Elmbridge Borough Council has changed again, this time telling residents not to use this form:</p> <p>"The Regulation 19 representation closes on Friday 29 July at 4pm. Please respond using the official online representation form, with GDPR declaration, rather than unofficial localised forms."</p> <p>Reference: file attached EBCFrontPage20220728</p> <p>I find it unhelpful that the Council does not welcome responses from residents, in whichever form the residents find easier to send them. Their opinion should be welcome.</p> <p>C.4. The consultation period, short as it is, is set up over the summer when people are away. Is this an attempt to impair the opportunity for the public to comment?</p> <p>----- -----</p> | <p>EBC Response to Local Plan Sub-Committee for Hersham.pdf</p> <p>https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556838/PDF/-/EBC%20Response%20to%20Local%20Plan%20Sub%2DCommittee%20for%20Hersham%2Epdf</p> <p>HershamLocalPlanExtensionDeadline20220718.docx</p> <p>https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556839/DOCX/-/HershamLocalPlanExtensionDeadline20220718%2Edocx</p> <p>HershamFloodMapGetTheData_20220718.png</p> <p>https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556849/PNG/-/HershamFloodMapGetTheData%5F20220718%2Epng</p> <p>HershamFloodMapWarningArea_20220718.png</p> <p>https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556850/PNG/-/HershamFloodMapWarningArea%5F20220718%2Epng</p> <p>HershamShoppingCentreGoogleEarthFlood20220728.png</p> <p>https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556851/PNG/-/HershamShoppingCentreGoogleEarthFlood20220728%2Epng</p> <p>HershamFloodMapPaulVansonCourt20220718.png</p> <p>https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556852/PNG/-/HershamFloodMapPaulVansonCourt20220718%2Epng</p> | <p>Hersham, car park only. Delivery period (years): 1-5 Allocated for: 200 residential units</p> <p>Redeveloping this site is totally unjustified for a number of reasons which you yourself list in your document.</p> <p>F.1. There must be a mistake in the site definition. In other documents on the website, as late as May 2022, the site reference includes the shopping centre. This has then been changed to be car park only. It is impossible to think that the car park alone could sustain 200 additional dwellings.</p> <p>F.2. Hersham Shopping Central is the heart of Hersham.</p> <p>The Walton Heart shopping redevelopment which took the better part of 10 years to build never recovered its previous levels of activity. Walton has a high street, Hersham does not. Hersham is much smaller than Walton and it will not survive if the evisceration of its only commercial centre.</p> <p>It is impossible to justify this redevelopment. Hersham has very few amenities. The new Lidl supermarket does not present the range of shops, restaurants and coffee shops that have taken residence in the Hersham Shopping Centre.</p> <p>Quoting your own plan's objectives: "Supporting our town, district and local centres</p> | <p>speaking at the Oral Examination and will bring documents to support my arguments.</p> | <p>notes that were provided on the consultation homepage explained the purpose of the representation period and how to consider legal compliance and the test of soundness.</p> <p>The questionnaire that was prepared is based on the Planning Inspectorate's model representation form. This will ensure consistency at examination.</p> <p>A1. The allocation of the quantum of development for each settlement area set out in strategic policy SS3 has been driven by the principle of sustainable development, again in accordance with national policy. The Plan seeks to make as much use as possible of existing suitable brownfield sites, including all publicly owned assets and land holdings. The urban areas of the borough were assessed, identifying the amount of development that could sustainably be accommodated. A2 Yes, these units have been accounted for in the identification of housing need in the Borough, which has informed the quantum of development identified for Hersham in strategic policy SS3. The evidence of housing need is set out in the Council's Local</p> |
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| | | | | | <p>afresh. We are being told that this plan which is necessarily obsolete (started in 2016! see above) is final, which does not make sense. It is based on old information and on measurements taken during Covid, particularly with regard to residents' and business activity and to car parks which stood empty for the better part of two years and are now still not back to normal.</p> <p>Covid is not over, cases are rising again at the time of writing (July 2022). It would be sound to wait until the situation settles properly before the plan gets restarted from scratch. Telling us that a plan is in its final formal phase, even though it has had major changes in 2018 and 2020 and keeps changing, and has been invisible during the time of Covid when residents were struggling in an unprecedented crisis, is not merely unsound, it is morally wrong.</p> <p>We are told that the last public consultation occurred in 2017. Five years ago! (Ref: Note at bottom of page: "All feedback can be found in the Elmbridge Local Plan Strategic Option Consultation (Regulation 18) Summary of Consultation Response, July 2017", p4, Options Document. Options__Web_final_version.pdf). Yet the plan has never stopped changing during these five years with key sites being included, excluded and included again in various waves of changes.</p> <p>B.2. The consultation period was supposed to open on Friday 17th June 2022. Due to an unexplained website</p> | <p>D.2.ii. H10 - US390 The Royal George Pub, 130-132 Hersham Road Hersham, KT12 5QJ Delivery period (years): 11-15 Allocated for: 15 residential units (Chapter 9, Page 99)</p> <p>We were told at the local residents meeting on Fri 1st July 2022 by Ms Karen Randolph of the Local Plan Committee that the owners only had to write to the council and their properties would be taken off the plan immediately.</p> <p>Why were they on the plan in the first place without any prior consultation?</p> <p>So much for AVAILABILITY.</p> <p>E. Effective</p> <p>E.1. Climate Change</p> <p>E.1.1. On of the targets of the Local Plan is that it has to address the environment and climate change. As a result many assertions of the fact that we will not drive cars but will walk, cycle and use public transport are repeated throughout the document.</p> <p>But nothing is indicated in the document as to the improvements needed in Elmbridge so that public transport can support this miraculous change. There are NO DETAILS at all. No added bus routes, no increased numbers of buses, bus route additions, no new cycling lanes, no budget considerations. The repeated vague statements of improved public transport are merely lip service, not a serious effort, not a genuine plan,</p> <p>In that respect it is wholly INEFFECTIVE as a plan.</p> <p>E.1.2. Car parks</p> <p>As everybody will be walking and cycling, we will not need car parks. This is perhaps why every single car park in Hersham is targeted for replacement with new dwellings.</p> <p>The following car parks are included in the plan, 6 out of 15 possible sites. (Chapter 9, p 99 and 100)</p> <p>H3 US379 Hersham Shopping Centre, Molesey Road, Hersham, car park only. (This might be a mistake, as 200 dwellings are listed, maybe this includes the shopping centre as well, which is inconceivable, as it is the heart of Hersham).</p> <p>H5 US45 Car park to the south of</p> | | <p>requiring the best use of resources and assets and minimise flood risk. p 21</p> <p>Ref quoted: How are we going to respond to our needs? 1.15 The council, ... and avoiding areas unsuitable for new development for example, where they are at high risk from flooding. p11</p> <p>Ref quoted: Managing flood risk 4.27 Elmbridge is a borough with a significant flood context, with the River Thames forming its northern boundary, and the Rivers Mole, Wey and Rythe and the Dead River all running through it. Flooding is one of the most immediate and visible consequences of extreme weather conditions and climate change. Large parts of the borough are at risk from flooding and there has been a long history of flood events which have caused significant damage, distress and disruption to communities, businesses and the borough's infrastructure network. p 39</p> <p>Ref quoted: Rivers 8.32 The River Thames between Datchet and Teddington has the largest area of developed flood plain in England without flood defenses. Over 15,000 homes and numerous businesses are at risk from flooding. The council is working with the Environment Agency and other partners to bring forward the River</p> | | <p>consultation techniques during the Regulation 18 and 19 stages to reach and engage with the widest possible range of stakeholders. Techniques included online advertisement on the Council's website and social media platforms – Twitter, Facebook, LinkedIn, Instagram and Nextdoor, as well as physical advertisement in a local newspaper – the Surrey Advertiser and posters on the Council's noticeboards located throughout the Borough, including within the Walton and Hersham communities. The DELP was also available to view and read at the Civic Centre and Borough libraries. In addition, over 8,200 individuals were directly contacted via letter or email to inform them of the consultation as they were registered on the Elmbridge planning database.</p> <p>The Council's Regulation 22 Consultation Statement fully details the range of techniques used during the consultation period to contact and engage with stakeholders.</p> <p>As set out above, A regulation 19 consultation must ask questions about the legal</p> |
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| | | | | | <p>malfunction, the consultation pages were not available until Friday 24th June morning. A week was lost. The deadline should be pushed by at least one week, until Friday 5th August 2022 for the full six weeks to be offered.</p> <p>B.3. The consultation period is too narrow, There are more than 800 pages worth of documentation. I understand some of the documentation was missing from the website (over 200 pages).It was requested from the council and was finally made available on 4th July 2022. This means the deadline should be pushed back so that these missing pages can be properly consulted.</p> <p>B.4. The documentation is too lengthy and contains much repeated text, as if a padding exercise has been undertaken. Is the intention to confuse/befuddle/drown ordinary residents with a surplus of unnecessary information to prevent comments from being put forward? There is no attempt to direct residents to simpler, digested content so that comments are welcome and facilitated instead of discouraged.</p> <p>B.5. Similarly the instructions given on the website are draconian, re-iterate the minute detail of procedure and rules that have to be adhered to, threatening that responses will otherwise be disregarded. Indeed, even though the website opened late, we are told on the consultation portal page that "Late responses will not be accepted under any circumstances and individual acknowledgement of</p> | <p>Mayfield Road, Hersham (Walton Station Car Park, Hersham Side)</p> <p>H6 US40 Hersham Day Centre and Village Hall, Queens Road, Hersham, KT12- 5LU</p> <p>H7 US380 New Berry Lane car park, Hersham, KT12 4HQ. Near Burhill School, Doctors', Dentist, Pharmacies, etc.</p> <p>H11 US376 Trinity Hall and 63-67 Molesey Road, Hersham (Bowling green, inc. Barley Mow pub and car park)</p> <p>H12 US435 Car Park next to Waterloo Court (overflow Railway car park behind Walton Station new block of new flats)</p> <p>New dwellings mean new residents, therefore new cars, but due to sky high land prices in Elmbridge, parking is not often addressed in planning applications. No developers want to pay the price of redevelopment with additional parking places.</p> <p>If new dwellings are built in these locations, at the high levels quoted, the existing parking facilities will disappear, parking needs will increase and because of elevated costs, no new parking will be available. This is completely unacceptable.</p> <p>This is a key issue for Hersham Library (H15 US374, p 100). It has a very necessary car park with disabled space, making is easily accessible to elderly residents. Many people say that they find Walton Library much less easy to go to. It is essential that Hersham Library retain its car park.</p> <p>E.1.3. Electric cars</p> <p>Reference: Sustainable transport - CC4 - Sustainable transport e) Provide electric vehicle charging facilities situated in convenient and easy to use locations. p 36.</p> <p>As all the car parks in Hersham will have been removed, there will be nowhere to provide electric charging point facilities. These cannot be provided on the street and at lampposts for safety reasons. Street parking is mostly unavailbale in HESham anyway, many pavements have been broken down in front of houses by residents needing to park more than one vehicle at home, as car ownership is on the rise, not falling.</p> <p>Car parks are necessary because</p> | | <p>Thames Scheme. This is a programme of projects and investments with the aim of reducing flood risk in communities. p 92</p> <p>Ref quoted: Managing flood risk CC5 - Managing flood risk To reduce the overall and local risk of flooding and manage water resources: 1. Development must be located, designed and laid out to ensure that it is safe; the risk from flooding is minimised whilst not increasing the risk of flooding elsewhere; and that residual risks are safely managed. Planning permission therefore will only be granted, or land allocated for development where it can be demonstrated that: a) Through a sequential test it is located in the lowest appropriate flood risk zone in accordance with national policy and the Elmbridge Strategic Flood Risk Assessment (SFRA); ... If 200 dwellings are built on this site, maintaining the 200 car parking spaces currently needed (shopping, school drop off / pick up at Burhill School next to the site), adding 200 car park spaces for new residents (total 400 min.), it will be necessary to build a multi-story building with a multi-level underground car park (similar to Walton - The Heart). The flood plain is only 200 metres behind the car park at the back of Paul Vance Court, near the River Mole</p> | | <p>compliance and soundness of the DELP. Guidance notes that were provided on the consultation homepage explained the purpose of the representation period and how to consider legal compliance and the test of soundness.</p> <p>The questionnaire that was prepared is based on the Planning Inspectorate's model representation form. This will ensure consistency at examination.</p> <p>D, E and F. Site allocations (H6, H11 and H13) for development of sites that are home to existing community uses seek to ensure these are retained or re-provided on site. In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protected.</p> <p>Site allocation H5 will remain in the site allocations chapter because it is currently under used. It has been given a longer timeframe so that the use can be monitored further.</p> <p>H8 and H10 are no longer available for development.</p> <p>Car parks are only included as site allocations when they are underused or could be consolidated into</p> |
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| | | | | | <p>receipt will not be possible." Is this punishing tone really necessary? Are comments actively being discouraged?</p> <p>B.6. Confusing / unnecessary / contradictory rules.</p> <p>A member of a local organisation called the council to get advice on the procedure to follow and were given misleading information across three attempts, given different instructions as to which details should be ABSOLUTELY included OTHERWISE comments would be disregarded and not included in the final consultation sent to the inspector. Different instructions and details and different email addresses were given and she was also told EXACTLY how 'Regulation 19: Draft Elmbridge Local Plan 2037' should be included, and told that, if not quoted exactly so, would result in the response being disregarded. Even though she had been told differently on a previous phone call</p> <p>Under the guise of helping, these differing instructions sent the local organisation into panicked moves to harsh responses required to EXACTLY what could be received whereas the only help given should have been to welcome all comments from residents, concentrating on content rather than form. That would be the sound path to take. Any other draconian and arbitrary rules would only harm the consultation process, unless of course the actual intention was to limit and discourage input from residents.</p> | | | <p>people will still drive cars in the near future, but they will be electric.</p> <p>The local plan is a pipe dream, building castles in the air without any realistic precise detail on how it can be achieved. It is INEFFECTIVE as a plan.</p> <p>=====</p> <p>==</p> <p>The rest of my response is in document ContinuedQuestionnaire Website20220728 added to the files.</p> | | | | <p>(see quoted Reference above). In normal flooding years, the risk is Low to Medium. As climate change worsens and extreme weather strikes, a spectacular flooding year will surely reach the Waitrose Car Park. I know it is possible to build huge structures near floodplains, but is it excessively risky and prohibitively expensive to do so.</p> <p>It seems unjustified to include the Hershams Shopping Centre and its car park as redevelopment sites.</p> <p>G. Consistent with national policy</p> <p>G.1. Unrealistic targets / impossible task</p> <p>The local planning team has put on the list sites that cannot possibly be built on without destroying the very community they are trying to improve. This is why so many of the sites on the Hershams List would violate one or more of the environment, community, amenities or climate change targets clearly described in the Local Plan, robbing Peter to pay Paul. It is an impossible task.</p> <p>I believe that the National Policy is flawed and councils in the South East CANNOT fulfil the targets the government imposes. It is unrealistic and unachievable, leading to inclusion in the plan of totally unsuitable locations, in the vague hope that planning permission will be refused when it comes to the crux.</p> <p>G.2. Fear of Inspector choosing Option 5 as</p> | <p>another location/site.</p> <p>Site H3 - Hershams Shopping Centre site will include parking for retail and residential use.</p> <p>E. A Local Plan has limited influence in that it influences development requiring planning permission. The delivery of infrastructure such as bus routes can only be achieved if development comes forward that is required or can contribute to the delivery of such infrastructure.</p> <p>The Council's Infrastructure Delivery Plan (May 2022) (IDP) and Update (July 2023) detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the quantum of development proposed in the DELP.</p> <p>The IDP and IDP Update have been informed by the preparation of other evidence base documents e.g., Transport Assessment (2022) and via discussions with infrastructure providers as part of the Council's duty to cooperate activities as outlined in the Council's Duty to Cooperate Statement of Compliance (June 2022), Duty to Cooperate Statement of Compliance Update (August 2023) and Statements of</p> |
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| | | | | | <p>second of which is now a 44 (44!) options list for residents to use to reply to the document paragraph by paragraph. It seems like a particular kind of torture, which will put off even the most resilient and responsible of residents.</p> <p>B.7.4. New parking / car parks consultation launched by EBC Reference: Elmbridge Customer Parking Survey - Help us shape the parking strategy for Elmbridge!</p> <p>On 24th July, a brand new consultation into car parks and parking around Elmbridge was launched by Elmbridge Borough Council, 5 days before the deadline for the Local Plan.</p> <p>On the website front page, this brand new 'Elmbridge Customer Parking Survey' has dislodged the Local Plan Draft 19 one further place down in the mini menu even though the deadline is only days away.</p> <p>Again, is the intention to confuse residents further and distract them from responding to the Local Plan by throwing another survey at them?</p> <p>B.7.5. Local Plan Draft 19 is now back on front page</p> <p>I complained to the council about the Local Plan having become invisible on the front page and they re-established it, even though they responded that they had not moved it from the front page.</p> <p>I don't know whether to be happy that they re-established it, so that people can find it, or unhappy that they would not admit to moving it in</p> | | | | <p>places to live for years now and people here are very proud of this.</p> <p>(Reference: Elmbridge named as best place to live in the UK "SURREY'S Beverly Hills" has been named the best place to live in Britain. By Surrey 25 NOV 2008 UPDATED 2 JUL 2013 https://www.getsurrey.co.uk/news/local-news/elmbridge-named-best-place-live-4826566) See attached document ElmbridgeNamedBestPlaceUK2013</p> <p>One of the reasons that Elmbridge scores so highly in the best places to live is the perfect balance between green spaces and great amenities. We want to preserve that perfect equilibrium. We want to hold on to our Green Spaces.</p> <p>There is a fear that the Inspector will reject Option 4 and choose Option 5 which releases crucially precious and so far inviolable Green Belt. On the plans proposed green areas are being included in the plan, including Burhill School, which is a shocking prospect.</p> <p>Additional Concerns</p> <p>H. Hersham Library</p> <p>H.1. Hersham Library is a precious community asset</p> <p>In its 60 years of life, this the 6th time the Council has tried to close Hersham Library. Usually it's a threat from Surrey County Council. This time, for the first time,</p> | | <p>reliance on private cars.</p> <p>G. The proposed spatial strategy is considered to be the best, most sustainable solution to meet the Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. As demonstrated through the evidence base, Duty to Cooperate activities and Statements of Common Ground, the development strategy can also be accommodated without putting undue pressure on the Borough's infrastructure.</p> <p>In addition, draft policies, such as ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located.</p> <p>An option to meet the Borough's identified housing need in full through intensification of urban areas was considered. However, the Council concluded that this option would see the</p> |
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policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and

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| 1109797 | Graham Thompson | | Yes | | No | there is still no guarantee of not building on the green belt. Needs more guaranteed commitment. there is no mention of promoting roadbuilding to relieve congestion -the most important factor in air quality. there is no mention of controlling burning wood and garden waste in the borough -in particular a policy for wood burning stoves. | Y | Y | Y | Y | | | | | No, I do not wish to participate at the oral examination | | <p>Comments noted.</p> <p>The DELP does not propose any development on Green Belt land.</p> <p>National policy sets out the circumstances under which development within the greenbelt can occur. The DELP is consistent with this approach.</p> <p>The Council's <u>Infrastructure Delivery Plan (May 2022)</u> (IDP) and <u>Update (July 2023)</u> detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the quantum of development proposed in the DELP.</p> <p>The IDP and IDP Update have been informed by the preparation of other evidence base documents e.g., <u>Transport Assessment (2022)</u> and via discussions with infrastructure providers as part of the Council's duty to cooperate activities as outlined in the Council's <u>Duty to Cooperate Statement of Compliance (June 2022)</u>, <u>Duty to Cooperate Statement of Compliance Update (August 2023)</u> and Statements of Common Ground published with the <u>Core Documents</u> submitted for Examination.</p> <p>The agreed position with our infrastructure</p> |
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We commissioned POD Architects to prepare studies, demonstrating positive potential of the 1.3ha site illustrating the sustainability and suitability for residential allocation within Elmbridge's Local Plan. This principle is supported by the National Planning Policy Framework, reinforcing the governments objectives to boost housing in places like Claygate. The design document, which accompanied the letter of the 21st December, has not been subject to any discussions with Elmbridge Borough Council planning department at this stage.

The Site

Current site consists of a plot occupied by a house and associated garden at 45 Red Lane, Claygate. The boundary line is a mix of fences, bushes and trees creating an urbanised feel. The cluster of farm buildings contain blockwork sheds with corrugated roofs and light industrial units supporting non-agricultural functions. There's also a rural pursuits centre. The northern boundary is defined by hedgerow which is unkempt in parts particularly where leylandii feature. This scruffy area separates part of the site from a scrap yard and made-up land. Western boundary is Surbiton Golf Club, which has long since changed the landscape from former agricultural usage to a leisure pursuit. Beyond are glimpses of the wider Claygate area. The descriptions emphasises the urbanising affect the town has had on this parcel of land.

DELSP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's [Topic Paper 1: How the spatial strategy was formed?](#) (June, 2022).

The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and

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| | | | | | <p>question forms a very small part of this land.</p> <p>Arup's 'Elmbridge Green Belt Boundary Review – Supplementary Work – Methodology and Review'. Rev A. (Dec 2018) identified land that performs weakly against the green belt designations. This included parcels within Area 34 that overall had been described as 'Strongly Performing'. The land (Part of RSA-25) subject to this representation was described as follows:</p> <p>a. Performs Weakly Overall b. Makes less important contribution to the Green Belt c. The inner green belt boundary is weak, following the weakly defined backs of residential properties (Those on Red Lane). d. The sub area maybe reduced in scale by realigning the northern and eastern boundaries (of my land) with dense well established tree belts separating Manor Farm and the paddock to north of properties on Red Lane. e. Finally it recommended: "That sub area 51 (including RSA- 25 (my land)) is considered further for release in its entirety, which would require the strengthening of the northern boundary as RSA-25, or alternatively a reduced area bounded by more readily recognisable boundary features could be considered". Effectively the diagram in the report identifies my land. The site is subject to policy CS14 which protects views across the site between Winey Hill and Telegraph Hill. This is in place to protect the local prevailing character of the area.</p> | | | | | | | | | <p>settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.</p> <p>The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.</p> <p>The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their</p> |
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| | | | | | land and south orientation, to make them energy efficient and keep much of its wild meadow character. We believe such a proposal (removal of land from Green-Belt) would accord with Elmbridge Councils policies as defined in DM10 and other sections of the LDP. As a family, we are proud to be part of the Claygate community, having lived in the village for thirty-six years. It is our intention to remain resident by downsizing into a new property and offering up a site for much needed new affordable family homes. | | | | | | | | | out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough. Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood. |
| 1110478 | Chris Cole | | Yes | Yes | <ul style="list-style-type: none"> • There is an inherent contradiction between a stated commitment to managing the effects of climate change and any meaningful strategy to reduce the impact of increased traffic. • The impact on Elmbridge of the large Wisley housing development represents an important omission. • There are fundamental errors in the reports assessing the performance of Green Belt sites. Most importantly, site SA-11 next to Waverley Road and Blundel Lane has been incorrectly assessed. • There is no recognition of the need for densification of urban areas such as Oxshott to be progressive and avoid the character of areas of comparatively low density being damaged by individual | | | | | | | | | Support and comments noted. <ul style="list-style-type: none"> • The Council's Infrastructure Delivery Plan (May 2022) (IDP) and Update (July 2023) detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the quantum of development proposed in the DELP. <p>The IDP and IDP Update have been informed by the preparation of other evidence base documents e.g.,</p> |

high-density schemes.

- While areas close to local centres and train stations are targeted for flats and infill development, the converse should apply so that the character of other areas (such as most of residential Oxshott) is protected.
- There are no design codes available to provide protection for local character and ensure excellent buildings.
- Calculations of developer contributions for affordable housing continue to be based on flawed methodology that has been subject to continual abuse.
- The Infrastructure Delivery Plan is weak with heavy reliance on a document that has not yet been produced by Surrey CC. Key to successful development must be the recognition that infrastructure must precede development. A noteworthy omission is the lack of commitment to install cycle lanes alongside trunk roads thereby promoting road safety and improving traffic flow.

Transport Assessment (2022) and via discussions with infrastructure providers as part of the Council's duty to cooperate activities as outlined in the Council's Duty to Cooperate Statement of Compliance (June 2022), Duty to Cooperate Statement of Compliance Update (August 2023) and Statements of Common Ground published with the Core Documents submitted for Examination.

The agreed position with our infrastructure delivery partners is that the proposed development strategy can be accommodated within the borough with the mitigation identified / a policy-led approach.

In addition, the DELP includes policies to ensure the infrastructure needed to support the delivery of the aspirations of, and quantum of development proposed, in the DELP is provided.

Draft policy INF1 – Infrastructure delivery aims to

ensure the required infrastructure needed to accommodate and mitigate the impact of new development in the Borough is delivered in a timely manner, whilst acknowledging that the infrastructure provision with a development must be proportionate to the size of the development.

Draft policy CC4 sets out how development must contribute to the delivery of an integrated, accessible and safe sustainable transport network and sets out how development should promote active travel and the use of public transport and support a transition away from reliance on private cars.

- EBC submitted an objection to the application submitted to Guildford Borough Council (GBC) for development of the Wisley Airfield site (planning application ref.: 2023/0072) due to its significant impact on the Borough's transport infrastructure.

The DELP cannot include a policy on sites

or schemes that are within a neighbouring authority's district as Local Plans are not cross-boundary unless a joint Local Plan is developed with the neighbouring authority. However, the potential impacts of proposed development at Wisley Airfield on neighbouring boundaries have been considered in the Council's [Transport Assessment \(2022\)](#) and [Infrastructure Delivery Plan \(May 2022\)](#).

In addition, the Council's [Duty to Cooperate Statement of Compliance \(June 2022\)](#), [Duty to Cooperate Statement of Compliance Update \(August 2023\)](#) and [Statement of Common Ground with GBC \(July 2023\)](#) detail the Council's Duty to Cooperate discussions with GBC, including the matter of the Wisely Airfield development.

- Comments regarding the assessment of site SA-11 noted. The Council has set out within its [Topic Paper 1: How the spatial strategy was formed?](#) (June, 2022) that the

proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located.

An option to meet the Borough's identified housing need in full through intensification of urban areas was considered. However, the Council concluded that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued subdivision of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the

existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities.

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

- The Council is currently progressing the production of the Borough's design code. A draft of the design code will be published for a public consultation

soon and the Council aims to have the design code adopted in 2024 in advance of the DELP adoption.

- The methodology for calculating affordable housing contributions is set in national guidance. This is not something the DELP can influence.
- While the preference would be for the infrastructure required to mitigate the impacts of development to be delivered first, this is rarely feasible on the scale of sites proposed in the Borough due to the need for providers to finance and deliver the infrastructure. The infrastructure will likely be delivered alongside new development, or where a site may be larger the development and infrastructure will have a phased delivery plan.

As Surrey County Council is the local highway authority in the Borough it is reasonable for the Council's IDP to refer to the contents of their LTP4 which has now

they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion

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| 1109075 | Susan drew | New Road Esher Limited | No | | No | | Y | Y | Y | Y | <p>I don't believe the proposed local plan should only look at brownfield sites. There are existing greenfield sites which can be better utilised and also some green field sites which should be developed.</p> | <p>I don't believe the proposed local plan should only look at brownfield sites. There are existing greenfield sites which can be better utilised and also some green field sites which should be developed.</p> <p>The proposed local plan makes no attempt to assess the 2016 Green belt review which recognises the need for Green Belt release</p> <p>If this were the case then targeting roads like New Rd Esher KT10 9PG for multiple dwellings would not need to happen</p> | | | <p>No, I do not wish to participate at the oral examination</p> | <p>Objection noted.</p> <p>During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.</p> <p>The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's <u>Topic Paper 1: How the</u></p> |
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spatial strategy was formed? (June, 2022).

The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition,

areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban

development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal](#) (SA) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes - 16,300 homes over the plan period through the release of green belt sites and optimisation of development in existing urban areas (see option 3 of Regulation 18 Options Consultation, 2018). Whilst this option would meet development needs, including the need for affordable housing in full, it would fundamentally alter the character of the Borough's towns and villages through coalescence, urban sprawl and encroachment of new development into the countryside due to the release of Green Belt land necessary to achieve the quantum of development. In addition, this option was found to have the most significant negative impacts of all the options considered by the Council, largely due to the impact of distributing development widely across the Borough.

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| 1110586 | Jon Yeomanson | | No | I am not sure of legal compliancy of the draft plan | No | The locations mentioned on the plan seem to take away all of Hersham's public buildings and meeting places to turn into housing. There are already too many houses and not enough services here in Hersham. Trying to say that Hersham residents should find alternative services in neighbouring towns is crazy as these are also stretched well beyond capacity already. Not to mention the increase in traffic (which mainly is at a standstill for most of the day at the moment), it cannot be a green solution that you are proposing, or a sustainable one. We need these services to remain local in Hersham. | Y | Y | Y | Y | I do not believe any thought has gone into any of these proposals except for how much money the council will make. Once these services are lost, then they will be gone forever, which cannot be legal. | Any future housing in the area needs to consider the amount of housing already in the area, and whether or not this area can cope with all the people seeking medical services, social care or other services such as libraries. The infrastructure of the area also needs to be considered and whether or not it can cope with the extra cars, parking rail and bus services that would be required to support an expanding population. At the moment, Hersham fails in all these areas as years of house building has left it almost impossible to move around the area in a timely and fit manor and be able to access medical services when required. | | | No, I do not wish to participate at the oral examination | | Objection noted. Site allocations including those within Hersham, for development of sites that are home to existing community uses seek to ensure these are retained or re-provided on site where appropriate. This is set out in more detail in the Council's Land Availability Assessment (2022) . In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protected. |
| 1111022 | Mr Nick Haig | Montagu Evans on behalf of BEGG Nominees Ltd c/o Global Investors | | | No | Policy SS3: Scale and location of good growth Draft Policy SS3 outlines the Council's strategic policy on delivering development over the Plan period, including for housing. The supporting text for Policy SS3 states EBC sought to meet its building needs through brownfield first sustainable development, however, this is not enough to meet the identified need within the Borough. Consideration was given to pursuing changes to the Green Belt Boundary but concluded that exceptional circumstances required by national policy for these amendments are not achieved. Therefore, the Council is seeking a 'capped need' in respect of housing provision and are only seeking to deliver 6,785 homes despite an objectively assessed need of 9,705 homes over the plan period. This is contrary to National Planning Policy 2021 (NPPF) Paragraph 60 which seeks to boost the supply of homes siting | | | | Y | Policy SS3: Scale and location of good growth Draft Policy SS3 outlines the Council's strategic policy on delivering development over the Plan period, including for housing. The supporting text for Policy SS3 states EBC sought to meet its building needs through brownfield first sustainable development, however, this is not enough to meet the identified need within the Borough. Consideration was given to pursuing changes to the Green Belt Boundary but concluded that exceptional circumstances required by national policy for these amendments are not achieved. Therefore, the Council is seeking a 'capped need' in respect of housing provision and are only seeking to deliver 6,785 homes despite an objectively assessed need of 9,705 homes over the plan period. This is contrary to National Planning Policy 2021 (NPPF) Paragraph 60 which seeks to boost the supply of homes siting the importance that sufficient and variety of land comes forward where needed. Furthermore, NFFP Paragraph 61 requires objectively assessed needs to be met unless exceptional circumstances apply. The Council must ensure that sufficient evidence is set out to deviate from the expectation to deliver its objectively assessed housing need of 9,705 homes over the Plan period. | 290722 Elmbridge Reg 19 - Walton Lodge - Letter of Representation FINAL.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557316/PDF/-/290722%20Elmbridge%20Reg%2019%20%2D%20Walton%20Lodge%20of%20Representation%20FINAL%2Epdf | As per 3a. | Yes, I wish to participate at the oral examination | As above. | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and | |

areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban

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| 1111025 | Tom Cole | Montagu Evans on behalf of Centrica Combined Common Investment Fund Ltd (c/o LaSalle Investment Management) | No | We write on behalf of our client, Centrica Combined Common Investment Fund Ltd (c/o LaSalle Investment Management) who own 42 Portsmouth Road, Long Ditton, Surbiton, KT6 5PZ. This letter of representation is submitted in response to the Regulation 19 consultation on the Draft Elmbridge Local Plan. The purpose of the consultation is to establish if the Local Plan meets the legal and procedural requirements for Plan-making as set out by Paragraph 35 of the NPPF and whether the Plan can be found sound. These representations are intended to help guide the formulation of Elmbridge's Local Plan. Our client is generally supportive of the draft Local Plan and its approach, whereby the Council proposes to de-designate the Kingston House Estate (including our client's Site) as Strategic Employment Land under the adopted Local Plan. In light of the development pressures the Council faces in order to meet its minimum housing requirements, we conclude that the Council must go further and allocate the Site within the draft | No | Policy SS3: Scale and location of good growth The draft Local Plan under Policy SS3 provides the Council's strategic policy for delivering development over the Plan period, including for housing. We support the Council's 'brownfield first' approach under part 2 of Policy SS3, with the aim to promote the development of previously developed land within urban areas, considering such locations to provide significant opportunities for sustainable development. This is a core objective in national policy, where Paragraph 119 makes explicitly clear that strategic policies must make as much use as possible of previously developed land. Through following this objective, the Council concludes, however, that it cannot identify sufficient land to meet objectively assessed housing needs across the Borough. Some consideration was given to reviewing Green Belt boundaries and removing land from the Green Belt to deliver housing, but the Council concluded that no circumstances would apply that would support Green Belt release. As a result of this the Council is only looking to deliver 6,785 homes over the Plan period despite being required to provide a minimum of 9,705 homes up to 2037. This is contrary to National Planning Policy 2021 (NPPF) Paragraph 60 which seeks to boost the supply of homes citing the importance that sufficient and variety of land comes forward where needed. Furthermore, NFFP Paragraph 61 requires objectively assessed needs to be met unless exceptional circumstances justify an alternative approach which reflects current and future demographic trends and market signals. The Council must ensure that sufficient evidence is set out to deviate from the expectation to deliver its objectively assessed housing need of 9,705 homes over the Plan period. We conclude that this has not been demonstrated adequately and there are clearly opportunities to formally allocate additional suitable land for development that have not been realised. Part 3 of Policy SS3 refers to development opportunities being encouraged that include "repurposing/redevelopment/diversification of specific sites now vacant in employment uses". The Council must revisit its housing land supply and include allocations on sites like 42 Portsmouth Road that would align with the aspirations of Policy SS3 and ensure the Council puts forward a positively prepared strategy. The draft Plan identifies that Long Ditton, Thames Ditton, Hinchley Wood and Weston Green are collectively expected to deliver only 635 homes against the | Y | Y | Y | Y | Policy SS3: Scale and location of good growth The draft Local Plan under Policy SS3 provides the Council's strategic policy for delivering development over the Plan period, including for housing. We support the Council's 'brownfield first' approach under part 2 of Policy SS3, with the aim to promote the development of previously developed land within urban areas, considering such locations to provide significant opportunities for sustainable development. This is a core objective in national policy, where Paragraph 119 makes explicitly clear that strategic policies must make as much use as possible of previously developed land. Through following this objective, the Council concludes, however, that it cannot identify sufficient land to meet objectively assessed housing needs across the Borough. 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We conclude that this has | Policy SS3: Scale and location of good growth The draft Local Plan under Policy SS3 provides the Council's strategic policy for delivering development over the Plan period, including for housing. We support the Council's 'brownfield first' approach under part 2 of Policy SS3, with the aim to promote the development of previously developed land within urban areas, considering such locations to provide significant opportunities for sustainable development. This is a core objective in national policy, where Paragraph 119 makes explicitly clear that strategic policies must make as much use as possible of previously developed land. Through following this objective, the Council concludes, however, that it cannot identify sufficient land to meet objectively assessed housing needs across the Borough. 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We conclude that this has | 1899_Thames Ditton_Emerging Design and Access Statement.pdf 290722_Thames Ditton Reps FINAL.pdf | As per 3a and 4. | Yes, I wish to participate at the oral examination | As above. | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, |
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| 1111014 | Lucy Morris | Nexus Planning on behalf of Charterhouse Strategic Land | No | Please see uploaded document at question 4a | No | Please see uploaded document at question 4a | Y | Y | Y | Y | <p>Please see uploaded document at question 4a for full response.</p> <p>CONCLUSION</p> <p>7.1 As has been demonstrated through these representations, there are significant issues relating to the soundness of the Local Plan which need to be rectified. The Plan is not positively prepared, justified, effective or consistent with national policy.</p> <p>7.2 It is clear that the spatial strategy has been pre-determined and the Council explicitly did not want to meet the housing requirement in full. Whilst a brownfield-first approach is acceptable in principle, this should not be at the expense of significantly under-delivering against housing need in a Borough which is one of the least affordable within the country. The Plan makes no attempt to tackle these issues and the Draft Plan will only exacerbate this issue.</p> <p>7.3 The allocation of solely brownfield sites within the urban area will have a significantly harmful impact on the character of the Borough. The Council has failed to demonstrate how the majority of the sites are developable or deliverable as required under national policy. The chosen spatial strategy will fail to deliver not only the scale, but also the mix, of housing required, including much needed affordable housing.</p> <p>7.4 The evidence base is clear that there are areas of the Borough, such as the Former Moore Place Golf Course, which perform poorly against the purposes of the Green Belt and have been recommended for release from the Green Belt. The Council has completely disregarded this evidence and has deliberately chosen to proceed with a Plan which will not help deliver the homes it needs.</p> <p>7.5 The designation of the Former Moore Place Golf Course as a Local Green Space is wholly unjustified and is an attempt to restrict a highly suitable and sustainable site from delivering high quality development.</p> <p>7.6 A Local Plan predicated entirely on the political resolve of the Council's elected Members in blatant defiance for the professional advice of their planning officers and the evidence base is simply not a sound and robust approach to plan-making where the English planning system operates on a plan-led basis.</p> | Please see uploaded document at question 4a | <p>Former Moore Place Golf Course Elmbridge Draft LP (Reg.19).pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557335/PDF/-/Former%20Moore%20Place%20Golf%20Course%5FElmbridge%20Draft%20LP%20%5FReg%2E19%5F%2Epdf</p> | <p>There are significant issues relating to the soundness of the Local Plan which need to be rectified. The Plan is not positively prepared, justified, effective or consistent with national policy.</p> <p>It is clear that the spatial strategy has been pre-determined and the Council explicitly did not want to meet the housing requirement in full. Whilst a brownfield-first approach is acceptable in principle, this should not be at the expense of significantly under-delivering against housing need in a Borough which is one of the least affordable within the country. The Plan makes no attempt to tackle these issues and the Draft Plan will only exacerbate this issue.</p> <p>The allocation of solely brownfield sites within the urban area will have a significantly harmful impact on the character of the Borough. The Council has failed to demonstrate how the majority of the sites are developable or deliverable as required under national policy. The chosen spatial strategy will fail to deliver not only the scale, but also the mix, of housing required, including much needed affordable housing.</p> <p>The evidence base is clear that there are areas of the Borough, such as the Former Moore Place Golf Course, which perform poorly against the purposes of the Green Belt and have been recommended for release from the Green Belt. The</p> | Yes, I wish to participate at the oral examination | Please refer to accompanying submission. Please note that Nexus Planning is acting on behalf of Charterhouse Strategic Land. | <p>Objection noted.</p> <p>During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.</p> <p>The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the</p> |
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the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the

the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal](#) (SA) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes - 16,300 homes over the plan period

particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council has considered several alternative approaches for the spatial strategy to support the place-making vision for the borough and how development need could be addressed during the preparation of the DELP. These options evolved over time in response to several factors, including the wider planning context, the Local Plan evidence base as it is prepared and reviewed, consultation responses (received during the three Regulation 18

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| 1111075 | Zoe Chick | Surrey County Council | Yes | The RTS does not consider, for the sections we have made representations on, that there is anything that is not legally compliant. We also consider these sections of the Draft Plan to be sound. | Yes | <p>We would like to bring to your attention that there appears to be an error in the 'Key Diagram' figure reference within this paragraph and numbering of the figure itself. Paragraph 3.28 refers to 'Key Diagram shown at Figure 1', however the actual figure is labelled Figure 3: Key Diagram (figure provided below). Recommended action: Review potential formatting error.</p> <p>We are pleased to see the RTS on the Key Diagram. However, the extent of the RTS shown in this figure is much greater than is proposed. The RTS would like this figure to represent the indicative RTS boundary and we will send you the shapefile so that this figure can be updated on the Key Diagram and the policies map. Recommended action: Figure and policies map to be updated with the indicative RTS boundary, which the RTS will provide.</p> <p>At present, this figure is the first reference to the RTS project in the Draft Plan. To introduce the scheme in this section would be beneficial, particularly to support earlier sections of the Draft Plan which highlight the need to tackle climate change as a key issue. We note that preceding paragraphs 3.17 – 3.27 focus on issues of housing and economy, however there is nothing on the environment and climate change. We would encourage you to add a paragraph(s) before 3.28 to concentrate on the environment and climate change. We have provided some suggested text below. Recommended action: The following supporting text paragraph could be added to introduce the</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| 1109788 | Rachel Davies | Lichfields obo Burwin Investments Ltd | Yes | Please see uploaded document at question 4a | No | Please see uploaded document at question 4a: | Y | Y | Y | Y | Please see uploaded document at question 4a | Please see uploaded document at question 4a | 65216 Regulation 19 Representations 28.07.22.PDF https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556805/PDF/-/65216%20Regulations%2028%2E07%2E22%2EPDF | <p>We object to draft Policies SS3 and HOU1 as strong reasons have not been identified that justify the scale and location of growth identified which is below the objectively assessed need for housing in the borough. The proposed minimum number of homes identified within the two draft policies will only deliver 70% of the local housing need.</p> <p>Exceptional circumstances were previously identified to justify the release of weakly performing Green Belt for housing development to increase the delivery of new homes, and in turn, increase the affordable housing provision. No evidence has been provided by the Council to confirm that those exceptional circumstances no longer exist.</p> <p>Neighbouring authorities to Elmbridge which are similarly constrained in terms of the Green Belt, have identified exceptional circumstances and released some Green Belt land through the Local Plan process.</p> <p>This demonstrates that the current spatial strategy in the draft Plan is unsound and should be revisited with a view to including some weakly performing Green Belt land to increase the housing supply over the Plan period. This is particularly important given that the Duty to Cooperate process has confirmed that Elmbridge's unmet need cannot (or is highly unlikely) be met within other Local</p> | Yes, I wish to participate at the oral examination | As set out in the uploaded representations report, on behalf of our client, we do not consider the plan, as currently drafted is sound. Our suggested modifications to the Plan require the selected spatial strategy to be revisited. We consider it is necessary to participate in the oral part of the examination to be able to respond to the Inspector's questions and, as necessary, understand the Council's position. If the Inspector agrees that the spatial strategy should be reviewed, our client's site is an important consideration as it is a deliverable and suitable site for release from the Green Belt. As set out in our representations we disagree with much of the evidence relied on within 'Topic Paper 1' and we wish to engage in this further, as necessary. | <p>Objection noted.</p> <p>During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.</p> <p>The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the</p> |
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the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal](#) (SA) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes - 16,300 homes over the plan period

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| | | | | | | | | | <p>f) Are not effective as it is not based upon joint working cross-boundary strategic matters, especially housing;</p> <p>g) Are not justified with respect of the inclusion of windfalls which duplicates expected supply from LAA sites;</p> <p>h) Are inconsistent with national policy as they do not provide for a strategy that meets the area's development needs;</p> <p>i) Are inconsistent with national policy as they does not currently provide for at least 15 years post adoption as required by paragraph 22 of the NPPF; and</p> <p>j) Are inconsistent with national policy in the failure to both boost housing supply and make a contribution towards addressing the housing needs of neighbouring authorities as required by paragraph 60 of the NPPF.</p> | <p>sites allocated where up to 4 dwellings are proposed; and</p> <p>E) That further allocations are included in the Plan to address the above requirements, including our clients land for around 60 dwellings (land east of Claygate House, north of Raleigh Drive, Claygate.</p> <p>2. That consequential amendments are made to the document to reflect these revisions.</p> | <p>ons%20and%20IR%2Epdf</p> <p>App 03 EXAM 13 - BFC - AP4.1 Response - Plan Period and Housing Numbers.pdf</p> <p>https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/553369/PDF/-/App%2003%20EXAM%2013%20%2D%20BFC%20%2D%20AP4%2E1%20Response%20%2D%20Plan%20Period%20and%20H</p> <p>App 04 Maidstone ED2-Inspectors-initial-letter-24May.pdf</p> <p>https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/553370/PDF/-/App%2004%20Maidstone%20ED2%20Inspectors%20Initial%20Letter%2024May%2Epdf</p> <p>App 05 Calverton v Nottingham City 2015 EWHC 1078 Admin.pdf</p> <p>https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/553372/PDF/-/App%2005%20Calverton%20v%20Nottingham%20City%202015%20EWHC%201078%20Admin%2Epdf</p> <p>App 06 St Albans v Hunston Properties 2013 EWCA Civ 1610.pdf</p> <p>https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/553368/PDF/-/App%2006%20St%20Albans%20v%20Hunston%20Properties%202013%20EWCA%20Civ%201610%2Epdf</p> <p>App 07 Hundal v S Bucks DC 2012 EWHC 7912 Admin.pdf</p> <p>https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/553371/PDF/-/App%2007%20Hunda</p> | <p>authorities, especially those in Greater London as required by Section 19(2)(c) of the 2004 Act.</p> | | | <p>neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's <u>Topic Paper 1: How the spatial strategy was formed?</u> (June, 2022).</p> <p>The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on</p> |
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this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and

authorities have a local plan in place.

The Council has undertaken active and on-going Duty to Cooperate activities with its partners and statutory consultation bodies in accordance with the requirements of the Duty to Cooperate, including with neighbouring authorities, during the development of the DELP. These activities are detailed in the Council's [Duty to Cooperate Statement of Compliance \(June 2022\)](#), [Duty to Cooperate Statement of Compliance Update \(August 2023\)](#) and Statements of Common Ground published with the [Core Documents](#) submitted for Examination. The matter of meeting the Borough's housing need, both within the Borough itself or with assistance from other authorities has been explored. However, this has not been identified as a deliverable option as all neighbouring authorities have confirmed that they cannot assist in meeting some / all of Elmbridge's unmet housing need.

All DTC partners have confirmed that they consider the Council has adequately discharged its duty to co-operate in preparing the plan. As such, the Council considers

4. Tackling Climate Change

CC1: Energy Efficiency, Renewable and Low Carbon Energy

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
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| 1107064 | Alan McCann | | Yes | Not sure | No | Too much pandering to environmental lobby at the expense of everything else. Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many. | | | Y | | | | | | | | <p>Comments noted.</p> <p>The spatial strategy set out in the DELP aims to balance the often competing and conflicting issue of protecting the environment and address the challenges of climate change, and growth to meet economic, housing and infrastructure needs.</p> <p>The proposed spatial strategy is considered to be the best, most sustainable solution to meet the Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. As demonstrated through the evidence base, Duty to Cooperate activities and Statements of Common Ground, the development strategy can also be accommodated without putting undue pressure on the Borough's infrastructure.</p> <p>In addition, draft policies, such as ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and</p> |

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| | | | | | | | | | | | | | | | buses is the responsibility of the privately owned bus operators. This is not something that the DELP can influence. |
| 1110299 | Martin Baker | | Yes | | Yes | | | | | | | | | | Support noted |
| 1110489 | Chris Colloff | Thames Water Utilities Limited | Yes | | No | The requirement in part 5 of the policy for ensuring the highest standards of water efficiency in existing developments through retrofitting is supported although as the policy relates to energy it is not certain that the requirement will be effective. | | Y | | As the policy relates to energy it is not clear that the inclusion of water efficiency requirements under this policy will be effective. | As the policy is focused on energy the references to retrofitting to improve water efficiency may be more appropriately included under Policy CC3. | | | No, I do not wish to participate at the oral examination | Comments noted. The Council has included this suggested amendment to criterion 5 of draft policy CC1 in its proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see minor modification MM4.3. |
| 1110576 | Katharine Maclean | | Yes | | No | | | | | | On CC1 point 1) i think this may benefit from being expanded to clarify what is meant by development? I believe it should include all new builds, all change of use applications, and all extensions over a certain size. An environmental assessment report should be required at planning stage. Whilst a lot of energy efficiency will be covered at Building Regulations stage, the general principles of orientation, materials window size, solar gain, landscape, water harvesting/run off etc are all dealt with at an earlier point on cc1 point 2) can/should this be expanded or clarified to confirm expectation for same under change of use to create new housing? Is it possible to apply this to schemes delivered under permitted development rights? | | | No, I do not wish to participate at the oral examination | Comments noted. The definition of development is set out in the glossary. Environmental impact assessments are required at planning stage for larger developments that may have a significant impact on the environment. This requirement is set out in national policy and guidance. Draft policy CC1 applies to all development requiring planning permission where feasible, including change of use. However, it should be noted that certain elements of building design, such as form factor, orientation, building materials etc. cannot be altered through a pure change of use proposal. As such, the policy will need to be applied in a proportionate way. The requirements of draft policy CC1 cannot be applied to permitted development as |

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| 1112275 | Sue Janota | Surrey County Council | | | <p>Following the declaration of a climate emergency and the setting of net-zero targets, there is strong justification for Local Plan policies to be in keeping with the future challenges faced around climate change. It is disappointing that there is no policy requirement for zero carbon development, particularly for the largest schemes, alongside exploration of a carbon offset scheme. We note that reference to the June 2022 update to part L of the Building Regulations has not been referenced specifically. This could be updated at paragraph 4.8 in chapter 4. We note that a Climate Change and Renewables SPD is due to be produced to accompany the Local Plan policies. Areas that could be expanded upon within this include:</p> <ul style="list-style-type: none"> • Detail on the scope to require more challenging Target Emission Rates in future as areas of policy such as the Future House/Future Buildings Standard progress. • Information on future proofing so development can be adapted to be carbon neutral without significant retrofit • Additional consideration of climate change adaptation and analysis of climate risks and vulnerability | | | | | | | | | | <p>Comments and suggestions for the SPD noted these will be taken forward and used to inform the production of the Council's forthcoming climate change SPD.</p> <p>It would be too onerous to require zero carbon development but policy CC1 is clear that zero carbon development is supported.</p> <p>Reference to the building regs Part L to encompass the 2022 update as well as subsequent updates has been included within the Council's proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see minor modification MM4.4.</p> |
| 1112286 | Peter Davis | Turley obo Taylor Wimpey | | | <p>Policy CC1 - Energy efficiency, renewable and low carbon energy Criterion 1 of this Policy states "To help tackle climate change, developments will be expected to achieve the highest levels of energy efficiency to mitigate the effects of climate change." That requirement is imprecise and unclear to readers of the Plan and should be clarified (and the wording then supported by evidence and viability appraisal).</p> | | | | | | | | | | <p>Objection noted.</p> <p>Draft policy CC1 has been drafted with the intention that criterion 1 set out a high level aspirational objective with the detail provided in further criteria. This is very common format for local planning policies to take.</p> <p>An amendment to criterion 2 of draft policy CC1 is included in the Council's proposed</p> |

CC2: Minimising Waste and Promoting a Circular Economy

| ID | N | Org | 1 | 1a | 2 | 2a | 3 | 3 | 3 | 3 | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
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| | | | | | | | P | E | J | C | | | | | | | |
| 1107065 | Alan McCann | | Yes | | No | Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many. | | | Y | | | | | | | | <p>Comments noted.</p> <p>The spatial strategy set out in the DELP aims to balance the often competing and conflicting issue of protecting the environment and address the challenges of climate change, and growth to meet economic, housing and infrastructure needs.</p> <p>The proposed spatial strategy is considered to be the best, most sustainable solution to meet the Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. As demonstrated through the evidence base, Duty to Cooperate activities and Statements of Common Ground, the development strategy can also be accommodated without putting undue pressure on the Borough's infrastructure.</p> <p>In addition, draft policies, such as ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes</p> |

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| | | | | | | and effectively manages flood risk | | | | | | | | | | |
| 1110774 | David Jardine | | Yes | | Yes | | | | | | | | | | Support noted | |
| 1110876 | Adrian Dilworth | Health at hand | Yes | | Yes | All attempts to build upon the greenbelt will be less green, less lean and less clean. Building on existing sites, replacing older less efficient structures when it comes to green efficiency is the way forward. | | | | | | | | | Support noted. The DELP does not propose any development on Green Belt land. | |
| 1111028 | Steven Fidgett | Union4 on behalf of Molesey Road Land Limited | Yes | see below | No | While we support the reduction of waste and optimal use of resources, it is not clear how some of the requirements in the policy will be applied in practical terms or what the implications are for applicants, to avoid this becoming simply a paper exercise. | Y | Y | Y | While we support the reduction of waste and optimal use of resources, it is not clear how some of the requirements in the policy will be applied in practical terms or what the implications are for applicants, to avoid this becoming simply a paper exercise. | Proposed Modifications to make the ELP sound: The specific requirements of the policy should be clarified. | | | Yes, I wish to participate at the oral examination | We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant | Comments noted. It is the Council's intention to set out more detail on the requirements of the policies within chapter 4 of the DELP within the forthcoming Climate Change and Renewables SPD. |

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| 1111026 | Tom Cole | Montagu Evans on behalf of Quadrant Repurpose and LaSalle Investment Management | | Please see uploaded document at question 4a | | Please see uploaded document at question 4a | | | Please see uploaded document at question 4a | Please see uploaded document at question 4a | <p>Hersham Green- Regulation 19 Local Plan Representations.pdf 7060- PL01 - Location Plan.pdf</p> | <p>Policies CC1, CC2 and CC3 set out the Council's aim to tackle climate change by reducing carbon dioxide emissions, supporting the transition to a low/zero carbon future, as well as delivering improvements to flood risk, air quality, recycling and waste management in the borough. Any redevelopment would test and adopt current approaches to delivering sustainable development including energy strategies not reliant on gas.</p> <p>We support the Council's approach to tackling climate change and meet carbon reduction targets, however consider the financial obligations to meeting such targets should be reflected within policy. As such, the wording of policies CC1, CC2 and CC3 should recognise the potential impacts on development viability. Our Clients also understand the embedded carbon in a development needs to be weighed with other factors. The existing Shopping Centre represents an inefficient use of a scarce town centre site which is dominated by a surface-level car park. The existing buildings reflect the time they were constructed when there was not the same knowledge nor technologies available to deliver more efficient buildings over their life cycle.</p> <p>Therefore as well as providing new homes and town centre services, our Clients believe that there will be significant benefits in terms of delivering a more sustainable development through a comprehensive</p> | | As above. | <p>Support and comments noted.</p> <p>The Local Plan is supported by a viability assessment (2022), which took into consideration the financial implications of the draft policies and building regulation requirements.</p> <p>The viability assessment concludes that the DELP policies taken as a whole will not negatively impact development viability and deliverability in the Borough.</p> <p>Draft policy CC2 sets out that development must adopt a circular economy approach. It is considered that as drafted the policy allows for flexibility to ensure the best solutions to individual, discreet development contexts are supported.</p> |
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CC3: Sustainable Design Standards

| ID | N | Org | 1 | 1a | 2 | 2a | 3 | 3 | 3 | 3 | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
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| | | | | | | | P | E | J | C | | | | | | | |
| 1107066 | Alan McCann | | Yes | | No | Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many. | | | Y | | | | | | | | <p>Comments noted.</p> <p>The spatial strategy set out in the DELP aims to balance the often competing and conflicting issue of protecting the environment and address the challenges of climate change, and growth to meet economic, housing and infrastructure needs.</p> <p>The proposed spatial strategy is considered to be the best, most sustainable solution to meet the Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. As demonstrated through the evidence base, Duty to Cooperate activities and Statements of Common Ground, the development strategy can also be accommodated without putting undue pressure on the Borough's infrastructure.</p> <p>In addition, draft policies, such as ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located. An option to meet the Borough's identified housing need in full through intensification of urban areas was considered. However, the Council concluded that this option would see the delivery of residential units that would negatively impact the urban structure</p> |

and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities.

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

The allocation of the quantum of development for each settlement area set out in strategic policy SS3 has been driven by the principle of sustainable development, again in accordance with national policy. The Plan seeks to make as much use as possible of existing suitable brownfield sites, including all publicly owned assets and land holdings. The urban areas of the borough were assessed, identifying the amount of development

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| | | | | | | of plant and machinery for which it would not be possible to achieve BREEAM ratings. Some plant and machinery may be contained within an enclosure or building to protect the equipment from the elements. The application of BREEAM ratings to such unoccupied enclosures or buildings in such instances may not be appropriate. | | | | | | | | | | | | | | | | | |
| 1110642 | Mr Gil Bray | | Yes | | Yes | | | | | | | | | | | | | | Support noted. | | | | |
| 1110815 | John Bamford | | Yes | | Yes | | | | | | | | | | | | | | Support noted. | | | | |
| 1110911 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | | | | | | | Support noted. | | | | |
| 1110405 | Guy Greaves | | | | | Policy CC3. Why is the requirement for new developments to meet Home Quality Mark 4 star and BREEAM UK Domestic Refurbishment 'Excellent' standards limited to project of 10 or more dwellings. These standards should apply to all new residential developments. | | | | | | | | | | | | Yes, I wish to participate at the oral examination | I will be extremely interested in hearing the arguments as to why the draft Elmbridge Local Plan is considered sound or otherwise. | Objection noted. Applying the Home Quality Mark 4 and BREEAM standards to all development would be too onerous for small scale development. | | | |
| 1110941 | Katharine Maclean | | Yes | | No | | | | | on cc3 point 1) e) can we apply a lower standard such as BREEAM 'Good' to developments of less than 10 dwellings? Finally on 'Sustainable Design Standards' the borough should resist the demolition of detached dwellings and consequent rebuilding of one house, UNLESS additional units can be created. There are numerous issues with this: 1) massive waste of material and embedded carbon 2) almost without exception these properties are generous well cared for family homes 3) increased vehicle movements for waste disposal/skips and new building material delivery 4) the reason this often occurs is that the homeowner can then benefit from a full VAT reduction on their building works as it is classified as a 'new build'. On a project of £1m+ this is a huge saving, and less than the cost of demolition. This is particularly prevalent in areas such as St Georges | | | | | | | | | | | No, I do not wish to participate at the oral examination | | Comments noted. It would be too onerous to require BREEAM standards of smaller scale development. The Council has included an amendment to draft policy CC2 to cover demolition in its proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see main modification ref. M3.5. |

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| | | | | | | | | | | Hill and the private estates. Look to Camden Council who have similar policy AGAINST any demolition in CA's - can we do whole borough? | | | | | |
| 1111039 | Lauren Manoharan | High Consulting Sorbon Estates | Yes | | No | Policy CC3 – Sustainable design standards Comments on Policy CC3 – Sustainable design standards: Sorbon Estates is committed to achieving high standards in sustainable design and construction. However, it has some concerns over the deliverability of point 1D of the policy in relation to the achievement of Home Quality Mark 4 star. The achievement of Home Quality Mark 4 star represents a very steep rise in requirements for developers over what is current needed, with early stage additional costs for a HQM pre-assessment and additional reports / evidence for individual credits before a scheme has been granted planning permission. This required upfront information could stifle development on brownfield land in urban locations in coming forward for development and prevent much needed housing being delivered. This would compromise the Council's overall strategy for the delivery of new housing on brownfield sites in urban areas and does not take into account reasonable alternative options. As an alternative, there could be a requirement for stepped integration / compliance similar to Code for Sustainable Homes in the past for example: all applications approved by 2025 to achieve Home Quality Mark 3 star and by 2028 Home Quality Mark 4 star. This would enable | Y | Y | Policy CC3 – Sustainable design standards Comments on Policy CC3 – Sustainable design standards: Sorbon Estates is committed to achieving high standards in sustainable design and construction. However, it has some concerns over the deliverability of point 1D of the policy in relation to the achievement of Home Quality Mark 4 star. The achievement of Home Quality Mark 4 star represents a very steep rise in requirements for developers over what is current needed, with early stage additional costs for a HQM pre-assessment and additional reports / evidence for individual credits before a scheme has been granted planning permission. This required upfront information could stifle development on brownfield land in urban locations in coming forward for development and prevent much needed housing being delivered. This would compromise the Council's overall strategy for the delivery of new housing on brownfield sites in urban areas and does not take into account reasonable alternative options. As an alternative, there could be a requirement for stepped integration / compliance similar to Code for Sustainable Homes in the past for example: all applications approved by 2025 to achieve Home Quality Mark 3 star and by 2028 Home Quality Mark 4 star. This would enable developers to factor in the additional costs and work required when planning developments. Part 1D) of the policy could therefore be amended to read: D) All residential development of 10 or more dwellings will meet the following minimum standards: • By 2025: Home Quality Mark 3, or any equivalent new standard • By 2028: Home Quality Mark 4, or any equivalent new standard It would be helpful if the Council undertook further discussions with housebuilders/developers in respect of this part of the policy to ensure that much needed development on brownfield sites is not prohibited by this policy. | Part 1D) of the policy could therefore be amended to read: D) All residential development of 10 or more dwellings will meet the following minimum standards: • By 2025: Home Quality Mark 3, or any equivalent new standard • By 2028: Home Quality Mark 4, or any equivalent new standard | | | Yes, I wish to participate at the oral examination | Sorbon Estates would like to have the opportunity to participate at the oral part of the examination to further explain to the Inspector why they consider that changes should be made to this policy. | Objection noted. The Council has included an amendment to criterion (1)(d) of draft policy CC3, changing the wording to use 'should' instead of 'must', within its proposed modifications to the DELP. This will provide greater flexibility for applicants. The proposed modifications have been submitted to the Inspector for Examination. Please see main modification ref. M3.7. |

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| | | | | | <p>developers to factor in the additional costs and work required when planning developments.</p> <p>Part 1D) of the policy could therefore be amended to read:</p> <p>D) All residential development of 10 or more dwellings will meet the following minimum standards:</p> <ul style="list-style-type: none"> • By 2025: Home Quality Mark 3, or any equivalent new standard • By 2028: Home Quality Mark 4, or any equivalent new standard <p>It would be helpful if the Council undertook further discussions with housebuilders/developers in respect of this part of the policy to ensure that much needed development on brownfield sites is not prohibited by this policy.</p> | | | | | | | | | |
| 1111089 | Paul Manning | Newsteer Real Estate Advisers obo Leos International Holding Group (Chris Pittock) | Yes | | No | <p>Our client is supportive of the Council's aspirations to promote and achieve sustainable design. Whilst the majority of the proposal reflects the direction of travel of many boroughs, it is felt that measure d) requiring all residential development of 10 or more dwellings to achieve a Home Quality Mark 4 star as a minimum is particularly onerous.</p> | | Y | <p>It is felt that measure d) requiring all residential development of 10 or more dwellings to achieve a Home Quality Mark 4 star as a minimum is particularly onerous.</p> | <p>It is suggested that a degree of flexibility is added to this policy, i.e. requiring all residential development to aim towards achieving a Home Quality Mark 4.</p> | <p>220729_Leos_Elbridge Local Plan Repls v1.0.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557534/PDF/-/220729%5FLeos%5FElmbridge%20Local%20Plan%20Reps%5Fv1%2E0%2Epdf</p> | As per 2a, 3a and 4. | No, I do not wish to participate at the oral examination | <p>Objection noted.</p> <p>The Council has included an amendment to criterion (1)(d) of draft policy CC3, changing the wording to use 'should' instead of 'must', within its proposed modifications to the DELP. This will provide greater flexibility for applicants. The proposed modifications have been submitted to the Inspector for Examination. Please see main modification ref. M3.7.</p> |
| 1112285 | Peter Davis | Turley obo Taylor Wimpey | | | | <p>As with Policy CC1, CC3 includes a series of requirements, but the wording means the LPA's actual expectations are unclear. The requirements should be clarified (and the wording then supported by evidence and viability appraisal).</p> | | | | | | | | <p>Comments noted.</p> <p>It is the Council's intention to set out more detail on the requirements of the policies within chapter 4 of the DELP within the forthcoming Climate Change and Renewables SPD.</p> <p>That said, draft policy CC1 and CC3 have been drafted with the intention that criterion 1 set out a high level aspirational objective with the detail provided in further criteria. This is very common</p> |

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| | | | | | | | | | | | | | | | | | | | format for local planning policies to take. The Local Plan is supported by a viability assessment (2022), which took into consideration the financial implications of the draft policies and building regulation requirements. The viability assessment concludes that the DELP policies taken as a whole will not negatively impact development viability and deliverability in the Borough. |
| 1111011 | Rachel Rae | Environment Agency-Thames Sustainable Places Team | Yes | | Chapter 4 (CC3) - Sustainable design standards Point of clarity and accuracy: 2.1. We are pleased to see that the local authority has recognised the water stressed nature of the area. We welcome the inclusion of 1.c) that requires all residential development to meet a minimum internal water efficiency standard of 110 litres per person per day. 2.2. The policy for water efficiency should be future-proofed to ensure that any reductions in the water efficiency target are reflected in the policy going forward. For instance, 'Should there be a change to water efficiency targets in order to reflect a changing climate, developers should work towards the most recent per capita consumption target for water stressed areas'. | | Y | Y | Y | | | EBC Reg 19 comments from EA 290722.pdf https://consult.elmbridge.gov.uk/qf2.ti/a/1205954/557306/PDF/-/EBC%20Reg%2019%20comments%20from%20EA%20290722%20Epdf | As per 2a. | Yes, I wish to participate at the oral examination | As a statutory consultee we are happy to participate at the oral examination if it is deemed necessary. | Comments noted. The Council agrees with the changes suggested by the EA. These have been included in the Council's proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see minor modification ref. MM4.8. | | | |

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| 1110553 | Mark Behrendt | HBF | | | No | <p>The policy not consistent with national policy or sufficiently justified. The HBF does not consider part d of this policy to be consistent with national policy. The Council are advocating the use of just one approach within the policy whereas paragraph 129 of NPPF makes no such prescription. The Council must be clear in policy that it encourages the use of a range of assessment frameworks and remove the specific reference in policy to the encouraged minimum design standards based on Homes Quality Mark and that it pays equal consideration to the outcome of any such assessment. The Council can consider the outcome of any such assessment process, but it cannot dictate the assessment used nor require the assessment to be undertaken in the first place as high quality and sustainable development can arise without the use of such assessment tools. As such the Council should amend the policy to encourage the use of design stand such as the Homes Quality Mark and delete reference to meeting any specific level of such standards.</p> <p>With regard to the requirement to deliver the option water efficiency standard in part c) the Council will, as required for all the optional technical standards set out in PPG, need to provide the necessary evidence to support adoption. We could not find the evidence relating to the need for this standard and this will need to be provided on submission of the local plan if this part of the policy is to retained.</p> | y | y | <p>The policy not consistent with national policy or sufficiently justified. The HBF does not consider part d of this policy to be consistent with national policy. The Council are advocating the use of just one approach within the policy whereas paragraph 129 of NPPF makes no such prescription. The Council must be clear in policy that it encourages the use of a range of assessment frameworks and remove the specific reference in policy to the encouraged minimum design standards based on Homes Quality Mark and that it pays equal consideration to the outcome of any such assessment. The Council can consider the outcome of any such assessment process, but it cannot dictate the assessment used nor require the assessment to be undertaken in the first place as high quality and sustainable development can arise without the use of such assessment tools. As such the Council should amend the policy to encourage the use of design stand such as the Homes Quality Mark and delete reference to meeting any specific level of such standards.</p> <p>With regard to the requirement to deliver the option water efficiency standard in part c) the Council will, as required for all the optional technical standards set out in PPG, need to provide the necessary evidence to support adoption. We could not find the evidence relating to the need for this standard and this will need to be provided on submission of the local plan if this part of the policy is to retained.</p> | <p>As such the Council should amend the policy to encourage the use of design stand such as the Homes Quality Mark and delete reference to meeting any specific level of such standards.</p> | <p>HBF rep EBC Reg 19 July 22.pdf https://consult.elmbridge.gov.uk/qf2.ti/a/1205954/555514/PDF/-/HBF%20rep%20EBC%20Reg%2019%20July%2022%2Epdf</p> | <p>As per 2a, 3a and 4.</p> | <p>Yes, I wish to participate at the oral examination</p> | <p>To set out ours and our members concerns with regard to the Elmbridge Local Plan.</p> | <p>Objection noted.</p> <p>The Council has included an amendment to criterion (1)(d) of draft policy CC3, changing the wording to use 'should' instead of 'must', within its proposed modifications to the DELP. This will provide greater flexibility for applicants. The proposed modifications have been submitted to the Inspector for Examination. Please see main modification ref. M3.7.</p> <p>The Local Plan is supported by a viability assessment (2022), which took into consideration the financial implications of the draft policies and building regulation requirements.</p> <p>The viability assessment concludes that the DELP policies taken as a whole will not negatively impact development viability and deliverability in the Borough.</p> |
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| 1111026 | Tom Cole | Montagu Evans on behalf of Quadrant Repurpose and LaSalle Investment Management | | Please see uploaded document at question 4a | | Please see uploaded document at question 4a | | | Please see uploaded document at question 4a | Please see uploaded document at question 4a | <p>Hersham Green- Regulation 19 Local Plan Representations.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557382/PDF/-/7060%20PL01%20Location%20Plan%20Epdf</p> <p>7060- PL01 - Location Plan.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557382/PDF/-/7060%20PL01%20Location%20Plan%20Epdf</p> | <p>Policies CC1, CC2 and CC3 set out the Council's aim to tackle climate change by reducing carbon dioxide emissions, supporting the transition to a low/zero carbon future, as well as delivering improvements to flood risk, air quality, recycling and waste management in the borough. Any redevelopment would test and adopt current approaches to delivering sustainable development including energy strategies not reliant on gas.</p> <p>We support the Council's approach to tackling climate change and meet carbon reduction targets, however consider the financial obligations to meeting such targets should be reflected within policy. As such, the wording of policies CC1, CC2 and CC3 should recognise the potential impacts on development viability. Our Clients also understand the embedded carbon in a development needs to be weighed with other factors. The existing Shopping Centre represents an inefficient use of a scarce town centre site which is dominated by a surface-level car park. The existing buildings reflect the time they were constructed when there was not the same knowledge nor technologies available to deliver more efficient buildings over their life cycle.</p> <p>Therefore as well as providing new homes and town centre services, our Clients believe that there will be significant benefits in terms of delivering a more sustainable development through a comprehensive approach. Any policy on the circular economy must therefore be flexible to cater for such circumstances.</p> | | As above. | <p>Support and comments noted.</p> <p>The Local Plan is supported by a viability assessment (2022), which took into consideration the financial implications of the draft policies and building regulation requirements.</p> <p>The viability assessment concludes that the DELP policies taken as a whole will not negatively impact development viability and deliverability in the Borough.</p> <p>Draft policy CC2 sets out that development must adopt a circular economy approach. It is considered that as drafted the policy allows for flexibility to ensure the best solutions to individual, discreet development contexts are supported.</p> |
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CC4: Sustainable Transport

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 | |
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| 1107067 | Alan McCann | | Yes | | No | Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many. | | | Y | | Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many. | | | | | | | <p>Comments noted.</p> <p>The spatial strategy set out in the DELP aims to balance the often competing and conflicting issue of protecting the environment and address the challenges of climate change, and growth to meet economic, housing and infrastructure needs.</p> <p>The proposed spatial strategy is considered to be the best, most sustainable solution to meet the Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. As demonstrated through the evidence base, Duty to Cooperate activities and Statements of Common Ground, the development strategy can also be accommodated without putting undue pressure on the Borough's infrastructure.</p> <p>In addition, draft policies, such as ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located. An option to meet the Borough's identified housing need in full through intensification of urban areas was considered. However, the Council concluded that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of</p> |

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| 1110080 | Susan Mealor | | No | <p>CC4 is about sustainable transport This Local Plan refers to the Parking Supplementary Planning Document which is based on the end of fossil fuel car sales by 2035, which is towards the end of the period. But this has been brought forward to 2030. Public transport (buses) are poor in Hershams with very limited timetables and routes. At present in Elmbridge, car ownership is around 1.5 cars per household on average with only 12% having no cars. Thus it is likely that private car usage will be still be significant within the timescale of this plan. Public car parking will still be needed. But virtually all the public car parks in Hershams are designated as available for building. This is untenable as it will put added considerable stress on the on-street parking which is already a problem. The removal of all of our car parks has not been discussed in this community: no consultation, therefore not valid therefore not legally compliant.</p> | No | <p>2e of CC4 states: Provide electric vehicle charging facilities situated in convenient and easy to use locations. 5. of CC4 :All development proposals will be required to provide cycle and vehicle parking and associated facilities, including electric vehicle charging points in line with the standards set out in the Parking Supplementary Planning Document (SPD).</p> <p>With particular regard to the community of Hershams.</p> <p>I agree with the need for additional and especially one and two bed residential units, but they must add to the attractiveness and vibrancy of the district centre. Plonking them onto car parks will not do this. The planning policy should be fair throughout the borough including those areas with predominantly large houses, not just built up areas. I have not found any mention of car parking in any of the documents that I have read. Throughout the draft plan and accompanying documents there is a presumption that there will be considerable drop in car usage with a replacement by walking, cycling and public transport. This is fully desirable. However it is most likely that there will still be large usage of cars, and by 2030 all new vehicles will be electric.</p> <p>There will need to be a significant public supply of Electric Vehicle Charging Points (EVCP). These are undesirable on lampposts and other street fixtures, due to trailing leads, parking on</p> | Y | Y | <p>With regard to the community of Hershams Not effective or justified CC4 2e states: Provide electric vehicle charging facilities situated in convenient and easy to use locations. CC4.6 states: Car free development will be encouraged in appropriate locations and where supported by evidence demonstrating that proposals would not lead to parking stress. CC4.5 states: All development proposals will be required to provide including electric vehicle charging points in line with the standards set out in the Parking Supplementary Planning Document (SPD).</p> <p>There are many dwellings within the Hershams Community that do not have front gardens where off-street parking can be achieved. There are also a large number of flats. Most recently built housing only has parking for one vehicle, including for 3&4 bed houses. Few recently built flats have much in the way of private car parking. Streets around the Railway Stations have commuter parking, which is beginning to build up again following the Covid crisis. It is inevitable that within the time scale of the plan, there would be considerably increased on-road parking stress if off-road car parks are built over.. together with the added vehicles that come with these residences.</p> <p>It therefore makes no sense to include almost every Hershams publicly used car park and shopping centre car park in the local Plan: H3 US379; H5 US45; H6 US40; H7 US380; H8 US389; H10 US390; H11 US376; H12 US435; H15 US374. Only H13 US378 appears to preserve car parking, but for its church communicants.</p> <p>There will need to be a significant public supply of Electric Vehicle Charging Points (EVCP). These are undesirable on lampposts and other street fixtures, due to trailing leads, parking on footpaths. Disabled, limited vision people, wheelchair users, buggy users, disabled vehicle users are all at risk if there is street use of EVCPs with any trailing leads. Thus it is obvious that there will need to be EVCP in public car parks and shopping centres. Parking SPD published in 2020 is out of date as the end of sale fossil fuel vehicles has been brought forward to 2030 from 2035. Most parking spaces will need to have EVCP by 2030</p> | <p>It is not my responsibility to provide wording for the professionals. Public car parks will need to have the majority of parking spaces fitted with EVCP well before 2030. This will prevent residential streets becoming blocked and impassable because of on-street EVCPs</p> | | | <p>No, I do not wish to participate at the oral examination</p> | <p>Comments noted.</p> <p>Car parks are only included as site allocations when they are underused or could be consolidated into another location/site. The recent ownership checks have resulted in the discounting of some of these sites.</p> <p>Draft policy CC4 sets out how development must contribute to the delivery of an integrated, accessible and safe sustainable transport network, including the provision of electric car charging infrastructure.</p> <p>The Council's forthcoming Design code will set out details for accommodating car parking and EV charging points into all forms of development. The Council's also intends to produce an updated Parking SPD which will provide further detail on parking requirements.</p> |
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| | | | | | <p>footpaths. Disabled, limited vision people, wheelchair users, buggy users, disabled vehicle users are all at risk if there is street use of EVCPs with any trailing leads. Thus it is obvious that there will need to be EVCP in public car parks and shopping centres. Parking SPD published in 2020 is out of date as the end of sale fossil fuel vehicles has been brought forward to 2030 from 2035. Most parking spaces will need to have EVCP by 2030</p> <p>It therefore makes no sense to include almost every Hersham publicly used car park and shopping centre car park in the local Plan: H3; H5; H6; H7; H8; H10; H11; H12; H15. Only H13 appears to preserve car parking, but for its church communicants. It is vital that off road EVCPs are supplied, for the use of visitors, those residents without their own front gardens and residents of flats. These will have to be in well controlled and monitored public places, ie they will have to be on the present car parking locations, as no new ones are envisaged in the plan. In addition to this, this could be a considerable income generating project on council owned and run sites, as long as they are well monitored and with sensible fees and therefore advantageous to EBC.</p> <p>Chapter 7 ECO3 is also relevant here. So is Chapter 8, INF2</p> | | | | | | | | | |
| 1110302 | Martin Baker | | Yes | | Yes | | | | | | | | | Support noted. |

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| 1110378 | Planning Team | Guildford Borough Council | Yes | | Yes | 2. Policy CC4 - Sustainable transport 2.1. In relation to 2a) and b), reference could be made to SCC's Elmbridge Cycling Plan, and/or forthcoming Local Cycling and Walking Infrastructure Plan. This inclusion would provide a focus for investment in walking and cycling infrastructure, with the network contained within the plan(s) a starting point for identifying routes and infrastructure to be funded and/or provided by developers. | | | | | | | | | Comments noted. The Council has included the suggested amendment in its proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see minor modification ref. MM4.10. | | |
| 1110643 | Gil Bray | | Yes | | Yes | | | | | | | | | | | Support noted. | |
| 1110819 | John Bamford | | Yes | | Yes | | | | | | | | | | | Support noted. | |
| 1110898 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | | | | Support noted. | |
| 1110594 | Cobham & Downside Residents Association and Stoke D'Abernon Residents Associa... | Cobham & Downside Residents Association and Stoke D'Abernon Residents Association | No | Please see uploaded document at question 4a | No | Please see uploaded document at question 4a | Y | Y | Y | Y | Policies INF1 to INF6, SS2, and CC4 should also make specific provision for and reference to the IDP strategy to deliver the required public transport connectivity to train stations and community/social amenities. The IDP states that modal shift will not be achieved by new bus provision but that the bus connectivity to stations is needed to reduce use if the car and we agree. This is in addition to better walking and cycling provision which cannot deliver the modal shift required in isolation. Otherwise the car parking policies and environmental policies and strategies would not be deliverable or effective and result in increased on-street parking stress. Travel Plans for developments, schools and businesses are helpful but again will not in themselves deliver necessary modal shift. There should also be recognition that different areas of the Borough require and can accommodate different travel and transport solutions to reduce reliance on the car. One size does not fit all in this respect. | Policies INF1 to INF6, SS2, and CC4 should also make specific provision for and reference to the IDP strategy to deliver the required public transport connectivity to train stations and community/social amenities. The IDP states that modal shift will not be achieved by new bus provision but that the bus connectivity to stations is needed to reduce use if the car and we agree. This is in addition to better walking and cycling provision which cannot deliver the modal shift required in isolation. Otherwise the car parking policies and environmental policies and strategies would not be deliverable or effective and result in increased on-street parking stress. Travel Plans for developments, schools and businesses are helpful but again will not in themselves deliver necessary modal shift. There should also be recognition that different areas of the Borough require and can accommodate different travel and transport solutions to reduce reliance on the car. One size does not fit all in this respect. | Head of Planning REG19.docx https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/555812/DOCX/-/Head%20of%20Planning%20REG19%2Edocx | As per 3a and 4. | Yes, I wish to participate at the oral examination | This response process does not allow sufficient scope to fully explain and justify all of the modifications we have proposed. In particular the Wisley Airfield issues are complex and further evidence of this and other matters raised for modification are emerging. This should be expressed at the oral examination. The Council have been asked to make modifications and if implemented or varied it is appropriate for them to be commented on orally as the only remaining route available to do so. Issues such as the status of Cobham Town Centre in Plan | Objection noted. The Council's IDP is part of the evidence base for the DELP. It is intended that the IDP be read alongside the DELP. It is not necessary to refer to the IDP in all policies it is relevant to. The Council has included an amendment to the supporting text of policy CC4 referencing the IDP within its proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see minor modification ref. MM.4.9. |

assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order

to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could

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| 1112166 | Richard Carr | Transport for London | | | <p>Although Surrey County Council is the Highway Authority for Elmbridge, proposals in the Local Plan will have an impact on road networks in adjoining London boroughs such as Kingston and Richmond, particularly where growth is proposed close to the borough boundaries. As well as TfL's role in managing the Transport for London Road Network, we also provide cross boundary bus services including routes K3, 467 and 411. Train connections from Surbiton to Central London are quick so there is demand for residents in Elmbridge to travel to Surbiton by bus to catch the train. Where there are cross boundary transport impacts, developer contributions may be required to provide improved public transport or active travel connectivity or increased capacity.</p> <p>Given that a high proportion of Elmbridge's working population commute out of the borough to London, the location and design of major development should aim to ensure that cross boundary trips are sustainable. In the light of proximity to London, we would be grateful, if you would consider extending some of the Mayor's strategic transport policy objectives set out in the Mayor's Transport Strategy and London Plan to the borough including the promotion of Healthy Streets, rebalancing the transport system towards walking, cycling and public transport, improving air quality and reducing road danger.</p> <p>TfL is also working with Department for Transport and Network Rail on the Crossrail 2</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | <p>Comments noted.</p> <p>As drafted policy CC4 applies the principles of healthy streets, reducing car traffic/use and promoting active and sustainable modes of transport in accordance with Surrey County Council's LTP4, which aligns with the Mayor's Transport Strategy and Health Streets approach.</p> |
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| | | | | | <p>project. Crossrail 2 proposals would pass through Elmsbridge serving stations on the South West Main Line branches of the exiting suburban rail network including Hampton Court and Thames Ditton. TfL is in discussion with Department for Transport on the question of formally safeguarding the latest Crossrail 2 scheme design. However, at present no decisions have been made. TfL continues to work with stakeholders whose developments are affected by safeguarding so that we can continue to protect the route until such time as the railway can be progressed. Given the current lack of a viable funding package for the scheme at the moment, TfL is not in a position to confirm when work on seeking consent can restart. The Mayor and TfL are of the view Crossrail 2 will still be needed in future to support future growth and have clearly demonstrated the case for the scheme. The project has been put in good order, ready to be restarted when the time is right.</p> | | | | | | | | | |
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| 1112277 | Sue Janota | Surrey County Council | | | <p>There is no reference to Local Transport Plan 4 (LTP4), although policy CC4 aligns well with LTP4 objectives. Additional supporting text referencing both LTP4 and the LCWIP would be beneficial and could include: "Surrey County Council's 2022 Local Transport Plan 4 sets out county-wide policies on reducing transport emissions in order to help meet the county's commitment to becoming net zero by 2050. One of the primary delivery mechanisms for achieving net zero is the role out of Local Cycling and Walking Infrastructure Plans (LCWIP)". Policy CC4 makes reference to walking and cycling, however please note that we are starting to see a move to the inclusion of "wheeling" when referring to walking and cycling, and this allows for inclusion of people who move at the same pace as a pedestrian but are not walking, and instead are using a wheelchair or similar mobility aid. For example please find a link to the Department for Transport's Cycling and Walking Investment Strategy Report to Parliament 2022: Cycling and Walking Investment Strategy Report to Parliament 2022 (publishing.service.gov.uk) The first line of the report states "The virtuous circles of walking, wheeling and cycling help us tackle environmental issues whilst boosting our health and wellbeing."</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | <p>Comments noted.</p> <p>The Council has included the suggested amendment in its proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see minor modification ref. MM4.10.</p> |
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| 1109070 | Ms Morgan | | Yes | Yes | <p>I am a cyclist and a driver and I am concerned about proposals to create more cycleways/active travel. Traffic flows through Walton are dominated by traffic on the A244 and A3050. Much of this traffic is involved in long distance travel starting or ending outside Elmbridge or both. Very little if any of this type of traffic will be converted to active travel.</p> <p>I would draw attention to the cycle ways that were put in along Terrace Road/Walton Road from Walton to Hampton Court. Cyclists were not consulted and in general they do not support the cycle lanes on the pavement. So everyone loses out - drivers got a narrower road yet still have cyclists using the road.</p> <p>Much of the traffic is drawn to Walton Bridge, particularly heavy traffic, because there is no weight limit on this bridge, unlike other "local" bridges such as Hampton Court. So better to introduce a weight limit on the bridge making it safer and hopefully will last longer, as well as protecting Walton on Thames from through traffic.</p> | | | | | | | <p>Comments noted.</p> <p>The DELP cannot influence the Borough's bridges as these are managed by Surrey County Council</p> |
| 1110553 | Mark Behrendt | HBF | | No | <p>Policy is unsound as it is not consistent with national policy. Part 5 requires to provide parking facilities in line with the Parking SPD. As the Council will be aware the Council not set policy in SPD and as such the Council will either need to establish its requirements in the local plan itself or state that development should have regard to the SPD.</p> | y | <p>Policy is unsound as it is not consistent with national policy. Part 5 requires to provide parking facilities in line with the Parking SPD. As the Council will be aware the Council not set policy in SPD and as such the Council will either need to establish its requirements in the local plan itself or state that development should have regard to the SPD.</p> | <p>HBF rep EBC Reg 19 July 22.pdf https://consult.elmbridge.gov.uk/qf2.ti/a/1205954/555514/PDF/-/HBF%20rep%20EBC%20Reg%2019%20July%2022%2Epdf</p> | As per 2a and 3a. | Yes, I wish to participate at the oral examination | To set out ours and our members concerns with regard to the Elmbridge Local Plan. | <p>Objection noted.</p> <p>The Council intends to set out detailed guidance on how to meet the requirement of this policy in its forthcoming Parking SPD.</p> |

CC5: Managing Flood Risk

| ID | N | Org | 1 | 1a | 2 | 2a | 3 | 3 | 3 | 3 | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
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| | | | | | | | P | E | J | C | | | | | | | |
| 1107068 | Alan McCann | | Yes | | No | Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many. | | | Y | | Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many. | | | | | Na | <p>Comments noted.</p> <p>The spatial strategy set out in the DELP aims to balance the often competing and conflicting issue of protecting the environment and address the challenges of climate change, and growth to meet economic, housing and infrastructure needs.</p> <p>The proposed spatial strategy is considered to be the best, most sustainable solution to meet the Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. As demonstrated through the evidence base, Duty to Cooperate activities and Statements of Common Ground, the development strategy can also be accommodated without putting undue pressure on the Borough's infrastructure.</p> <p>In addition, draft policies, such as ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located.</p> <p>An option to meet the Borough's identified housing need in full through intensification of urban areas was considered. However, the Council concluded that this option would see the delivery of residential units that would negatively</p> |

impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities.

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

The allocation of the quantum of development for each settlement area set out in strategic policy SS3 has been driven by the principle of sustainable development, again in accordance with national policy. The Plan seeks to make as much use as possible of existing suitable brownfield sites, including all publicly owned assets and land holdings. The urban areas of the borough were assessed, identifying the

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| | | | | | | | | | | | | | | | | amount of development that could sustainably be accommodated. |
| 1109542 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | Support noted |
| 1110303 | Martin Baker | | Yes | | Yes | | | | | | | | | | | Support noted |
| 1110452 | Adrian Dilworth | Health at hand | Yes | | Yes | If the threat of removing greenbelt is carried out, I believe the environmental consequences will only add to the increase in climate change. Natural habitation of animals will be destroyed, The ability of the land to cope with rainfall will be reduced causing increased flooding. The land around my property can barely cope with the increase in rainfall as it is, Building roads and removing green areas will only exacerbate the issue. | | | | | | | | | | Support noted. The DELP does not propose any release of, or development on Green Belt land. |
| 1110492 | Chris Colloff | Thames Water Utilities Limited | Yes | | No | The principle of Policy CC5 is supported however, it is considered that the wording of the policy could be amended to ensure it is more effective in addressing flood risk from all forms of flooding including surface water flooding and sewer flooding. As a result of their subterranean nature, basement developments that are connected to the sewerage network can be at risk of sewer flooding from surcharge of the sewers should sewers become overloaded. As a result additional text should be added to the policy in relation to basement flooding. | Y | | Amendments are needed to ensure that the policy is effective in addressing flood risk from all sources, particularly in relation to sewer flooding and surface water flooding. With regard to Parts 4 and 5 of the policy on surface water and SuDS it is considered that the policy could be more ambitious in relation to its requirements which would make the policy more effective at reducing the risk of surface water flooding, particularly given potential issues of more intense rainfall events occurring as a result of climate change. | To ensure that the policy is effective at reducing the risk of flooding from all forms of flooding it is considered the policy should be revised to state 'To reduce the overall and local risk of all forms of flooding...'. While this issue is considered further in section 4.28 it is considered that the additional wording in the policy would increase the clarity and effectiveness of the policy. To ensure that basements are protected from this risk it is considered that an additional requirement is added to the policy to state: "6. Any basement development connected to the sewerage network shall be fitted with a positive pumped device to protect the basement from sewer flooding." In relation to surface water, the policy could be revised to include a requirement for developments to aim to achieve greenfield run-off rates and to provide a drainage hierarchy. Similar requirements are included in Policy SI13 of the London Plan. | | | No, I do not wish to participate at the oral examination | | Comments noted. The suggested changes to draft policy CC5 have been included in the Council's proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see main modification ref. M3.10. | |

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| 1112274 | Sue Janota | Surrey County Council | | | <p>Comments are made in our capacity as Lead Local Flood Authority. To improve consistency in how surface water flood risk is reviewed across the county we would recommend that the following policy wording is considered in terms of surface water flood risk under CC5 – Managing flood risk:</p> <p>All development proposals are required to demonstrate that land drainage will be adequate and that they will not result in an increase in surface water run-off. Sustainable drainage systems are required on all developments, unless proved to be not reasonable practicable, and should:</p> <p>a) Ensure surface run-off is managed as close to the source as possible and does not increase flood risk elsewhere;</p> <p>b) Be in accordance with the rainwater disposal hierarchy of Buildings Regs Part H3 (3);</p> <p>c) In circumstances where it has been proved that infiltration is impractical, discharge of surface water to watercourse/sewer shall not exceed the following peak rates:</p> <ul style="list-style-type: none"> • at pre-development greenfield runoff rates on all new development; • as close as reasonably practicable to greenfield run off rates from all other brownfield sites. <p>d) Be designed to be multi-functional and incorporate sustainable drainage into landscaping and public realm, including maximising opportunities to establish surface water ponding areas, urban watercourse buffer areas and multi-use flood storage areas in locations of high surface water flood risk and critical drainage areas to improve flood resilience, amenity and biodiversity.</p> | | | | | | | | | <p>Changes agreed.</p> <p>The suggested changes to draft policy CC5 have been included in the Council's proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see main modification ref. M3.10.</p> |
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e) Achieve improvements in water quality through a sustainable drainage system management train;

f) Be designed with consideration of future maintenance and climate change; and

g) Make improvements in accordance with the Council's most up to date Infrastructure Delivery Plan.

We have the following suggestions on the wording of policy CC5:

CC5 - Managing flood risk

To reduce the overall and local risk of flooding and manage water resources:

1. Development must be located, designed and laid out to ensure that it is safe; the risk from flooding from all sources is minimised whilst not increasing the risk of flooding elsewhere; and that residual risks are safely managed.

Planning permission therefore will only be granted, or land allocated for development where it can be demonstrated that:

a) Through a sequential test it is located in the lowest appropriate flood risk zone (consider amending to 'lowest area of flood risk from all sources' otherwise this only refers to fluvial flood risk) in accordance with national policy and the Elmbridge Strategic Flood Risk Assessment (SFRA);

b) It would not constrain the natural function of the flood plain or surface water flow route, either by impeding flood flow or reducing storage capacity; and

c) Where sequential and exception tests have been undertaken, any development that takes place where there is a risk of flooding from all sources will need to

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| | | | | | | ensure that flood mitigation measures are integrated into the design to minimise the risk to property and life should flooding occur. 4. Development proposed must attenuate surface water run-off so that the run-off rate is no greater than the run-off prior to development taking place or, if the site is previously developed, development actively reduces run-off rates and volumes. Consider replacing points 4 and 5 with our suggested wording above. 5. All new development is required to ensure that sustainable drainage systems are used for the management of surface water. Comment as point 4 above. | | | | | | | | | | | |
| 1110594 | Cobham & Downside Residents Association and Stoke D'Abernon Residents Association | Cobham & Downside Residents Association and Stoke D'Abernon Residents Association | No | Please see uploaded document at question 4a | No | Please see uploaded document at question 4a | Y | Y | Y | Y | CC5 addresses surface water flooding with regard to new development and reuse of existing sites but does not acknowledge or address existing issues such as the Plough Corner flooding in Cobham. We request a policy that EBC will work with third party providers to resolve existing chronic surface water flood management issues and actively seek permanent resolution as part of the overall environmental provisions of the DLP. There is no obvious reason why such existing matters are omitted and only new development covered. | CC5 addresses surface water flooding with regard to new development and reuse of existing sites but does not acknowledge or address existing issues such as the Plough Corner flooding in Cobham. We request a policy that EBC will work with third party providers to resolve existing chronic surface water flood management issues and actively seek permanent resolution as part of the overall environmental provisions of the DLP. There is no obvious reason why such existing matters are omitted and only new development covered. | Head of Planning REG19.docx https://consult.elmbridge.gov.uk/qf2.ti/a/1205954/555812/DOCX/-/Head%20of%20Planning%20REG19%2Edocx | As per 3a and 4. | Yes, I wish to participate at the oral examination | This response process does not allow sufficient scope to fully explain and justify all of the modifications we have proposed. In particular the Wisley Airfield issues are complex and further evidence of this and other matters raised for modification are emerging. This should be expressed at the oral examination. The Council have been asked to make modifications and if implemented or varied | Objection noted. Surrey County Council (SCC) as Lead Local Flood Authority (LLFA) is the risk management authority responsible for local flood risk defined as flooding from surface water, groundwater, and ordinary watercourses. Joint working between the Council, the LLFA (SCC) and other relevant stakeholders continues to seek to address such issues outside of the plan making process. |

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| 1111011 | Rachel Rae | Environment Agency-Thames Sustainable Places Team | Yes | | No | <p>3. Chapter 4 (CC5) – Managing flood risk</p> <p>Point of soundness 1: Development vulnerability in relation to flood risk:</p> <p>3.1. We are pleased to see the inclusion of Policy CC5 – Managing flood risk. However, Policy CC5 does not reflect some of the conclusions within the evidence submitted in the Strategic Flood Risk Assessment (SFRA) Level 1. Therefore, we do not consider this policy to be justified by the evidence base or consistent with the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG).</p> <p>Detailed explanation</p> <p>3.2. With regards to the developed areas of Flood Zone 3b - Functional Floodplain, page 17 of the Level 1 SFRA states 'Where redevelopment is proposed in developed areas, schemes should not increase the vulnerability classification of the site. This has not been reflected in Policy CC5. Overcoming point of soundness 1:</p> <p>3.3. In order to overcome this point of soundness we recommend that Policy CC5 is updated to reflect your SFRA:</p> <p>"Development proposals in the 'developed' Flood Zone 3b – Functional Floodplain will only be approved where the footprint of the proposed building(s) is not greater than that of the existing building(s) and there will be no increase in development vulnerability or intensification in use.</p> | Y | Y | Y | | | EBC Reg 19 comments from EA 290722.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557306/PDF/-/EBC%20Reg%2019%20comments%20from%20EA%20290722%20Epdf | As per 2a. | Yes, I wish to participate at the oral examination | As a statutory consultee we are happy to participate at the oral examination if it is deemed necessary. | Comments noted. The suggested changes to draft policy CC5 have been included in the Council's proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see main modification ref. M3.10. |
| 1111075 | Zoe Chick | Surrey County Council | Yes | The RTS does not consider, for the sections we | Yes | We suggest that supporting text is added under Policy CC5 which outlines the council's support of the RTS and its recognition of the | | | | | | | | | | Comment noted. The suggested changes to the supporting text of draft policy CC5 have been included in the Council's |

have made representations on, that there is anything that is not legally compliant. We also consider these sections of the Draft Plan to be sound.

RTS as an important project providing flood resilience alongside biodiversity, public open space, and active travel improvements. This is so that the support for the RTS is in line with the approach Runnymede Borough Council have taken in their Adopted Local Plan.
Recommended action:
We suggest adding additional wording to the supporting paragraph 4.27 to provide support for the RTS. The supporting text could be amended to: "4.27 Elmbridge is a borough with a significant flood context, with the River Thames forming its northern boundary, and the Rivers Mole, Wey and Rythe and the Dead River all running through it. Flooding is one of the most immediate and visible consequences of extreme weather conditions and climate change. Large parts of the borough are at risk from flooding and there has been a long history of flood events which have caused significant damage, distress and disruption to communities, businesses and the borough's infrastructure network. The council supports proposals for strategic flood alleviation measures (and associated enabling works), including the emerging flood alleviation measures at Desborough Island and Sunbury Lock as part of the wider River Thames Scheme. The council recognises it as an important project providing flood resilience, alongside biodiversity, public open space, and active travel improvements.

proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see minor modification ref. MM4.11.

5. Environment

ENV1: Green and Blue Infrastructure

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 | |
|---------|-------------|-----|-----|----------|----|--|--------|--------|--------|--------|--|---|----|----|---|---|---|--|
| 1107070 | Alan McCann | | Yes | Not sure | No | Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many. | | | Y | | Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many. | | | | | | | <p>Comments noted.</p> <p>The spatial strategy set out in the DELP aims to balance the often competing and conflicting issue of protecting the environment and address the challenges of climate change, and growth to meet economic, housing and infrastructure needs.</p> <p>The proposed spatial strategy is considered to be the best, most sustainable solution to meet the Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. As demonstrated through the evidence base, Duty to Cooperate activities and Statements of Common Ground, the development strategy can also be accommodated without putting undue pressure on the Borough's infrastructure.</p> <p>In addition, draft policies, such as ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the</p> |

areas in which they are located.

An option to meet the Borough's identified housing need in full through intensification of urban areas was considered. However, the Council concluded that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities.

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

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| | | | | | | waterscape * Conserve and enhance bio-diversity... *Support opportunities to improve public access... | | | | | | | | | | | | | | |
| 1110304 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | | | | Support noted. |
| 1110646 | Gil Bray | | Yes | | Yes | | | | | | | | | | | | | | | Support noted. |
| 1110775 | David Jardine | | Yes | Green belt must be protected for the benefit of all | Yes | | | | | | | | | | | | | | | Support noted. |
| 1110821 | John Bamford | | Yes | | Yes | | | | | | | | | | | | | | | Support noted. |
| 1110879 | Adrian Dilworth | Health at hand | Yes | | Yes | The recreational facilities that the green belt offers beyond Telegraph Lane towards Telegraph hill is invaluable. The community utilises this green space for walking, running, dog walking. Having a sense of rural openness is what makes this area invaluable to the community. Allowing urban sprawl to desecrate this historic green space would be disastrous. There is, in my opinion, no good reason to build upon the green belt in Elmbridge and particularly in and around Telegraph Hill. | | | | | | | | | | | | | | Support noted. Comments regarding the value of Telegraph hill green belt noted. The DELP does not propose any development on Green Belt land. |

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| 1111070 | A Barry | Molesey Road Land Limited | Yes | | No | While we support the provision of good quality green and blue infrastructure in the Borough, close to where people live, this should be an objective of the spatial strategy, in using new development (and the potential release of Green Belt land) to maximise the benefits of change to the environment and community. | Y | Y | Y | Y | While we support the provision of good quality green and blue infrastructure in the Borough, close to where people live, this should be an objective of the spatial strategy, in using new development (and the potential release of Green Belt land) to maximise the benefits of change to the environment and community. | The objective should be a key part of the spatial strategy for the Borough that helps guide future development that can deliver positive change in green and blue infrastructure. | | | Yes, I wish to participate at the oral examination | We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan. | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022). The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong |
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development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be

protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality. The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site

parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of

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| | | | | | | | | | there are not any green infrastructure allocations and there are limited Greenfield allocations which could assist. This is fundamental to the soundness of the emerging ELP, and is a result on the effect of the unbalance of the plan. The Green and Blue Infrastructure Study (2020) sets out both borough-wide and settlement-specific opportunities to contribute towards Elmbridge's network of green and blue spaces – though it is not clear whether a sufficient network of positively prepared allocations have been made for deliverable Green Infrastructure improvements. | | | | | |
| 1111011 | Rachel Rae | Environment Agency-Thames Sustainable Places Team | 4.1. We welcome the plans principle to protect and enhance the quality of the environment. However, we understand this only relates to existing green and blue infrastructure as opposed to delivering new infrastructure. Whilst we welcome opportunities to maintain and enhance these natural assets, we suggest including a specified requirement to deliver additional green and blue infrastructure. 4.2. A Green and Blue Infrastructure SPD should be produced to support this policy, which details the type of measures that the council would support and provides overall guidance to developers on this topic. In accordance with paragraph 179 of the NPPF a map which identifies all the existing green and blue infrastructure in the borough | | | | | | | EBC Reg 19 comments from EA 290722.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557306/PDF/-/EBC%20Reg%2019%20comments%20from%20EA%20290722%20Epdf | As per 1a. | Yes, I wish to participate at the oral examination | As a statutory consultee we are happy to participate at the oral examination if it is deemed necessary. | Comments noted. The Council has included the suggested amendments within its proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see main modification ref. M4.1. Comment noted regarding the need for a Green and Blue Infrastructure SPD. The Council will consider if this can be produced. The definition of connectivity of the ecological network is covered across the environmental policies in chapter 5 of the DELP. |

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| | | | <p>should be included. This can then be used to identify areas for delivering new green and blue infrastructure, connecting it to the existing networks. This has been done in other councils, for example, Runnymede Borough Council have produced a green and blue infrastructure SPD which can be found here: https://www.runnymede.gov.uk/downloads/file/1243/gbi-spd-nov21. 4.3. We would like a clear definition of the importance of the connectivity of the ecological network, as well as the social and access connectivity considerations which are clear in the policy. The importance and value of ecological connectivity is defined in the NPPF and the Local Nature Recovery Strategy commitment of the Government's 25 year Environment Plan and enacted by the Environment Act 2021.</p> | | | | | | | | | | |
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ENV2: Landscape, Trees and Woodlands

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 | |
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| 1107071 | Alan McCann | | Yes | | No | Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many. | | | Y | | Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many. | | | | | | | <p>Comments noted.</p> <p>The spatial strategy set out in the DELP aims to balance the often competing and conflicting issue of protecting the environment and address the challenges of climate change, and growth to meet economic, housing and infrastructure needs.</p> <p>The proposed spatial strategy is considered to be the best, most sustainable solution to meet the Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. As demonstrated through the evidence base, Duty to Cooperate activities and Statements of Common Ground, the development strategy can also be accommodated without putting undue pressure on the Borough's infrastructure.</p> <p>In addition, draft policies, such as ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located.</p> <p>An option to meet the Borough's identified housing need in full through intensification of</p> |

urban areas was considered. However, the Council concluded that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities.

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

The allocation of the quantum of development for each settlement area set out in strategic policy SS3 has been driven by the principle of sustainable

should be refused. If there are exceptional circumstances which require their removal, adequate replacement trees must be provided.- A repeating 5-year permission notice introduced to planning permissions. Where trees with TPO or within 5 year protection scheme have been removed, replacement orders can be followed through for a rolling set five year periods. This is manageable with a simple log of permissions with such initial five year protection clauses.- All applications should include a landscape plan and statement of tree/shrub removal and retention for approval as part of the application process- All applications and preplanning consultations must -- Retain and protect trees of amenity and biodiversity value on the site and in adjacent sites that may be affected by the proposals;Ensure that the future long term health and amenity value of the trees is not harmed;Provide adequate separation between the built form and the trees including having regard to shading caused by trees and buildings- Applications and preplanning, must outline how the development will contribute to the protection, enhancement or restoration of the ecological value of the site and the surrounding area, including the provision of living landscaping and the formation and enhancement of waterways, wildlife corridors and green chains- In applications and preplanning, provision must be made to increase tree and hedge(non- Laurel) cover on the

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| | | | | | | development site and new tree planting and living landscape schemes included with the emphasis on planting mature, large, shade and oxygen producing trees, native trees and hedges and flora of high ecological value.- All trees contained within approved development should be considered as protected indefinitely. Any future works to the trees should only be allowed with given permission following a planning application and assessment by The Tree Officer.- Where trees are removed etc without permission, the developer/owner and tree surgery company should be heavily penalised and council tree and compliance officers should feel able to pursue this." | | | | | | | | | | |
| 1110777 | David Jardine | | Yes | Trees must be protected at all costs and developments carefully monitored | Yes | | | | | | | | | | | Support noted |
| 1110822 | John Bamford | | Yes | | Yes | | | | | | | | | | | Support noted |
| 1110912 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | | | | Support noted |

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| 1111010 | Bridget Fox | Woodland Trust | No | <p>The National Planning Policy Framework (NPPF) 2021 (paragraph 180c) states: "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists".</p> <p>The proposed wording of ENV2 para 2. "Development must not result in the loss of, or damage to, ancient trees, trees, woodlands and hedgerows that make or are capable of making a significant contribution to the character or amenities of an area, unless the benefits would clearly outweigh the loss and replacement planting is provided" is insufficiently robust to match the requirement of the NPPF as it refers to relative benefit rather than to wholly exceptional reasons.</p> | No | <p>The National Planning Policy Framework (NPPF) 2021 (paragraph 180c) states: "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists".</p> <p>The proposed wording of ENV2 para 2. "Development must not result in the loss of, or damage to, ancient trees, trees, woodlands and hedgerows that make or are capable of making a significant contribution to the character or amenities of an area, unless the benefits would clearly outweigh the loss and replacement planting is provided" is insufficiently robust to match the requirement of the NPPF as it refers to relative benefit rather than to wholly exceptional reasons.</p> | Y | <p>The National Planning Policy Framework (NPPF) 2021 (paragraph 180c) states: "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists".</p> <p>The proposed wording of ENV2 para 2. "Development must not result in the loss of, or damage to, ancient trees, trees, woodlands and hedgerows that make or are capable of making a significant contribution to the character or amenities of an area, unless the benefits would clearly outweigh the loss and replacement planting is provided" is insufficiently robust to match the requirement of the NPPF as it refers to relative benefit rather than to wholly exceptional reasons.</p> | <p>The Woodland Trust recommends the following policy wording for protection of ancient woodland:</p> <p>i. Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons.</p> <p>ii. As ancient woodland and ancient or veteran trees are irreplaceable, discussions over possible compensation should not form part of the assessment to determine whether the exceptional benefits of the development proposal outweigh the loss.</p> <p>iii. Ancient wood pasture and historic parkland should receive the same consideration as other forms of ancient woodland. The protection of the whole habitat is necessary even though tree cover may be comparatively sparse. Development on open space between trees in an area of ancient wood pasture or historic parkland should not be permitted.</p> <p>Further information is available in the Trust's "Planners' Manual for ancient woodland".</p> | <p>planners-manual-for-ancient-woodland.pdf https://consult.elmbridge.gov.uk/qf2.ti/a/1205954/557302/PDF/-/planners%2Dmanual%2Dfor%2Dancient%2Dwoodland%2Epdf</p> | As per 1a, 2a, 3a and 4. | No, I do not wish to participate at the oral examination | <p>Objection noted.</p> <p>The Council has included the suggested amendments within its proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see main modification ref. M4.2.</p> |
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| 1111037 | Denise Stanczyk | | Yes | | No | <p>As part of the local plan, ENV2 should be strengthened by the council committing to creating a formal tree strategy policy for the borough e.g the Enfield local plan, particularly DM80 and DM81 (points outlined below). This would protect our trees and green living environment at pre, post and during the planning process.</p> <p>This would also promote joined up working with planning, developers, landscape professionals and the local community to create a healthy environment, built and natural for us all, now and into the future.</p> <p>-Works to trees covered by a Tree Preservation Order or trees situated within a Conservation or Tree Preservation Area must ensure the long term health of the tree, and retain and enhance amenity value to the locality. Works must comply with current arboreal best practice, guidelines and legislation.</p> <p>- All development and demolition must comply with established good practice, guidelines and legislation for the retention and protection of trees. There must be a high regard for the retention of all trees of amenity and environmental value, taking consideration of both their individual merit and their interaction as part of a group or broader landscape feature.</p> <p>- All development including subsidiary or enabling works, that involve the loss of or harm to trees covered by Tree Preservation Orders, or trees of significant amenity or biodiversity value, should be refused. If there are exceptional circumstances which require their removal,</p> | | | | I cannot answer this question | Please see my response to question 2 | | | No, I do not wish to participate at the oral examination | <p>Objection noted.</p> <p>Much of this is restricted by legislation (Town and Country Planning Act-protected trees).</p> <p>All tree work applications and conservation area notifications are judged on their own merits. Works which are deemed to be detrimental to the long term health of trees are refused based on the experience of officers.</p> <p>The requirement for landscape plans and tree statements would be part of a validation checklist rather than detailed in the policy.</p> |
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adequate replacement trees must be provided.

- A repeating 5-year permission notice introduced to planning permissions. Where trees with TPO or within 5 year protection scheme have been removed, replacement orders can be followed through for a rolling set five year periods. This is manageable with a simple log of permissions with such initial five year protection clauses.
- All applications should include a landscape plan and statement of tree/shrub removal and retention for approval as part of the application process
- All applications and preplanning consultations must -- Retain and protect trees of amenity and biodiversity value on the site and in adjacent sites that may be affected by the proposals; Ensure that the future long term health and amenity value of the trees is not harmed; Provide adequate separation between the built form and the trees including having regard to shading caused by trees and buildings
- Applications and preplanning, must outline how the development will contribute to the protection, enhancement or restoration of the ecological value of the site and the surrounding area, including the provision of living landscaping and the formation and enhancement of waterways, wildlife corridors and green chains
- In applications and preplanning, provision must be made to increase tree and hedge(non- Laurel) cover on the development site and new tree planting

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| | | | | | <p>and living landscape schemes included with the emphasis on planting mature, large, shade and oxygen producing trees, native trees and hedges and flora of high ecological value.</p> <ul style="list-style-type: none"> - All trees contained within approved development should be considered as protected indefinitely. Any future works to the trees should only be allowed with given permission following a planning application and assessment by The Tree Officer. - Where trees are removed etc without permission, the developer/owner and tree surgery company should be heavily penalised and council tree and compliance officers should feel able to pursue this. | | | | | | | | |
| 1112003 | Mike Wheeler | VOX | | | <p>Policies need to be changed to mitigate the serious adverse consequences of wholesale site clearance of sites prior to submitting planning applications. TPO's provide only limited protection (particularly in the absence of enforcement of planning conditions) and the destruction of natural landscapes leaves a stain on the character of an area. Similarly, more effective commitment is needed to identify and protect ancient trees.</p> | | | | | | | <p>Comments noted.</p> <p>The Council has included the suggested amendments within its proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see main modification ref. M4.2.</p> | |

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| 1110594 | Cobham & Downside Residents Association and Stoke D'Abernon Residents Associa... | Cobham & Downside Residents Association and Stoke D'Abernon Residents Association | No | Please see uploaded document at question 4a | No | Please see uploaded document at question 4a | Y | Y | Y | Y | It is appreciated that it is very difficult to protect trees from felling prior to applications being made where no TPO exists, and we have no intention of thwarting development in this regard. However, we strongly recommend that the matter is addressed by an addition to ENV1 and/or ENV2 to create a presumption in favour of replacement of non-TPO mature trees felled prior to development by the landowner and the developer. This can be registered against the property and, at least, gives the council teeth to demand replacement within any new development's landscaping proposals. The matter can then be clearly identified at application stage. It is not perfect but would provide some protection against wholesale loss of trees in the suburbs as the Local Plan growth is implemented. All tree felling could be subject to an application regardless of TPO. | It is appreciated that it is very difficult to protect trees from felling prior to applications being made where no TPO exists, and we have no intention of thwarting development in this regard. However, we strongly recommend that the matter is addressed by an addition to ENV1 and/or ENV2 to create a presumption in favour of replacement of non-TPO mature trees felled prior to development by the landowner and the developer. This can be registered against the property and, at least, gives the council teeth to demand replacement within any new development's landscaping proposals. The matter can then be clearly identified at application stage. It is not perfect but would provide some protection against wholesale loss of trees in the suburbs as the Local Plan growth is implemented. All tree felling could be subject to an application regardless of TPO. | Head of Planning REG19.docx https://consult.elmbridge.gov.uk/qf2.ti/a/1205954/555812/DOCX/-/Head%20of%20Planning%20REG19%2Edocx | As per 3a and 4. | Yes, I wish to participate at the oral examination | This response process does not allow sufficient scope to fully explain and justify all of the modifications we have proposed. In particular the Wisley Airfield issues are complex and further evidence of this and other matters raised for modification are emerging. This should be expressed at the oral examination. The Council have been asked to make modifications and if implemented or varied it is appropriate for them to be commented on orally as the only remaining route available to do so. Issues such as the status of Cobham Town Centre in Plan 5 and definition and implication of use of the term 'urban area' as a blanket categorisation can be better and more succinctly evidenced orally. | Objection noted. As a local authority, the Council has a statutory duty to consider the protection and planting of trees when granting planning permission for proposed development. Trees are considered as part of the planning process, regardless of whether they are protected (by Tree Preservation Order or Conservation Order) or not. To help protect the Borough's trees and woodland, a felling licence from the Forestry Commission is required to fell most trees. Please see https://www.gov.uk/guidance/tree-felling-licence-when-you-need-to-apply | |
| 1112472 | Adrian Wise | Cobham Conservation and Heritage Trust | | | | It is appreciated that it is very difficult to protect trees from felling prior to applications being made where no TPO exists, and we have no intention of thwarting development in this regard. However, we strongly recommend that the matter is addressed by an addition to ENV1 and/or ENV2 to create a presumption in favour of replacement of non-TPO mature trees felled prior to development by the landowner and the developer. This can be registered against the property and, at least, gives the council teeth to demand replacement within any new | | | | | | | | | | | | Noted. As a local authority, the Council has a statutory duty to consider the protection and planting of trees when granting planning permission for proposed development. Trees are considered as part of the planning process, regardless of whether they are protected (by Tree Preservation Order or Conservation Order) or not. To help protect the borough trees and woodland, a felling licence from the Forestry Commission is required to fell most trees. Please see https://www.gov.uk/guidance/tree-felling-licence-when-you-need-to-apply |

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| | | | | | development's landscaping proposals. The matter can then be clearly identified at application stage. It is not perfect but would provide some protection against wholesale loss of trees in the suburbs as the Local Plan growth is implemented. All tree felling could be subject to an application regardless of TPO. | | | | | | | | | | ance/tree-felling-licence-when-you-need-to-apply |
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ENV3: Local Green Spaces

| ID | N | Org | 1 | 1a | 2 | 2a | 3 | 3 | 3 | 3 | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
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| 1107072 | Alan McCann | | Yes | | Yes | | Y | | | | | | | | | | Support noted |
| 1109547 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | Support noted |
| 1109879 | Ian Nelson | Stoke D'Abernon Residents' Association | Yes | | No | Please include Stoke D'Abernon Memorial Park as a Local Green Space | | | Y | | Please consider the Stoke D'Abernon Memorial Park to be a Local Green Space | Please consider including Stoke D'Abenron Memorial Park as a Local Green Space | Stoke mem park map.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/550919/PDF/-/Stoke%20mem%20park%20map%2Epdf Stoke Mem park green space.docx https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/550920/DOCX/-/Stoke%20Mem%20park%20green%20space%2Edocx | As per 2a, 3a and 4. | No, I do not wish to participate at the oral examination | | Comments noted. The site has been assessed in the Council's Local Green Space Addendum (2023) which is include in the DELP evidence base submitted to the Inspector for Examination. The site is recommended for designation as Local Green Space designation. |
| 1110078 | Susan Mealor | | No | The criteria for registering local green spaces emphasises repeatedly that there must be a benefit to the local community. It is my assertion that private land should not be included in the open spaces sites as they are inaccessible to the community at large. In particular I refer to reference to Number 30 : Wooded area in Burwood Park area D. since there is no community benefit, this site should not be included in a legal document. | No | 2.2 As part of the NPPF (first published in 2012), the Government introduced a new designation to protect local green areas which are valued by local communities.the opportunity to identify and protect areas that are of particular importance and value to the community. 2.4 Setting out the circumstances for using the designation, paragraph 102 of the NPPF continues that, "the Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, healthy community. Green or open space ...can provide tangible health and wellbeing benefits such as promoting healthier lifestyles through recreation uses and encouraging social interaction within a community. As well as these health and wellbeing benefits, green spaces can also improve | Y | Y | Y | Local Green Space Study April 2022 states: "Demonstrably Special to a Local Community" . A private estate is no more accessible than a private back garden. The criteria for registering local green spaces emphasises repeatedly that there must be a benefit to the local community. for example: 5.12 High quality green space..... is a vital part of a vibrant and healthy community. Green or open space ...can provide tangible health and wellbeing benefits such as promoting healthier lifestyles through recreation uses and encouraging social interaction within a community. As well as these health and wellbeing benefits, green spaces can also improve the visual amenity of particular area... 5.13 National policy recognises the importance of particular green areas to local communities These spaces are demonstrably special to the local community Whilst this site may well be attractive, it is in a private estate that is totally inaccessible to the local population, which is the Community of Hersham (even though for EBC purposes only, it comes in area designated Weybridge). Not only is the estate private and exclusive, it is a fact that during the worst days of the Covid crisis when the community was severely restricted in travel and movement from home, the owner/residents of this private estate employed security guards specifically to keep all non-residents out. Since the last public consultation early 2020 , the owner/residents have installed locked gates on roadways and foot entry points and it is patrolled by security guards to keep allcomers out. Thus it is clear that the local population | With specific reference to Number 30 : Wooded area in Burwood Park area D. The site should be removed as there is no access to the community of Hersham, only for the residents who own it. The clause reference is ENV3 and this site is also in Appendix A4 of the draft local plan | | | Yes, I wish to participate at the oral examination | Reference to Number 30 : Wooded area in Burwood Park area D. No private exclusive sites should be allowed to be listed as community assets, any more than private back gardens would be. Whilst this is a pleasant area, it has no community access whatsoever. As a private piece of land which specifically excludes the community, it cannot be regarded as a useful asset. It should not be listed but should have normal regulations applied, such as tree preservation orders. | Objection noted. The proposal has been assessed in the Council's Local Green Space Addendum (2023) which is include in the DELP evidence base submitted to the Inspector for Examination. | |

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| | | | | | the visual amenity of particular area... With specific reference to Number 30 : Wooded area in Burwood Park area D. The site should be removed as there is no access to the community of Hersham, only for the residents who own it. Therefore it is not sound to include it as there is no benefit to the community | | | | | has no contact or ability to access this site. The sole benefit is to the owners. It must be removed from the plan. I would further suggest that no sites within private gated and therefore exclusive estates be included as green places. All developments on such sites are within the remit of the owners anyway, and presumably subject to normal planning regulations, tree preservation orders, etc It is my assertion that this type of private land should not be included in the open spaces sites as they are inaccessible to the community at large. | | | | | | | |
| 1110310 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | Support noted |
| 1110453 | Adrian Dilworth | Health at hand | Yes | | Yes | The greenbelt, in which I live has a diverse number of birds who migrate to the fields each year, wild deer, rabbits, moles, all manner of insects, butterflies etc. These creatures would have their natural habitat destroyed if the greenbelt was re-classified. | | | | | | | | | | | Support noted. The DELP does not propose any development on the Green Belt. |
| 1110648 | Gil Bray | | Yes | | Yes | | | | | | | | | | | | Support noted |
| 1110778 | David Jardine | | Yes | | Yes | | | | | | | | | | | | Support noted |
| 1110823 | John Bamford | | Yes | | Yes | The last two years have demonstrated the importance of retaining green space that serve as a vital part of a vibrant and healthy community | | | | | | | | | | | Support noted. The DELP seeks to protect and enhance existing green space in the borough and require new development to deliver new green space where appropriate. |

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| 1110991 | Miles Macleod | Portmore Park & District Residents Association | Yes | | No | It omits some significant green spaces in north Weybridge which merit consideration for protection as Local Green Spaces | | Y | It omits some significant green spaces in north Weybridge which appear to meet the criteria for protection as Local Green Spaces | Consideration and inclusion for protection as Local Green Spaces of the following green spaces in north Weybridge: the Thames Street Weybridge Green Space; the Grotto Road Recreation Area and the Walton Lane Open Space. Please see the attached pdfs for the rationale and case for inclusion. | Grotto Road Recreation Area Weybridge Local Green Space PPDR evidence.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557355/PDF/-/Grotto%20Road%20Recreation%20Area%20Weybridge%20Local%20Green%20Space%20PPDR%20evidence%2Epdf Thames Street Weybridge Local Green Space PPDR evidence.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557356/PDF/-/Thames%20Street%20Weybridge%20Local%20Green%20Space%20PPDR%20evidence%2Epdf Walton Lane Open Space Weybridge Local Green Space PPDR evidence.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557525/PDF/-/Walton%20Lane%20Open%20Space%20Weybridge%20Local%20Green%20Space%20PPDR%20evidence%2Epdf | As per 4. | No, I do not wish to participate at the oral examination | N/A | Comments noted. These proposal has been assessed in the Council's Local Green Space Addendum (2023) which is include in the DELP evidence base submitted to the Inspector for Examination. |
| 1111997 | Graham Cooke | Thames Ditton & Weston Green Residents' Association | | | | We believe that 4 of the sites that were considered (and rated), but not designated, as Local Green Space should be included for the following reasons. 1/ Esher College - We see no reason why the Esher College site should be treated differently to the Tiffins' Sports Grounds - They are both are in close proximity to each other and both about the Hampton Court Way. The Esher College site has historic significance being part of what was the old Weston Manor Farm dating back to the Domesday Book. 2/ Ditton Marina - We disagree with the low assessments given in terms of recreational | | | | | | | | | Comments noted. These proposal has been assessed in the Council's Local Green Space Addendum (2023) which is include in the DELP evidence base submitted to the Inspector for Examination. |

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| | | | | | | value, tranquillity and wildlife - we believe that an overall assessment of at least 14 would be appropriate to this site on the banks of the River Thames. Public access to the various facilities on the site are widely used. 3/ Ditton Field and Fieldsave - We believe that these two sites should be considered together as they form one contiguous piece of land which provides the setting for Grade 1 listed Hampton Court Palace. The site also provides an important part of the protected strategic views from Hampton Court Palace to the Surrey Hills. | | | | | | | | |
| 1110501 | Stephen Reisbach | | Yes | Please see comments in relation to question 2 below | Yes | We support the emphasis in the Draft Local Plan on the conservation of green and blue infrastructure and biodiversity. We would make the following specific points. The first of these, in relation to Chapter 5 (Policy ENV3 and paragraph 5.13) and Appendix A4, constitutes an qualification to our general answers above. The second of them is not a qualification, but relates to the implementation of Policy ENV6 going forward. 1. Chapter 5 (Policy ENV3 and paragraph 5.13) and Appendix A4: Local Green Spaces Although we consider the above parts of the draft Local Plan for the most part to be sound and legally compliant, we would make an exception to this, as set out below. We strongly support the designation of both Area 8: Stokes Field and surrounding community uses (area reference 116 in the Local Green Spaces study 2022) and Area 51: One Tree Hill (area reference 111 in the 2022 study) as Local Green Spaces. | | | | https://consult.elmbridge.gov.uk/af/1205954/833656/PJP/-/Stephen%20Reisbach%20%20Marian%20Thomas%20Stokes%20Field%20-%20Additional%20Areas%20A%20and%20B.jpg | | | | Comments noted. Combining the two sites would exceed the 30ha threshold for Local Green Space and therefore the proposal has not been recommended for designation as Local Green Space. This assessment is set out in detail within the Council's Local Green Space Addendum (2023) which is include in the DELP evidence base submitted to the Inspector for Examination. |

However, we consider it is irrational and not in accordance with the evidence to confine designation to two discrete parcels of land within what is in fact a larger area, which in terms of use and biodiversity ought properly to be regarded as a single entity for the purposes of designation as a Local Green Space. In our view the appropriate area for designation as a Local Green Space would be a single site comprising areas 8 and 51 together with (a) the area between Stokes Field LNR and the field at One Tree Hill, and (b) the area of woodland, hedges and scrub immediately to the east of One Tree Hill and extending up to the boundary of the site currently in use by Hill Park Roses. (We find that the online consultation form does not allow us to upload a plan indicating more precisely the areas in question, and so we shall supply this separately.) Given that the whole of the area comprising Stokes Field LNR, the One Tree Hill field as delineated in the Local Green Space study, and the additional areas described above ("Area A and Area B") are effectively used by the public as a single site, and that much of the wildlife and biodiversity value of the area comes from its continuity, size and the diversity of the habitats which make it up, it seems perverse and illogical not to designate the whole as a Local Green Space. Areas A and B very much form part of a whole with the One Tree Hill field and Stokes Field LNR, both in terms of effective public access and use and biodiversity. As

regards the former, we consider that most members of the public who frequent the area do not make any distinction between, on the one hand, Stokes Field LNR and One Tree Hill and, on the other, Areas A and B; rather, they attribute a single identity to them in terms of "place". The path which is a continuation of Bankside Drive and constitutes the boundary between Stokes Field LNR and Area A is completely unremarkable as compared with the other paths around the area and has no obvious markers to designate its significance. The normal circuits walked by most dog owners and other visitors incorporate parts of one or other or both - in our observation generally both - of the Areas A and B. From a biodiversity viewpoint Areas A and B are important in terms of (i) the varying areas of habitat contained within them, (ii) the essential connectivity they provide between Stokes Field LNR and One Tree Hill, and (iii) the greater viability for a range of species afforded by the combined areas together as compared with two much smaller discrete pockets in Stokes Field LNR and One Tree Hill. Importantly, the area supports a significant population of the Brown Hairstreak butterfly (*Thecla betulae*), a Biodiversity Action Plan priority species which is classified as Vulnerable (VU) in the recently published Red List of UK butterflies (2022). The butterfly is dependent on its larval foodplant, blackthorn. The majority of the blackthorn hedges suitable for breeding are situated within Areas A and B (indeed, most of them border One Tree

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| | | | | | Hill, but the demarcation of the Local Green Space by reference to the field alone appears to exclude them). Similarly, the iconic but elusive Purple Emperor butterfly (<i>Apatura iris</i>) has been recorded at Stokes Field LNR, but the great majority of its larval foodplant, sallow, in the vicinity is found in Area B. Again, Area B includes some of the oldest trees in the complex as a whole, and these are most likely to support species such as stag beetle (<i>Lucanus cervus</i>), another Biodiversity Action Plan priority species. We believe that a single Local Green Space constituted by the designation of Areas A and B together with Area 8 (Stokes Field and surrounding community uses) and Area 51 (One Tree Hill) would be well within the 30ha. upper limit. Further, although we consider that each of Areas A and B would in themselves in any case satisfy the characteristics and threshold score for designation, it is not necessary to demonstrate that that is the case since, for an area whose characteristics and customary use effectively constitute it as a single space, the correct approach must be to assess that space as a whole. | | | | | | | | | | | | |
| 1111014 | Lucy Morris | Nexus Planning on behalf of Charterhouse Strategic Land | No | Please see uploaded document at question 4a | No | 6.1 The Former Moore Place Golf Course is designated as Local Green Space (No.6) within the draft Local Plan. Charterhouse submit however that the site does not meet the criteria set out within either the PPG or the NPPF to justify this designation. Please see uploaded document at question 4a for full response. | Y | Y | Y | Y | Please see uploaded document at question 4a. | 6.10 This designation should be removed from the site as it is not sound. | https://consult.elmbridge.gov.uk/qf2.ti/af/1205954/557335/PDF/-/Former%20Moore%20Place%20Golf%20Course%20Elmbridge%20Draft%20LP%20Reg.19.pdf | As per 2a and 4. | Yes, I wish to participate at the oral examination | Please refer to accompanying submission. Please note that Nexus Planning is acting on behalf of Charterhouse Strategic Land. | Objection noted. The Council considers the site is appropriate for designation of Local Green Space. An assessment of the site is set out in more detail within the Council's Local Green Space Addendum (2023) which is include in the DELP evidence base submitted to the Inspector for Examination. |

ENV4: Protecting Green Belt

| ID | N | Org | 1 | 1a | 2 | 2a | 3 | 3 | 3 | 3 | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
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| | | | | | | | P | E | J | C | | | | | | | |
| 1107074 | Alan McCann | | Yes | | Yes | | | | | | | | | | | | Support noted |
| 1109548 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | Support noted |
| 1110311 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | Support noted |
| 1110649 | Gil Bray | | Yes | | Yes | | | | | | | | | | | | Support noted |
| 1109900 | Michael O'Sullivan | | Yes | | No | <p>It is understood that re-designation of Green Belt land can only be achieved during a Local Plan process; hence this comment, which seeks it for two minor pieces of existing Green Belt for the future benefit of Weybridge as a whole. 100% of Local Green Belt Area 40 is a tarmac-laid surface car park, as is a very minor piece of land contained within the much larger Area 39. These two parking areas are colloquially known as Heath Road (Station) Car Park South, and North respectively. This comment stems from a principle contained within a future proposal for major development within Brooklands College, which itself forms a highly significant portion of the 73.4ha of Area 39. The College appreciates that Very Special Circumstances will have to be demonstrated before any development will be approved, but it has contended that, due to the continued existence of a concrete base on which a former hangar was located, that specific piece of land has been "wrongly categorised" as being Green Belt. If that wrong categorisation is correct, then the same principle should apply to both aforementioned car parks. There are only two scenarios here: either Local Green Belt Areas 39 & 40 already existed when the car parks were developed</p> | | | | Y | <p>It is understood that re-designation of Green Belt land can only be achieved during a Local Plan process; hence this comment, which seeks it for two minor pieces of existing Green Belt for the future benefit of Weybridge as a whole. 100% of Local Green Belt Area 40 is a tarmac-laid surface car park, as is a very minor piece of land contained within the much larger Area 39. These two parking areas are colloquially known as Heath Road (Station) Car Park South, and North respectively. This comment stems from a principle contained within a future proposal for major development within Brooklands College, which itself forms a highly significant portion of the 73.4ha of Area 39. The College appreciates that Very Special Circumstances will have to be demonstrated before any development will be approved, but it has contended that, due to the continued existence of a concrete base on which a former hangar was located, that specific piece of land has been "wrongly categorised" as being Green Belt. If that wrong categorisation is correct, then the same principle should apply to both aforementioned car parks. There are only two scenarios here: either Local Green Belt Areas 39 & 40 already existed when the car parks were developed on them in the mid/late-1960s, or the car parks were already in existence when the land on which they were located was designated as Green Belt. The former is the more likely, but in either event, both car parks can now be considered as wrongly categorised and so their Green Belt status removed. This release will provide an important opportunity for the Town to eliminate the current parking congestion being suffered in its two retail areas, where the Weybridge Society has proved that between 750 and 1,100 commuter vehicle park in residential roads all day, every business day. In turn, this inconveniences local residents and deters visitors to the Town, thereby reducing retail footfall for traders, which seems at odds with national policy of</p> | Removal of both, wrongly-categorised station car parks from Green Belt status. | | | Yes, I wish to participate at the oral examination | The matter I have raised is an important one of principle, and will have a specific and significant impact on the future of Weybridge as a whole. | <p>Objection noted.</p> <p>The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?</p> <p>Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's</p> |

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| 1110728 | John Nicol | | No | The draft plan proposes to retain our clients site at Mill Road as Green Belt when it fails to meet the tests on the NPPG for the purposes of designating Green Belt land. | No | The draft plan proposes to retain our clients site at Mill Road as Green Belt when it fails to meet the tests on the NPPG for the purposes of designating Green Belt land. The site should be released for residential as amplified elsewhere in our representations. | Y | | Y | Y | Our clients site is suitable for residential development and does not meet the tests to retain it as such in the NPPF. Therefore it is inconsistent with national policy to do so. We have questioned whether the plan can deliver the level of housing suggested on the adjoining sites and therefore meet its housing requirements. It is therefore not positively prepared and justified. | To remove our clients site from the Green Belt and allocate it for housing. | Local Plan Submissions Final.pdf https://consult.elmbridge.gov.uk/qf2.ti/a/1205954/556486/PDF/-/Local%20Plan%20Submissions%20Final%20Epdf | As per 1a, 2a, 3a and 4. | Yes, I wish to participate at the oral examination | It will be important to explain to the Inspector the contribution that development of the subject site can make to housing provision and delivery in Elmbridge and in particular affordable housing in light of the Councils poor performance on delivery and its significant lack of existing housing supply. Further the poor contribution that the site makes to the Green Belt and that the suggestion the site has 'standing water' is erroneous. Given it is in the main grazed by horses its biodiversity value is poor, contrary to the sites designation. There is no evidence base to underpin the suggested Biodiversity Opportunity Area designation should apply to this site. | Objection noted. The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of <u>Topic Paper 1: How the spatial strategy was formed?</u> Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still |
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perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported

by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

Site allocation US39 is no longer available for development.

Landowners have confirmed availability for US33 and US38 in 2023. The 6-10 year timescale allows for employment options to be considered.

The council has commissioned a feasibility study to look at the options for redevelopment and regeneration of the wider area around Lower Green. It is envisaged that this will include options for mixed use development which will include some employment use.

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| 1110729 | Ian Anderson | Lichfields | Yes | | No | <p>Policy ENV4, and its supporting text, fails to adequately explain:</p> <p>1. what is considered 'appropriate' development in the Green Belt</p> <p>2. The role of limited infilling or complete redevelopment of previously developed land, whether redundant or in continuing use, subject to this not having a greater impact on the openness of the Green Belt.</p> <p>Simple ref to the NPPF in our view does not explain fully, nor help explain to non technical reviewers of the Plan</p> <p>The Policy should be reviewed against NPPF21 notably paras 147-151.</p> | Y | Y | Y | <p>see earlier comments:</p> <p>Simple ref to the NPPF in our view does not explain fully, nor help explain to non technical reviewers of the Plan</p> <p>Policy ENV4, and its supporting text, fails to adequately explain:</p> <p>1. what is considered 'appropriate' development in the Green Belt</p> <p>2. The role of limited infilling or complete redevelopment of previously developed land, whether redundant or in continuing use, subject to this not having a greater impact on the openness of the Green Belt.</p> <p>The Policy should be reviewed against NPPF21 notably paras 147-151.</p> | see above comments | | | No, I do not wish to participate at the oral examination | <p>Objection noted.</p> <p>Local Plans do not need to duplicate national policy. An amendment to add a specific reference to the NPPF is included in the Council's proposed modifications to the DELP. These were submitted to the Inspector for Examination. Please see main modification ref. M4.4.</p> | | |
| 1110824 | John Bamford | | Yes | | Yes | <p>I support the council placing great importance on protecting Green Belt as it serves as a buffer to neighbouring area, preserves the open countryside as well as the integral character of individual areas..</p> | | | | | | | | | | Support noted | |
| 1110913 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | | | | | Support noted |

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| 1110978 | Andrew Munton | Reside Developments | No | <p>We are extremely disappointed and concerned with this Reg 19 local plan, which fails the most vulnerable people in the borough. This plan fails to deliver even its minimum OAN of 9,615 homes year, only providing 6,985 homes, which is 73% of its minimum need. In other words, over 25% of the population needing new homes in Elmbridge is being left without homes.</p> <p>In addition, the council is already failing its electorate, where it cannot demonstrate a 5-year supply of housing land (published at 3.96 over a year ago) and has failed the Housing Delivery Test reaching only a meagre 58% and is therefore in a position where the Presumption of sustainable development is engaged.</p> <p>The reason for not meeting the OAN in the revised local plan is cited as being to protect the green belt and to build only building on brownfield land.</p> | No | <p>However, the green belt is not an environmental designation, and the green belt's fundamental aim to prevent urban sprawl (NPPF). However, there is not an embargo on releasing and building on green belt land, where there are exceptional circumstances.</p> <p>In fact it has already helped by steering development to the existing brownfield sites. However, these seem to have been exhausted, otherwise one assumes more brownfield sites would have been included to the meet the OAN. Para 141 of the NPPF specifically points to using brownfield first, but then, once exhausted, there being exceptional circumstances for green belt land release.</p> <p>Not providing sufficient housing to meet its needs and the extremely high affordability ratios are clear exceptional circumstances for releasing green belt land for new homes. This has been tested at many EiPs up and down the country, including locally at neighbouring Guildford, Waverley and Woking to name but a few.</p> <p>To release no green belt land and fail to meet the OAN renders the plan unsound. It has clearly therefore not been Positively Prepared and the choice to not release any green belt land is not Justified. Furthermore, the plan cannot be consider to be Effective, where it is not providing for over 25% of its housing need, and is not Consistent with national policy, which requires councils to meet its OAN.</p> | Y | Y | Y | Y | <p>Since the Reg 18 document, nothing in green belt policy has changed and there are therefore no reasons for the council's retrograde step in its strategy to exclude any green belt land release. This is a political decision, not a planning policy decision.</p> <p>As well as not delivering market housing, this will also have a knock-on effect of delivering much needed affordable housing. In 2019, the council's HHRSS paper report that there were 1,801 applications on its waiting list.</p> <p>In 2019, the same HHRSS report stated that the council has the second highest ratio of house prices to income in the South East at 15.08 (2017). This gap has been widening considerably, where the ratio was 9.65 in 2003. Not only does this point to the need for more housing and meeting the OAN (this would also add to the exceptional circumstances for releasing green belt land for housing), but it also points to needing to deliver more than the OAN.</p> <p>This means that the failing to deliver the OAN is even worse than not providing 27% of the need, as more is needed in Elmbridge. This clearly points at the plan being Ineffective, not Positively prepared of Justified and not Consistent with national policy.</p> | <p>The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective.</p> | | | <p>Yes, I wish to participate at the oral examination</p> | <p>These matters can only be fully explored and tested in person.</p> | <p>Objection noted.</p> <p>During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.</p> <p>The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022).</p> <p>The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong</p> |
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reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing

development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be

protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality. The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site

parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of

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| 1111009 1111040 | Steven Fidgett | Union4 on behalf of Molesey Road Land Limited (A Barry) | No | | No | ENV4 - Development in the Green Belt Objection For the reasons set out in respect of SS3 and HOU1, it is considered that exceptional circumstances exist that justify a review of the Green Belt and the release of selected sites from the Green Belt to meet the need for housing over the plan period. In summary, it is clear from the evidence base that: 1. When considering housing need in Elmbridge it is acute. 2. There are inherent constraints on supply that mean that housing needs cannot be met from within the existing urban areas or land sustainably located outside the Green Belt. 3. It is evident that sustainable development cannot be achieved, indeed needs would not be met which impact on the economy, social equity and the environment, without consideration of Green Belt release. 4. It is evident that the extent of Green Belt release can be limited both in quantum and in the nature of proposed release. 5. It is also evident the consequences for the Green Belt can include local enhancements to both accessibility and the function of the Green Belt in respect of its key purposes that minimise the overall effect of such release. | Y | Y | Y | Y | See above and response to SS3 and HOU1. | Proposed Modifications to make the ELP sound: The review of Green Belt boundaries and bringing forward of modifications to release land from the Green Belt sufficient to meet at least the minimum level of objectively assessed housing need. Specifically, the identification of land east of the Molesey Road, Walton on Thames should be released from the Green Belt and identified for housing led mixed use development, as set out in the attached proposal. In conjunction with the proposed land identified for development, it is proposed to create a substantial area of SANG as publicly accessible greenspace, as one of the largest areas of accessible greenspace in the Borough, close to the main centres of population. | | | Yes, I wish to participate at the oral examination | We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan. | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELDP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022). The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong |
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reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing

development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be

protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality. The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site

parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of

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| 1111098 | Sophie Rae | WSP obo The Julien Family Trust | No | We support the principle of restricting development on Green Belt land, in line with national policy in the NPPF which provides that inappropriate development in the Green Belt should only be allowed in very special circumstances. However, we do not support the protection of all existing Green Belt land in circumstances where it would result in a highly significant undersupply of homes and where certain parcels of land can be released without harming the purposes of the Green Belt. In order for the Plan to be found sound, the Council must properly engage with and consider the potential for amendments to the boundary of the Green Belt. The release of certain Green Belt land would facilitate an uplift in the delivery of housing within the Borough. Rodona Road offers such an opportunity to the Local Authority. | No | Please see uploaded document at question 4a | Y | Y | Y | Y | Please see uploaded document at question 4a | We request that the conflict between the Green Belt boundary and Estate boundary, as set out earlier in these representations, be addressed as part of the emerging Local Plan. This requires the amendment of the Green Belt boundary so that it aligns with that of the Estate, to include for Plots B-F. The boundary of the Estate (and our proposed boundary for the Green Belt) has been marked out on the ground by the SGHRA. They have installed fencing to reflect the settlement boundary of the estate. That fencing along the outer edges of the Estate marks a clearly defensible Green Belt boundary that would give further protection to the Green Belt and prevent urban sprawl into the wider Green Belt. It should be noted that SHGRA support the development of the land at Rodona Road and its release from the Green Belt (see letter attached). There are a range of public benefits which would stem from this amendment, which are discussed later within this representation, and without detriment to the purposes of the Green Belt. | Rodona Road 29 July 2022 FINAL.pdf https://consult.elmbridge.gov.uk/qf2.ti/a/1205954/557554/PDF/-/Rodona%20Road%2029%20July%202022%20FINAL%2Epdf | As per 1a and 4. | Yes, I wish to participate at the oral examination | Please refer to submitted letter | Objection noted. The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed? Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still |
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The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported

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| | | | | | | no longer relevant and should be removed from the evidence base. | | | | | | | | | | | | | |
| 1112933 | Miss Beckett | Savills obo Crown Estate | | | No | <p>Policy ENV4: Development in the Green Belt – no objection to the policy per se, however, the Green Belt boundaries should be reviewed in sustainable locations to ensure that land that weakly meets the defined Green Belt purposes and appropriate for development is released and allocated for a combination of development with associated (and deliverable) Green Infrastructure enhancements.</p> | | | | | | | | <p>TCE do not have an issue with the policy wording itself however, EBC may want to consider Green Belt release in order to ensure that the plan is justified, positively prepared and consistent with the NPPF. Thus, the objection is associated with retaining the extent of the present Green Belt without modification. This is because Exceptional Circumstances for Green Belt release are capable of being demonstrated. As mentioned in Section 4, it is clear from Topic Paper 1 Green Belt release was considered by Officers, noting the 12 sites identified in paragraph 6.66. TCE question why the evidence supporting the identification of these sites has not been published. TCE do not consider the information included in the Topic Paper 1 to be sufficient enough to explain the conclusions reached.</p> <p>It is noted that no updated Green Belt evidence has been published with this consultation, owing to the fact that no Green Belt allocations have been made. Given the EBC's most up to date evidence on this remains as the 2018/19 work, TCE would like to highlight that their comments on this work in their Reg 18 representations stand, and they wish to withstand the right to comment further should any new evidence be published. Overall, TCE do not object to the policy, rather the extent of retaining the present Green Belt without further review and/or amendment. Thus, TCE question the earlier approach taken which had clearly considered Green Belt release and then did not follow through with this in terms of making allocations. Should an Inspector require EBC to investigate Green Belt sites for potential allocation, TCE would like to highlight their sites as available (see Appendices 1-5 and X).</p> | <p>220729 The Crown Estate EBC Reg 19 Local Plan Representation FINAL.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/569732/PDF/-/220729%20The%20Crown%20Estate%20EBC%20Reg%2019%20Local%20Plan%20Representation%20FINAL%2Epdf</p> | A per 2a and 3a. | Yes, I wish to participate at the oral examination | In our representations, a number of concerns (objections) were noted, so TCE would like to be present at the relevant Matters to contribute and further explain the points raised. | <p>Comments noted.</p> <p>During the development of the Draft Elmbridge Local Plan 2037 (DELDP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.</p> <p>The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022).</p> <p>The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green</p> |

Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow

local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality.

The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing](#)

[Need Assessment \(2020\).](#)

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

Promoted sites Land at South of Hare Lane, Claygate; Land at Horingdon Farm; Land East of Blundel Lane, Oxshott and Land SE of Danes Way, Oxshott have been assessed by the Council and were found to be not suitable for Green Belt release.

a few steps from the northwest corner of SA-11; and as indicated by the Church of England official parish boundaries map :
<https://arcgis.com/home/we-map/viewer.html?webmap=67bce0ed36dd4ee0af7a16bc079aa09a&extent=-0.4891,51.2975,0.256>
 The development to the west is a ribbon development of detached 4 & 5 bedroom houses built roughly 95-100 years ago - whereas the development to the north is a more recently built mix of detached, semi-detached and terraced houses - some of which are ,51.6099 former Council housing.
 B. On page 24, the assessment of SA-11's role in safeguarding the countryside from encroachment is merely moderate because it fails to recognise that 0% of the land is previously developed (it instead inaccurately claims less than 10% is previously developed); and fails to recognise that SA-11 is characterised by open rural land uses and landscapes, including agricultural land consisting of open fields yielding crops of hay, with many wildflowers on the field edges. Strategic views of Surrey Hills AONB, from the southern end of the SA-11 Public Footpath leading to SA8, have not been recognised. These stunning views need to be recognised in order to assess accurately, and duly recognise, SA-11's high performance in safeguarding the countryside from encroachment.
 Furthermore, development of SA-11 would isolate SA-15 (Danes Hill School sports grounds) from the wider countryside. SA-15 is designated as Institutional Spaces to

be protected in EBC's Green Infrastructure map. SA-15 therefore needs to be duly protected by safeguarding SA-11 from development.

Development of SA-11 would be visible from Bridle Lane, marking the boundary with SA8. Development of SA-11 would also reduce the performance of SA8 by affecting the pretty views to SA8's north.

C. Correction of this inappropriate, inaccurate ARUP evidence would provide clear justification for the conclusion that SA-11 should not be considered further for development - since SA-11 in fact meets the 3 Purposes assessment more strongly than currently indicated.

Correction of the Evidence Base inaccuracies for SA-11 is needed in order to save in from development by Savills who, acting on behalf of The Crown Estate landowners, have been lobbying EBC for several years to develop this readily visible, readily accessible open landscape with stunning strategic views. SA-11 is in the northern part of LF1 in the 2015 Surrey Landscape Character Assessment, conducted by Hankinson Duckett Associates on behalf of Surrey County Council, Surrey LPAs including Elmbridge Council, and Surrey Hills AONB. The LF1 assessment states : page 23 "The northern part of the area is a pleasant rural farmland landscape with less urban influence despite adjoining Built Up areas to the north." The page 23 character assessment duly recognises the visible, unspoilt rural environment of SA-11 - unlike the ARUP work commissioned by EBC. EBC contradicts/rejects

this assessment of clear evidence. EBC's rejection of these key facts is inappropriate, inaccurate and disproportionate. Page 27 : The section on LF1 Built Development recommends that LPAs "Retain gaps in linear development particularly where these allow rural views over farmland." This Built Development policy needs to be adopted. It will save SA-11 in the medium and long term, as so many passersby enjoy the rural views over farmland along Blundel Lane. The draft Local Plan section "Protecting the Green Belt" should make this proposal more sound, and therefore more readily deliverable, by adopting the following part of the 2011 Elmbridge Development Strategy : "Protecting the Green Belt : 3.11 Elmbridge is embedded in the London Green Belt and is under a national obligation to protect and maintain it. The success of the Green Belt policy over the years has shaped the pattern of settlements, and separates towns and villages into individual and distinctive communities. The Green Belt permeates all parts of the Borough and has prevented the coalescence of its component settlements. The fragmented nature of the Green Belt distinguishes the Borough from the more developed London boroughs on one side and the more open countryside on the other." This statement is essential since SA-11 is part of the Green Belt that surrounds Oxshott and helps define Oxshott's green, healthy beautiful character. The draft LP Green Infrastructure map and policy exclude nearly all

the Green Belt - in stark contrast to the 2011 Elmbridge Development Strategy (cf page 54) which includes all the Green Belt. The draft LP's exclusion of SA-11/GB46 and nearly all other Green Belt from Green Infrastructure is inconsistent with the NPPF. NPPF Page 67 defines Green Infrastructure as : "A network of multifunctional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and well-being benefits for nature, climate, local and wider communities and prosperity."

In other words, Green Infrastructure is not just a beneficial network of Public Footpaths (as the draft LP proposes), but a range of views from these Footpaths of stunning landscapes and open countryside and fields; clean air; and biodiversity. For example, our SA-11 benefits the local economy by providing unspoilt farmland, hay fields, or pastureland, as the local Esher Arbrook Farm who currently lease the land deem appropriate.

Therefore in order to make the draft Local Plan's Green Belt protection policy more sound throughout the 15 coming years, the LP should include all appropriate Green Belt sites in the Green Infrastructure map.

This will then make the LP consistent with the NATIONAL POLICY on Green Infrastructure adopted by HMG in December 2021, as proposed by Natural England. The general policy in the draft LP to protect the Green Belt, such as SA-11, is

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| | | | | | <p>enormously encouraging in the short term, and needs more sound evidence in the medium and long term in order to deliver this policy effectively.</p> <p>This statement is, on behalf of residents living near the SA-11 site, and the 2506 people who have signed the petition to save SA-11 by correcting the evidence base used to assess its performance. Dorothy Ford and Richard Marshall are co-leaders of the BluWav Residents Group, set up to save SA-11. Richard Marshall and Blu-Wav endorse all the comments in this box.</p> | | | | | | | | | |
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ENV5: Thames Basin Heaths Special Protection Area

| ID | N | Org | 1 | 1a | 2 | 2a | 3 | 3 | 3 | 3 | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
|--------------------|-----------------|---|-----|--|-----|---|---|---|---|---|---|--|---|--|--|---|--|
| | | | | | | | P | E | J | C | | | | | | | |
| 1107075 | Alan McCann | | Yes | | Yes | | | | | | | | | | | | Support noted |
| 1109549 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | Support noted |
| 1110312 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | Support noted |
| 1110650 | Mr Gil Bray | | Yes | | Yes | | | | | | | | | | | | Support noted |
| 1110825 | John Bamford | | Yes | | Yes | | | | | | | | | | | | Support noted |
| 1110914 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | | | | | Support noted |
| 1111012 1111042 | Steven Fidgett | Union4 on behalf of Molesey Road Land Limited (A Barry) | No | While the approach of the policy to the protection of the Thames Basin Heaths SPA is recognised and supported, it is clear that additional SANG capacity is required alongside any additional housing proposed to meet the objectively assessed need. Without this, the ELP fails to meet the requirements of the Habitats Regulations and the Sustainability Appraisal is flawed. The SANG Options Study (May 22) identified that there will only be enough SANG capacity for the first 10 years of the plan. This is clearly inadequate, and it cannot meet the test of soundness for the latter period of the plan to be left uncertain. It notes that 'Years 11 to 15 will require an additional 7.5ha of land for SANG provision in order to ensure that the integrity of the | No | Please see uploaded document at question 4a | Y | Y | Y | Y | Please see uploaded document at question 4a | Proposed Modifications to make the ELP sound: The bringing forward of modifications to increase the area of available SANG at a level to correspond with the increased delivery of housing to meet objectively assessed need and the proposed allocation as part of these modifications, of land east of the Molesey Road to provide a SANG alongside the proposed mixed use residential led development. See SANG Landscape Masterplan. | https://consult.elmbrid ge.gov.uk/gf2.ti/af/1205954/557303/PDF/-/Site%20Masterplan.pdf https://consult.elmbrid ge.gov.uk/gf2.ti/af/1205954/557304/PDF/-/210909_1.PDF https://consult.elmbrid ge.gov.uk/gf2.ti/af/1205954/557305/PDF/-/MAMOLE_1.PDF | The proposals for the Identified Site are located in the area designed to serve the greatest proportion of the Borough's population, adjoining the main urban areas where growth is to be focussed. The proposal is sustainable in location and form and assists in the Local Plan aim of urban intensification while making a substantial new area of natural green space available to the main urban centres. The proposed SANG is optimally located to connect to existing natural and green space and serve as a sustainable recreational resource for the Borough and is readily accessible by foot, cycle and public transport as well as accommodating appropriate parking provision as a destination green space that would reduce pressure on the Thames Basin Heaths SPA. | Yes, I wish to participate at the oral examination | We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of | Objection noted. The Council's SANG mitigation and avoidance strategy (2023) and SANG Options Assessment (2023) sets out that there is enough SANG capacity in the Borough to accommodate the level of development planned for in the DELP. The Council is also working to bring forward additional SANG land to ensure there is sufficient capacity to accommodate future additional development. In addition, the Council has continued to engage with Natural England since the Regulation 19 representation period and our agreed position in regard to SANG is set out in the Council's statement of common ground with Natural England . The Council has assessed the suitability of the promoted site – Land East of Molesey Road for release from the Green Belt designation and it was found that the site was not suitable for release. The assessment is set out in Green Belt Site Assessment Proforma SA-72. |

SPA is protected.' Hence the policy should identify additional SANG capacity as part of the ELP and should not delegate this to the TBH SPA Delivery Framework and mitigation strategy. Unless this is included as an express part of the local plan, it is not clear how the legal obligations to protect the Thames Basin Heaths can be certain of secured. The land proposed for the release from the Green Belt for housing led mixed use development east of the Molesey Road, Walton on Thames is outside of the zones A, B and C for protection of the SPA and hence would not impact on them. Further, the proposal is capable of providing one of the largest areas of publicly accessible green space within easy walking and cycling distance of the major urban centres and the areas of visitor pressure and is hence the most appropriate and suitable area for new SANG provision. The proposals would result in up to 40ha of new SANG informal public open space with areas for recreation and nature, a

The provision of the land for the proposed SANG is enabled by combining this with the targeted and small-scale release of Green Belt for housing alongside the creation of the proposed SANG. The proposals would not be viable or available without it. The area of housing and supporting services and infrastructure proposed (10ha) is also in a sustainable location. It lies adjacent to existing bus routes, Hershams Station and a wide range of footpath and cycleway provision and it has access to a wide range of associated employment opportunities, schools and services.

SANG and this has a significant bearing on the overall level of provision proposed in the Plan.

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| | | | <p>preliminary design for which has been prepared as part of the earlier SANG call for sites. this accompanies a proposal for up to 10ha of residential development, close to Hershams Station and the Molesey Road services. Its release as part of the proposed allocation, would help to serve the informal recreational needs of a large swathe of the urban population and help deflect pressure from the SPA heathland. The SANG Options Study concluded that the land East of the Molesey Road that overall, this site has the potential to meet all of the essential criteria and all five of the desirable criteria could potentially be met. As such, this site was recommended for further consideration. The only reason it was discounted was because: 'Members of the Local Plan Working Group, at their meeting held on the 13 January 2022, confirmed that an urban only strategy will be presented to Cabinet and full Council in the Spring 2022. Therefore, Hershams Golf Course and Land East of Molesey Road are now discounted as</p> | | | | | | | | | | |
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| | | | <p>they rely on residential development in the Green Belt in order to deliver SANG.' However, this leaves no viable option identified in the Local Plan for the essential SANG to support the housing trajectory. This would worsen, were additional housing be identified (as we suggest) to meet objectively assessed housing need.</p> <ul style="list-style-type: none">• Littleworth Common does not have a car park and is poorly located with the zones of influence. The site is also designated as a Site of Nature Conservation Importance, and the attraction of additional visitors to the site (in order to draw them away from the SPA) would potentially conflict with conservation objectives.• The remaining sites are currently in agricultural use and are of agricultural value and suffer from a significant risk of flooding and are poorly located in terms of area/population coverage.• The only remaining option for a SANG site within the borough is to extend SANG at Esher Common (Site B Oxshott Heath) which would conflict with its | | | | | | | | | | |
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| | | | | designation as a SSSI. | | | | | | | | | | | | | |
| 1111981 | Sharon Jenkins | Natural England | Yes | | No | Please see uploaded document at question 4a for full response. As it stands we feel this documents fails the tests of soundness within the NPPF. | Y | Y | Y | Y | Please see uploaded document at question 4a for full response. As it stands we feel this documents fails the tests of soundness within the NPPF. | We feel that Elmbridge Borough Council need to formally provide further evidence and justification that there are mitigation projects available. To allow the Planning Inspectorate to be satisfied that there is enough mitigation available to allow all the Plan to be delivered. Natural England and Elmbridge Borough Council are still engaged in ongoing discussions and we feel that progress is being made on this matter. Following receipt of further information, we are hoping to issue a Statement of Common Ground, in advance of the Examination in Public. Natural England may then review our challenge upon the Local Plan. | 395889 - NATURAL ENGLAND Response.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/563681/PDF/-/395889%20%2D%20NATURAL%20ENGLAND%20Response%2Epdf | As per 4. | | | Objection noted. The Council has continued to engage with Natural England since the Regulation 19 representation period and our agreed position in regard to SANG is set out in the Council's statement of common ground with Natural England . |

ENV6: Protecting, Enhancing and Recovering Biodiversity

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 | | | |
|---------|-----------------|-------------------------|-----|----|-----|---|--------|--------|--------|--------|--|---|----|----|--|---|---|---|--|--|
| 1107076 | Alan McCann | | Yes | | Yes | | | | | | | | | | | | | Support noted | | |
| 1107237 | Dorothy Ford | | Yes | | No | | | | Y | | <p>The map of the Thames Basin Heath Special Protection Area, which shows the zone within 5km of the TBH SPA, should be more detailed so that it is then apparent which roads and which Green Belt sites are indeed with 5km of the TBH SPA.</p> <p>For example, the entirety of Green Belt Sub-Area 11 is indeed within 5 km of the Thames Basin Heath SPA. However this is not apparent from the map provided in the draft Local Plan.</p> <p>The map on page 18 of the 2011 Elmbridge Core Strategy clearly shows that the entirety of Green Belt Sub-Area 11 is within 5 km of the TBH SPA. The map achieves this by including all Green Belt boundaries.</p> <p>If the draft Local Plan map includes the Green Belt boundaries and main roads, that would help.</p> | | | | | | | | | <p>Comments noted.</p> <p>The map set out under draft policy ENV5 is relevant specifically to that policy and is intended to illustrate the Thames Basin Heath zones. For exact streets, the policies map can be used.</p> <p>The DELP does not proposed any development on Green Belt land.</p> |
| 1109550 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | | Support noted | | |
| 1110178 | Keith Parker | | Yes | | No | Why is the River Mole not included as an Elmbridge SNCI, but the rivers Wey and Thames are? | Y | | | | The River Mole is not identified as an Elmbridge SNCI. | The River Mole needs to be added to the list of SNCI entries. | | | No, I do not wish to participate at the oral examination | | | <p>Comments noted.</p> <p>Consideration of the River Mole for designation as an SNCI has been referred to the Surrey Local Sites Partnership.</p> | | |
| 1110318 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | | Support noted | | |
| 1110651 | Gil Bray | | Yes | | Yes | | | | | | | | | | | | | Support noted | | |
| 1110826 | John Bamford | | Yes | | Yes | | | | | | | | | | | | | Support noted | | |
| 1110915 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | | | | | | Support noted | | |

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| 1111015 1111045 | Steven Fidgett | Union4 on behalf of Molesey Road Land Limited (A Barry) | No | The policy is based in part on out of date data and should be amended to reflect the current position in respect of designated sites. | No | ENV6 - Protecting, enhancing and recovering biodiversity Objection While the approach of the policy towards the protection and enhancement of biodiversity is supported, the list of sites to which it applies, as set out in the (unnumbered) table after para 5.24 is out of date. The Field Common/ Hershams Pits SNCI was de-designated following the restoration of the former flooded gravel pits to equestrian use and loss of the previous wetland and wildfowl interest that had been the basis of the original designation. This was confirmed in correspondence at the time of the de-designation in 2017. | Y | Y | ENV6 - Protecting, enhancing and recovering biodiversity Objection While the approach of the policy towards the protection and enhancement of biodiversity is supported, the list of sites to which it applies, as set out in the (unnumbered) table after para 5.24 is out of date. The Field Common/ Hershams Pits SNCI was de-designated following the restoration of the former flooded gravel pits to equestrian use and loss of the previous wetland and wildfowl interest that had been the basis of the original designation. This was confirmed in correspondence at the time of the de-designation in 2017. | Proposed Modifications to make the ELP sound: Deletion of the Field Common/ Hershams Pits SNCI from the Land East of the Molesey Road to reflect the de-designation of the previously infilled gravel pits. | | | Yes, I wish to participate at the oral examination | We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan. | Comments noted. Land to the south of Field common was de-designated in 2017. As such the Council has included its removal from the list on page 52 of the DELP in it proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see minor modification MM5.7. |
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| 1111069 | Robert Hutchinson | Surrey Wildlife Trust | Yes | | Yes | <p>1. Biodiversity Net Gain- We note that Policy ENV6 has regard for a minimum 10% biodiversity net gain. Please be advised that Surrey Nature Partnership recommend a minimum of 20% biodiversity net gain policy. The Surrey Nature Partnership recommends that Surrey's local planning authorities adopt a policy for Biodiversity Net Gain that will require developers using Biodiversity Metric 2.0 (or as subsequently amended) to demonstrate the post-development achievement of a minimum 20% increase in biodiversity units, in support of their planning application(s).</p> <p>2.. Policy ENV6 Point 3. "Development proposals must seek to protect, enhance and conserve wildlife habitats and species by creating new natural areas or restoring and enhancing existing habitats". We would advise that the wording is altered to specifically include Habitats of Principal Importance, and Species of Principal Importance. Therefore we would advise that this states "Development proposals must seek to protect, enhance and conserve wildlife habitats, including Habitats of Principal Importance, and species, including Species of Principal Importance, by creating new natural areas or restoring and enhancing existing habitats"</p> <p>3. Policy ENV Point 4b – "Protect, conserve and enhance existing biodiversity features and secure their long-term management and maintenance" We would advise that the wording is altered to specifically include Habitats of Principal Importance.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | <p>Comments noted.</p> <p>The suggested amendments to criterion 3, 4a and 4b of draft policy ENV6 are included in the Council's proposed modifications to the DELP. These were submitted to the Inspector for Examination. Please see main modification ref. M4.6.</p> <p>An addition to the glossary of DELP to include public benefit is also included in the Council's proposed modifications to the DELP. Please see minor modification ref. MM11.6.</p> |
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| | | | | | <p>Therefore we would advise that this states "Protect, conserve and enhance existing biodiversity features, including Habitats Principal Importance, and secure their long-term management and maintenance</p> <p>4. Habitats of Principal Importance and Species of Principal Importance-Section 41 of the Natural Environment and Rural Communities Act 2006 refers to a published list of habitats and species which are of principal importance for the conservation of biodiversity in England. The above wording amendments to Policy ENV6 Point 3 and 4b, would provide greater emphasis of the protection of important habitats and species in Elmbridge.</p> <p>Policy ENV6, Point 6 - We would advise that the Local Plan clearly defines what public benefits arising from a development outweigh harm to biodiversity. This could be in the narrative and not necessarily in the policy but it would provide clarity to members of the public, developers, ecologists, planning officers and councilors. This could include a criteria of public benefits, and scenarios for when they are relevant.</p> | | | | | | | |
| 1112272 | Sue Janota | Surrey County Council | | | <p>SCC has been notified, on a provisional basis, that it will be the responsible body for a county wide Local Recovery Strategy (LNRS). The following comments are made in relation to the county's strategic interest in biodiversity arising from this role.</p> <p>Clause 1 of policy ENV6 could include reference to the nature recovery networks to be proposed in the LNRS for Surrey, which will be developed in 2022 and 2023.</p> | | | | | | | <p>Comments noted.</p> <p>The suggested amendments to draft policy ENV6 are included in the Council's proposed modifications to the DELP. These were submitted to the Inspector for Examination. Please see main modification ref. M4.6.</p> |

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| | | | | | <p>Clause 6 of ENV6 would benefit from additional clarification. It is unclear what is meant by 'harm to biodiversity' where a net gain is provided. An acceptable compensation strategy should always be in place even in the context of irreplaceable habitats, which are dealt with outside of the Biodiversity Net Gain metric.</p> <p>Terminology could be standardised to ensure that 'conservation, restoration and enhancement' of biodiversity is the consistent term.</p> <p>In supporting policy text, further details could be added about the Surrey context. For example, with reference to the Surrey Nature Partnership's State of Nature report, which revealed that trends in extinction locally are even higher than the already very concerning rates nationally.</p> | | | | | | | |
| 1112283 | Peter Davis | Turley obo Taylor Wimpey | | | <p>ENV6 - Protecting, enhancing and recovering biodiversity Criterion 4 of the Policy states "4. Development proposals must: a) Lead to a net gain in biodiversity of a minimum of 10% on all sites, unless an exemption applies. The achievement of net gain should be informed by an ecological assessment of the site's existing features and development impacts and demonstrated using a net-gain calculator and biodiversity gain plan". We assume that this requirement has its origins in the Environment Act 2021. However the Policy suggests that the net gain should be achieved "on all sites", whereas the Act allows "Biodiversity gain objective 2(1) The biodiversity gain objective is met in</p> | | | | | | | <p>Comments noted.</p> <p>Reference to 'in accordance with the provisions of the Environment Act' is included in the Council's proposed amendments to draft policy ENV6 which are included in the modifications to the DELP. These were submitted to the Inspector for Examination. Please see main modification ref. M4.6.</p> |

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| | | | | | <p>relation to development for which planning permission is granted if the biodiversity value attributable to the development exceeds the pre-development biodiversity value of the onsite habitat by at least the relevant percentage.</p> <p>(2) The biodiversity value attributable to the development is the total of—</p> <p>(a) the post-development biodiversity value of the onsite habitat,</p> <p>(b) the biodiversity value, in relation to the development, of any registered offsite biodiversity gain allocated to the development, and</p> <p>(c) the biodiversity value of any biodiversity credits purchased for the development.</p> <p>(3) The relevant percentage is 10%.</p> <p>(4) The Secretary of State may by regulations amend this paragraph so as to change the relevant percentage.”</p> <p>Our emphasis Accordingly, the Policy should be clarified in order to ensure that off-site net gains can be accounted for.</p> | | | | | | | | | | |
| 1111011 | Rachel Rae | Environment Agency-Thames Sustainable Places Team | Yes | 5. Chapter 5 (ENV6) - Protecting, enhancing and recovering biodiversity Point of clarity and accuracy: 5.1. We welcome the inclusion of paragraph 4.a) in Policy ENV6. To futureproof your plan the following wording should be included: Lead to a net gain in biodiversity of a minimum of 10% (or the standard minimum, whichever is greater) on all sites, unless an exemption applies. | No | | Y | Y | Y | | EBC Reg 19 comments from EA 290722.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557306/PDF/-/EBC%20Reg%2019%20comments%20from%20EA%20290722%20Epdf | As per 1a. | Yes, I wish to participate at the oral examination | As a statutory consultee we are happy to participate at the oral examination if it is deemed necessary. | Changes agreed. The suggested amendment to draft policy ENV6 is included in the Council's proposed modifications to the DELP. These were submitted to the Inspector for Examination. Please see main modification ref. M4.6. |

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| 1110501 | Stephen Reisbach | | Yes | | Yes | <p>We support the emphasis in the Draft Local Plan on the conservation of green and blue infrastructure and biodiversity. In relation to Chapter 5 (Policy ENV3 and paragraph 5.13) and Appendix A4, constitutes an qualification to our general answers above. The second of them is not a qualification, but relates to the implementation of Policy ENV6 going forward. Chapter 5, Policy ENV6 – application in context of Chapter 6, Policy HOU1, paragraph 5/ Chapter 9, paragraph 9.2. We strongly support the policies proposed in Policy ENV6, including those in paragraph 4. We consider that particular attention will need to be paid to the application of these in the context of the Policy HOU1, including paragraph 5, which contemplates “infill” development in large. Residential gardens, especially mature ones of a substantial size, constitute an important element of overall biodiversity, both for the diverse habitats they provide in themselves and for the connectivity they provide. Taken together, a network of such gardens constitutes a landscape-scale ecosystem mirroring many of the characteristics of open woodland. Progressive attrition of this by a succession of smaller developments is liable ultimately to degrade the value of the whole. It is therefore very important, in considering proposals for infill-type developments, to ensure that the development incorporates measures to maintain and indeed enhance the site’s biodiversity value, including its role in assisting connectivity.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | <p>Support and comments noted.</p> <p>The Council’s forthcoming design code includes guidance on urban greening.</p> |
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ENV7: Environmental Quality

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 | |
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| 1107078 | Alan McCann | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1107665 | Mark Shurmer | | Yes | | Yes | I would like it to go further on electric vehicle charging points, by providing a minimum number of points across the borough, enough to make a genuine difference. I would also like to see a more concrete plan of those being added to all Elmbridge borough facilities | | | | | | | | | | | | Comments noted. Draft policy CC4 sets out how development must contribute to the delivery of an integrated, accessible and safe sustainable transport network, including EV charging infrastructure. |
| 1109551 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110306 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110495 | Chris Colloff | Thames Water Utilities Limited | Yes | | No | The policy as drafted will not ensure that mitigation measures can be used to address issues relating to noise, odour, vibration and light to protect amenity of existing and future occupiers. It is therefore not effective or sound. | | Y | | | Part a of the policy focuses on zoning to ensure existing or future occupiers are not subject to unacceptable levels of odour, noise, vibration or light. Mitigation measures may be possible to ensure that development can be located close to sources of odour, noise, vibration or light helping to make the most efficient use of land. While section b of the policy makes reference to mitigating impacts, this section of the policy only applies to noise. As such the policy is not considered to be fully consistent with paragraph 187 of the NPPF as it would not ensure that mitigation measures could be secured to address issues of light, odour or vibration as well as noise. | To address the above concern it is suggested that parts a and b of the policy could be combined to state: a) Incorporate site zoning of pollution sources and receptors, or secure appropriate mitigation measures, to ensure that existing and future occupiers are not subject to unacceptable level of odour pollution, noise, vibration or light disturbance, both within buildings and externally; | | | No, I do not wish to participate at the oral examination | | | Comments noted. The Council has included the suggested amendments within its proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see main modification ref. M4.7. |
| 1110652 | Gil Bray | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110827 | John Bamford | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110916 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | | | | | | Support noted. |

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| 1111011 | Rachel Rae | Environment Agency-Thames Sustainable Places Team | Yes | | No | <p>Point of clarity and accuracy: We note Chapter 5 and Policy ENV7 touches on water quality. We request a stand-alone water quality policy is included like the air quality section and policy. The policy should seek to protect and enhance the Water Framework Directive (WFD) status of any waterbodies that may be impacted by development. This would ensure that developments have a net benefit on the water environment. A policy that would require developments to undertake a WFD assessment for any sites close to a waterbody would be welcomed.</p> <p>Water Cycle Study (WCS)-We are pleased to see a WCS has been carried out. We understand the WCS has determined that there is sufficient headroom within the permits of the two works that will receive most of the growth in the area, namely Esher Waste Water Treatment Works (WWTW) and Weybridge WwTW.</p> <p>Expected growth in the catchment has been clearly shown, which is the important figure required by the water company to plan for upgrades. No urgent changes are needed to this water cycle study, but any future water cycle studies or updates to this water cycle study should consider the actual design volume the works is capable of treating before it spills to storm. . Reviewing the permitted and actual flow to full treatment at each of the works would have given an indication of whether growth would lead to an increase in storm spills from the works, which would indicate whether</p> | Y | Y | Y | | | EBC Reg 19 comments from EA 290722.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557306/PDF/-/EBC%20Reg%2019%20comments%20from%20EA%20290722%20Epdf | As per 2a. | Yes, I wish to participate at the oral examination | As a statutory consultee we are happy to participate at the oral examination if it is deemed necessary. | Comments noted. The Council has included the suggested amendments within its proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see main modification ref. M4.8. |
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upgrades are necessary.

Improvement in Water Framework Directive (WFD) status
Any future modelling should use SIMCAT modelling, like Weybridge WwTW, as it gives a better indication of what could be done in the upstream parts of the catchment to improve the WFD status of the River Mole. As with the River Wey and Weybridge WwTW, there are numerous WwTW upstream of Esher. By only looking at the impacts of Esher WwTW on the River Mole, this has not given a view of wider catchment measures at other WwTWs that could be implemented to improve the Mole WFD status.
Drainage and Wastewater Management Plans
Water companies are in the process of developing Drainage and Wastewater Management Plans (DWMP), which may contain useful information for planning purposes. Although the DWMPs are not yet finalised, the Borough Council is encouraged to engage with the water company to ensure that relevant information is considered in the local plan and in any future updates to the local plan.

ENV8: Air Quality

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 | |
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| 1107079 | Alan McCann | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1109552 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110308 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110653 | Gil Bray | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110828 | John Bamford | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110918 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1109797 | Graham Thompson | | Yes | | No | there is still no guarantee of not building on the green belt. Needs more guaranteed commitment. there is no mention of promoting roadbuilding to relieve congestion - the most important factor in air quality. there is no mention of controlling burning wood and garden waste in the borough -in particular a policy for wood burning stoves. | Y | Y | Y | Y | | see comment at question 2 | | | No, I do not wish to participate at the oral examination | | | Objection noted. The DELP does not propose any development on Green Belt land. National policy sets out the circumstances under which development within the greenbelt can occur. The DELP is consistent with this approach. The Council's <u>Infrastructure Delivery Plan (May 2022) (IDP) and Update (July 2023)</u> detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the quantum of development proposed in the DELP. The IDP and IDP Update have been informed by the preparation of other evidence base documents e.g., <u>Transport Assessment (2022)</u> and via discussions with infrastructure providers as part of the Council's duty to cooperate activities as outlined in the Council's <u>Duty to Cooperate Statement of Compliance (June 2022)</u> , <u>Duty to Cooperate Statement of Compliance Update (August 2023)</u> and Statements of Common Ground published with the <u>Core Documents</u> submitted for Examination. |

The agreed position with our infrastructure delivery partners is that the proposed development strategy can be accommodated within the borough with the mitigation identified / a policy-led approach. In addition, the DELP includes policies to ensure the infrastructure needed to support the delivery of the aspirations of, and quantum of development proposed, in the DELP is provided.

Draft policy INF1 – Infrastructure delivery aims to ensure the required infrastructure needed to accommodate and mitigate the impact of new development in the Borough is delivered in a timely manner, whilst acknowledging that the infrastructure provision with a development must be proportionate to the size of the development.

Draft policy CC4 sets out how development must contribute to the delivery of an integrated, accessible and safe sustainable transport network and sets out how development should promote active travel and the use of public transport and support a transition away from reliance on private cars.

Burning of wood and garden waste are not issues that can be addressed through planning policy as planning policy can only influence issues that are directly or indirectly impacted by development that requires planning permission.

ENV9: Design Quality

| ID | N | Org | 1 | 1a | 2 | 2a | 3 | 3 | 3 | 3 | 3a | 4 | 4a | 4b | 5 | 6 | 7 | |
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| 1107081 | Alan McCann | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1109553 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110313 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110654 | Gil Bray | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110829 | John Bamford | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110919 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1112006 | Mike Wheeler | VOX | | | | The draft LP omits reference to the importance of enforcing planning conditions. Section 59 of the NPPF refers to the importance of effective enforcement in maintaining public confidence. It is admitted by EBC that it neither routinely monitors compliance with planning conditions nor seeks to enforce them. A clear public commitment to effective enforcement should be made in the draft LP. | | | | | | | | | | | | Comments noted. A specific policy on enforcement within the DELP is not required as the enforcement process is dictated by planning regulations set and national guidance. It is a separate system to the Local Plan making process. Any report of a potential or perceived breach of planning conditions is investigated by the Council in accordance with its Enforcement Plan (2022) . |
| 1112267 | Sue Janota | Surrey County Council | | | | We note that policy ENV9 sets out that development should be consistent with the National Design Guide and that the forthcoming Elmbridge Design Code will be based on this. We assume that this design guidance will ensure that all new properties, including flats, have suitable storage space for a full range of recyclable collections. | | | | | | | | | | | | Comments noted. Yes, this will be included in the Council's forthcoming Design Code. |
| 1110041 | Meghan Rossiter | Abri | Yes | | No | | | Y | | | | As with our comments to CC1, draft policy ENV9 ambitiously asks that development be fully adaptable and resilient to the impacts of a changing climate, but this is not an effective policy ask, as it could be used to require developments to undertake much more detailed and wide-ranging environmental impact-style assessments. More precise language, or | 07.2022 Elmbridge Local Plan.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/552089/PDF/-/07%2E2022%20Elmbridge%20Local%20Plan%2Epdf | As per 4. | No, I do not wish to participate at the oral examination | | Objection noted. The Council considers that as drafted policy ENV9 provides an appropriate level flexibility whilst also clearly setting out an aspirational objective for development to deliver high quality design in the Borough. Detailed guidance to help applicants meet the | |

ENV10: Preserving and Enhancing our Heritage Assets

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 | |
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| 1107082 | Alan McCann | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1109555 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110315 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110655 | Gil Bray | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110830 | John Bamford | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110929 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110946 | Katharine Maclean | | Yes | | No | | | | | | | Can you please highlight that heritage assets are not just historic buildings. They can be culturally, environmentally, and aesthetically important. The borough has a rich and important history in terms of its mid-century development (such as Span developments in Templemere in Weybridge, or the houses on Lakeside Drive in Esher), and this is being rapidly eroded away. This too counts as a heritage asset, and we should be looking to protect such areas just as much (if not more) as the more commonly understood and appreciated ones. | | | No, I do not wish to participate at the oral examination | | Comments noted. The glossary of the DELP sets out the definition of heritage assets, which goes beyond historic buildings and includes for example places, areas and landscapes. | |
| 1111090 | Paul Manning | Newsteer Real Estate Advisers obo Leos International Holding Group (Chris Pittock) | Yes | | Yes | Our client is supportive of the Council's intention to conserve designated heritage assets and the requirement for all development proposals to ensure that the significance of these assets is sustained, and where possible, enhanced. They are also favourable of the Council's position on the demolition of buildings within conservation areas and welcomes the allowance for demolition where the proposed development would contribute positively to the character and appearance of the conservation area. | | | | | | | | | | | | Support noted. |

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| 1111968 | Alan Byrne | Historic England (South East Region) | Yes | | Yes | <p>Previous comments in the regulation 18 consultations have been addressed and are now not likely to affect the soundness of the Local Plan.</p> <p>We welcome the inclusion of policies for the historic environment in the local plan that meet the obligation for preparing the positive strategy required by the NPPF. The key test of the soundness of the plan and the achievement of sustainable development as defined in the NPPF in respect of the elements that relate to the historic environment, in our view, have been met.</p> <p>We should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals including those that are allocated sites, which may subsequently arise when we consider that these would have an adverse effect upon the historic environment. In particular we note the inclusion of site COS1 Cedar House, Mill Road, Cobham, for conversion to 7 residential units; we have previously objected strongly to the conversion of this Grade II* listed building for fewer units, and consider the amount of alteration that would arise from development of this number of units as likely to be harmful to the significance of the heritage asset.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | <p>Comments noted.</p> <p>For reference site COS1 was granted planning permission in June 2023.</p> |
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| 1112273 | Sue Janota | Surrey County Council | | | <p>The heritage policy ENV10 is quite high-level in nature. Although the NPPF deals with some concerns, the policy does lack some fine detail and doesn't reflect the different ways that heritage assets are managed within planning. The policy could provide further clarity on the approaches that the borough might adopt when considering development that affects heritage assets of different classes. Policy Paragraphs 1-2 deal with "designated heritage assets, assets at risk and non-designated heritage assets". It is not made clear that within these different classes of heritage asset, different legislative conditions apply and that development must be designed accordingly. Development affecting Grade I Listed Buildings or Scheduled Monuments is considerably more prohibitive than that affecting Grade II listed sites or "non-designated" heritage assets such as Locally Listed Buildings for example, and the planning process is weighted accordingly. "Great Weight" is accorded to the conservation and preservation of the former, but in lesser graded or ungraded sites the considerations are significantly more nuanced. The policy as written doesn't reflect this and it would be helpful for applicants if it were more detailed. We welcome the inclusion of consideration of the settings of heritage assets in paragraph 2. We would suggest adding "and curtilage" after this reference in this paragraph as setting and curtilage are</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | <p>Comments noted.</p> <p>The suggested amendments regarding archaeological sites have been included in the Council's proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see main modification M4.9 and minor modification MM5.12.</p> |
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| | | | | | <p>different things and the latter is absent currently. Policy paragraph 5 on archaeology doesn't mention Scheduled Monuments or County Sites of Archaeological Importance (CSAIs). These are the most sensitive class of archaeological sites in the borough and we would expect to see note of them somewhere within the archaeological policy. The draft policies map appears to show Areas of High Archaeological Potential and CSAIs as one combined layer. Much as comments above relate to the difficulties in differentiating between grades of heritage in the policy, it is also not possible to differentiate between grades of non-designated archaeology on the policies map. We suggest a more fine-grained approach to better inform applicants. Both classes of monument also have enhanced setting considerations. To better accommodate these most significant sites, a suggested enhanced wording for this final paragraph is below, for consideration:</p> <p>Development proposals should take into account the potential for heritage assets of archaeological importance being present on the site. A desk-based assessment, at a minimum, will be required for sites affecting the area or setting of Scheduled Monuments and County Sites of Archaeological Importance, or which are located within Areas of High Archaeological Potential, and for any site outside of these which is greater in area than 0.4ha.</p> <p>We welcome the retention of the 0.4ha requirement for archaeological assessment.</p> | | | | | | | | |
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ENV11: Strategic Views

| ID | N | Org | 1 | 1a | 2 | 2a | 3 | 3 | 3 | 3 | 3a | 4 | 4a | 4b | 5 | 6 | 7 | |
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| | | | | | | | P | E | J | C | | | | | | | | |
| 1107083 | Alan McCann | | Yes | | Yes | | | | | | | | | | | | Support noted. | |
| 1107240 | Dorothy Ford | | Yes | | No | It's a good start, but needs more detail to respect/implement the NPPF. | | | Y | Y | The Surrey Hills AONB is visible from the Public Footpath in Oxshott's Green Belt Sub-Area 11 - not just from Oxshott Heath. The Surrey Hills are visible from the ancient southern part of the Footpath leading to other Green Belt sites, including Sub-Area 8, which have been duly recognised as strongly performing. Sub-Area 11 is part of the larger Green Belt Parcel 10 site which has been duly designated as strongly performing. Given the stunning landscape of Sub-Area 11, its unspoilt rural character, the fact that it is 100% undeveloped greenfield agricultural land currently yielding crops of hay, and the stunning landscape of Surrey Hills AONB - the Evidence Base for the Local Plan should designate SA-11 as strongly performing and therefore not worthy of further consideration for possible development. The facts/evidence need correcting. Because SA-11 is so strongly performing, it has been teamed up with weak performing, previously developed Sub-Area 15 in order to designate it for further consideration for development. It is inconsistent with national policy, and potentially unlawful, to join up a high performing Green Belt Sub-Area such as SA-11, with a weakly performing Sub-Area such as SA-15 simply in order to consider developing that high performing site. Page 37 of ARUP's December 2018 Green Belt - Boundary Review Supplementary Work :Methodology and Assessment recommends that SA-11 is coupled with previously developed SA-15 so that it can be considered for future development. | | | | | | | Objection noted. Comments regarding the assessment of site SA-11 noted. The Council has set out within its Topic Paper 1: How the spatial strategy was formed? (June, 2022) that the Green Belt evidence on the whole undervalues the performance of the Borough's Green Belt sites. SA-11 is not included in the DELP as a site allocation for development. The DELP does not propose any development on Green Belt land. |
| 1109556 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | Support noted. | |
| 1110317 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | Support noted. | |
| 1110441 | Graham Cooke | | Yes | | Yes | Whilst we consider the Plan to be sound, we are concerned to note that Strategic Views 2 and 3 (From Hampton Court Palace to the Surrey Hills and to Thames Ditton Marina and Surrey Water Works) are no longer in the Local Plan, based on the recommendation of ARUP. We can see no reason why these important | | | | | | | | | | | Comments noted. The evidence is contained in the Council's Strategic Views Study (2019) , which was submitted to the Inspector for Examination as part of the DELP evidence base. | |

6. Delivering Homes

HOU1: Housing Delivery

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
|---------|---------------|--|-----|----|----|---|--------|--------|--------|--------|----------------------|---|--|------------------|--|---|---|
| 1106890 | Bhavash Vashi | BVA Planning obo Chalford Property Company Ltd | Yes | | No | The Council is fundamentally not positively looking to address its significant housing needs both market and affordable. Therefore, we consider there are exceptional circumstances to allow alterations to GB boundaries to accommodate more housing given the background issues set out below: <ul style="list-style-type: none"> • "One of the worst levels of affordability in the country coupled with an under supply of affordable homes; • Need to deliver a better mix of new housing away from current delivery focussed on houses of four or more bedrooms; and • The land that is being kept open for the purposes of Green Belt is no longer meeting those purposes." Whilst we believe that these issues should be considered as exceptional circumstances with regard to Green Belt release, a further consideration is the level of housing needed in the borough over the next plan period. While this unmet need on its own is not considered exceptional, in conjunction with the above issues, it is considered a significant material issue. Currently the borough's distinct character is a patchwork of towns and villages being separated by open land which is designated as Green Belt (around 57%). | Y | Y | Y | Y | See response to Qu.2 | The Council need to plan for more homes than currently it is and review the politically driven approach to exclude GB sites from allocation as there are exceptional circumstances as outlined in our response. | Land off heathside Vision Doc.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/541381/PDF/-/Land%20off%20heathside%20Vision%20Doc%2Epdf | As per 2a and 4. | Yes, I wish to participate at the oral examination | We believe we can assist the Inspector in exploring the issues around GB review, housing numbers and impact upon local communities. | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022). |

There remains very few developable brownfield sites situated in non-designated Green Belt areas. Therefore, this leaves very few expansion opportunities that are not in the Green Belt, which in our view constitutes very strong exceptional circumstances given that the draft level of provision only equates to 6,780 homes (with many on small below 10 unit sites compared to the OAN of 9,615 homes. Even with the Council's own figures, the Land Availability Assessment (P.24) recognises that the will be insufficient land coming forward within the borough's urban areas to meet its development needs over the plan period. It goes onto state that the Council will also not meet its first 5 year HLS target which will be just 4.36 years. The Council need to re-consider its political position with regard to excluding GB sites from allocation and look to review sites (such as my clients at Hinchley Wood) for allocation if it is to effectively and positively plan for the next 15 years or so. Without such a reconsideration, our fear is that the pressures highlighted above will be further increased and lead to chronic housing shortages across both the private and public sectors leading to a cap on the potential economic growth of the area also.

The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the

2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the

responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities

promoted through the intensification of urban areas option could not be integrated sensitively into the locality. The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be

provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council acknowledges that Elmbridge is an expensive borough in which to live, with a high affordability ratio and an acute need for

affordable homes. Through the preparation of the draft Local Plan, the Council has explored opportunities for increasing the provision of affordable housing over the plan period through increasing the delivery of market housing. However, the Council reached the decision that the exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not fully evidenced and justified. A decision that took full account of the benefit of delivering a greater number of market homes to enable to the Council to deliver a greater proportion of its identified affordable housing need of 269 dwelling per annum (dpa), set out in the Local Housing Need Assessment (2020) (LHNA). Concluding that the benefit of doing so did not outweigh the harm in releasing and developing on the Green Belt.

The Council acknowledges that it will not be possible to meet the Borough's affordable housing need in full through the approach set out in the proposed spatial strategy. However, in light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the Draft Elmbridge Local Plan 2037 is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Moreover, national policy and guidance do not require identified

affordable housing need to be met in full ([NPPF paragraph 62](#) and [PPG Housing & Economic Needs Assessment paragraph 024](#)). The Council also has additional models/methods of delivering affordable housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal \(SA\)](#) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes -

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|---------|-----------------|--|-----|--|----|---|---|--|--|---|---|--|--|---|--|
| 1110192 | Christopher Lee | | Yes | | No | <p>As a resident of Esher who lives on New Road, I see three plots are earmarked for multiple residential use. My issue is the affordability that you focus on. The land cost of New Road means multiple use residential units (the three plots earmarked suggest knocking down one house and building between five and six units) are not affordable housing. They add pressure onto infrastructure (the road is thinly metalled and damages easily) and upset the drainage. They are also NOT carbon neutral. Huge increases in density are not carbon neutral and involve increased amounts of building materials. It is disingenuous to suggest this is not so. Overdevelopment of residential plots leads to environmental degradation, infrastructure issues, air pollution and does not address the issue of affordable housing. Flats costing over half a million pounds and townhouses costing 2 million pounds do not solve the issue of affordable housing. Less dense developments are more sensible. Elements of your plan are therefore not sound and go contrary to policy.</p> | Y | | | <p>The issue that Esher needs to address is affordable housing. Building apartments that cost over half a million pounds each on the most expensive roads in Esher does not solve this issue. All the council receives is CIL payments which serve little other than help to balance the council budget in other areas. There are other land banks in Esher that are more sensible (such as the Jockey Club plans for residential units at Sandown Park and the use of More place (formerly a 9 hole golf course) which is now running wild with weeds and rodents.</p> | <p>Notice must be taken to address the issue of affordability of housing which may not be suitably addressed by development on land whose cost precludes the effective delivery of such housing</p> | | | <p>No, I do not wish to participate at the oral examination</p> | <p>Objection noted.</p> <p>Draft policy HOU4 – affordable housing of the DELP sets out how residential development schemes must contribute towards the provision of affordable housing either onsite or through a financial contribution.</p> <p>The spatial strategy and policies set out in the DELP seek to balance the need to address the challenge of climate change whilst also addressing the need to deliver new homes and development in the Borough. An approach that seeks to balances these issues along with other planning challenges in the Borough accords with the requirements of planning regulations, national policy and guidance.</p> <p>Chapter 4 and 5 of DELP sets out a suite of policies that set out how relevant development schemes must contribute to the mitigation of and adaptation to climate change and the protection of the environment. This includes requirements to minimise air pollution; support for carbon neutral development; and requirements to apply a circular economy approach to minimise the use of materials and prioritise retention and refurbishment of existing buildings where feasible.</p> <p>The site allocations at New Road have been through a thorough assessment process, including consideration of impacts on townscape, the existing character of the surrounding area and infrastructure. The level of development proposed is considered</p> |
|---------|-----------------|--|-----|--|----|---|---|--|--|---|---|--|--|---|--|

accordance with the Draft Local Plan is likely to be significant lower than the already low figure identified i.e. the under-supply will be even worse. Accordingly, it is clear that in addition to failing to provide for anything close to identified local housing needs, the level of housing that is actually proposed by way of new allocations is minimal, and the sites that are identified will not, by their nature, deliver housing in the way or timescale identified. As such, the level of housing and affordable housing delivery will in fact be even lower than identified in the Draft Local Plan.

Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

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The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow

local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality.

The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

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Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing](#)

[Need Assessment \(2020\).](#)

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council acknowledges that Elmbridge is an expensive borough in which to live, with a high affordability ratio and an acute need for affordable homes. Through the preparation of the draft Local Plan, the Council has explored

[Needs Assessment paragraph 024](#)). The Council also has additional models/methods of delivering affordable housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal \(SA\)](#) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes - 16,300 homes over the plan period through the release of green belt sites and optimisation of

As set out above in relation to Policy SS3, this per annum target of 452 is contrary to the Council's objectively assessed need of 647 homes per annum.

The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022).

The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?

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renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

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The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the

continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality. The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking

and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

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Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

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In light of the considerations set out above, it is the Council's

performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

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fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

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In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its

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| | | | | | | | | | | | they are now changing their interpretation of this to prevent all amalgamations unless undersized. Perhaps the wording here could be changed to resist all amalgamations unless the original units are undersized against current housing standards. | | | | | approach accords the suggestions made. | |
| 1110970 | Nigel Rankine | Green Kite Homes and ACAP Advisory | No | The draft Local Plan is considered to be "unsound". The draft Local Plan in policy SS3 fails in its requirement to meet its objectively assessed housing need calculated using the standard method. The plan explains in paragraph 3.19, that: "Using 2022 as the base year for calculation, the housing need for the borough equates to 647 dwellings per annum and over the plan period 9,705 homes." Policy SS3 (1)(a) explains that the Plan will make provision for 6,785 net additional homes with at least 30% to be affordable new homes. This represents a shortfall of 2,790 homes (or 30% of the objectively assessed housing needs using the standard method). | No | Objection to policy HOU1 Policy HOU 1 sets out a minimum housing provision figure of 452 dwellings per annum against the calculation set out in the standard method of 647 dwellings per annum and an identified need of 269 dwellings per annum of affordable housing. Policy HOU1 is therefore "unsound" as it fails to positively plan for its housing need by proposing only 70% of the standard method requirement, i.e. it will therefore only deliver 6,785 homes against a housing need of 9,705 homes. | Y | Y | Y | Y | Policy HOU 1 sets out a minimum housing provision figure of 452 dwellings per annum against the calculation set out in the standard method of 647 dwellings per annum and an identified need of 269 dwellings per annum of affordable housing. Policy HOU1 is therefore "unsound" as it fails to positively plan for its housing need by proposing only 70% of the standard method requirement, i.e. it will therefore only deliver 6,785 homes against a housing need of 9,705 homes. | It is suggested that to make the plan "sound" a positive spatial strategy would consider bringing forward new highly sustainable site allocations at Stoke Hill, Cobham and Manor Park, Claygate as larger development sites that can be repurposed and released from the Green Belt to enable the comprehensive delivery of new and affordable housing and essential social and physical infrastructure. This would be justified as exceptional circumstances in accordance with the NPPF. | | | Yes, I wish to participate at the oral examination | The local plan fails to positively plan for a comprehensive approach to delivery by only promoting a range of new small housing sites or redevelopment of existing retail or employment land (that is unlikely to come forward). The spatial strategy is fundamentally flawed and will not be able to deliver the required mix of housing typologies (such as 1, 2 and 3 bedroom smaller homes as required by the housing needs assessment), affordable housing and important essential social and physical infrastructure such as new schools and healthcare services. | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022). The Council reached the conclusion that the |

necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified

any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18

consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban

areas option could not be integrated sensitively into the locality. The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger

homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

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| 1110984 | Andrew Munton | Reside Developments | No | We are extremely disappointed and concerned with this Reg 19 local plan, which fails the most vulnerable people in the borough. This plan fails to deliver even its minimum OAN of 9,615 homes year, only providing 6,985 homes, which is 73% of its minimum need. In other words, over 25% of the population needing new homes in Elmbridge is being left without homes. In addition, the council is already failing its electorate, where it cannot demonstrate a 5-year supply of housing land (published at 3.96 over a year ago) and has failed the Housing Delivery Test reaching only a meagre 58% and is therefore in a position where the Presumption of sustainable development is engaged. The reason for not meeting the OAN in the revised local plan is cited as being to protect the green belt and to build only building on brownfield land. However, the green belt is not an environmental designation, and the green belt's fundamental aim to prevent urban sprawl (NPPF). However, there is not an embargo | No | Not providing sufficient housing to meet its needs and the extremely high affordability ratios are clear exceptional circumstances for releasing green belt land for new homes. This has been tested at many EiPs up and down the country, including locally at neighbouring Guildford, Waverley and Woking to name but a few. To release no green belt land and fail to meet the OAN renders the plan unsound. It has clearly therefore not been Positively Prepared and the choice to not release any green belt land is not Justified. Furthermore, the plan cannot be considered to be Effective, where it is not providing for over 25% of its housing need, and is not Consistent with national policy, which requires councils to meet its OAN. The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective. Since the Reg 18 document, nothing in green belt policy has changed and there are therefore no reasons for the council's retrograde step in its strategy to exclude any green belt land release. This is a political decision, not a planning policy decision. As well as not delivering market housing, this will | Y | Y | Y | Y | In 2019, the same HHRSS report stated that the council has the second highest ratio of house prices to income in the South East at 15.08 (2017). This gap has been widening considerably, where the ratio was 9.65 in 2003. Not only does this point to the need for more housing and meeting the OAN (this would also add to the exceptional circumstances for releasing green belt land for housing), but it also points to needing to deliver more than the OAN. This means that the failing to deliver the OAN is even worse than not providing 27% of the need, as more is needed in Elmbridge. This clearly points at the plan being Ineffective, not Positively prepared of Justified and not Consistent with national policy. | The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective. In addition the plan needs to meet at least its minimum OAN. | | | Yes, I wish to participate at the oral examination | These matters can only be fully tested and explored in person. | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. 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protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality. The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site

parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

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Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of

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| 1111003 1111046 | Steven Fidgett | Union4 oboMole sey Road Land Limited (A Barry) | No | We raise objection to the substantial under provision targeted in the proposed housing requirement in HOU1 and the corresponding housing trajectory. The proposed ELP requirement of a minimum of 452 homes each year is substantially below the actual number of homes needed by the local community. Although the problems of undersupply are acknowledged, the further consequences of deliberately not meeting local needs are not spelled out in the Local Plan. These include: 1. an ever increasing, cumulative under provision between the community's need for homes and the available supply; 2. further increases in house prices and worsening affordability ratios which affects lower and even average wage earners who can no longer afford to live in the Borough; 3. further shortfalls in affordable housing provision; 4. life chances are frustrated as access to decent housing is effectively rationed; 5. adverse impacts on economic growth as recruitment suffers; 6. the | No | The level of new housing required is identified in the standard methodology as 647 homes each year and should be the minimum level that should be provided for in the Local Plan. This includes population and household change and market signals. The latest assessment indicates a particular need for smaller homes from studios to 3 beds to meet the needs of smaller households including first time buyers and those on average and lower incomes. This includes key workers and others that are an essential part of the community and the ability to effectively run local services. The standard method however, caps housing needs where plans are out of date, as is the case for Elmbridge, at 40% above the average annual household growth or current housing requirement, whichever is higher. The actual level of need therefore, is likely to be significantly more. The HBF have identified this as 859 new homes each year. Elmbridge has been a Borough where there has been a persistent and substantial under-delivery of new homes when compared with local need. This has resulted in some of the least affordable housing in England. The Housing Delivery Test records Elmbridge as consistently underperforming, achieving only 70% of the requirement over the last 3 years, a performance that reflects the previous years' results. The Borough delivered just 1133 new homes in the three preceding years against a requirement of 1618 homes. | Y | Y | Y | Y | see comments at section 1 and 2 and attached statement | The scale and locations of growth should be increased to meet the objectively assessed need of a minimum of 9,705 homes over the plan period, at least 647 each year over the period. This should adopt a housing trajectory that prioritises early delivery, to address the substantial pre-existing unmet need arising from persistent under delivery and spiralling house price inequality. The second part of the proposed policy proceeds to identify the broad locations for growth and the corresponding number and percentage of overall housing provision for each settlement. This should be revised to include additional sites to meet housing need and that this should be reflected in a revised spatial distribution. A sustainable strategy should also be weighted to favour the most sustainable locations for growth, close to the main urban centres of Walton on Thames, Hershams and the Moleseys and Lower Green, where the benefits of growth can achieve the greatest benefit to existing and future resid | 220720 Representations for Molesey Land.pdf https://consult.elmbridge.gov.uk/gf2:ti/a/1205954/557289/PDF/-/220720%20Representations%20for%20Molesey%20Land%20Epdf | As per 1a, 2a and 4. | Yes, I wish to participate at the oral examination | We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan. | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022). The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong |
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wider impact on adjoining authorities is exacerbated as unmet need is displaced. It is important to understand that these are not randomly imposed targets, but are a reflection of the real need for more homes in the South East and in Elmbridge in particular. These needs arise from the local community, and it is the community that suffer the consequences of a deliberate under-supply.

reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing

development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

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The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be

protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality. The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site

parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

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It is the Council's position that an intensification strategy would not promote a sustainable pattern of

development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council acknowledges that Elmbridge is an expensive borough in which to live, with a high affordability ratio and an acute need for affordable homes. Through the preparation of the draft Local Plan, the Council has explored opportunities for increasing the provision of affordable housing over the plan period through increasing the delivery of market housing. However, the

Council reached the decision that the exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not fully evidenced and justified. A decision that took full account of the benefit of delivering a greater number of market homes to enable to the Council to deliver a greater proportion of its identified affordable housing need of 269 dwelling per annum (dpa), set out in the [Local Housing Need Assessment \(2020\)](#) (LHNA). Concluding that the benefit of doing so did not outweigh the harm in releasing and developing on the Green Belt.

The Council acknowledges that it will not be possible to meet the Borough's affordable housing need in full through the approach set out in the proposed spatial strategy. However, in light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the Draft Elmbridge Local Plan 2037 is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Moreover, national policy and guidance do not require identified affordable housing need to be met in full ([NPPF paragraph 62](#) and [PPG Housing & Economic Needs Assessment paragraph 024](#)). The Council also has additional models/methods of delivering affordable

housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal \(SA\)](#) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes - 16,300 homes over the plan period through the release of green belt sites and optimisation of development in existing urban areas (see option 3 of Regulation 18 Options Consultation, 2018). Whilst this option would meet development needs,

development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

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Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of

the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality. The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the

infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not

considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

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The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our

residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

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In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process,

elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's [Topic Paper 1: How the spatial strategy was formed?](#) (June, 2022).

The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of

function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

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The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

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The Council's preferred development strategy

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It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

All site allocations proposed in the DELP have been thoroughly assessed to ensure they are available and deliverable in accordance with national policy and guidance. These assessments are set out in detail within the Council's [Land Availability Assessment \(2022\)](#).

The Council acknowledges that Elmbridge is an expensive borough in which to live, with a high affordability ratio and an acute need for affordable homes. Through the preparation of the draft Local Plan, the Council has explored opportunities for increasing the provision of affordable housing over the plan period through increasing the delivery of market housing. However, the Council reached the decision that the exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not fully evidenced and justified. A decision that took full account of the benefit of delivering a greater number of market homes to enable to the Council to deliver a greater proportion of its identified affordable housing need of 269 dwelling per annum (dpa), set out in the [Local Housing Need Assessment \(2020\)](#) (LHNA). Concluding that the benefit of doing so did not outweigh the harm in releasing and developing on the Green Belt.

The Council acknowledges that it will not be possible to meet the Borough's affordable housing need in full through the approach

set out in the proposed spatial strategy. However, in light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the Draft Elmbridge Local Plan 2037 is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Moreover, national policy and guidance do not require identified affordable housing need to be met in full ([NPPF paragraph 62](#) and [PPG Housing & Economic Needs Assessment paragraph 024](#)). The Council also has additional models/methods of delivering affordable housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore

need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal](#) (SA) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes - 16,300 homes over the plan period through the release of green belt sites and optimisation of development in existing urban areas (see option 3 of Regulation 18 Options Consultation, 2018). Whilst this option would meet development needs, including the need for affordable housing in full, it would fundamentally alter the character of the Borough's towns and villages through coalescence, urban sprawl and encroachment of new development into the countryside due to the release of Green Belt land necessary to achieve the quantum of development. In addition, this option was found to have the most significant negative impacts of all the options considered by the Council, largely due to the impact of distributing development widely across the Borough.

The Council has assessed the suitability of the promoted site – Wood Lark Farm, Hershams for release from the Green Belt designation and it was found that the site was not suitable for release. The assessment is set

that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

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The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

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The Council acknowledges that it will not be possible to meet the Borough's affordable housing need in full through the approach set out in the proposed spatial strategy. However, in light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the Draft Elmbridge Local Plan 2037 is sound and that a strategy that seeks to protect the

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All site allocations proposed in the DELP have been thoroughly assessed to ensure they are available and deliverable in accordance with national policy and guidance. This includes consideration of factors such as access and impact the Borough's transport infrastructure. These assessments are set out in detail within the Council's [Land Availability Assessment \(2022\)](#).

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The Council acknowledges that it will not be possible to meet the Borough's affordable housing need in full through the approach set out in the proposed spatial strategy. However, in light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the Draft Elmbridge Local Plan 2037 is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

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The Council's [Sustainability Appraisal \(SA\)](#) sets out how the Council considered and

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| | | | | | | | | | | | | | | | | | | any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located. |
| | | | | | | | | | | | | | | | | | | Promoted sites Land at South of Hare Lane, Claygate; Land at Horringdon Farm; Land East of Blundel Lane, Oxshott and Land SE of Danes Way, Oxshott have been assessed by the Council and were found to be not suitable for Green Belt release. The assessment is set out in Green Belt Assessment Site Proforma SA-41; SA-23, SA-24, SA-29, and SA-39; SA-11 and SA-14 respectively. |
| 1110682 | James Owens | Rapleys LLP obo Alexpo (IOM) Ltd - Robert Lane | Yes | | No | Object to the draft policy HOU1, which only seeks to deliver 452 homes per annum, equating to just 6,780 homes over the plan period. The draft policy is unsound, failing to comply with paragraph 35 of the NPPF, which amount other things states that plans must be: (a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; (as well as accommodating unmet need from neighbouring areas where it is practical to do so); (b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based upon proportionate evidence; (c) Effective – deliverable over the plan period; (d) Consistent with National Policy – enabling the delivery of sustainable development | Y | Y | Y | Y | The draft policy has not been positively prepared as it does not as a minimum seek to meet the area's objectively assessed needs. The Council itself calculates that its objectively assessed housing need for the Borough is 647 dwellings per annum, equating to 9,705 homes over the plan period. The draft policy does not meet this objectively assessed need. Indeed, it aims to meet less than 70% of the housing need, with just 452 homes per annum, equating to just 6,780 homes over the plan period. This results in a shortfall of 2,925 homes over the plan period. This approach is not justified and is not consistent with National Policy. The justification put forward by the Council is given in paragraph 6.7 of the draft Local Plan, which explains that required number of homes specified in the draft policy is not based on the identified housing need, but on the Borough's environmental constraints. Whilst it is accepted that parts of the Borough lie within the Green Belt and there are other environmental constraints, these are not unique to Elmbridge. As at 31 March 2021, 180 local authorities had land designated as Green Belt, which equates to some 57% of all local authorities. If the Government had intended for objectively assessed housing need only to be provided in those boroughs that are not subject to such constraints, then (for such a significant issue affecting the majority of | In order to be sound, draft Policy HOU1 should increase its housing target to at least 647 dwellings per annum, equating to 9,705 homes over the plan period, in line with the Council's own objectively assessed housing need. | | | | Yes, I wish to participate at the oral examination | Housing numbers go to the root of the local plan making process and with the Council seeking to argue that it does not need meet its objectively assessed housing need, contrary to the NPPF, its approach needs to be fully tested at the Examination. | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELPL) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working |

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in

open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the

Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

Non-implementation discounts have been used to ensure the anticipated delivery rate is realistic. These have to be set within a 3 year time period to represent the life of a planning approval. This approach is in accordance with national policy and guidance. The next LAA will consider if these percentages are still accurate.

All site allocations proposed in the DELP have been thoroughly assessed to ensure they are available and deliverable in accordance with national policy and guidance. This includes consideration of factors such as access and impact the Borough's transport infrastructure. These assessments are set out in detail within the Council's [Land Availability Assessment \(2022\)](#).

Sites are only excluded from the LAA assessment where owners have specifically stated that the site is not available for development. Where landowners have not replied to ownership checks, sites have been put in the 11 to 15 year category to allow further ownership checks to take place. This approach is in accordance with national policy and guidance.

Site allocations for development of sites

to ensure as a minimum the area's objectively assessed needs will be satisfied in accordance with paragraph 35(a) of the NPPF.

spatial strategy was formed? (June, 2022).

The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup

assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in

full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

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flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

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Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

HOU2
It is proposed to delete criterion 1 of draft policy HOU2. This amendment

the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

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Amenity and other open space would also need

to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

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In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the

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| | | | | (which includes the Site) 'no longer contains a significant concentration of employment uses'. We are in pre-application discussions with the Council on a comprehensive residential proposal for the Site that would make a material contribution to the Council's housing land supply. Our client has engaged with the Council on a proposal which identifies a capacity of circa 158 homes for the Site. Detailed technical and environmental assessments will be undertaken in due course to ensure that sufficient evidence is provided to underpin the allocation of the site. | Hinchley Wood and Weston Green within the draft plan will only provide 397 of these based on unit allocations. Of these allocations only 49 units are provided within sites in Long Ditton. Part 2 of Policy SS3 supports a 'brownfield first' approach alongside the utilisation of previously developed land. Part 3 of the policy, it supports the optimisation of development within urban areas to allow for the most efficient use of land. We support these objectives in principle, but in our view the Council must exhaust all suitable opportunities for allocating brownfield land in urban areas such as 42 Portsmouth Road. The Site evidently has significant potential for a comprehensive development and could achieve at least 158 units as demonstrated by the pre-application discussions. | | | | demonstrated by the pre-application discussions. | Part 2 of Policy SS3 supports a 'brownfield first' approach alongside the utilisation of previously developed land. Part 3 of the policy, it supports the optimisation of development within urban areas to allow for the most efficient use of land. We support these objectives in principle, but in our view the Council must exhaust all suitable opportunities for allocating brownfield land in urban areas such as 42 Portsmouth Road. The Site evidently has significant potential for a comprehensive development and could achieve at least 158 units as demonstrated by the pre-application discussions. | | | | | | | |
| 1111014 | Lucy Morris | Nexus Planning on behalf of Charterhouse Strategic Land | No | Please see uploaded document at question 4a | No | Please see question 4a for full response. The Council is only planning to meet approximately 70% of its need, resulting in a gross under-delivery of 2,925 homes over the Plan period. The Council is not proposing to meet its LHN, which means that it must robustly justify its lower housing requirement figure for the identified Plan period, but not having done so renders the Draft Plan unsound. Accordingly, and without any reasoned justification for taking a lower figure, when the evidence base clearly indicates it is feasible to meet in full the LHN, Charterhouse Strategic Land submit the Plan is not sound. We submit | Y | Y | Y | Y | Bullet point 1 of Policy HOU1 states that in order to achieve the minimum 452dpa, the Council "adopt a requirement in line with the Elmbridge Housing Trajectory". This implies that the Council is intending to adopt a yearly housing target based on the supply available in that current year, rather than a consistent target across the plan period in order to ensure the consistent delivery of much needed housing. Evidently, this is not a sound approach and is not positively prepared, justified, effective or consistent with national policy. This text should be removed from the policy wording. Appendix A5 of the draft Local Plan sets out the housing trajectory for the plan period. Two indicative trajectories are proposed, one which includes a non-implementation rate of and one without a non-implementation rate. It is considered that a more conservative approach of applying a non implementation rate is the appropriate approach to take. | Please see question 4a for full response. In summary, Charterhouse questions the LAA methodology and considers the Council to be double counting and propose the windfall allowance be reduced by at least 140. The Council is struggling to deliver the homes it needs and a proportionate and sound approach would be to remove the windfall allowance in its entirety. | Former Moore Place Golf Course Elmbridge Draft LP (Reg.19).pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557335/PDF/-/Former%20Moore%20Place%20Golf%20Course%5FElmbridge%20Draft%20LP%20%5FReg%2E19%5F%2Epdf | As per 2a, 3a and 4. | Yes, I wish to participate at the oral examination | Please refer to accompanying submission. Please note that Nexus Planning is acting on behalf of Charterhouse Strategic Land. | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the |

the approach adopted by the Council is manifestly deficient and in the absence of any robust justification to explain the Council's decision to only plan for 452 homes a year shows the Draft Plan has not been positively prepared; is not justified; and is not consistent with national policy.

duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's [Topic Paper 1: How the spatial strategy was formed?](#) (June, 2022).

The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

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|---------|----------|---|----|--|----|--|---|--|---|---|--|--------------------------|--|-----------|---|--|--|--|--|
| | | | | | | | | | | | | | | | | | | | urban areas is a true reflection of the communities' aspirations for the Borough. Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood. There are sites under 5 units included in the site allocations. These are part of the PA housing pre-application and therefore included as site allocations rather than windfall. The Council has assessed the suitability of the promoted site – Moore Place Golf Course for release from the Green Belt designation and it was found that the site was not suitable for release. The assessment is set out in Green Belt Site Assessment Proforma SA-50. |
| 1111026 | Tom Cole | Montagu Evans on behalf of Quadrant Repurpose and LaSalle Investment Management | No | Policy HOU1 sets out the Council's aim to respond positively to the housing needs of the borough over the fifteen-year plan period from 2021- 2037. In doing so, the Plan seeks to deliver a minimum of 452 homes per annum over the plan period. Reflecting on the local housing need for Elmbridge as set out within the Establishing Local Housing Need- May 2022' paper, the | No | Policy HOU1 sets out the Council's aim to respond positively to the housing needs of the borough over the fifteen-year plan period from 2021- 2037. In doing so, the Plan seeks to deliver a minimum of 452 homes per annum over the plan period. Reflecting on the local housing need for Elmbridge as set out within the Establishing Local Housing Need- May 2022' paper, the delivery of a minimum of 452 homes per annum will fall significantly short of the Objectively Assessed Need of 647 dwellings per annum. As such, Quadrant Repurpose and LaSalle | Y | | Policy HOU1 sets out the Council's aim to respond positively to the housing needs of the borough over the fifteen-year plan period from 2021- 2037. In doing so, the Plan seeks to deliver a minimum of 452 homes per annum over the plan period. Reflecting on the local housing need for Elmbridge as set out within the Establishing Local Housing Need- May 2022' paper, the delivery of a minimum of 452 homes per annum will fall significantly short of the Objectively Assessed Need of 647 dwellings per annum. As such, Quadrant Repurpose and LaSalle Investment Management do not consider Policy HOU1 to be positively prepared in accordance with Paragraph 35 of the NPPF, and queries the soundness of the Plan on this basis. Therefore, by recognising the need for the Plan to be positively prepared in accordance with NPPF Paragraph 35, it is suggested that the minimum delivery of housing over the plan period as | Policy HOU1 sets out the Council's aim to respond positively to the housing needs of the borough over the fifteen-year plan period from 2021- 2037. In doing so, the Plan seeks to deliver a minimum of 452 homes per annum over the plan period. Reflecting on the local housing need for Elmbridge as set out within the Establishing Local Housing Need- May 2022' paper, the delivery of a minimum of 452 homes per annum will fall significantly short of the Objectively Assessed Need of 647 dwellings per annum. As such, Quadrant Repurpose and LaSalle Investment Management do not consider Policy HOU1 to be positively prepared in | Hersham Green- Regulation 19 Local Plan Representations.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557381/PDF/-/Hersham%20Green%2D%20Regulation%2019%20Local%20Plan%20Representations%2Epdf 7060- PL01 - Location Plan.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557382/PDF/-/7060%2D%20PL01%20%2D%20Location%20Plan%2Epdf | As per 1a, 2a, 3a and 4. | Yes, I wish to participate at the oral examination | As above. | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going | | | | |

and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character

as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary

to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality. The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary

to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing

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| | | | | | | | | | | | | | | | boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough. Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood. |
| 1110690 | Gareth Garner | Willow Tree Homes | No | Please see uploaded document at question 4a for full response. Willow Tree Homes are promoting Pharaohs Lodge, West End Lane, Esher The council's housing target for the plan period is set out in Policy HOU1 (Housing delivery) of the Regulation 19 version of the Local Plan. The council is to deliver a minimum of 452 dwellings per annum (dpa), which equates to a minimum of 6,780 dwellings between 2021 and 2037. This housing target equates to only 70% of the Local Housing Need figure of 641dpa as set out by the standard method. This would result in an under delivery of 2,835 homes over the plan period. This approach is not | No | Please see uploaded document at question 4a for full response. This is expanded on within the PPG where it states that deviation from the standard method will need to be demonstrated using robust evidence which is based on realistic assumptions of demographic need. There must also be exceptional local circumstances which can justify this deviation. The Establishing Local Housing Need 2022 paper which accompanies the council's evidence base makes it clear that the council does not consider there to be any exceptional circumstances to justify a deviation from the standard method. In particular, it states that: 6.4 "Nevertheless, whilst the council may not agree with elements of the standard method, this does not necessitate that exceptional circumstances exist nor that those matters advanced are either uncommon across local authorities | Y | Y | Please see uploaded document at question 4a. The wording under bullet point 1 of Policy HOU1 is of particular concern which states in order to meet the minimum target of 452dpa, the council will "adopt a requirement in line with the Elmbridge Housing Trajectory". This implies that the council is taking the approach of a supply-based requirement as opposed to a needs-based requirement and there is the potential for the council to alter the yearly target based on available supply, rather than apply a consistent target to ensure the consistent delivery of much needed homes. This cannot be considered to be positively prepared, justified or sound. As such, this text should be removed from the policy wording. | Please see uploaded document at question 4a In order to be considered positively prepared, justified and evidenced, the plan should seek to meet its housing need in full. | Regulation 19 Repls - Pharaohs Lodge.pdf https://consult.elmbridge.gov.uk/consult/2019/Regulation%2019%20Reps%20%2D%20Pharaohs%20Lodge%2E.pdf | As per 1a, 2a, 3a and 4. | Yes, I wish to participate at the oral examination | see separate representations document | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the |

considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our

residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the

character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality. The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process,

are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy

and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal

considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council acknowledges that Elmbridge is an expensive borough in which to live, with a high affordability ratio and an acute need for affordable homes. Through the preparation of the draft Local Plan, the Council has explored opportunities for increasing the provision of affordable housing over the plan period through increasing the delivery of market housing. However, the Council reached the decision that the exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not fully evidenced and justified. A decision that took full account of the benefit of delivering a greater number of market homes to enable to the Council to deliver a greater proportion of its identified affordable housing need of 269 dwelling per annum (dpa), set out in the Local Housing Need Assessment (2020) (LHNA). Concluding that the benefit of doing so did not outweigh the harm in releasing and developing on the Green Belt.

The Council acknowledges that it will not be possible to meet the Borough's affordable housing need in full through the approach set out in the proposed spatial strategy. However, in light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the Draft Elmbridge Local Plan 2037 is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its

urban areas is a true reflection of the communities' aspirations for the Borough.

Moreover, national policy and guidance do not require identified affordable housing need to be met in full ([NPPF paragraph 62](#) and [PPG Housing & Economic Needs Assessment paragraph 024](#)). The Council also has additional models/methods of delivering affordable housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

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| 1110780 | Matthew Nicholson | Barton Willmore now Stantec obo Audley Group | No | Please refer to our letter dated and submitted on 28/07/22. We seek amendments to Policies HOU1, HOU3, HOU4, HOU6, INF2, INF3 and SS2 to ensure that the development of specialist forms of residential accommodation, namely Integrated Retirement Communities, is not prejudiced. | No | The supply of new homes has been an issue within Elmbridge over recent years. According to the Government's Housing Delivery Test, (HDT), published each year, the amount of housing delivered has fallen significantly short of the relevant target (62% in 2018, 58% in 2019, 58% in 2020 and 70% in 2021). Whilst the situation is showing signs of improvement, every effort should be made to promote the supply of new homes given the national housing crisis, and the undersupply seen in recent years. The aim should be to significantly boost the supply of new homes (NPPF Paragraph 60). We see that Policy HOU1 sets 452 homes to be built per annum over the plan period, from 2021 through to 2037. Having reviewed the evidence base supporting the draft plan, this figure seems somewhat at odds with the level of need identified for the Borough. The Establishing Local Need Assessment (May 2022) uses the Standardised Methodology to identify a requirement of 647 dpa. That figure amounts to 195 more homes per annum, or 3,120 new homes over the plan period through to 2037. The difference between the two could result in a chronic undersupply of new homes within the Borough, which represents an unsustainable pattern of development which could result in significant challenges for the Borough in the years to come. Very little justification for the 452 dpa target is set out within Chapter 6 of the draft Plan. | Y | Y | Y | Y | Please see uploaded letter. Our comments aim to ensure that the development of specialist forms of residential accommodation, namely Integrated Retirement Communities, is not prejudiced. In our view more needs to be done to ensure that the document plans positively for the growth of this sector and that any restrictions be better justified. | Please see uploaded letter. HOU1: To plan for the most sustainable forms of growth, we consider that the Council should aim to meet and more importantly exceed any identified target, albeit such development should not bring about any significant adverse impacts in the future. We would ask that the target set out at Policy HOU1 is increased to a minimum of 647 dpa to better meet the needs of a growing population | 220726 34309 (Audley Group) Representations) v2.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556793/PDF/-/220726%2034309%20%5FAudley%20Group%5F%20Representations%5F%20v2%2Epdf Elmbridge Draft Headline Need Report V2.pdf | As per 2a, 3a and 4. | No, I do not wish to participate at the oral examination | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022). The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong |
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To plan for the most sustainable forms of growth, we consider that the Council should aim to meet and more importantly exceed any identified target, albeit such development should not bring about any significant adverse impacts in the future. We would ask that the target set out at Policy HOU1 is increased to a minimum of 647 dpa to better meet the needs of a growing population.

reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing

development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be

protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality. The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site

parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of

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| 1110041 | Meghan Rossiter | Abri | Yes | | No | | Y | | <p>Draft policy HOU1 is supported in its aim to maximise opportunities to deliver homes to meet local housing needs and the wider housing requirement. As with our comments in response to draft policy SS3, a numerical, annualised, target for affordable housing delivery may assist in better targeting and monitoring the delivery of the range of affordable tenures to meet local needs. We support the intentions and detail of draft policies HOU2, HOU3 and HOU4 as a beneficial steer to maximise the efficiency of land and delivery of affordable housing across the borough. The stepped approach to brownfield and greenfield sites is also supported in ensuring proper differentiation in the costs associated with each site and the prospects for viable delivery of affordable housing.</p> | <p>Draft policy HOU1 is supported in its aim to maximise opportunities to deliver homes to meet local housing needs and the wider housing requirement. As with our comments in response to draft policy SS3, a numerical, annualised, target for affordable housing delivery may assist in better targeting and monitoring the delivery of the range of affordable tenures to meet local needs. We support the intentions and detail of draft policies HOU2, HOU3 and HOU4 as a beneficial steer to maximise the efficiency of land and delivery of affordable housing across the borough. The stepped approach to brownfield and greenfield sites is also supported in ensuring proper differentiation in the costs associated with each site and the prospects for viable delivery of affordable housing.</p> | <p>07.2022 Elmbridge Local Plan.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/552089/PDF/-/07%2E2022%20Elmbridge%20Local%20Plan%2Epdf</p> | As per 3a and 4. | No, I do not wish to participate at the oral examination | | <p>Support for draft policy HOU1 noted.</p> <p>The Council's considers the proposed approach set out in draft policy HOU4 to seek 30% affordable housing on relevant schemes is appropriate and is supported by the DELP evidence base, including the viability assessment.</p> |
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| 1110281 | Graham Ritchie | Woolf Bond Planning obo Claygate House Investment Ltd and MJS Investments Ltd | No | See attached statement which highlights the plan does not accord with the requirements outlined in the Planning & Compulsory Purchase Act 2004 (as amended) together with The Environmental Assessment of Plans and Programmes Regulations (2004) (as amended). | No | The approach to the Green Belt and housing provision as set out in policies SS3 and HOU1 are not sound as the Local Plan fails to provide for at least 15 years postadoption together with a failure to plan for a requirement which reflects the Government's objectives of significantly boosting the supply of housing. | Y | Y | Y | Y | See attached statement and appendices 1-7. In summary, this indicates that the plan (especially policies SS3 and HOU1):a) Are not positively prepared as they do not seek to address the borough's housing needs, therefore further sites should be allocated;b) Are not positively prepared as they fail to boost the supply of housing by seeking to address the uncapped housing need derived through local housing need;c) Are not positively prepared as they fail to boost the supply of housing by seeking to address even the capped housing need derived through local housing need;d) Are also not positively prepared as it also fails to identify sites to contribute towards addressing unmet need of neighbouring authorities, especially those in Greater London;e) Are not justified with regard to the timeframe that the examination of the Local Plan will take resulting in a delayed adoption of the document;f) Are not effective as it is not based upon joint working cross-boundary strategic matters, especially housing;g) Are not justified with respect of the inclusion of windfalls which duplicates expected supply from LAA sites;h) Are inconsistent with national policy as they do not provide for a strategy that meets the area's development needs;i) Are inconsistent with national policy as they does not currently provide for at least 15 years post adoption as required by paragraph 22 of the NPPF; andj) Are inconsistent with national policy in the failure to both boost housing supply and make a contribution towards addressing the housing needs of neighbouring authorities as required by paragraph 60 of the NPPF. | See attached statement which details the changes necessary. These are:1. That policies SS3 and HOU1 are amended to:A) ensure that the plan period is from 1st April 2022 to no earlier than 31st March 2040.B) That the housing requirement is increased to a minimum of 860dpa i.e. 15,480 dwellings over the minimum plan period specified;C) That the potential for a higher housing requirement is assessed which can contribute towards unmet needs of neighbouring authorities, especially those in Greater London as obligation by Section 19(2) of the 2004 Act;D) That the allowance of small windfalls is reduced to remove any duplication with sites allocated where up to 4 dwellings are proposed; andE) That further allocations are included in the Plan to address the above requirements, including our clients land for around 60 dwellings (land east of Claygate House, north of Raleigh Drive, Claygate.2. That consequential amendments are made to the document to reflect these revisions. | https://consult.elmbridge.gov.uk/gf2.ti/af/1205954/553365/PDF/-/App%2002%20Watford%20LP%20Modifications%20and%20IR.pdf https://consult.elmbridge.gov.uk/gf2.ti/af/1205954/553366/PDF/-/WBP%20Reps%20for%20Claygate%20House%20-%2026%20July%202022.pdf https://consult.elmbridge.gov.uk/gf2.ti/af/1205954/553367/PDF/-/App%2001%20WBP%20Reps%20for%20Claygate%20Mar%202020.pdf https://consult.elmbridge.gov.uk/gf2.ti/af/1205954/553368/PDF/-/App%2006%20St%20Albans%20v%20Hunston%20Properties%202013%20EWCA%20Civil%201610.pdf https://consult.elmbridge.gov.uk/gf2.ti/af/1205954/553369/PDF/-/App%2003%20EXAM%2013%20-%20BFC%20-%20AP4.1%20Response%20-%20Plan%20Period%20and%20Housing%20Numbers.pdf https://consult.elmbridge.gov.uk/gf2.ti/af/1205954/553370/PDF/-/App%2004%20Maidstone%20ED2-Inspectors-initial-letter-24May.pdf https://consult.elmbridge.gov.uk/gf2.ti/af/1205954/553371/PDF/-/App%2007%20Hundal%20v%20S%20Bucks%20DC%202012%20EWHC%207912%20Admin.pdf App 05 Calverton v Nottingham City 2015 EWHC 1078 Admin.pdf | As per 1a, 2a, 3a and 4. | Yes, I wish to participate at the oral examination | See enclosed statement which details why attendance is necessary | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022). The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong |
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reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing

development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be

protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality. The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site

parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of

obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal \(SA\)](#) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes - 16,300 homes over the plan period through the release of green belt sites and optimisation of development in existing urban areas (see option 3 of Regulation 18 Options Consultation, 2018). Whilst this option would meet development needs,

including the need for affordable housing in full, it would fundamentally alter the character of the Borough's towns and villages through coalescence, urban sprawl and encroachment of new development into the countryside due to the release of Green Belt land necessary to achieve the quantum of development. In addition, this option was found to have the most significant negative impacts of all the options considered by the Council, largely due to the impact of distributing development widely across the Borough.

Paragraph 3.13 of the LAA 2022 explains that in accordance with the PPG the council undertook a filtering / sieving process so that only sites that have a realistic potential were assessed in more detail.

There are sites under 5 units included in the site allocations. These are part of the PA housing pre-application and therefore included as site allocations rather than windfall.

The Council has assessed the suitability of the promoted site – Land North of Rayleigh Drive, Claygate for release from the Green Belt designation and it was found that the site was not suitable for release. The assessment is set out in Green Belt Site Assessment Proforma SA-59.

HOU2: Optimisation of Sites

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
|-------------|-------------------------|--|-----|-----|-----|--|--------|--------|--------|--------|--|--|--|----------------------|--|---|---|
| 1107 086 | Alan McCan n | | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1109 558 | Sally Harma n | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1110 153 | James Waterh ouse | Iceni Projects obo Northumb erland Estates Ltd | Yes | | No | | | Y | | | The policy is not effective as it is unprecise and therefore at risk of not being delivered. Para 16 d) of the NPPF states that "plans should... contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals". Greater precision is therefore needed for the policy to be unambiguous and clear. | The modification sought is the insertion of "within 400m of a train station" to replace the references to being "adjacent to" or "near to" a train station. | | | Yes, I wish to participate at the oral examination | The policy cannot be effective when there is ambiguity over the proximity of sites to railway stations. However, we would not need to attend the Examination on this matter if clarity is provided through minor policy amendment. | Objection noted. Given the position of the Borough's trains stations in relation to its centres, the approach set out in draft policy HOU2(1) and (2) is considered to be appropriate. |
| 1110 320 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1110 566 | Mr Harris | Nexus Planning obo Kingacre Estates Ltd | Yes | N/A | No | 1. Criterion 2. of Policy HOU2 refers to, inter alia, delivering additional homes on sites adjacent to train stations as part of the Council's strategy to optimise development in sustainable locations within the borough. 2. Whilst this is logical in general terms many of the train stations in an Elmbridge context are located in environmentally constrained locations and / or located some way distant from any urban area. As such, as set out in further detail below, they are not the locations for significant development that they might be in another context. Paragraph 105 of the Framework states that: "The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or | | Y | Y | | 1. Criterion 2. of Policy HOU2 refers to, inter alia, delivering additional homes on sites adjacent to train stations as part of the Council's strategy to optimise development in sustainable locations within the borough. 2. Whilst this is logical in general terms many of the train stations in an Elmbridge context are located in environmentally constrained locations and / or located some way distant from any urban area. As such, as set out in further detail below, they are not the locations for significant development that they might be in another context. Paragraph 105 of the Framework states that: "The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes." 3. The borough has three train lines that extend through it: • the mainline from Portsmouth to London; • the line from Guildford to London; and • the line from Hampton Court to London. 4. As shown in Figure 1 of the Draft Local Plan (page 19), there are a total of 10 train stations on | Proposed Changes 9. As part of a fundamental review of the Council's housing strategy, to ensure that appropriate consideration is given to the genuine suitability and sustainability of land adjacent to the borough's railway stations as a potential for sustainable development / optimisation. Proposed Changes 10. As part of a fundamental review of the Council's housing strategy, ensure that the locational and environmental constraints that apply to the majority of the stations in Elmbridge are acknowledged. | Elmbridge Policy HOU2.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/555567/PDF/-/Elmbridge%20Policy%20HOU2%2Epdf | As per 2a, 3a and 4. | Yes, I wish to participate at the oral examination | We represent a developer with significant land interests in the borough and to whom the housing strategy in Elmbridge as a whole, and the release of land from the Green Belt, is of fundamental importance. Accordingly, it is essential that we are able to participate in all relevant hearing sessions. | Objection noted. Given the position of the Borough's trains stations in relation to its centres, the approach set out in draft policy HOU2(1) and (2) is considered to be appropriate. In addition, draft policy HOU2 is also intended to apply to windfall schemes and therefore the approach is appropriate even if the DELP does not include any site allocations on Green Belt land. Constraints are shown on the policies map . |

can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”

3. The borough has three train lines that extend through it: • the mainline from Portsmouth to London; • the line from Guildford to London; and • the line from Hampton Court to London.

4. As shown in Figure 1 of the Draft Local Plan (page 19), there are a total of 10 train stations on these lines within the borough.

5. However, the stations at Claygate, Weybridge, Esher, Oxshott, and Cobham and Stoke D’Abernon are all located in or adjacent to the Green Belt (and the Council is not proposing to make any amendment to Green Belt boundaries in these locations.)

6. Additionally, in nearly all cases, the stations are in fact located a substantial distance to, and remote from, the associated town / district / local centres and are not, therefore, as sustainable as they appear (other than for commuting purposes).

7. Not shown in Figure 1 of the Draft Local Plan are also the other relevant constraints to development around train stations. For example, at Oxshott, the west of the station is within a SSSI and contains habitats of principal importance – which will constrain development potential. Hampton Court Station (East Molesey) has heritage constraints and Hersham Station is surrounded by Strategic Employment Land and Waste Sites.

8. Against this

these lines within the borough.

5. However, the stations at Claygate, Weybridge, Esher, Oxshott, and Cobham and Stoke D’Abernon are all located in or adjacent to the Green Belt (and the Council is not proposing to make any amendment to Green Belt boundaries in these locations.)

6. Additionally, in nearly all cases, the stations are in fact located a substantial distance to, and remote from, the associated town / district / local centres and are not, therefore, as sustainable as they appear (other than for commuting purposes).

7. Not shown in Figure 1 of the Draft Local Plan are also the other relevant constraints to development around train stations. For example, at Oxshott, the west of the station is within a SSSI and contains habitats of principal importance – which will constrain development potential. Hampton Court Station (East Molesey) has heritage constraints and Hersham Station is surrounded by Strategic Employment Land and Waste Sites.

8. Against this background, the opportunities for sustainable development at stations in the borough is far more limited than it might appear.

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| | | | | | | background, the opportunities for sustainable development at stations in the borough is far more limited than it might appear. | | | | | | | | | | | |
| 1110 621 | Kelly McCann | Knight Frank obo Landowne rs of Land East of Blundel Lane | No | Policy HOU2 sets out the Council's ambition of optimising sites to make efficient use of land. Policy HOU2(2) specifically references the requirement for Sites "within or on the edge of town, district and local centres and sites adjacent to train stations" to provide "higher density housing such as flats and terraced homes, rather than semi-detached and detached homes". Policy HOU3 adds that "within town, district and local centres as defined on the Policies Map and near train stations ... development shall be predominantly one- and two- bedroom homes". Policy HOU3 adds that "within town, district and local centres as defined on the Policies Map and near train stations ... development shall be predominantly one- and two- bedroom homes". Whist we support the principle of optimising and making the most efficient use | No | Policy HOU2 sets out the Council's ambition of optimising sites to make efficient use of land. Policy HOU2(2) specifically references the requirement for Sites "within or on the edge of town, district and local centres and sites adjacent to train stations" to provide "higher density housing such as flats and terraced homes, rather than semi-detached and detached homes". Policy HOU3 adds that "within town, district and local centres as defined on the Policies Map and near train stations ... development shall be predominantly one- and two- bedroom homes". Whist we support the principle of optimising and making the most efficient use of land, this policy highlights the pressure the Council are under to deliver additional housing units on brownfield land, with insufficient brownfield land available. There are numerous issues with this approach. Firstly, there is a real risk that, owing to pressures to meet housing need, the Council will focus on the quantity of units that can be delivered on such brownfield sites, rather than the quality. Secondly, it is very likely that this overconcentration of predominately one- and two- bedroom homes in such locations will lead to an undersupply of larger family-sized | Y | Y | Y | Y | Policy HOU2 sets out the Council's ambition of optimising sites to make efficient use of land. Policy HOU2(2) specifically references the requirement for Sites "within or on the edge of town, district and local centres and sites adjacent to train stations" to provide "higher density housing such as flats and terraced homes, rather than semi-detached and detached homes". Policy HOU3 adds that "within town, district and local centres as defined on the Policies Map and near train stations ... development shall be predominantly one- and two- bedroom homes". Whist we support the principle of optimising and making the most efficient use of land, this policy highlights the pressure the Council are under to deliver additional housing units on brownfield land, with insufficient brownfield land available. There are numerous issues with this approach. Firstly, there is a real risk that, owing to pressures to meet housing need, the Council will focus on the quantity of units that can be delivered on such brownfield sites, rather than the quality. Secondly, it is very likely that this overconcentration of predominately one- and two- bedroom homes in such locations will lead to an undersupply of larger family-sized | As set out above, we recommend the allocation of suitable and sustainable sites within the Green Belt, to ensure that there is a sufficient mix of housing (to meet needs) across the District. We recommend that suitable and available sites within the Green Belt, such as Land East of Bundel Lane, are seriously considered for residential-led development. This site specifically could help to deliver high-quality housing in a well-connected and sustainable location, and thus align with some of the fundamental principles and objectives of the emerging Local Plan. The development of the Site would contribute to sustainable patterns of development, alongside other clusters of development in the vicinity. The Site could address housing needs, deliver much needed affordable housing, provide a varied housing mix (including family homes, bungalows, senior living accommodation) (as need dictates). Furthermore, the site is equipped with its own SANG. | Land east of Blundel Lane - 220727 - Reg. 19 Representations - Issue.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/563208/PDF/-/Land%20east%20of%20Blundel%20Lane%20%2D%20220727%20%2D%20Reg%2E%2019%20Representations%20%2D%20Issue%2Epdf | As per 1a, 2a, 3a and 4. | Yes, I wish to participate at the oral examination | Please see Letter of Representation. | Objection noted. The DELP sets out a range of policies that seek to balance the range of challenges faced by the Borough. Including the pressing need to deliver additional homes and ensuring these provide a range of types of homes that are of a high quality. For example, draft policy HOU3 sets out that development must provide a range of homes in accordance with the mix identified in the Council's Local Housing Need Assessment (2020) . In addition, draft policies, such as ENV9 – Urban design quality, set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located. Planning applications will be assessed on their merits against all policies in the DELP. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the |

mixed and balanced communities (as required by Paragraph 63 of the NPPF). Only through the allocation of larger, available and suitable Green Belt sites, will the Council be able to deliver larger units (i.e. 3+ bedroom properties) (that are typically more suited towards families), with gardens, car parking and sufficient open space. In consideration of the above, we consider that the Council will struggle to meet housing needs on brownfield sites alone.

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the

Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential

units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality. The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is

not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole,

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| 1110 935 | Sam Osborn | Vail Williams LLP obo Haleon Ltd (GSK CH) Trading Ltd - D Prout | | Summary of attached document Supports Site Allocation WEY33 for residential development but requests that the capacity is increased to 120 units as a guide.. | | Policy HOU2 identifies that (under point 2) sites adjacent to train stations will deliver additional homes by provision of higher density housing such as flats and terraced homes. The work undertaken by OSP Architecture in support of the allocation has taken into account the recommendations for housing mix and optimisations of sites and, given the size of this site and identification of a strategic site within the SA, means it considered appropriate to also provide family housing as the site will be capable of delivering in excess of 100 units. | | | | | Policy HOU2 identifies that (under point 2) sites adjacent to train stations will deliver additional homes by provision of higher density housing such as flats and terraced homes. The work undertaken by OSP Architecture in support of the allocation has taken into account the recommendations for housing mix and optimisations of sites and, given the size of this site and identification of a strategic site within the SA, means it considered appropriate to also provide family housing as the site will be capable of delivering in excess of 100 units. | Policy HOU2 identifies that (under point 2) sites adjacent to train stations will deliver additional homes by provision of higher density housing such as flats and terraced homes. The work undertaken by OSP Architecture in support of the allocation has taken into account the recommendations for housing mix and optimisations of sites and, given the size of this site and identification of a strategic site within the SA, means it considered appropriate to also provide family housing as the site will be capable of delivering in excess of 100 units. | EBC Reg 19 Repts - Site Ref WEY33 - St Georges Avenue Weybridge 28.07.22.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557201/PDF/-/EBC%20Reg%2019%20Reps%20%2D%20Site%20Ref%20WEY33%20%2D%20St%20Georges%20Avenue%20Weybridge%2028%2E07%2E22%2Epdf | As per 1a, 2a, 3a and 4. | Yes, I wish to participate at the oral examination | We would like to reserve the right to attend the Examination to fully address the opportunities presented by site WEY33 in terms of capacity unless the suggested increase to approximately 120 units is supported by the Inspector and local authority. | Support and comments noted. The Council's Local Housing Need Assessment (2020) (LHNA), which identifies the housing mix sought in the Borough based on need sets out that the greatest need is for smaller 1 and 2 bed homes. Hence it is considered appropriate that sites should focus on delivering these units. However, this does not preclude the provision of other sizes of units in line with the mix identified in the LHNA. The capacity of site allocation WEY33 set out in the DELP is expressed as the number of units that is supported by the Council in principle on the site. It does not preclude a planning application coming forward with a larger number of homes. |
| 1111 021 1111 048 | Steven Fidgett | Union4 on behalf of Molesey Road Land Limited (A Barry) | No | While we support the objectives of the policy, the optimisation of development options should apply irrespective of whether the site is within the urban area or lies outside of this as part of a Green Belt release or previously developed land. The emphasis on increasing density and smaller homes supply near to train stations and other accessible locations is supported and is a key | No | While we support the objectives of the policy, the optimisation of development options should apply irrespective of whether the site is within the urban area or lies outside of this as part of a Green Belt release or previously developed land. The emphasis on increasing density and smaller homes supply near to train stations and other accessible locations is supported and is a key aim of sustainable place making. | Y | Y | Y | Y | While we support the objectives of the policy, the optimisation of development options should apply irrespective of whether the site is within the urban area or lies outside of this as part of a Green Belt release or previously developed land. The emphasis on increasing density and smaller homes supply near to train stations and other accessible locations is supported and is a key aim of sustainable place making. | Proposed Modifications to make the ELP sound: The policy should be amended to apply generally, within and outside the urban area, promoting efficient design and optimisation of delivery in sustainable locations. This should be fully considered in the review of Green Belt and spatial strategy recommended in our response to SS2/3 and HOU1. | | Yes, I wish to participate at the oral examination | We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. | Objection noted. It is proposed to delete criterion 1 of draft policy HOU2. This amendment is included in the proposed modifications to the DELP submitted to the Inspector for Examination. Please see main modification ref. M5.1. | |

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| | | | | | for delivering higher density housing such as one and two bedroom flats. Sorbon Estates therefore request that part 2 of the policy is amended to include 'and brownfield sites in sustainable locations with good transport links'. This amendment to the policy would strengthen the ability of the plan to deliver high density housing on brownfield sites in sustainable locations and ensure that the plan is positively prepared and will meet the areas objective housing needs. | | | | | sustainable locations and ensure that the plan is positively prepared and will meet the areas objective housing needs in accordance with the overarching theme of the NPPF to deliver sustainable development. | | | | | | | |
| 1111 088 1111 091 | Sophie Rae | WSP obo The Julien Family Trust | No | HOU 2- Optimisation of sites In line with previous comments, the Rodona Road site offers an opportunity to contribute much needed housing, including affordable housing on land appropriate for development. | No | HOU 2- Optimisation of sites In line with previous comments, the Rodona Road site offers an opportunity to contribute much needed housing, including affordable housing on land appropriate for development. | Y | Y | Y | Y | HOU 2- Optimisation of sites In line with previous comments, the Rodona Road site offers an opportunity to contribute much needed housing, including affordable housing on land appropriate for development. | HOU 2- Optimisation of sites In line with previous comments, the Rodona Road site offers an opportunity to contribute much needed housing, including affordable housing on land appropriate for development. | Rodona Road 29 July 2022 FINAL.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557530/PDF/-/Rodona%20Road%2029%20July%202022%20FINAL%2Epdf | As per 1a, 2a, 3a and 4. | Yes, I wish to participate at the oral examination | Please refer to submitted letter | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant |

elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's [Topic Paper 1: How the spatial strategy was formed?](#) (June, 2022).

The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of

function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our

residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the

character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality. The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process,

In addition, draft policies, such as ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located.

An option to meet the Borough's identified housing need in full through intensification of urban areas was considered. However, the Council concluded that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

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intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.

The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's [Topic Paper 1: How the spatial strategy was formed?](#) (June, 2022).

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1: How the spatial strategy was formed?

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The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that

this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

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In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

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| | | | | | | | | | | | | | | | | | | | Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood. Promoted sites Land at South of Hare Lane, Claygate; Land at Horringdon Farm; Land East of Blundel Lane, Oxshott and Land SE of Danes Way, Oxshott have been assessed by the Council and were found to be not suitable for Green Belt release. The assessment is set out in Green Belt Assessment Site Proforma SA-41; SA-23, SA-24, SA-29, and SA-39; SA-11 and SA-14 respectively. |
| 1110 881 | Adam Kindred | CBRE obo Ashill Land Ltd | Yes | | No | Ashill support the thrust of Draft Policy HOU2 in terms of making efficient use of land and optimising site capacity in accordance with paragraph 124 of the NPPF. However, this policy is unsound as currently drafted as it does not seek to optimise sites outside urban areas / town centres. Reference should be made to the optimisation of suitable sustainably located sites released from the Green Belt outside the urban area / town centres, including Land at Burwood Road, Hershams which has capacity for 80-100 new dwellings, and is available now, offers a suitable and sustainable location for development that is achievable and developable within the | | Y | Y | Ashill support the thrust of Draft Policy HOU2 in terms of making efficient use of land and optimising site capacity in accordance with paragraph 124 of the NPPF. However, this policy is unsound as currently drafted as it does not seek to optimise sites outside urban areas / town centres. Reference should be made to the optimisation of suitable sustainably located sites released from the Green Belt outside the urban area / town centres, including Land at Burwood Road, Hershams which has capacity for 80-100 new dwellings, and is available now, offers a suitable and sustainable location for development that is achievable and developable within the short term i.e. next five years. | Refer to appended representations. | Burwood Road - Reg 19 - FINAL.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556909/PDF/-/Burwood%20Road%20%2D%20Reg%2019%20%2D%20FINAL%2Epdf | As per 2a and 3. | Yes, I wish to participate at the oral examination | Refer to appended representations. | Objection noted. SS3, HOU1 and ENV4 During the development of the Draft Elmbridge Local Plan 2037 (DLP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three | | | |

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In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

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| 1111 022 | Mr Nick Haig | Montagu Evans on behalf of BEGG Nominees Ltd c/o Global Investors | | | No | <p>Policy HOU2: Optimisation of sites In principle emerging Policy HOU2 is supported, as it supports the optimisation and efficient use of sites within the urban area. This would accord with national policy requirement under NPPF Paragraph 125 which places importance on planning policy and decisions to avoid homes being built at low densities and ensure the optimal use of potential within each site.</p> <p>In our view we find conflict between this and Policy SS2 (Sustainable place-making) because the Council has not sought to accept that there needs to be a step change in the density of development to deliver housing for plan in order for the plan to be considered positively prepared and to align with NPPF Paragraph 35.</p> <p>Paragraph 6.13 states that one of the key aims of the draft Plan is to boost the supply of new homes. We do not agree that this objective can be achieved if the Borough's objectively accessed needs are not being aspired to. There is a concern that this will mean the Council cannot deliver sufficient homes to meet its identified needs and the longstanding issues of under supply of housing will persist. Paragraph 6.15 refers to greater detail and clarification that is to be provided within the forthcoming Elmbridge Design Code. This is eagerly awaited, however, must be ambitious within its scope and ambitions.</p> | | | Y | <p>Policy HOU2: Optimisation of sites In principle emerging Policy HOU2 is supported, as it supports the optimisation and efficient use of sites within the urban area. This would accord with national policy requirement under NPPF Paragraph 125 which places importance on planning policy and decisions to avoid homes being built at low densities and ensure the optimal use of potential within each site.</p> <p>In our view we find conflict between this and Policy SS2 (Sustainable place-making) because the Council has not sought to accept that there needs to be a step change in the density of development to deliver housing for plan in order for the plan to be considered positively prepared and to align with NPPF Paragraph 35.</p> <p>Paragraph 6.13 states that one of the key aims of the draft Plan is to boost the supply of new homes. We do not agree that this objective can be achieved if the Borough's objectively accessed needs are not being aspired to. There is a concern that this will mean the Council cannot deliver sufficient homes to meet its identified needs and the longstanding issues of under supply of housing will persist. Paragraph 6.15 refers to greater detail and clarification that is to be provided within the forthcoming Elmbridge Design Code. This is eagerly awaited, however, must be ambitious within its scope and ambitions.</p> | <p>Policy HOU2: Optimisation of sites In principle emerging Policy HOU2 is supported, as it supports the optimisation and efficient use of sites within the urban area. This would accord with national policy requirement under NPPF Paragraph 125 which places importance on planning policy and decisions to avoid homes being built at low densities and ensure the optimal use of potential within each site.</p> <p>In our view we find conflict between this and Policy SS2 (Sustainable place-making) because the Council has not sought to accept that there needs to be a step change in the density of development to deliver housing for plan in order for the plan to be considered positively prepared and to align with NPPF Paragraph 35.</p> <p>Paragraph 6.13 states that one of the key aims of the draft Plan is to boost the supply of new homes. We do not agree that this objective can be achieved if the Borough's objectively accessed needs are not being aspired to. There is a concern that this will mean the Council cannot deliver sufficient homes to meet its identified needs and the longstanding issues of under supply of housing will persist. Paragraph 6.15 refers to greater detail and clarification that is to be provided within the forthcoming Elmbridge Design Code. This is eagerly awaited, however, must be ambitious within its scope and ambitions.</p> | <p>290722 Elmbridge Reg 19 - Walton Lodge - Letter of Representation FINAL.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557316/PDF/-/290722%20Elmbridge%20Reg%2019%20%20Walton%20Lodge%20Letter%20of%20Representation%20FINAL%20Epdf</p> <p>A12032OT0001P1 LR - Pre-app document.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557317/PDF/-/A12032OT0001P1%5F LR%20%2D%20Pre%20Dapp%20document%20Epdf</p> | As per 2a, 3a and 4. | Yes, I wish to participate at the oral examination | As above. | <p>Objection noted.</p> <p>Draft policy HOU2 set out an approach that is supportive of higher density development.</p> |
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| 1111 025 | Tom Cole | Montagu Evans on behalf of Centrica Combined Common Investmen t Fund Ltd (c/o LaSalle Investmen t Managem ent) | No | We write on behalf of our client, Centrica Combined Common Investment Fund Ltd (c/o LaSalle Investment Management) who own 42 Portsmouth Road, Long Ditton, Surbiton, KT6 5PZ. This letter of representatio n is submitted in response to the Regulation 19 consultation on the Draft Elmbridge Local Plan. The purpose of the consultation is to establish if the Local Plan meets the legal and procedural requirements for Plan- making as set out by Paragraph 35 of the NPPF and whether the Plan can be found sound. These representatio ns are intended to help guide the formulation of Elmbridge's Local Plan. Our client is generally supportive of the draft Local Plan and its approach, whereby the Council proposes to | No | Policy HOU2: Optimisation of sites In principle emerging Policy HOU2 is supported, as it prioritises the optimisation and efficient use of sites within the urban area. This would accord with national policy requirement under NPPF Paragraph 124 which places importance on planning policy and decisions to avoid homes being built at low densities and ensure the optimal use of potential within each site. In our view we find conflict between this and Policy SS2 (Sustainable place- making) because the Council has not sought to accept that there needs to be a step change in the density of development to deliver sufficient housing in order for the Plan to meet objectively assessed needs and demonstrate consistency with national policy. Paragraph 6.13 states that one of the key aims of the draft Plan is to boost the supply of new homes, however, we question how this can be achieved if the Borough's objectively accessed needs are not being aspired to. There is a concern that this will mean the Council cannot deliver sufficient homes to meet its identified needs and the longstanding issues of under supply of housing will persist. Paragraph 6.15 refers to greater detail and clarification is to be provided within the forthcoming Elmbridge Design Code, this is eagerly awaited, however, must be | Y | Y | Y | Y | Policy HOU2: Optimisation of sites In principle emerging Policy HOU2 is supported, as it prioritises the optimisation and efficient use of sites within the urban area. This would accord with national policy requirement under NPPF Paragraph 124 which places importance on planning policy and decisions to avoid homes being built at low densities and ensure the optimal use of potential within each site. In our view we find conflict between this and Policy SS2 (Sustainable place-making) because the Council has not sought to accept that there needs to be a step change in the density of development to deliver sufficient housing in order for the Plan to meet objectively assessed needs and demonstrate consistency with national policy. Paragraph 6.13 states that one of the key aims of the draft Plan is to boost the supply of new homes, however, we question how this can be achieved if the Borough's objectively accessed needs are not being aspired to. There is a concern that this will mean the Council cannot deliver sufficient homes to meet its identified needs and the longstanding issues of under supply of housing will persist. Paragraph 6.15 refers to greater detail and clarification is to be provided within the forthcoming Elmbridge Design Code, this is eagerly awaited, however, must be ambitious within its scope and ambitions. | Policy HOU2: Optimisation of sites In principle emerging Policy HOU2 is supported, as it prioritises the optimisation and efficient use of sites within the urban area. This would accord with national policy requirement under NPPF Paragraph 124 which places importance on planning policy and decisions to avoid homes being built at low densities and ensure the optimal use of potential within each site. In our view we find conflict between this and Policy SS2 (Sustainable place-making) because the Council has not sought to accept that there needs to be a step change in the density of development to deliver sufficient housing in order for the Plan to meet objectively assessed needs and demonstrate consistency with national policy. Paragraph 6.13 states that one of the key aims of the draft Plan is to boost the supply of new homes, however, we question how this can be achieved if the Borough's objectively accessed needs are not being aspired to. There is a concern that this will mean the Council cannot deliver sufficient homes to meet its identified needs and the longstanding issues of under supply of housing will persist. Paragraph 6.15 refers to greater detail and clarification is to be provided within the forthcoming Elmbridge Design Code, this is eagerly awaited, however, must be ambitious within its scope and ambitions. | 1899 Thames Ditton Emerging Design and Access Statement.pdf https://consult.elmbridg e.gov.uk/gf2.ti/a/120595 4/557321/PDF/- /1899%5FThames%20 Ditton%5FEmerging%2 0Design%20and%20Ac cess%20Statement%2E pdf 290722 Thames Ditton Reps FINAL.pdf https://consult.elmbridg e.gov.uk/gf2.ti/a/120595 4/557322/PDF/- /290722%20Thames%2 0Ditton%20Reps%20FI NAL%2Epdf | As per1a, 2a, 3a and 4. | Yes, I wish to participate at the oral examination | As above. | Objection noted. Draft policy HOU2 set out an approach that is supportive of higher density development |
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de-designate the Kingston House Estate (including our client's Site) as Strategic Employment Land under the adopted Local Plan. In light of the development pressures the Council faces in order to meet its minimum housing requirements, we conclude that the Council must go further and allocate the Site within the draft Local Plan to more positively encourage development. This would align with the Council's own conclusions on the Site as being underutilised, with the Elmbridge Strategic Employment Land Review (2019) concluding that the Kingston House Estate (which includes the Site) 'no longer contains a significant concentration of employment uses'. We are in pre-application discussions with the Council on a comprehensive residential proposal for

ambitious within its scope and ambitions.

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| | | | | <p>beyond which is residential. To the north of the Site is a marina and the River Thames. Surbiton Station is approximately 0.8 miles to the east of the Site and provides regular train services into Central London. A number of local bus routes also connect the Site with neighbouring towns. There are no statutorily or locally listed buildings on site and the Site does not fall within a Conservation Area. The Site is located within Flood Zone 1, the area with the least likelihood of flooding. The Site is not affected by any other environmental designations and so is evidently highly suitable for consideration for allocation. The Site is currently used as a car dealership with a planning history consisting of a number of applications associated with the Site for this use.</p> | | | | | | | | | | | |
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| | | | | As noted above the Site is recommended for de-designation as Strategic Employment Land as part of the Kingston House Estate. | | | | | | | | | | | | | |
| 1111 014 | Lucy Morris | Nexus Planning on behalf of Charterho use Strategic Land | No | Please see uploaded document at question 4a | No | Policy HOU2 requires development to make the most efficient use of land and optimise sites within the urban area. Whilst this, as a principle, is in accordance with national policy, bullet point 2a) states that sites within or on the edge of centres and on sites adjacent to train stations will deliver additional homes by the: "Provision of higher density housing such as flats and terraced homes rather than semi-detached and detached homes." 2.38 At bullet point 2c) the policy goes on to state that the Council will promote mixed use development and increased building heights. 2.39 This appears to completely disregard the legitimate concerns raised within the Regulation 18 consultations by the Council themselves over a brownfield-only Options which would have harmful impacts on the character of the Borough. 2.40 The evidence base also notes the predominant character of the Borough being of suburban nature. The Local Plan & Community Infrastructure Levy Scoping Viability Assessment (May 2022) states at paragraph 3.4.8 that: "...to our knowledge, | Y | Y | Y | Y | Policy HOU2 requires development to make the most efficient use of land and optimise sites within the urban area. Whilst this, as a principle, is in accordance with national policy, bullet point 2a) states that sites within or on the edge of centres and on sites adjacent to train stations will deliver additional homes by the: "Provision of higher density housing such as flats and terraced homes rather than semi-detached and detached homes." 2.38 At bullet point 2c) the policy goes on to state that the Council will promote mixed use development and increased building heights. 2.39 This appears to completely disregard the legitimate concerns raised within the Regulation 18 consultations by the Council themselves over a brownfield-only Options which would have harmful impacts on the character of the Borough. 2.40 The evidence base also notes the predominant character of the Borough being of suburban nature. The Local Plan & Community Infrastructure Levy Scoping Viability Assessment (May 2022) states at paragraph 3.4.8 that: "...to our knowledge, Elmbridge is a borough where the market offer and appeal is more related to the generally lower rise and relatively "leafy" or open / more "village-like" nature of much of the urban areas." 2.41 This is completely at odds with the aims of Policy HOU2 to significantly increase densities and heights, and further calls in the deliverability of the Council's chosen spatial strategy given the market demand for lower densities. 2.42 Policy HOU2 is also at odds with Policy HOU3 (Housing mix), which requires development to reflect local housing demand and | Please refer to accompanying submission. | Former Moore Place Golf Course Elmbridge Draft LP (Reg.19).pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557335/PDF/-/Former%20Moore%20Place%20Golf%20Course%5FElmbridge%20Draft%20LP%20%5FReg%2E19%5F%2Epdf | As per 2a and 3. | Yes, I wish to participate at the oral examination | Please refer to accompanying submission. Please note that Nexus Planning is acting on behalf of Charterhouse Strategic Land. | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELDP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the |

assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in

full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is

flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The proposed spatial strategy is considered to be the best, most sustainable solution to

meet the Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. As demonstrated through the evidence base, Duty to Cooperate activities and Statements of Common Ground, the development strategy can also be accommodated without putting undue pressure on the Borough's infrastructure.

In addition, draft policies, such as ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located.

An option to meet the Borough's identified housing need in full through intensification of urban areas was considered. However, the Council concluded that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially

different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities.

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

The Council has assessed the suitability of the promoted site – Moore Place Golf Course for release from the Green Belt designation and it was found that the site was not suitable for release. The assessment is set out in Green Belt Site Assessment Proforma SA-50.

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| 1111 026 | Tom Cole | Montagu Evans on behalf of Quadrant Repurpose and LaSalle Investmen t Managem ent | | | | <p>4. Policy HOU2 (Optimisation of Sites) Policy HOU2 confirms development must make the efficient use of land and optimise sites within the urban area of the borough. The policy goes on to confirm: 'Sites within or on the edge of town, district and local centres and sites adjacent to train stations will deliver additional homes by: a) Provision of higher density housing such as flats and terraced homes rather than semidetached and detached homes; b) Infill and backland developments to the rear of existing frontage property(ies); c) Promoting mixed use development and increased building heights; and d) Seeking comprehensive development that leads to more efficient and effective site layouts. We support the Plan's approach to make the most efficient use of land by optimising key development sites within urban areas of the borough and promoting efficient and effective site layouts with increased building heights. Notwithstanding this, it is noted that there is balance to be met between optimising the use of previously developed land (of which includes inherently requires increased building heights and/ or massing), and the policy objective to maintain, reinforce and enhance existing characteristics of areas (as per Policy ENV9 (Urban design quality)). Therefore, with the Council's approach to deliver</p> | | | | | | | | | <p>Hersham Green- Regulation 19 Local Plan Representations.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557381/PDF/-/Hersham%20Green%20Regulation%2019%20Local%20Plan%20Representations%2Epdf</p> <p>7060- PL01 - Location Plan.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557382/PDF/-/7060%2D%20PL01%20%2D%20Location%20Plan%2Epdf</p> | As per 2a. | | | <p>Comments noted. The Council is currently progressing the production of the Borough's design code. A draft of the design code will be published for a public consultation soon and the Council aims to have the design code adopted in 2024 in advance of the DELP adoption.</p> |
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| | | | | | <p>housing supply focussing primarily on the re-use of previously developed land, an acceptance of increased density in accessible and sustainable locations is required. There should be a recognition of how townscape analysis can assist this approach which avoids the problem of falling back on an approach of solely replicating existing building heights.</p> <p>Whist it is noted that further guidance on the optimisation of sites can be found in the forthcoming Elmbridge Design Code (as per paragraph 6.15 of the Draft Plan) given the Council's key strategy for the delivery of housing will take place through the 'brownfield approach', the Design Code will need to adopt best practice to support higher densities in such town centre locations to deliver this strategy. If the Design Code follows the approach of seeking to replicate existing heights it will be in conflict with HOU2.</p> | | | | | | | | | |
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HOU3: Housing Mix

| ID | N | Org | 1 | 1a | 2 | 2a | 3 | 3 | 3 | 3 | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
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| | | | | | | | P | E | J | C | | | | | | | |
| 1107087 | Alan McCann | | Yes | | No | Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many. | | | Y | | Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many. | | | | | | <p>Comments noted.</p> <p>The spatial strategy set out in the DELP aims to balance the often competing and conflicting issue of protecting the environment and address the challenges of climate change, and growth to meet economic, housing and infrastructure needs.</p> <p>The proposed spatial strategy is considered to be the best, most sustainable solution to meet the Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. As demonstrated through the evidence base, Duty to Cooperate activities and Statements of Common Ground, the development strategy can also be accommodated without putting undue pressure on the Borough's infrastructure.</p> <p>In addition, draft policies, such as ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located.</p> <p>An option to meet the Borough's identified</p> |

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| | | | | capacity is increased to 120 units as a guide.. | | undertaken by OSP Architecture in support of the allocation has taken into account the recommendations for housing mix and optimisation of sites and, given the size of this site and identification as a strategic site within the SA, means it is considered appropriate to also provide family housing as the site will be capable of delivering in excess of 100 units. | | | | 20Reps%20%2D%20Site%20Ref%20WEY33%20%2D%20St%20Georges%20Avenue%20Weybridge%2028%2E07%2E22%2Epdf | | | the suggested increase to approximately 120 units is supported by the Inspector and local authority. | the site. It does not preclude a planning application coming forward with a larger number of homes. | |
| 1111047 | Lauren Manoharan | high Consulting obo Sorbon Estates | Yes | | Yes | Comments on Policy HOU3 – Housing Mix: Sorbon Estates is supportive of Policy HOU3, particularly the emphasis placed on delivering residential development proposals that include 1 and 2 bedroom homes suitable for newly forming households, young couples and older people as this clearly reflects Elmbridge's current housing need as evidenced within the Local Housing Needs Assessment. | | | | | | | | Support noted. | |
| 1111913 | Mr Crickett | Boyer Planning obo Antler Homes PLC | | | No | The policy is unsound. It is not effective. 7.9 Antler Homes is concerned by the wording and inclusion of Part 3 of the policy stating where the internal layout of a one, two or three bedroom home appears designed to circumvent Policy HOU3 by facilitating subsequent subdivision of large rooms, planning permission may be refused. 7.10 Firstly, the definition of 'rooms' needs to be very clearly presented within the policy and or its supporting text. As presently written, this could be applied to any room, i.e. living room, dining room, etc. 7.11 Secondly, this approach will most likely unfairly penalise and impact development viability for housebuilders delivering new homes on smaller sites and in locations | Y | | The policy is unsound. It is not effective. 7.9 Antler Homes is concerned by the wording and inclusion of Part 3 of the policy stating where the internal layout of a one, two or three bedroom home appears designed to circumvent Policy HOU3 by facilitating subsequent subdivision of large rooms, planning permission may be refused. 7.10 Firstly, the definition of 'rooms' needs to be very clearly presented within the policy and or its supporting text. As presently written, this could be applied to any room, i.e. living room, dining room, etc. 7.11 Secondly, this approach will most likely unfairly penalise and impact development viability for housebuilders delivering new homes on smaller sites and in locations | 7.12 For the same reasoning, it is also recommended the wording of Part 2 of the policy be amended to reflect that, whilst emphasis in residential development proposals is to be placed on one, two and three bedroom homes, proposals that come forward can and should also include a mix of homes appropriate to a site's context. | 220727 Elmbridge Reg19 Representations obo Antler Homes.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/563526/PDF/-/220727%20Elmbridge%20Reg19%20Representations%20obo%20Antler%20Homes%2Epdf | As per 2a, 3a and 4. | Yes, I wish to participate at the oral examination | Should the DLP be submitted for examination, Antler Homes would welcome the opportunity to participate in the Examination Hearings in order to ensure our concerns with the DLP are presented to the appointed Inspector(s) in person. | Objection noted. The Council considers the wording of draft policy HOU3 to be appropriate given the greatest need in the Borough is identified as being for smaller 1 and 2 bed homes and the need to ensure development schemes deliver high quality homes that meet and exceed space standards. |

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| | | | | | where demand and need for smaller homes does not align to the Borough wide area. 7.12 For the same reasoning, it is also recommended the wording of Part 2 of the policy be amended to reflect that, whilst emphasis in residential development proposals is to be placed on one, two and three bedroom homes, proposals that come forward can and should also include a mix of homes appropriate to a site's context. | | | | | | | | |
| 1112917 | Steve Hinsley | Stephen Hinsley Planning obo PA Housing | | | Policy HOU3 and supporting text below The policy fails to address the size requirements for affordable housing as evidenced in the Council's Local Housing Need Assessment which at para. 21 states that: In total, 15% of need is for one-bedroomed units, 34% for two-bedrooms; 11% for three bedrooms; and 40% for four or more bedrooms. Para. 6.17 Policy HOU3 will not provide a "balanced" housing market. Para. 6.20 We say that it is the restriction on housing land release which is the primary cause of "exacerbated affordability issues" in Elmbridge. Policy HOU3 will not "ensure that future housing stock reflects local need". | | | | | | | | Objection noted. Draft policy HOU3 clearly sets out that development must provide a range of homes in accordance with the mix identified in the Local Housing Need Assessment (2020) . During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working |

not require identified affordable housing need to be met in full ([NPPF paragraph 62](#) and [PPG Housing & Economic Needs Assessment paragraph 024](#)). The Council also has additional models/methods of delivering affordable housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal \(SA\)](#) sets out how the

HOU4: Affordable Housing

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
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| 11070 88 | Alan McCann | | Yes | Not sure | No | The number of new properties your intending to squeeze into Weybridge is far too many and it doesn't need any more blocks of council housing. | | | Y | | See above | | | | | | Objection noted. The allocation of the quantum of development for each settlement area set out in strategic policy SS3 has been driven by the principle of sustainable development, again in accordance with national policy. The Plan seeks to make as much use as possible of existing suitable brownfield sites, including all publicly owned assets and land holdings. The urban areas of the borough were assessed, identifying the amount of development that could sustainably be accommodated. |
| 11095 60 | Sally Harmann | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 11101 65 | James Waterhouse | Iceni Projects Northumberland Estates Ltd | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 11103 22 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 11104 54 | Adrian Dilworth | Health at hand | Yes | | Yes | I agree that the council should make every attempt to deliver affordable houses to those that need them. However, not at the expense of the greenbelt. All efforts must be made to use brown sites, existing structures not currently used or those inefficiently used. Under no circumstances should the green belt be used to provide housing stock. The areas in which I live are utilised by many people in the local | | | | | | | | | | | Support for the proposed spatial strategy noted. |

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| | | | | | | community to walk, run, walk their dogs etc. Destroying the greenbelt when there are alternative options is a very poor solution to the housing issue. | | | | | | | | | | | | |
| 1110659 | Mr Gil Bray | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110792 | John Bamford | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1111023 1111050 | Steven Fidgett | Union4 obo Molesey Road Land Limited (A Barry) | No | While the aims of the policy are supported, it is not considered that the policy will be effective since it fails to tackle the underlying undersupply that is driving up house prices through constrained supply. The overall supply of homes should be increased in line with need and the policy brought into line with the NPPF. | No | While the aims of the policy are supported, it is not considered that the policy will be effective since it fails to tackle the underlying undersupply that is driving up house prices through constrained supply. The overall supply of homes should be increased in line with need and the policy brought into line with the NPPF. | Y | Y | Y | Y | While the aims of the policy are supported, it is not considered that the policy will be effective since it fails to tackle the underlying undersupply that is driving up house prices through constrained supply. The overall supply of homes should be increased in line with need and the policy brought into line with the NPPF. | Proposed Modifications to make the ELP sound: Increase the overall provision for housing in the ELP and consequently the level of affordable homes delivered. | | | | Yes, I wish to participate at the oral examination | This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan. | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELDP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance |

context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022).

The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently

draft Local Plan, the Council has explored opportunities for increasing the provision of affordable housing over the plan period through increasing the delivery of market housing. However, the Council reached the decision that the exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not fully evidenced and justified. A decision that took full account of the benefit of delivering a greater number of market homes to enable to the Council to deliver a greater proportion of its identified affordable housing need of 269 dwelling per annum (dpa), set out in the Local Housing Need Assessment (2020) (LHNA). Concluding that the benefit of doing so did not outweigh the harm in releasing and developing on the Green Belt.

The Council acknowledges that it will not be possible to meet the Borough's affordable housing need in full through the approach set out in the proposed spatial strategy. However, in light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the Draft Elmbridge Local Plan 2037 is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true

reflection of the communities' aspirations for the Borough.

Moreover, national policy and guidance do not require identified affordable housing need to be met in full ([NPPF paragraph 62](#) and [PPG Housing & Economic Needs Assessment paragraph 024](#)). The Council also has additional models/methods of delivering affordable housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of

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| 11110 95 | Sophie Rae | WSP obo The Julien Family Trust | No | Elmbridge Borough has a significant need for affordable homes. Preventing development on all existing Green Belt sites greatly hinders the amount of potential affordable homes that can be delivered within the plan period. If developed for housing, sites such as Plots B- F Rodona Road, would deliver significant contributions to affordable housing in Elmbridge. | No | Elmbridge Borough has a significant need for affordable homes. Preventing development on all existing Green Belt sites greatly hinders the amount of potential affordable homes that can be delivered within the plan period. If developed for housing, sites such as Plots B-F Rodona Road, would deliver significant contributions to affordable housing in Elmbridge. | Y | Y | Y | Y | As set out in the attached letter at question 4a. the Plan as drafted is unsound. An in-principle prohibition on any Green Belt release across the Borough ensures that much needed homes for local people will not be delivered. Without adequate justification, this is unsustainable as an approach and is not in accordance with national planning policy. | A sensible conversation has to take place to identify suitable sites such as Rodona Road, for Green Belt release so that the housing need can be addressed. We have set out proposed changes to the Plan and Proposals Map to render it sound and legally compliant | Rodona Road 29 July 2022 FINAL.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557551/PDF/-/Rodona%20Road%2029%20July%202022%20FINAL%2Epdf | As per 1a, 2a, 3a and 4. | Yes, I wish to participate at the oral examination | Please refer to submitted letter | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on- going discussions with neighbouring authorities and other strategic partners as part of the duty-to- cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022). The Council reached the conclusion that the necessary exceptional circumstances |
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need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal](#) (SA) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes - 16,300 homes over the plan period through the release of green belt sites and optimisation of development in existing urban areas (see option 3 of Regulation 18 Options Consultation, 2018). Whilst this option would meet development needs, including the need for affordable housing in full, it would fundamentally alter the character of the Borough's towns and villages through coalescence, urban sprawl and encroachment of new development into the countryside due to the release of Green Belt land necessary to achieve the quantum of development. In addition, this option was found to have the most significant negative impacts of all the options considered by the Council, largely due to the impact of distributing development widely across the Borough.

The Council has assessed the suitability of the promoted site – Land at Rodona Road for release from the Green Belt

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| | | | | | | | | | | | | | | | | | | | designation and it was found that the site was not suitable for release. The assessment is set out in Green Belt Site Assessment Proforma GB16. |
| 111100 | Paul Manning | Newsteer Real Estate Advisers obo Leos International Holding Group (Chris Pittock) | Yes | | No | <p>Our client welcomes the reduction in the minimum requirement for affordable housing on brownfield sites compared to the existing Core Strategy Policy CS21. They consider it a positive that the Council acknowledge the challenge in delivering the current 40% requirement on sites of 15 dwellings or more.</p> <p>However, with regard to the sub-text to the policy at paragraph 6.34 which concerns viability assessments, it is our client's view that the policy is restrictive as the policy does permit negotiations in relation to the affordable housing provision post-submission, which does not allow for changes to external factors, including market conditions and potential amendments that may be required to a scheme following the receipt of statutory consultee responses.</p> <p>Our client has also commented that the current phrasing of paragraphs 6.34-6.36 is ambiguous.</p> | Y | Y | <p>It is our client's view that the policy is restrictive as the policy does permit negotiations in relation to the affordable housing provision post-submission, which does not allow for changes to external factors, including market conditions and potential amendments that may be required to a scheme following the receipt of statutory consultee responses.</p> <p>Our client has also commented that the current phrasing of paragraphs 6.34-6.36 is ambiguous.</p> | <p>The affordable housing requirements and thresholds of this policy are achievable. This has been confirmed by the viability assessment of the Local Plan. Notwithstanding this, the Council acknowledges that circumstances may arise post adoption of the Plan which impact on viability. Where this is the case, the Council will accept a viability assessment both at the application stage, and a viability assessment at the decision-making stage, should conditions change post-submission of an application.</p> | <p>220729_Leos_Elmbridge Local Plan Reps v1.0.pdf</p> <p>https://consult.elmbridge.gov.uk/qf2.ti/a/1205954/557558/PDF/-/220729%5FLeos%5FElmbridge%20Local%20Plan%20Reps%5Fv1%2E0%2Epdf</p> | As per 2a, 3a and 4. | No, I do not wish to participate at the oral examination | | <p>Objection noted.</p> <p>Amendments to draft policy HOU4 have been included in the Council's proposed modifications to the DELP to ensure it considers late stage review mechanisms. This was submitted to the Inspector for Examination. Please see main modification ref. M5.2.</p> | | | | |

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| 11119 22 | Mr Cricket t | Boyer Planning obo Antler Homes PLC | | | No | <p>The policy is unsound. It is not consistent with national policy. Part 1(c) of Policy HOU4 requires developments on sites of 9 or less units to provide a financial contribution equivalent to the provision of 20% affordable housing of the gross number of dwellings. Firstly, should such a contribution be justified, we consider any such contribution should be based on the net number of dwellings and not the gross number. The same applies to Parts 1(a) and 1(b) in this regard. Secondly, the evidence we have seen presented to justify non-major residential development sites making provision is the acute need for affordable housing in the Borough: combined with the delivery of many of the Borough's new homes coming forward on small sites. It is fully agreed that there is an acute need for affordable homes. However, it is not agreed that in the absence of the Council making the sensible and reasonable choice to allocate more land for housing to better address this need, that it is appropriate to require a financial contribution from developers of small sites. Paragraph 64 of the NPPF makes very clear the provision of affordable housing should not</p> | | | Y | <p>By placing the requirement on SME housebuilders to make a contribution to delivery of affordable housing on non-major development when the Council are themselves not seeking to deliver enough new homes and allocated sufficient sites to deliver a more meaningful correction to the supply of affordable new homes (and affordability in general, etc.) over the DLP is at odds with this initiative. And at odds with national policy. With regard to Part 7 of the Policy, we would question the appropriateness of seeking affordable housing provision from self and custom build residential developments. We have not been able to identify the Council's evidence justifying that this is an appropriate and reasonable requirement from this source of future housing development.</p> | <p>Antler would welcome the opportunity to discuss the Land at Blundel Lane with the Council and its ability to contribute towards the Borough achieving a sound Plan.</p> | <p>220727 Elbridge Reg19 Representations obo Antler Homes.pdf</p> <p>https://consult.elbridge.gov.uk/gf2.ti/a/1205954/563579/PDF/-/220727%20Elbridge%20Reg19%20Representations%20obo%20Antler%20Homes%2Epdf</p> | <p>As per 2a, 3a and 4.</p> | <p>Yes, I wish to participate at the oral examination</p> | <p>Should the DLP be submitted for examination, Antler Homes would welcome the opportunity to participate in the Examination Hearings in order to ensure our concerns with the DLP are presented to the appointed Inspector(s) in person.</p> | <p>Objection noted.</p> <p>The DELP and the approach to the delivery of affordable housing set out in draft policy HOU4 is supported by the Council's viability assessment (2022), which found that the DELP taken as a whole will not genitively impact the deliverability and viability of development in the Borough.</p> <p>During the development of the Draft Elbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.</p> <p>The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability</p> |
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| | | | | | | <p>be sought for residential developments that are not major developments, other than in designated rural areas. The purpose for this policy's inclusion in the NPPF acknowledges the disproportionate burden that developer contributions have upon small and medium scale housebuilders and developers. It is widely recognised that the planning system and other regulatory requirements, combined with accessibility to project financing, has resulted to a substantial reduction to the total number of SME house builders over the last 40-years. The Government have clearly stated this is a situation they wish to see challenged in order to support the ongoing existence of SME housebuilders. And to encourage and support new start-up SMEs moving forward.</p> | | | | | | | | | | | | | | <p>appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022).</p> <p>The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?</p> <p>Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt -</p> |
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[Housing Need Assessment \(2020\).](#)

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council acknowledges that Elmbridge is an expensive borough in

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| | | | | | <p>Care Retirement Communities being even less viable than Retirement Housing. Accordingly it is much harder for Age Restricted Developers and in particular those seeking to deliver Extra Care to secure sites for development and meet the housing needs they aim to supply.</p> <p>These difficulties are due to a number of factors, firstly, the net to gross ratio for an Extra Care community is typically around 70-75% in comparison to traditional housing which is 100%, this is also reflected in Paragraph 2.4.10 of the Local Plan and CIL Scoping Viability Assessment Final Report which forms part of the evidence base for the draft Local Plan. This, added to higher construction costs mean the total build cost of a 100sqm extra care unit could be £131,107 compared to £140,645 for a similar sized traditional house. Significantly greater design team input is also required as extra care schemes tend to be individual bespoke products rather than a standard set of house types, increasing costs further.</p> <p>The specialist nature of age restricted developments mean that the sales rates are significantly slower than a standard</p> | | | | | | | | | |
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| | | | | | <p>residential product. Part of this is due to the sale of these units being a 'last move' for the resident(s) and the care needs associated. The additional sales period means that sales costs also increase significantly. This slower sales journey has knock on financial impact, because the facilities for residents covered by the service charge have to be fully operational from the first sale. IV has to cover the costs of the unsold units service charge over the sales period. We also will also cover the costs of completed unsold units in relation to Council Tax. These two costs are significant and also impact on the finance costs of the scheme overall. Finally, the land value delivered by the scheme, if required to make a contribution towards affordable housing, will generally not allow IRC providers to compete with general needs housebuilders who can deliver a policy compliant scheme and pay significantly more for the land due to the considerations outlined above. Whilst the Draft Local Plan evidence base does acknowledge some of the viability challenges faced by developers of extra care housing, it has only included one extra care scheme tested in the study,</p> | | | | | | | | | |
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| | | | | | the scheme tested was only a previously developed site of 60 units. This is not reflective of the typical size and nature of integrated retirement communities which are typically between 60 and 250 units (see Figure 1 above), and are developed on both greenfield sites and previously developed sites. We would encourage the viability assessment to consider the information above, and include further evidence on extra care typologies. | | | | | | | | | |
| 11124 73 | Adrian Wise | Cobham Conservation and Heritage Trust | | | Our principal concern is that delivery of real affordable homes is finally achieved. While the DLP makes this a commitment the means of achievement are unclear. Notably how delivery of the key worker homes and the social element of affordable housing (the element that the SHMA makes clear is in the most, even dire) need, will be achieved is silent. Cannot the affordable homes contribution not require a portion of such housing within each development's affordable homes quota? | | | | | | | | | Comments noted. Draft policy HOU4 sets out an approach that seeks to deliver affordable housing with the range of tenures identified in the Council's Local Housing Need Assessment (2020) , which includes social rented housing. An approach that is in accordance with national policy and guidance. |

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| 11129 16 | Steve Hinsley | Stephen Hinsley Planning obo PA Housing | | | | <p>(1) b We believe there is scope for raising the provision of affordable housing on allocated sites formerly in the Green Belt, i.e., allocated following a Green Belt Review, to 50%. Indeed, we believe this will be imperative if sufficient affordable housing is going to be delivered over the LP period.</p> <p>(3) The needs for affordable housing are varied across the borough – there is a need for all types of affordable housing. The requirement that “All affordable housing should be genuinely affordable, with the cost substantially lower than 30% below local market prices and rents.” is far too onerous and will place an unacceptable burden on Registered Providers. The Glossary in the NPPF provides the definition of affordable housing and this is all that is required. To impose the above requirement in policy goes beyond what is reasonable in the context of a LP.</p> <p>(4) As Registered Providers are the main deliverers of affordable housing their knowledge and expertise are of paramount importance when making decisions about the level, tenure and mix of affordable housing in individual developments. Therefore, the following should be</p> | | | | | | | | | | | | | | | | | | | | | | | | <p>Comments noted.</p> <p>The approach to affordable housing set out in draft policy HOU4 is supported by the Council's viability assessment (2022).</p> <p>During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.</p> <p>The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy</p> |
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from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of

and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Moreover, national policy and guidance do not require identified affordable housing need to be met in full ([NPPF paragraph 62](#) and [PPG Housing & Economic Needs Assessment paragraph 024](#)). The Council also has additional models/methods of delivering affordable housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the

commitment to managing the effects of climate change and any meaningful strategy to reduce the impact of increased traffic.

- The impact on Elmbridge of the large Wisley housing development represents an important omission.
- There are fundamental errors in the reports assessing the performance of Green Belt sites. Most importantly, site SA-11 next to Waverley Road and Blundel Lane has been incorrectly assessed.
- There is no recognition of the need for densification of urban areas such as Oxshott to be progressive and avoid the character of areas of comparatively low density being damaged by individual high-density schemes.
- While areas close to local centres and train stations are targeted for flats and infill development, the converse should apply so that the character of other areas (such as most of residential Oxshott) is protected.
- There are no design codes available to provide protection for local character and ensure excellent buildings.
- Calculations of developer contributions for affordable housing continue to be based on flawed methodology that

- The Council's [Infrastructure Delivery Plan \(May 2022\)](#) (IDP) and [Update \(July 2023\)](#) detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the quantum of development proposed in the DELP.

The IDP and IDP Update have been informed by the preparation of other evidence base documents e.g., [Transport Assessment \(2022\)](#) and via discussions with infrastructure providers as part of the Council's duty to cooperate activities as outlined in the Council's [Duty to Cooperate Statement of Compliance \(June 2022\)](#), [Duty to Cooperate Statement of Compliance Update \(August 2023\)](#) and Statements of Common Ground published with the [Core Documents](#) submitted for Examination.

The agreed position with our infrastructure delivery partners is that the proposed development strategy can be accommodated within the borough with the mitigation identified / a

(GBC) for development of the Wisley Airfield site (planning application ref.: 2023/0072) due to its significant impact on the Borough's transport infrastructure.

The DELP cannot include a policy on sites or schemes that are within a neighbouring authority's district as Local Plans are not cross-boundary unless a joint Local Plan is developed with the neighbouring authority. However, the potential impacts of proposed development at Wisley Airfield on neighbouring boundaries have been considered in the Council's Transport Assessment (2022) and Infrastructure Delivery Plan (May 2022).

In addition, the Council's Duty to Cooperate Statement of Compliance (June 2022), Duty to Cooperate Statement of Compliance Update (August 2023) and Statement of Common Ground with GBC (July 2023) detail the Council's Duty to Cooperate discussions with GBC, including the matter of the Wisely Airfield development.

ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located.

An option to meet the Borough's identified housing need in full through intensification of urban areas was considered. However, the Council concluded that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued subdivision of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these

contributions is set in national guidance. This is not something the DELP can influence.

- While the preference would be for the infrastructure required to mitigate the impacts of development to be delivered first, this is rarely feasible on the scale of sites proposed in the Borough due to the need for providers to finance and deliver the infrastructure. The infrastructure will likely be delivered alongside new development, or where a site may be larger the development and infrastructure will have a phased delivery plan.

As Surrey County Council is the local highway authority in the Borough it is reasonable for the Council's IDP to refer to the contents of their LTP4 which has now been published. In addition, this means that Surrey County Council lead and make decisions about how the Borough's roads and cycle lanes are expanded, improved and maintained.

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| 11105 53 | Mark Behre ndt | HBF | | | No | <p>The policy is unsound as it is not consistent with national policy. Part 1c) of policy HOU4 sets out the Council's intention to require a financial contribution for affordable housing on sites of less than 10 units and no more than 1000sqm. As the Council are aware this is inconsistent with paragraph 64 of the NPPF. However, before considering the Council's justification for this departure it is worth reiterating why the Government introduced this particular policy. The Ministerial Statement is clear that the reason for introducing this policy was to "ease the disproportionate burden of developer contributions on small scale developers". This is distinct from whether or not such development is viable in general but whether they are a disproportionate burden on a specific sector that faces differential costs that are not reflected in general viability assessments. These costs have led to a reduction in the number of small and medium (SME) sized house builders. Analysis by the HBF shows that over the last 30 years changes to the planning system and other regulatory requirements, coupled with the lack of attractive</p> | Y | <p>The policy is unsound as it is not consistent with national policy. Part 1c) of policy HOU4 sets out the Council's intention to require a financial contribution for affordable housing on sites of less than 10 units and no more than 1000sqm. As the Council are aware this is inconsistent with paragraph 64 of the NPPF. However, before considering the Council's justification for this departure it is worth reiterating why the Government introduced this particular policy. The Ministerial Statement is clear that the reason for introducing this policy was to "ease the disproportionate burden of developer contributions on small scale developers". This is distinct from whether or not such development is viable in general but whether they are a disproportionate burden on a specific sector that faces differential costs that are not reflected in general viability assessments. These costs have led to a reduction in the number of small and medium (SME) sized house builders. Analysis by the HBF shows that over the last 30 years changes to the planning system and other regulatory requirements, coupled with the lack of attractive terms for project finance, have led to a long-term reduction of total SME house builder numbers by about 70% since 1988. The Government is very anxious to reverse this trend and increase the number of small businesses starting up and sustaining this activity. Improving business conditions for SME home builders is the key to long-term supply responsiveness. The justification for the Council's approach is that due to the acute need for affordable housing in the Borough and that many homes are built on small sites the Council expects a financial contribution from small developers to support their delivery. Whilst the HBF would agree that there is an acute need for affordable homes the most appropriate approach would be to allocate land that will allow the Council to better address these needs rather than seek financial contributions from small developments that will likely contribute very little to overall delivery. The reason for the increasing house prices and poor affordability is the fact that housing needs, as we set out in our comments on policy SS3, is much higher than what has been delivered or what is being proposed in this local plan. There is a significant gap between delivery and the baseline need arising from household growth. This will inevitably put increasing pressure on house prices worsening affordability, increasing the need for</p> | <p>The policy is unsound as it is not consistent with national policy. Part 1c) of policy HOU4 sets out the Council's intention to require a financial contribution for affordable housing on sites of less than 10 units and no more than 1000sqm. As the Council are aware this is inconsistent with paragraph 64 of the NPPF. However, before considering the Council's justification for this departure it is worth reiterating why the Government introduced this particular policy. The Ministerial Statement is clear that the reason for introducing this policy was to "ease the disproportionate burden of developer contributions on small scale developers". This is distinct from whether or not such development is viable in general but whether they are a disproportionate burden on a specific sector that faces differential costs that are not reflected in general viability assessments. These costs have led to a reduction in the number of small and medium (SME) sized house builders. Analysis by the HBF shows that over the last 30 years changes to the planning system and other regulatory requirements, coupled with the lack of attractive terms for project finance, have led to a long-term reduction of total SME house builder numbers by about 70% since 1988. The Government is very anxious to reverse this trend and increase the number of small businesses starting up and sustaining this activity. Improving business conditions for SME home builders is the key to long-term supply responsiveness. The justification for the Council's approach is that due to the acute need for affordable housing in the Borough and that many homes are built on small sites the Council expects a financial contribution from small developers to support their delivery. Whilst the HBF would agree that there is an acute need for affordable homes the most appropriate approach would be to allocate land that will allow the Council to better</p> | <p>HBF rep EBC Reg 19 July 22.pdf https://consult.elmbridge.gov.uk/qf2.ti/a/1205954/555514/PDF/-/HBF%20rep%20EBC%20Reg%2019%20July%2022%2Epdf</p> | As per 2a, 3a and 4. | Yes, I wish to participate at the oral examination | To set out ours and our members concerns with regard to the Elmbridge Local Plan. | <p>Objection noted.</p> <p>The Council's viability assessment (2022) which has been prepared in accordance with national policy and guidance found that the DELP taken as a whole, including the approach to affordable housing on small sites, will not genitively impact the deliverability and viability of development in the Borough.</p> |
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| | | | | | | <p>a significant gap between delivery and the baseline need arising from household growth. This will inevitably put increasing pressure on house prices worsening affordability, increasing the need for affordable housing. The issue of affordability and affordable housing delivery is, therefore, unlikely to be addressed by requiring financial contributions on smaller sites but rather through the allocation of additional sites in this local plan. In brief the Council's focus on the general viability of affordable housing delivery on small sites and is, in part, missing the broad scope of the Government's policy to support the growth of this particular sector and see it thrive once more. As such we do not consider the Council to have justified a departure from national policy with regard to the small site exemption. The policy will continue to be a burden to SME house builders and in particular to new entrants into the market. In addition, the outcomes of the policy are likely to be ineffective in delivering the scale of affordable housing required to meet needs in Reigate and Banstead. As such part 1c) of this policy should be deleted.</p> | | | | | | | | | |
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| 11110 14 | Lucy Morris | Nexus Planning on behalf of Charterhouse Strategic Land | No | Please see uploaded document at question 4a | No | Please see uploaded document at question 4a. Policy HOU4 at 1c) seeks financial contributions of 20% on sites of nine or less units. This is not in compliance with the paragraph 64 of the NPPF where it explicitly states that (emphasis added): "Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer)." 4.5 The definition of designated rural areas is set out within Annex 2 of the NPPF. They are defined as National Parks, Areas of Outstanding Natural Beauty and areas designated as 'rural' under Section 157 of the Housing Act 1985. The policy wording is clear that it is seeking to apply the requirement for affordable housing contributions on minor development in areas which are not designated as rural areas. 4.6 It is noted within the Establishing Local Housing Need 2022 paper that this is not in compliance with the NPPF for the reasons set out above. Therefore, it is clear that this part of Policy HOU4 is not sound in that it is not consistent with national policy and this text should be removed. | Y | Y | Y | Y | 4.7 Of the 200 allocations put forward by the Council, five sites do not involve the delivery of housing and two are for care home units, which are assumed to fall within Use Class C2 and do not attract affordable housing contributions as per the wording of Policy HOU4. 4.8 From the remaining 193 allocations, 89 fall below the 10 unit threshold, a total of 568 dwellings, meaning that affordable housing contributions cannot be sought on these sites. 4.9 None of the allocations are greenfield sites, meaning that the higher level of 40% affordable housing contributions will, in practice, not materialise. This is due to the Council not releasing any land from the Green Belt which is drawn tightly to the urban edge. Without the release of land from the Green Belt, part 1(b) of Policy HOU4 cannot be considered effective. In order to deliver a greater number of affordable homes, the Council needs to allocate larger, greenfield sites. As noted within the Establishing Local Housing Need paper at paragraphs 5.65 and 5.66 it states [emphasis added]: "5.65 Given the high level of affordable housing need within the borough and increasing issues relating to affordability, it is unlikely that the affordable housing needs of the borough will be met regardless of the housing target. As recognised by our communities, housing delivery is currently via the reliance of small sites where developers often cite viability issues. Furthermore, the Government's policy of not permitting affordable housing contributions (both on-site and financial) to be sought on small sites (of 10 or fewer dwellings) is making it increasing challenging to provide the type of housing needed in the borough. 5.66 Nevertheless, in terms of meeting our affordable housing need, one of the biggest opportunities the council has to do this is through the development of larger sites which, it would be required to consider as part of the options for meeting the standard method figure given that this cannot be met solely within the existing urban areas. Through the delivery of large sites, the council is more likely to see the delivery of affordable housing on- site and at a higher percentage of all units proposed than on smaller sites." 4.18 This is not reflected within the Council's chosen spatial strategy. This is not considered a positively prepared or effective approach to plan-making. | 4.19 Further, there is clearly an acute need for affordable housing delivery across the Borough, as previously evidenced by Charterhouse in their representations to earlier rounds of Local Plan consultations, but currently the draft Local Plan is not underpinned by an adequate assessment of viability demonstrating the thresholds are justified and capable of delivering the woefully in adequate level of new affordable housing anticipated. 4.20 Charterhouse Strategic Land consider the spatial strategy approach being taken by the Council when coupled to the draft housing policies conflict with the stated 'key principle' at paragraph 3.17 of the Draft Plan. 4.21 Paragraph 3.17 states: "Key principles behind the scale and location of growth in the borough include increasing the number of new and genuinely affordable homes in the borough." 4.22 As such, in one of the highest house priced authorities outside central London, Charterhouse Strategic Land submit the Council is failing in its statutory duty and the spatial strategy approach coupled with Policy HOU4 does nothing to ensure the needs of the present and future generations will not be uncompromised. The approach to affordable housing being pursued by the Council fails their own 'key principle' and accordingly is not sound. 4.23 Charterhouse Strategic land submit that the Former Moore Place Club Golf Course has the ability to make a substantial contribution to affordable housing, at a higher percentage (40%), than is sought on brownfield sites. This means that it has the potential to deliver up to 120 affordable homes on site, based on a scheme of approximately 300 dwellings. | Former Moore Place Golf Course Elmbridge Draft LP (Reg.19).pdf https://consult.elmbrid ge.gov.uk/gf2.ti/a/1205 954/557335/PDF/- /Former%20Moore%2 0Place%20Golf%20Co urse%5FElmbridge%2 0Draft%20LP%20%5F Reg%2E19%5F%2Epd f | As per 2a, 3a and 4. | Yes, I wish to participate at the oral examination | Please refer to accompanying submission. Please note that Nexus Planning is acting on behalf of Charterhouse Strategic Land. | Objection noted. The Council's viability assessment (2022) which has been prepared in accordance with national policy and guidance found that the DELP taken as a whole, including the approach to affordable housing on small sites, will not genitively impact the deliverability and viability of development in the Borough. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on- going discussions with neighbouring authorities and other strategic partners as part of the duty-to- cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; |
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Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii). In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council acknowledges that Elmbridge is an

that the spatial strategy proposed in the Draft Elmbridge Local Plan 2037 is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Moreover, national policy and guidance do not require identified affordable housing need to be met in full ([NPPF paragraph 62](#) and [PPG Housing & Economic Needs Assessment paragraph 024](#)). The Council also has additional models/methods of delivering affordable housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes

units delivered as affordable than on smaller sites.

Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater

supports the principle of making financial contributions as part of developments to mitigate any impacts and to help achieve strategic policy aims, however the calculation of such contributions should have a firm basis in reality, which acknowledges the unique nature and operation of the IRC model. Such contributions were originally intended to be applied to residential developments, but have in recent years been applied to Use Class C2 uses. Audley's IRCs have higher construction and operating costs than traditional Class C3 residential developments and provide extensive care and communal facilities that are specifically targeted to meet the needs of their residents. The cost of providing these care and communal facilities reduces the GDV of such developments (when compared with traditional forms of housing), which in turn makes the delivery of affordable housing (whether on site or through contributions) unviable or at best marginal. Accordingly, it is essential that any changes to policies relating to the delivery of affordable housing consider the unique operational model and viability of Use

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| | | | | | | Class C2 IRCs. We would therefore ask that the wording of HOU4 be amended to acknowledge that the application of the policy may need to be applied in a flexible manner to ensure that it does not prejudice the supply of specialist forms of housing. | | | | | | | | |
| 1110041 | Meghan Rossiter | Abri | Yes | | No | | Y | Affordable Housing Target The identification of a percentage target figure for affordable housing within draft policy SS3 is supported, however the use of a specific numerical target for affordable housing, as informed by the Local Housing Needs Assessment, would provide more focus on delivery. The use of the numerical target of 269 affordable homes per annum would also permit more directed and effective monitoring the success of policies in meeting local housing need over the plan period, a particularly important issue in an area so constrained by its Green Belt, and allow the Council to respond to shortfalls where this occurs. An affordable housing target should, as with the general housing target, be a net figure, to account for any future losses to the local stock and to ensure that the plan can be used to respond to changes in affordability which may require a further uplift in delivery of affordable housing. | Point 3 of HOU4 is useful in responding to site specific circumstances, however the final sentence is not specific enough and would introduce too much uncertainty in determining locally appropriate pricing. Alternative wording, such as costs being set "at least 30% below market prices and rent" would be more appropriate. As the viability work has demonstrated that only the delivery of 1-bed flats can be provided at a 30% discount as First Homes, it may be challenging to deliver this tenure across the borough, particularly where schemes are not delivering 1-bed flats. The delivery of First Homes almost exclusively as 1-bed flats should be considered in assessing individual schemes to ensure delivery of affordable rented and other affordable sale properties can continue to meet those needs across the borough. The policy aims to achieve affordable housing delivery on all self-contained residential developments, however the viability work did not allow for First Homes within those scheme typologies, and this should be subject to further testing. Full integration through pepper-potting can make management of affordable housing more difficult, and so point 6 of HOU4 should allow an element of flexibility, to ensure clusters of affordable housing can be delivered where appropriate. As the Council has identified that such a significant proportion of housing is brought forward across the borough on smaller sites, necessitating financial | 07.2022 Elmbridge Local Plan.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/552089/PDF/-/07%2E2022%20Elmbridge%20Local%20Plan%2Epdf | As per 3a and 4. | No, I do not wish to participate at the oral examination | Objection noted. The Council considers the proposed approach set out in draft policy HOU4 to seek 30% affordable housing on relevant schemes is appropriate and is supported by the DELP evidence base, including the viability assessment. The delivery of First Homes as an affordable housing tenure is required by national policy and guidance. The approach set out in HOU4 is in accordance with this. | |

HOU5: Housing Technical Standards

| ID | N | Org | 1 | 1a | 2 | 2a | 3 | 3 | 3 | 3 | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
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| | | | | | | | P | E | J | C | | | | | | | |
| 1107089 | Alan McCann | | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1109562 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1110323 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1110567 | Mr Harris | Nexus Planning obo Kingacre Estates Ltd | Yes | N/A | No | Policy HOU5 – Housing Technical Standards 1. We fully support the objective of Policy HOU5 to deliver high quality new development / homes in the borough which accords with the objective of paragraph 130 of the Framework to create places with a high standard of amenity. However, footnote 49 of the Framework is clear that: 'Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified'. (emphasis added) 2. Paragraph ID 56-002 of the PPG adds that: "Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans." 3. We are not aware of any evidence produced by the Council as to the need for such a policy. 4. On this basis, Policy HOU5 is inconsistent with national policy and, therefore, unsound. Proposed Changes 5. Produce evidence to justify Policy HOU5 in accordance with national policy or delete it. | | | Y | Y | | Proposed Changes 5. Produce evidence to justify Policy HOU5 in accordance with national policy or delete it. | Elmbridge Policy HOU5.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/555568/PDF/-/Elmbridge%20Policy%20HOU5%2Epdf | As per 2a and 4. | Yes, I wish to participate at the oral examination | We represent a developer with significant land interests in the borough and to whom the housing strategy in Elmbridge as a whole, and the release of land from the Green Belt, is of fundamental importance. Accordingly, it is essential that we are able to participate in all relevant hearing sessions. | Objection noted. Draft policy HOU5 sets out the requirement for development to meet nationally described space standards. In addition, other than the requirement to meet national space standards, the criteria set out under draft policy HOU5 are aspirational and use 'should' not 'must' as such, there is flexibility built into the policy. |
| 1110660 | Mr Gil Bray | | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1110793 | John Bamford | | Yes | | Yes | In my opinion the Housing Standards Policy will deliver appropriate functional, adaptable and accessible new homes. | | | | | | | | | | | Support noted. |

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| 1110927 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1111027 1111054 | Steven Fidgett | Union4 obo Molesey Land Limited (A Barry) | Yes | | No | <p>HOU5 - Housing technical standards Objection</p> <p>The aims of the policy are broadly supported, but the policy itself imposes a rigid and unduly prescriptive requirement on design issues that are normally the subject of design guidance that should be interpreted flexibly to take account of site circumstances. The policy will be ineffective and is not supported by national standards or evidence as set out below.</p> <p>Parts 4 and 5 of the policy express a rigid requirement that does not reflect the relevant guidance or effective design. This is notably the case in respect of daylight requirements and in the requirement for 100% dual aspect dwellings, which precludes optimisation of site capacity and is not a pre-requisite of good quality housing. Such circumstances are not exceptional and are a feature of many sites and developments that provide good quality accommodation. This is especially a constraint on apartment building design, where some element of single aspect dwellings are both inevitable and appropriate and can provide good quality accommodation. Both are relevant considerations but should not be imposed as rigid requirements. they would in effect restrict site optimisation, design solutions and the number of homes delivered.</p> <p>This is particularly important in the context of the need to optimise development density as a result of the under-delivery proposed in the ELP.</p> | Y | Y | Y | Y | see above | <p>Proposed Modifications to make the ELP sound: The policy should be expressed as guidance (e.g. to optimise the number of dual aspect dwellings but not preclude single aspect other than single aspect north facing) and should allow detailed design and site specific circumstances to consider the most appropriate response. Part 5 should 'wherever possible seek to' achieve the daylight levels set out and not require that as an absolute. It should be consistent with national guidance.</p> | | | | Yes, I wish to participate at the oral examination | <p>We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan.</p> | <p>Objection noted.</p> <p>The DELP is supported by the Council's viability assessment (2022). Criterion 4 and 5 are aspirational and use 'should' not 'must' as such, there is flexibility built into the policy.</p> |

HOU6: Specialist Accommodation

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 | |
|---------|-----------------|-------------------------------------|-----|----------|-----|---|--------|--------|--------|---|-----------------------|--|-------------------|--|--|---|---|---|
| 1107090 | Alan McCann | | Yes | Not sure | No | See previous comments | | | Y | | See previous comments | | | | | | | Noted. A response has been provided to previous comments. |
| 1109563 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110324 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110661 | Mr Gil Bray | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110794 | John Bamford | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110926 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1111904 | Mr Crickett | Boyer Planning obo Antler Homes PLC | | | No | 6.9 There are a number of shortcomings with the council's approach to specialist housing. Firstly, the DLP is essentially entirely reactive in omission of otherwise positively seeking to address identified needs. Moreover, it places the emphasis on a site-by-site basis for future applicants to demonstrate at the application and/or appeal stage evidence demonstrating to the decision maker that there is clear and robust evidence. This approach is neither effective nor consistent with national policy, given its call for planning to address the needs of all members of the community. 6.10 Secondly, whilst the DLP includes named site allocations with the sites identified on the Proposals Maps there is no specific policy wording for each site allocation. Instead Chapter 9 of the DLP refers to the need to cross reference to the IDP and the published SLAA for further details to establish the council's requirements for development on these sites to come forward through the future application stages. The DLP approach therefore fails to provide a clear written policy for the site | Y | Y | Y | 6.1 The NPPF makes clear (at paragraph 62) that Local Plans need to consider more than the overall number of new homes that will be needed. They also need to consider the size, type and tenure of housing needs for different groups in the community, including inter alia older people. 6.2 The PPG12 confirms the need to recognise the multitude of different types of specialist housing designed to meet the diverse needs of older people, and that needs cannot be met simply through extra-care or sheltered housing. It notes that specialist housing for older people includes age-restricted general market housing. 6.3 Furthermore, the PPG13 makes clear the need to provide housing for older people is of critical importance. And that plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people 6.4 The DLP recognises the importance for the Plan to deliver suitable specialist forms of accommodation. At paragraph 6.50 it states: 'By 2037 the number of those aged 65 or over in Elmbridge is projected to be 35,500. This represents a 37% increase on 2020 figures, with the expected rate of increase of the 75 or over and 85 or over groups in the population projected to be higher, at 46% and 80% respectively. The Plan seeks to ensure that additions to the future housing stock reflect local need and provide housing choice...' 6.5 The Council's evidence base includes very limited evidence demonstrating an up to date understanding of the Borough's specialist housing needs. The only document we've been able to identify is the 2016 dated SHMA which suggested (Table 9.4a of the SHMA) the following need for various forms of accommodation designed to meet the needs of older people in the Borough | | 220727 Elmbridge Reg19 Representations obo Antler Homes.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/563466/PDF/-/220727%20Elmbridge%20Reg19%20Representations%20obo%20Antler%20Homes%2E.pdf | As per 2a and 3a. | Yes, I wish to participate at the oral examination | Should the DLP be submitted for examination, Antler Homes would welcome the opportunity to participate in the Examination Hearings in order to ensure our concerns with the DLP are presented to the appointed Inspector(s) in person. | Objection noted. Draft policy HOU6 sets out that specialist older persons accommodation will be supported where a local need can be demonstrated. It is considered that this approach is appropriate in the Borough. | | |

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| 1112154 | Ellen Pearce | Inspired Villages | | | No | <p>The cobweb consulting assessment of local housing needs has set a provisional target of 626 dwellings per annum. However, no specific targets or assessments have been made for older persons housing in Elmbridge. The local housing need assessment does not include a proposed provision rate for market extra care units per 1000 75+ population despite acknowledgement at paragraph 6.50 that the number of those age 65 or over in Elmbridge is expected to increase by 37% by 2037 and those over 85 expected to increase by 80%. This goes against best practice advice and the and results in a failure to address local need for specialist older persons accommodation. Nigel Appleton of Contact Consulting (an expert in Extra Care housing provision rates) suggests Councils should plan for future provision of 30 market extra care units per 1000 75+ population, whilst the consultancy DLP's released a report in April 2022 - The Older Persons Housing Needs Model – which proposes a local provision rate of 44 units per 1000 75+ population. A numeric target should be set by SDC for each type and tenure of older persons housing to be delivered within the plan period. It is not sufficient to solely set housing technical standards as set out in draft Policy HOU5. The PPG (ID: 63-006) states that “authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people” and that these policies should set out “how the plan-making authority will consider proposals for the different types of</p> | Y | | | <p>Policy HOU6 is not positively prepared, in that it has not adequately addressed or evidenced the need for housing for older people and is therefore not deliverable. The only identified scheme outlined in Policy HOU6 is for the expansion of Whiteley Village, it is not realistic to expect the borough's housing needs for older people to be met solely via the expansion of an existing site. Allocations should be made for older persons housing and targets set for each type and tenure of specialist housing for older people.</p> | <p>The Local Plan should viability test a variety of types of housing for older people (care homes, age restricted, IRCs, retirement housing) to provide a fair and accurate measures of issues related to the size of such schemes, significant amounts of non-saleable floorspace, significant time taken to sell each unit and difficult of IRC operators to compete on land values with general needs housing. There are viability challenges for Extra Care housing which should be acknowledged through the Local Plan and then considered through relevant policies. Ultimately, if specific sites are not allocated through the Local Plan for different forms of housing for older people, and the viability challenges for such forms of housing are not acknowledged through policy, retirement community developers will not be able to compete in the market to buy land, and this type of accommodation will not be delivered to meet the existing and forecast significant need for specialist housing in the borough. The only way in which the viability concerns highlighted can be addressed through the planning system is by reducing planning policy requirements including affordable housing. This will give developers of age restricted developments and particularly Extra Care developments a better chance of competing for land in the market and delivering these much needed schemes. The following documents are appended to this letter for your consideration;</p> <ul style="list-style-type: none"> • Appendix 1: Financial Viability Review of Evidence in Connection with the Solihull Local Plan EiP • Appendix 2: Representation by Inspired Villages: To support the practical delivery of much-needed specialist accommodation to meet the needs of an ageing population (version 2) – | <p>Elmbridge Regulation 19 Draft Local Plan Consultation Letter Inspired Villages.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/564410/PDF/-/Elmbridge%20Regulation%2019%20Draft%20Local%20Plan%20Consultation%20Letter%20Inspired%20Villages%20Epdf</p> | <p>As per 2a, 3a and 4.</p> | | <p>Objection noted. Draft policy HOU6 sets out that specialist older persons accommodation will be supported where a local need can be demonstrated. It is considered that this approach is appropriate in the Borough.</p> |
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| 1111026 | Tom Cole | Montagu Evans on behalf of Quadrant Repurpose and LaSalle Investment Management | <p>Policy HOU6 sets out the need to deliver housing choice in the borough, including specialist forms of accommodation which meets local needs. Part 1 of the Policy notes:</p> <p>“Development for specialist accommodation, including older person’s housing, will only be permitted where there is clear and robust evidence that demonstrates a local need for the new accommodation, the type and level of care it offers, and does not result in an over provision of that particular type of accommodation and care within the borough.”</p> <p>Supporting text of the Policy states the delivery of specialist accommodation is closely monitored in the Council’s Authority Monitoring Report (AMR). We support this policy approach in order to plan effectively for meeting the needs of the elderly in the Borough, in particular providing a path to avoid existing residents to have to leave the Borough in later life because appropriate accommodation is not available. The 2020/ 2021 AMR confirms that in light of the</p> | <p>Part 2 of the Policy goes on to stipulate that developments providing older persons’ accommodation shall deliver the level of affordable housing required by Policy HOU4. The Council currently has no such policy and so its introduction must be carefully considered and evidence based in order to be justified.</p> <p>Key to this is the overall viability of the scheme when considering the ability for a scheme to provide affordable in accordance with Part 4b) of Policy HOU4. National policy is clear that all Plans must be prepared positively, in a way that is aspirational but deliverable (NPPF Paragraph 16) and that policies expecting contributions from development should not undermine the deliverability of the plan (NPPF Paragraph 34), for example by making developments unviable. This is reinforced by the NPPG makes clear that: “It is the responsibility of plan makers... to create realistic, deliverable policies. Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable”.</p> <p>We express concerns that the introduction of an affordable housing policy for older persons’ housing could render development unviable. The Council must provide more detailed evidence of need for affordable housing and that this can be viably delivered by development sites.</p> | | | | | | | | | | <p>The Council must also acknowledge that this will need to be balanced against competing demands for planning gain on mixed use sites in town centres, given the expectation to improve the function of town centres and broaden their appeal beyond conventional retailing post-Covid. The Council’s current approach would likely have the undesired effect of stymying development due to viability issues, which is exacerbated by prevailing issues of build cost inflation. This must be avoided at all costs to ensure the Council is able to deliver on its growth requirements.</p> | <p>Hersham Green- Regulation 19 Local Plan Representations.pdf 7060- PL01 - Location Plan.pdf</p> | As per 1a, 2a and 4. | | <p>Comments noted.</p> <p>The Council’s viability assessment (2022) which has been prepared in accordance with national policy and guidance found that the DELP taken as a whole, including the approach to affordable housing contributions, will not genitively impact the deliverability and viability of development in the Borough.</p> |
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| | | | | competing pressures on development land in the Borough, Use Class C2 proposals are required to be supported by robust evidence to demonstrate that the proposal represents the most efficient use of the site. We also support this objective to ensure consistency with the policy approach of site optimisation being pursued by the Council. In terms of identifying the need for elderly accommodation over the Plan period, the Council's core evidence base is the Assessment of Local Housing Needs (2020). This sets out the anticipated need for specialist housing for the elderly, which amounts to 1,551 units up to 2035 | | | | | | | | | | | |
| 1110780 | Matthew Nicholson | Barton Willmore now Stantec obo Audley Group | No | No | Please see uploaded letter. We seek amendments to Policies HOU1, HOU3, HOU4, HOU6, INF2, INF3 and SS2 to ensure that the development of specialist forms of residential accommodation, namely Integrated Retirement Communities, is not prejudiced. | Y | Y | Y | Y | Please see uploaded document. Our comments aim to ensure that the development of specialist forms of residential accommodation, namely Integrated Retirement Communities, is not prejudiced. In our view more needs to be done to ensure that the document plans positively for the growth of this sector and that any restrictions be better justified. | Please see uploaded document. HOU3 and HOU6: We ask that the wording of Policies HOU3 and HOU6 is revised to take on a general presumption in favour of proposals for specialist housing. | 220726 34309 (Audley Group) Representations) v2.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556793/PDF/-/220726%2034309%20%5FAudley%20Group%5F%20Representations%5F%20v2%2Epdf Elmbridge Draft Headline Need Report V2.pdf | As per 2a, 3a and 4. | No, I do not wish to participate at the oral examination | Objection noted. The Council's viability assessment (2022) which has been prepared in accordance with national policy and guidance found that the DELP taken as a whole, including the approach to affordable housing contributions, will not genitively impact the deliverability and viability of development in the Borough. |

HOU7: Gypsy, Roma, Traveller and Travelling Showpeople Accommodation

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 | |
|---------|--|---------------------------|-----|----|-----|--|--------|--------|--------|--------|-----------|---|----|----|---|---|---|--|
| 1107093 | Alan McCann | | No | | No | See above | | | Y | | See above | | | | | | | Comments noted. National policy and guidance requires Local Plans to address the needs of all groups. |
| 1109564 | Claygate Parish Council (Sally Harman) | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110325 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110379 | Planning Team | Guildford Borough Council | Yes | | Yes | 3.1. The provision of Traveller accommodation is a cross boundary issue, and it is important that needs are assessed and planned for through the plan making process. The Council welcomes the fact that Elmbridge have assessed their traveller accommodation needs in the Gypsy and Traveller Accommodation Assessment (GTAA) 2020. 3.2. We are aware that the Elmbridge GTAA only achieved 29 interviews with the local traveller community. It identified the need for 18 pitches for travellers meeting the PPTS definition, 0-1 pitch for travellers of unknown planning status and 9 pitches for travellers who do not meet the PPTS traveller definition. Whilst there is a travelling showperson site in Elmbridge it was found to be occupied by non-travellers. The Elmbridge Gypsy, Roma and Traveller Site Assessment March 2022 states that planning permission has been granted for 8 pitches, leaving a net need for 10 pitches for travellers meeting the PPTS definition over the plan period. 3.3. The Council is concerned that the DELP does not identify a | | | | | | | | | | | | Comments noted. The Council has set out its response to the comments/issues raised by Guildford Borough Council in their representation in its Statement of Common Ground |

target for pitches nor allocate any pitches to meet the identified accommodation needs of travellers in Elmbridge borough as identified in the Elmbridge GTAA.

3.4. Planning Policy for Travellers Sites (paragraph 9) states that local planning authorities should set pitch targets for gypsies and travellers as defined in Annex 1 and plot targets for travelling showpeople as defined in Annex 1 which address the likely permanent and transit accommodation needs of travellers in their area. Neither Policy SS3 or Policy HOU7 sets a target and as such this approach does not seem to be consistent with national policy.

3.5. No site allocations are proposed in the DELP to meet the identified traveller accommodation needs. Whilst we note a document has been produced in March 2022 called 'Gypsy, Roma and Traveller site assessment' it proposes to meet need by allowing additional touring caravans, static caravans, tourers and day rooms on existing sites. The Council are not convinced that this is a satisfactory approach towards meeting the identified accommodation needs of travellers in Elmbridge borough.

3.6. The Council are concerned that should Elmbridge BC not effectively plan to meet their full need for traveller accommodation that this may result in cross boundary impacts.

3.7. We also note that Elmbridge Borough Council do not plan to meet the identified accommodation needs for 7 pitches for travellers who do not meet the PPTS definition (as identified in the

Elmbridge 2022 Gypsy, Roma and Traveller Site Assessment).

3.8. Whilst we recognise it is not a requirement of the PPTS we feel that it is important to work towards identifying suitable traveller pitches to meet that identified need. The Equalities Act 2010 requires Councils to take steps to meet the needs of people who have relevant protected characteristics, such as Romany Gypsies and Irish and Scottish Travellers, some of whom may not meet the PPTS definition of a traveller, so planning to meet their needs is important and failure to do so will result in a shortfall of appropriate accommodation.

3.9. PPTS paragraph 4 states that local planning authorities should develop fair and effective strategies to meet need through the identification of land for sites. The draft plan as it stands does not appear to plan for or identify sufficient land for sites. We think it is important to identify specific sites at this stage. There may be an opportunity for Elmbridge BC to include specific allocation of pitches, relating to the intensification or expansion of existing sites (as per the GTAA at para 8.7) or potentially within some of the proposed site allocations which would help achieve sustainable and mixed communities whilst meeting the shortfall in providing accommodation for all travellers regardless of their planning status.

3.10. We consider that this under provision could have potential cross boundary impacts should the full need not be met as it could result in increased pressure on traveller sites within other boroughs.

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| | | | | | | Guildford Borough Council have only allocated sufficient sites to meet the needs arising from our borough in the Guildford borough Local Plan: strategy and sites 2019 (LPSS). Our ability to meet the future needs of travellers residing in Guildford may be compromised if other boroughs such as Elmbridge do not plan to meet the accommodation needs arising from travellers in their areas. | | | | | | | | | | | | | |
| 1110662 | Mr Gil Bray | | Yes | | Yes | | | | | | | | | | | | | | Support noted. |
| 1110795 | John Bamford | | Yes | | Yes | I support this Policy for the delivery of Gypsy, Roma and Traveller pitches and Travelling Showpeople's plots. In particular I support the requirements for provision of on-site services such as water supply, sewage disposal and power supply and landscaping compatible with the visual character of the area and amenities of neighbouring uses. | | | | | | | | | | | | | Support noted. |
| 1110925 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | | | | | | | Support noted. |
| 1111011 | Rachel Rae | Environment Agency-Thames Sustainable Places Team | | | | Point of clarity and accuracy: 8.1. We understand from paragraph 6.57 and 6.58 the plan has concluded that there is no requirement to allocate sites for Gypsy, Roma, Traveller and Travelling Showpeople. However, we note that Policy SS3 1.c) states the plan will make provision for Gypsy, Roma, and Traveller pitches. This needs to be clarified. 8.2. We welcome the inclusion of Policy HOU7 which states sites free from the risk of flooding. 8.3. Any sites proposed in a Source Protection Zone 1 (SPZ1) must connect to a mains sewer. | | | | | EBC Reg 19 comments from EA 290722.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557306/PDF/-/EBC%20Reg%2019%20comments%20from%20EA%20290722%20Epdf | As per 2a. | Yes, I wish to participate at the oral examination | As a statutory consultee we are happy to participate at the oral examination if it is deemed necessary. | Comments noted. An addition to draft policy ENV7 to reflect SPZs is included in the Council's proposed modifications to the DELP. This Was submitted to the Inspector for Examination. Please see main modification M4.8 | | | | |

HOU8: Self and Custom Build Housing

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 | |
|---------|----------------------------------|-------------------------|-----|----|-----|--|--------|--------|--------|--------|--|---|----|----|--|---|---|----------------|
| 1107094 | Alan McCann | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1109565 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110328 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110663 | Mr Gil Bray | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110796 | John Bamford | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110924 | Health at hand (Adrian Dilworth) | Health at hand | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110757 | David HOWE | | Yes | | No | I believe the evidence base to be inconsistent with data previously supplied by EBC as evidence. I believe EBC is not committed to assist Self-Builders The plan does not acknowledge the significant fall in the number of additional homes delivered that occurred when current policy CS21 was introduced in 2011 | Y | Y | Y | Y | 1)The Plan for Self Builders does not include sufficient detail - requiring a subsequent SPD it defines process but not policy 2)The evidence base conflicts with data EBC has submitted in evidence previously, namely Planning Permission data 3) Elmbridge Planning data systems seem to be flawed and inconsistent | 1) Add the 'Exemption' criteria for Self-Builders from Affordable Housing Contributions suggested, but not detailed into Hou8 eg : must occupy for 3 years? 2) Identify which set of Gross annual Planning Permission data sets (if either) is correct- The one in the evidence base (HDT Action plan) conflicts significantly with the Gross annual Planning Permission figures submitted as evidence by EBC to the Inspectorate since Nov 2018. 3) Delivery of Housing need- Lessons learned from implementation of Policy CS21 2002 to 2011 should be highlighted and the policy reappraised to more closely align with Govt and NPPF guidance. After CS21 introduced in 2011 the average (mean) delivery for the preceding 9 years was an additional 383 units pa. This fell to just 284 additional units pa for the 9 years after the introduction of CS21. EBC now 279th worst Council out of 297 for additional home delivery. Consistently delivering only 58% of need. | | | No, I do not wish to participate at the oral examination | | Objection noted. It is not clear from the representation which areas of the DELP evidence base and what previous evidence submitted by EBC are considered to be inconsistent. Draft policy sets out a policy approach that is supportive of self build applications and is evidence based as set out in the supporting text. This approach is in accordance with national policy and guidance. It does not set out any requirement for a more detail SPD and the Council considers that an SPD is not required to expand on this policy. The affordable housing contributions referred to in draft policy HOU8 are set out in HOU4 – affordable housing. The approach set out in HOU8 is considered to be appropriate given the acute need for affordable housing in the Borough and is supported by the Local Plan evidence base, including the viability assessment (2022) . The DELP evidence base, which has informed the | |

7. Growing a Prosperous Economy

ECO1: Supporting the Economy

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
|---------|------------------|---|-----|----|-----|----|--------|--------|--------|--------|---|---|----|----|--|---|--|
| 1107095 | Alan McCann | | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1109420 | Mr Gil Bray | | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1109566 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1110159 | James Waterhouse | Iceni Projects obo Northumberland Estates Ltd | Yes | | No | | Y | | Y | | <p>Para 5.2 of the EBC Strategic Employment Land Review Addendum (November 2021) identifies that a number of SELs have been eroded or totally lost to non-residential uses as a result of planning permissions or permitted development. The report states "Based on the current loss of employment floorspace, the borough will continue to lose approximately 88,892.4 sqm employment floorspace by the end of the plan period (expected 2036). The borough will result in approximately 258,761 sqm SEL land remaining at the end of the plan period in 2036, should the rate of employment floorspace be lost to non-employment uses continue". The policy approach being articulated is ECO1 is broadly the same as that pursued in the existing Local Plan Framework under CS23 and DM11, which has resulted in significant reductions in economic floorspace.</p> <p>The current permitted development rights (including Class E to residential introduced in 2020) is likely to continue to reduce employment generating floorspace in SELs, and expedite the loss of floorspace in town centres and other sites over the plan period. The policy framework does not appear to recognise the likelihood of continued economic floorspace loss in SELs and town centres.</p> <p>The opportunities for new economic growth are likely to be limited, with low vacancy rates suggesting that few sites will be available for development. Accordingly, there is a real risk of economic decline and this is evidenced by both the monitoring evidence and the objectively assessed need work that's been done which requires an additional 16Ha of land to be positively planned for, but which isn't being positively planned for. Given the failure to plan for objectively assessed need for both</p> | <p>The Strategic Policy should be amended to plan positively for economic growth, rather than be allowed to remain as is, which arguably promotes decline. The former Weylands Treatment Works site, which adjoins the Hersham Industrial Estate and which constitutes a significant piece of previously developed land in the Green Belt that currently gives rise to numerous local issues through its existing established uses, should be identified as a key component of a positive economic strategy for the Borough</p> | | | Yes, I wish to participate at the oral examination | <p>The Plan's ability to plan positively for economic growth is a key issue that should be tested as part of the Examination into the soundness of the Plan, especially given the Plan does not allocate any land for economic development despite an assessment of objectively assessed need indicating 16 HA should be allocated in the period to 2030.</p> | <p>Objection noted.</p> <p>Site allocations are included on the policies map and this also includes proposed floorspace where relevant.</p> <p>The Council would not be able to address the issue of employment floorspace loss due to permitted development rights through a policy approach or site allocations for more employment floorspace as policy cannot override permitted development rights.</p> |

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| | | | | | | | | | | employment and residential, there is a high likelihood that town centre locations are going to be brought forward for residential development with only minor employment generating floorspace anticipated. The Plan can only be made sound by proactively allocating new land for economic floorspace in line with local objectively assessed need. | | | | | | | |
| 1110327 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1110797 | John Bamford | | Yes | | Yes | I support the policy of protecting employment land and encouraging its innovative re-use in ways that better meet the needs of the market. | | | | | | | | | | | Support noted. |
| 1110882 | Adrian Dilworth | Health at hand | Yes | | Yes | There are a number of sites that are not being used optimally, for example the BT building on Hare Lane. This site could be redeveloped, incorporating new build, affordable housing with the potential for optimising employment space in an efficient, environmentally sustainable manner. The detrimental impact on the local residents, infrastructure and the community as a whole will be minimal compared to the impact of reclassifying and redeveloping greenbelt. | | | | | | | | | | | Support and comments noted. The landowners of the BT building have confirmed that the site is not available for development. |
| 1112914 | Steve Hinsley | Stephen Hinsley Planning obo PA Housing | | | | Policy ECO1(3) Given the lack of supply of sites for affordable housing in Elmbridge, employment sites outside the SEL can provide a welcome source for such opportunities. Therefore, the following should be added: After d) add, OR e) The development provides for 100% affordable housing | | | | | | | | | | | Comments noted. The Council has included amendments to draft policy ECO1 within its proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see main modification ref. M6.1. |
| 1111025 | Tom Cole | Montagu Evans on behalf of Centrica Combined Common Investment Fund | No | We write on behalf of our client, Centrica Combined Common Investment Fund Ltd (c/o LaSalle Investment Management) | No | Policy ECO1: Supporting the Economy The removal of the Site's allocation in the adopted Local Plan is welcomed in light of the fact that the Kingston House Estate no longer contains significant | Y | Y | Y | Y | Policy ECO1: Supporting the Economy The removal of the Site's allocation in the adopted Local Plan is welcomed in light of the fact that the Kingston House Estate no longer contains significant employment uses. Policy ECO1 outlines the Council's overarching employment policy. It generally seeks to protect employment land and sets out the | Policy ECO1: Supporting the Economy The removal of the Site's allocation in the adopted Local Plan is welcomed in light of the fact that the Kingston House Estate no longer contains significant employment uses. Policy | 1899 Thames Ditton Emerging Design and Access Statement.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557321/PDF/-/1899%5FThames%20Ditton%5FEmerging%5FDesign%20and%20Access%20Statement.pdf | As per 2a, 3a and 4. | Yes, I wish to participate at the oral examination | As above. | Objection noted. The Council acknowledges that the site referenced does not meet the criteria for allocation as strategic employment land. However, this does not |

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| | | Ltd (c/o LaSalle Investment Management) | <p>who own 42 Portsmouth Road, Long Ditton, Surbiton, KT6 5PZ. This letter of representation is submitted in response to the Regulation 19 consultation on the Draft Elmbridge Local Plan.</p> <p>The purpose of the consultation is to establish if the Local Plan meets the legal and procedural requirements for Plan-making as set out by Paragraph 35 of the NPPF and whether the Plan can be found sound. These representations are intended to help guide the formulation of Elmbridge's Local Plan. Our client is generally supportive of the draft Local Plan and its approach, whereby the Council proposes to de-designate the Kingston House Estate (including our client's Site) as Strategic Employment Land under the adopted Local Plan. In light of the development pressures the Council faces in order to meet its minimum housing requirements, we conclude that the Council must go further and allocate the Site within the draft Local Plan to more positively encourage development. This would align with the Council's own conclusions</p> | <p>employment uses. Policy ECO1 outlines the Council's overarching employment policy. It generally seeks to protect employment land and sets out the following criteria that must be met to enable the loss of employment-generating uses on non-Strategic Employment Land:</p> <p>a) There is no reasonable prospect of the site being retained in employment use;</p> <p>b) The site is no longer suitable for its existing use or other employment uses;</p> <p>c) The existing use creates (or any other employment use would create) significant amenity issues for neighbouring occupiers, best remedied by encouraging a replacement with a nonemployment use; and</p> <p>d) The development provides opportunities for sustainable co-location with other non-employment uses.</p> <p>The supportive text to Policy ECO1 suggests that the Council would target between 12 – 36 months marketing evidence under criterion a) above to demonstrate that there is no reasonable prospect of employment sites being retained in employment use. This is very onerous and not appropriate. Focusing on our client's land, as identified by the Council's own Employment Land Review, the Site is acknowledged to lack a concentration of employment uses and therefore evidently has limited function as an employment site. This is the reason why the Site is being de-allocated. It would be illogical to require any evidence of marketing to reaffirm what the Council already knows. This is a</p> | <p>following criteria that must be met to enable the loss of employment-generating uses on non-Strategic Employment Land:</p> <p>a) There is no reasonable prospect of the site being retained in employment use;</p> <p>b) The site is no longer suitable for its existing use or other employment uses;</p> <p>c) The existing use creates (or any other employment use would create) significant amenity issues for neighbouring occupiers, best remedied by encouraging a replacement with a nonemployment use; and</p> <p>d) The development provides opportunities for sustainable co-location with other non-employment uses.</p> <p>The supportive text to Policy ECO1 suggests that the Council would target between 12 – 36 months marketing evidence under criterion a) above to demonstrate that there is no reasonable prospect of employment sites being retained in employment use. This is very onerous and not appropriate. Focusing on our client's land, as identified by the Council's own Employment Land Review, the Site is acknowledged to lack a concentration of employment uses and therefore evidently has limited function as an employment site. This is the reason why the Site is being de-allocated. It would be illogical to require any evidence of marketing to reaffirm what the Council already knows. This is a fundamental soundness issue and the Council must change its policy approach. If the intended purpose is to safeguard valuable employment uses this must be clarified (and those particular uses set out in policy), rather than simply a reference in policy to "employment-generating uses" which is vague and could be misinterpreted as restricting the redevelopment of any site in the Borough that currently provides jobs. The Council must revisit this policy and readdress the priority being given to protecting poorly performing (or limited) employment sites in the face of the Council's significant housing supply shortfall against objectively assessed needs. Employment sites can make a more meaningful contribution to resolving this shortfall and the Council must reflect this in its Local Plan strategy.</p> | <p>ECO1 outlines the Council's overarching employment policy. It generally seeks to protect employment land and sets out the following criteria that must be met to enable the loss of employment-generating uses on non-Strategic Employment Land:</p> <p>a) There is no reasonable prospect of the site being retained in employment use;</p> <p>b) The site is no longer suitable for its existing use or other employment uses;</p> <p>c) The existing use creates (or any other employment use would create) significant amenity issues for neighbouring occupiers, best remedied by encouraging a replacement with a nonemployment use; and</p> <p>d) The development provides opportunities for sustainable co-location with other non-employment uses.</p> <p>The supportive text to Policy ECO1 suggests that the Council would target between 12 – 36 months marketing evidence under criterion a) above to demonstrate that there is no reasonable prospect of employment sites being retained in employment use. This is very onerous and not appropriate. Focusing on our client's land, as identified by the Council's own Employment Land Review, the Site is acknowledged to lack a concentration of employment uses and therefore evidently has limited function as an employment site. This is the reason why the Site is being de-allocated. It would be illogical to require any evidence of marketing to reaffirm what the Council already knows. This is a fundamental soundness issue and the Council must change its policy approach. If the intended purpose is to safeguard valuable employment uses this must be clarified (and those particular uses set out in policy), rather than simply a reference in policy to "employment-generating uses" which is vague and could be misinterpreted as</p> | <p>20Design%20and%20Access%20Statement%2Epdf</p> <p>290722 Thames Ditton Reps FINAL.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557322/PDF/-/290722%20Thames%20Ditton%20Reps%20FINAL%2Epdf</p> | | | <p>mean that its loss as a site which offers a level of employment would be supported. This would need to be considered through a planning application supported by the information requested as set out in draft policy ECO1.</p> <p>The Council considers the approach set out in draft policy ECO1 is appropriate in light of the loss of a considerable amount of employment floorspace in the Brough due to the impact of permitted development rights.</p> |
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on the Site as being underutilised, with the Elmbridge Strategic Employment Land Review (2019) concluding that the Kingston House Estate (which includes the Site) 'no longer contains a significant concentration of employment uses'. We are in pre-application discussions with the Council on a comprehensive residential proposal for the Site that would make a material contribution to the Council's housing land supply. Our client has engaged with the Council on a proposal which identifies a capacity of circa 158 homes for the Site. Detailed technical and environmental assessments will be undertaken in due course to ensure that sufficient evidence is provided to underpin the allocation of the site. This will be fundamental in ensuring any allocation is sound and based on proportionate evidence as sought by the NPPF.

SITE AND SURROUNDING AREA The site is located to the south of Portsmouth Road and lies adjacent the southerly bank of the Thames.

fundamental soundness issue and the Council must change its policy approach. If the intended purpose is to safeguard valuable employment uses this must be clarified (and those particular uses set out in policy), rather than simply a reference in policy to "employment-generating uses" which is vague and could be misinterpreted as restricting the redevelopment of any site in the Borough that currently provides jobs. The Council must revisit this policy and readdress the priority being given to protecting poorly performing (or limited) employment sites in the face of the Council's significant housing supply shortfall against objectively assessed needs. Employment sites can make a more meaningful contribution to resolving this shortfall and the Council must reflect this in its Local Plan strategy.

restricting the redevelopment of any site in the Borough that currently provides jobs. The Council must revisit this policy and readdress the priority being given to protecting poorly performing (or limited) employment sites in the face of the Council's significant housing supply shortfall against objectively assessed needs. Employment sites can make a more meaningful contribution to resolving this shortfall and the Council must reflect this in its Local Plan strategy.

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| | | | | <p>Surrounding uses to the east and south are residential. West of the Site is a self storage building and the Crowne Plaza Hotel, beyond which is residential. To the north of the Site is a marina and the River Thames.</p> <p>Surbiton Station is approximately 0.8 miles to the east of the Site and provides regular train services into Central London.</p> <p>A number of local bus routes also connect the Site with neighbouring towns. There are no statutorily or locally listed buildings on site and the Site does not fall within a Conservation Area.</p> <p>The Site is located within Flood Zone 1, the area with the least likelihood of flooding. The Site is not affected by any other environmental designations and so is evidently highly suitable for consideration for allocation. The Site is currently used as a car dealership with a planning history consisting of a number of applications associated with the Site for this use. As noted above the Site is recommended for de-designation as Strategic Employment Land as part of the Kingston House Estate.</p> | | | | | | | | | |
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ECO2: Strategic Employment Land

| ID | N | Org | 1 | 1a | 2 | 2a | 3 | 3 | 3 | 3 | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
|---------|-----------------|--|-----|----|-----|---|---|---|---|---|---|--|----------------------|--|---|---|----------------|
| | | | | | | | P | E | J | C | | | | | | | |
| 1107096 | Alan McCann | | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1109421 | Mr Gil Bray | | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1109567 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1110329 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1110798 | John Bamford | | Yes | | Yes | I support the safeguarding of Strategic Employment Land for employment uses to support and retain employment opportunities in locations attractive to businesses in order to maintain thriving communities. | | | | | | | | | | | Support noted. |
| 1110923 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1111102 | Paul Manning | Newsteer Real Estate Advisers obo Leos International Holding Group (Chris Pittock) | Yes | | No | <p>Our client acknowledges the need to safeguard land for employment use in order to ensure that there is sufficient land retained, in the most suitable and attractive locations, for future employment opportunities.</p> <p>Notwithstanding this, our client proposes that residential accommodation is acceptable within the Strategic Employment Land allocations both where, and where it does not form part of a larger redevelopment proposal. Further, they propose that residential redevelopment should be acceptable if either criteria a) or b) of Section 4 of the proposed policy applies, to optimise the sites and make most efficient use of the land to deliver the housing required. It is their view that it should not be a requirement that both of these criteria are met for residential accommodation is considered acceptable, and that residential only redevelopment should be deemed acceptable where it can be</p> | Y | | Y | <p>Our client acknowledges the need to safeguard land for employment use in order to ensure that there is sufficient land retained, in the most suitable and attractive locations, for future employment opportunities.</p> <p>Notwithstanding this, our client proposes that residential accommodation is acceptable within the Strategic Employment Land allocations both where, and where it does not form part of a larger redevelopment proposal. Further, they propose that residential redevelopment should be acceptable if either criteria a) or b) of Section 4 of the proposed policy applies, to optimise the sites and make most efficient use of the land to deliver the housing required. It is their view that it should not be a requirement that both of these criteria are met for residential accommodation is considered acceptable, and that residential only redevelopment should be deemed acceptable where it can be demonstrated that the floorspace is redundant for employment use.</p> | <p>Residential accommodation in SELs will only be acceptable where:</p> <p>a. It would bring investment to floorspace which has been demonstrated to be redundant for employment uses; or</p> <p>b. The proposal would comprise a mix of flexible uses.</p> | <p>220729_Leos_Elmbridge_Local_Plan_Reps_v1.0.pdf</p> <p>https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557565/PDF/-/220729%5FLeos%5FElmbridge%20Local%20Plan%20Reps%5Fv1%2E0%2Epdf</p> | As per 2a, 3a and 4. | No, I do not wish to participate at the oral examination | <p>Objection noted.</p> <p>The Council considers that draft policy ECO2 strikes the right balance between protecting the Borough's strategic employment land and allowing some opportunities for development and change of use to residential.</p> <p>The Council considers this approach to be appropriate in light of the loss of a considerable amount of employment floorspace in the Brough due to the impact of permitted development rights.</p> | | |

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| | | | | | <p>allocating the following five strategic employment sites (SELs):</p> <ul style="list-style-type: none">• The Heights, Weybridge• Hershams Place Technology Park, Hershams• Brooklands Industrial Estate, Weybridge• Hershams Trading Estate, Walton-on-Thames• Molesey Industrial Estate, West Molesey <p>However, Policy ECO2 does not state how much employment floorspace these sites are to provide. We also note The Heights, Weybridge is listed in Chapter 9. It is not clear why The Heights, Weybridge is listed in both Policy ECO2 and Chapter 9. We note the Heights Webridge is located in Flood Zone 3. Flood risk can significantly reduce the amount of developable land available. Therefore, the site may not be able to deliver as much floorspace as it is required to. Please see Chapter 9 for specific details relating to flood risk at The Heights. With regards to the other sites listed in Policy 5, no site information has been provided so we are unable to screen these sites for environmental constraints within our remit. Without this information we are unable to confirm if the sites are deliverable.</p> | | | | | | | | |
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ECO3: Supporting our Town, District and Local Centres

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 | |
|---------|-----------------|-------------------------|-----|----|-----|---|--------|--------|--------|--------|----|---|----|----|---|---|---|----------------|
| 1107097 | Alan McCann | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1109568 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110331 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110664 | Mr Gil Bray | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110802 | John Bamford | | Yes | | Yes | I commend the support of identified retail, office, residential, community, cultural and leisure uses in the borough's town, district and local centres in order to retain thriving communities. | | | | | | | | | | | | Support noted. |
| 1110922 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1111013 | Owen Neal | Sport England | Yes | | Yes | Sport England welcomes recognition of the role physical activity; movement and sport plays in ensuring the vibrancy and vitality of town; district and local centres. Sport England welcomes the approach to resisting the loss of leisure; recreational and community facilities and their promotion in new development proposals. | | | | | | | | | | | | Support noted. |

ECO4: Visitor, Arts and Culture

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
|---------|-----------------|-------------------------|-----|---|-----|---|--------|--------|--------|--------|---|------------------------------------|----|----|--|---|--|
| 1107098 | Alan McCann | | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1109569 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1110081 | Susan Mealor | | No | By the proposals to build on so many of Hershams public amenities without appropriate consultation, it cannot be said that there has been a proper community involvement. | No | The loss of so many social and cultural facilities in Hershams is not consistent with the plan's aims to improve the health and well being on Hershams community. Unnecessary loss of community infrastructure is not permitted if there is still an identified need. In Hershams, the following social sites are listed for building, with precisely this loss: H1; H6; H8; H10; H13; H15. Of these only H6 and H15 have potential re-use, but neither of these is likely to happen. | | | Y | | Not justified. In Hershams, with so many car parks in the building plans, there will be increased park on streets, which are already pretty choked. Hershams Library (H15) holds regular literary talks with famous authors. The Hershams Sports and social Club(H8) is on the list, as is the Hershams Catholic Church hall (H13), the United Reform church (H1), Royal George Pub (H10) , and the Hershams Village Hall and Day Centre (H6). Plus the Nursery/playgroup (H11) There will be less opportunity to attend functions locally. This is against the principles of ECO4 | Remove H15, H6, H8, from the plan. | | | No, I do not wish to participate at the oral examination | | Objection noted. Site allocations for development of sites that are home to existing community uses, including those within Hershams, such as Hershams Library (H15) and the Hershams day centre (H6), seek to ensure these are retained or re-provided on site. In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protected. Car parks are only included as site allocations when they are underused or could be consolidated into another locations/site. H8 is no longer available for development. |
| 1110330 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1110665 | Mr Gil Bray | | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1110803 | John Bamford | | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1110921 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | | | | | Support noted. |

ECO5: Equestrian Development

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 | |
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| 1107100 | Alan McCann | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1109570 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110332 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110666 | Mr Gil Bray | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110804 | John Bamford | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110907 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | | | | | | Support noted. |

8. Providing Infrastructure and Connectivity

INF1: Infrastructure Delivery

| ID | N | Org | 1 | 1a | 2 | 2a | 3 | 3 | 3 | 3 | 3a | 4 | 4a | 4b | 5 | 6 | 7 | |
|---------|---------------|--------------------------------|-----|--|-----|--|---|---|---|---|--|--|----|----|--|--|---|----------------|
| | | | | | | | P | E | J | C | | | | | | | | |
| 1107101 | Alan McCann | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1109571 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110335 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110355 | Helen Plummer | Manby Lodge Infant School | Yes | We hope this is legally compliant but would not know if it wasn't. | No | The plan does not seem to be specific enough to Weybridge, it seems ambiguous. | | Y | | | To be effective I would expect to have Elmbridge specific examples of what kind of infrastructure is being planned, rather than just a list which could apply to any region in the country. | There are identified locations of residential development throughout the borough but no specifics on the infrastructure to support all of these new homes. | | | Yes, I wish to participate at the oral examination | As a school we have grown in size without the carparking facilities for all the staff. We are also aware of local residents struggling to get GP appointments, this includes staff and families of our pupils. | Comments noted. The specific examples of the infrastructure that is required in the Borough over the plan period of the DELP are set out in the Council's Infrastructure Delivery Plan (2022) . This should be read alongside the DELP. | |
| 1110493 | Chris Colloff | Thames Water Utilities Limited | Yes | | No | The aims of Policy INF1 are supported. For water and wastewater network infrastructure improvements that may be necessary to avoid risks of sewer flooding and/or pollution of land and watercourse or issues of low/no water pressure, there may be a requirement for development to be phased so that the relevant phase of development is not occupied until the necessary infrastructure is in place. While infrastructure will be delivered by infrastructure providers and funded through the infrastructure charge for new properties connected to the water and wastewater networks. It is not practical to commit to delivery until there is certainty that development will come forward. Given the potential timescales for delivery of network upgrades which can take | | Y | | | As above, the ability to use conditions to align development and infrastructure delivery are required to ensure the policy is effective and sound. It is also noted that text is included in Section 9.4 in relation to site allocations stating that "Pre-application advice prior to the submission of a planning application is encouraged as well as engagement with infrastructure providers at the earliest opportunity.". While this text is supported, engagement should be encouraged for all development and not just for development on allocated sites. While this text is supported, engagement should be encouraged for all development and not just for development on allocated sites. It is therefore considered that this text would be more beneficial in support of Policy INF1. Early engagement will help to align the development and infrastructure delivery processes and minimise the risk of phasing conditions being required to ensure development is not occupied ahead of the delivery of infrastructure. | To ensure conditions can be used for this it is considered that the text in Section 8.7 should be revised as set out below. 'The delivery of infrastructure will be funded through a combination of existing public funding, developer-led provision, infrastructure providers and through the use of the Community Infrastructure Levy (CIL). The council's Charging Schedule and updated Development Contributions Supplementary Planning Document (SPD) should also be referred to. Where necessary conditions of S106 agreements will be used to secure and co-ordinate development and infrastructure delivery.' The text from Section 9.4 stating that "Pre-application advice prior to the submission of a planning application is encouraged as well as engagement with infrastructure providers at the earliest opportunity." should be included in support of Policy INF1 to | | | No, I do not wish to participate at the oral examination | | Support and comments noted. The suggested amendments to the supporting text of draft policy INF1 have been included in the Council's proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see minor modification ref. MM8.2. | |

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| 1112163 | Rowan Gilbert | NHS Property Services | | | Yes | <p>Policy INF1 states that the council will work in partnership with providers of infrastructure and services to facilitate the timely provision of infrastructure necessary to support sustainable development.</p> <p>NHSPS supports the overall approach to infrastructure delivery set out with Policy INF1 and welcomes that the delivery of infrastructure will be funded through a combination of existing public funding, developer-led provision, and through the use of the Community Infrastructure Levy (CIL). Our experience has shown that the provision of new purpose-built healthcare infrastructure to mitigate the impacts of development will require extensive capital funding. This means a large proportion of CIL for health should be anticipated. NHSPS encourage the Council to work with NHS commissioners and NHS delivery teams to identify opportunities to utilise CIL funding towards the delivery of new and expanded health facilities to support growth.</p> | | | | | | | | | <p>and infrastructure will have a phased delivery plan.</p> <p>Support noted.</p> <p>The Council agrees that it is critical that EBC and the NHS work in partnership to ensure the need healthcare infrastructure is provided.</p> <p>The Council has engaged with the NHS throughout the development of DELP. This is detailed in the Council's statement of common ground with the NHS.</p> |
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| 1112276 | Sue Janota | Surrey County Council | | | <p>Education Brooklands is one of two Further Education colleges in Elmbridge. We welcome the recognition of Brooklands College for the important contribution to the borough, in terms of higher and further education and vocational training and upskilling, that development at the site could make. From a county council point of view, sustainability of the Brooklands College offer is vital in terms of ensuring sufficiency of post 16 education provision, including post 16 SEND provision, in the borough. Following the rising demand for secondary school places in Elmbridge, there is expected to be a corresponding increased demand for post 16 places. An expansion of the current specialist provision at Brooklands College is also being considered as part of the SEND Capital Programme. Additional SEND places at Brooklands College would enable increased numbers of pupils with Educational Health and Care Plans resident in Elmbridge to access Post 16 education at a college local to them. Special Educational Need and Disability (SEND) provision Surrey County Council has identified a long-term sufficiency gap for additional specialist school places in Elmbridge. The May 2022 Elmbridge Infrastructure Delivery Plan (IDP) highlights this need and references Surrey's SEND Capital Programme. The IDP provides details of the first set of schemes planned to be brought forward to increase the number of specialist places available locally. There is a potential opportunity to</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | <p>Comments noted. The information provided has been captured in the Council's <u>Infrastructure Delivery Plan (May 2022)</u> (IDP) and <u>Update (July 2023)</u>.</p> |
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| | | | | | | <p>secure investment in the specialist education estate through the next wave of the Department for Education (DfE) Special Free School programme. Applications will be submitted in October 2022 and successful applicants will be announced in Summer 2023. SCC has submitted a pre-registration application for a school in Elmbridge. Site search and land due diligence is underway. There is an expectation that in order to successfully secure one of these new Special Free Schools, applicant authorities would need to provide a suitable site, available to the DfE for a 'peppercorn rent'. For any school delivered through this route, a planning application would be made by the DfE to the relevant district or borough.</p> | | | | | | | | | |
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| 1112477 | Adrian Wise | Cobham Conservation and Heritage Trust | | | <p>All aspects of the Infrastructure Delivery Plan (IDP) which supports the DLP are, almost without exception, reliant on developer contributions to fund infrastructure for the planned growth. This means that, even if fully successful in raising sufficient funds, infrastructure will always lag growth and is unlikely ever to catch up. Policy INF1 (6) should therefore be more positively worded i.e. 'new development must make provision for sufficient capacity in all infrastructure impacted by the development either on site or through a financial mechanism unless existing infrastructure can be shown by the developer to fully accommodate the development into the future.'</p> <p>Policies INF1 to INF6, SS2, and CC4 should also make specific provision for and reference to the IDP strategy to deliver the required public transport connectivity to train stations and community/social amenities. The IDP states that modal shift will not be achieved by new bus provision but that the bus connectivity to stations is needed to reduce use of the car and we agree. This is in addition to better walking and cycling provision which cannot deliver the modal shift required in isolation. Otherwise the car parking policies and environmental policies and strategies would not be deliverable or effective and result in increased on-street parking stress. Travel Plans for developments, schools and businesses are helpful but again will not in themselves deliver necessary modal shift. There should also be</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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Comments noted.

The Council considers that draft policy INF1 is appropriate. INF1 makes clear that new development in the borough must be supported by appropriate infrastructure, proportionate to the development and delivered in a timely manner.

While the preference would be for the infrastructure required to mitigate the impacts of development to be delivered first, this is rarely feasible on the scale of sites proposed in the Borough due to the need for providers to finance and deliver the infrastructure. The infrastructure will likely be delivered alongside new development, or where a site may be larger the development and infrastructure will have a phased delivery plan.

The Council's IDP is part of the evidence base for the DELP. It is intended that the IDP be read alongside the DELP. It is not necessary to refer to the IDP in all policies it is relevant to.

That said, the Council has included an amendment to the supporting text of policy CC4 referencing the IDP within its proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see minor modification ref. MM.4.9.

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| | | | | | <p>recognition that different areas of the Borough require and can accommodate different travel and transport solutions to reduce reliance on the car. One size does not fit all in this respect.</p> <p>If we are to rely on development contributions for most infrastructure the rules as proposed for the must be strengthened over those proposed. Collection should be up-front not after the fact. Exemptions must be almost eliminated, e.g., why are those for commercial developments of any kind allowed (rental properties, care homes, etc.)? By extension the rules for affordable home contributions must be extended to include all building, even one-for-one replacement building.</p> | | | | | | | | | |
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| 1110594 | Cobham & Downside Residents Association and Stoke D'Abernon Residents Associa... | Cobham & Downside Residents Association and Stoke D'Abernon Residents Association | No | Please see uploaded document at question 4a | No | Please see uploaded document at question 4a | Y | Y | Y | Y | All aspects of the Infrastructure Delivery Plan (IDP) which supports the DLP is, almost without exception, reliant on developer contributions to fund infrastructure for the planned growth. This means that, even if fully successful in raising sufficient funds, infrastructure will always lag growth and is unlikely ever to catch up. | Policy INF1 (6) should therefore be more positively worded i.e. 'new development must make provision for sufficient capacity in all infrastructure impacted by the development either on site or through a financial mechanism unless existing infrastructure can be shown by the developer to fully accommodate the development into the future.' | Head of Planning REG19.docx https://consult.elmbridge.gov.uk/qf2.ti/a/1205954/555812/DOCX/-/Head%20of%20Planning%20REG19%2Edocx | As per 3a and 4. | Yes, I wish to participate at the oral examination | This response process does not allow sufficient scope to fully explain and justify all of the modifications we have proposed. In particular the Wisley Airfield issues are complex and further evidence of this and other matters raised for modification are emerging. This should be expressed at the oral examination. The Council have been asked to make modifications and if implemented or varied it is appropriate for them to be commented on orally as the only remaining route available to do so. Issues such as the status of Cobham Town Centre in Plan 5 and definition and implication of use of the term 'urban area' as a blanket categorisation can be better and more succinctly evidenced orally. | Objection noted. The Council considers that draft policy INF1 is appropriate. INF1 makes clear that new development in the borough must be supported by appropriate infrastructure, proportionate to the development and delivered in a timely manner. While the preference would be for the infrastructure required to mitigate the impacts of development to be delivered first, this is rarely feasible on the scale of sites proposed in the Borough due to the need for providers to finance and deliver the infrastructure. The infrastructure will likely be delivered alongside new development, or where a site may be larger the development and infrastructure will have a phased delivery plan. |
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| 1106692 | Siobhan Halliday | | Yes | <p>I am sure that it is legally compliant. However, two areas for development in particular, I think will really badly impact upon the local area.</p> <p>To build so many units on Sandpiper, Newlands Avenue, Weston Green will have a very negative impact upon the local roads. Esher College, Weston Green School and Thames Ditton station are all on the road that Newlands Avenue has to join to exit the cul-de-sac. The traffic is already a nightmare around there. There is little in the way of public transport, such as buses, into Kingston, so people will be dependent upon their cars.</p> <p>Palace Road, Hampton Court is already so busy. No one can park as it is. The roads into Hampton Court Village from there, and access to the bridge are tiny and congested. The quality of life for these people will be dreadful.</p> | No | <p>I think not enough attention has been paid to roads and infrastructure, such as GPs etc., which is difficult enough at present.</p> | | Y | Y | <p>I know that everyone has a right to a home, but building homes that will make the lives of those living in these streets already a living hell, and making it so impossible for the new residents to move helps no one.</p> | | | | <p>Yes, I wish to participate at the oral examination</p> | <p>I feel that we all need to speak up to protect not only those living in the borough, but those wishing to move into the borough. Don't over-develop existing roads: go for brownfield.</p> | <p>Comments noted.</p> <p>The Council's <u>Infrastructure Delivery Plan (May 2022)</u> (IDP) and <u>Update (July 2023)</u> detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the quantum of development proposed in the DELP.</p> <p>The IDP and IDP Update have been informed by the preparation of other evidence base documents e.g., <u>Transport Assessment (2022)</u> and via discussions with infrastructure providers as part of the Council's duty to cooperate activities as outlined in the Council's <u>Duty to Cooperate Statement of Compliance (June 2022)</u>, <u>Duty to Cooperate Statement of Compliance Update (August 2023)</u> and Statements of Common Ground published with the <u>Core Documents</u> submitted for Examination.</p> <p>The agreed position with our infrastructure delivery partners is that the proposed development strategy can be accommodated within the borough with the mitigation identified / a policy-led approach.</p> <p>In addition, the DELP includes policies to ensure the infrastructure needed to support the delivery of the aspirations of, and quantum of development proposed, in the DELP is provided.</p> <p>Draft policy INF1 – Infrastructure delivery aims to ensure the required infrastructure</p> |
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INF2: Social and Community Infrastructure

| ID | N | Org | 1 | 1a | 2 | 2a | 3 | 3 | 3 | 3 | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
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| | | | | | | | P | E | J | C | | | | | | | |
| 1107102 | Alan McCann | | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1109572 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1110085 | Susan Mealor | | No | Ch8 INF2 SOCIAL AND COMMUNITY INFRASTRUCTURE There has been no consultation with the community of Hersham over the loss of so many community infrastructure sites. There were no notices on Hersham on-line social sites, no communication from councillors, no notices on notice boards. No one seems have known about the Feb/Mar2020 consultation. Thus it cannot be said that the council has fulfilled the requirement to consult fully | No | Chapter 8 INF2 Unnecessary loss of community infrastructure is not permitted if there is still an identified need. In Hersham, the following social sites are listed for building, with precisely this loss: H1; H6; H8; H10; H13; H15. Of these only H6 and H15 have potential re-use, but neither of these is likely to happen. | | Y | Y | Not Effective or Justified INF2.3 states: Development proposals that would result in the unnecessary loss of community facilities will not be permitted unless it can be demonstrated that: a) that there is no longer an identified community need for the facilities or they no longer meet the needs of users and cannot be adapted Ch 8 para 8.8 states: Social and community infrastructure plays an important role in providing good quality of life, stimulating and supporting social cohesion and interaction, as well as developing strong and inclusive communities. They provide opportunities to bring different groups of people together, contributing to social integration and the desirability of a place. These places also need to promote social interaction, be safe and accessible and support healthy lifestyles It is in clear contravention of these statements that so many social and employment sites in Hersham have been included in the Local Plan: H1 US 441 63 Queens Road, United Reform Church This building was previously a United Reform Church and then used as a children's nursery. An application to convert to offices has recently been refused planning permission on these grounds: "The proposed development would result in the loss of community use which would not be replaced by equivalent or better provision at the site nor is there any justification that there would be alternative community use in a suitable location in the locality. As such the proposal is contrary to Policies CS16 of the Core Strategy 2011, Policy DM9 of the Development Management Plan 2015 and the NPPF 2019" H6 US40 Hersham Day Centre and Village Hall This site has been threatened with redevelopment for numerous years, and a Community Hall here is highly unlikely to be replaced once the present one is closed. The comments in H1 above apply equally well to H6. This Hall has been cited as an alternative hall in other past proposals | Remove H1, H6, H8, H11 and H15 from the plan | | | Yes, I wish to participate at the oral examination | The loss of social and community sites as proposed in this plan is too great to be acceptable. The community fully accepted that the local secondary school be rebuilt on the playing fields, which resulted in a significant loss of green space. The site of the previous buildings were sold for housing to pay for it. But the 259 dwellings thus provided have not been included in the contribution to the housing total, because of delays in the plans. This is not the fault of Hersham Residents. It does not seem right to then expect further community assets to be used to provide even more housing, with associated job losses.. | Objection noted. A letter was sent to Hersham Residents committee clarifying many of these concerns during the representation period. The Council has met and exceeded its duty to engage with and consult stakeholders on the preparation and contents of the DELP and has done so in accordance with its <u>Statement of Community Involvement</u> and all relevant planning regulations. The Council utilised a range of advertisement and consultation techniques during the Regulation 18 and 19 stages to reach and engage with the widest possible range of stakeholders. Techniques included online advertisement on the Council's website and social media platforms – Twitter, Facebook, LinkedIn, Instagram and Nextdoor, as well as physical advertisement in a local newspaper – the Surrey Advertiser and posters on the Council's noticeboards located throughout the Borough, including within the Walton and Hersham communities. The DELP was also available to view and read at the Civic Centre and Borough libraries. In addition, | |

underground structures and requires 24 hour access in emergencies. At any time large vehicles and road tankers will need access, including at night..

H15 US374 Hersham Library
The library site has a covenant that precludes the use of the site other than for a library. A covenant is imposed to ensure that the generosity and vision of the donors is kept for future generations, and that the site does not become vulnerable to the fads and fashions of short-termism. The library is well used and popular and its loss would be indirect contravention of INF2. A library provides a service to all, with no social, educational or other hang-ups for users who may have had problems at school, home or in society. This is given in full in my submission in Ch9. There can be no justification on community, welfare or health grounds to close the library. It is extremely unlikely that a new library will be provided on the site at greater expense and much higher running costs than the existing one.

It is also worth noting Ch9 para 4 which states: All site allocations require planning permission prior to development. Allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses. Pre-application advice prior to the submission of a planning application is encouraged as well as engagement with infrastructure providers at the earliest opportunity.

There is also a loss of green sites: on H15 and H11.
I note that Hersham has recently accepted a major reduction in green space to support the rebuilding of the local secondary school on its playing fields. This is accepted as necessary. The previous site of the school buildings has been used to build 259 dwellings to fund the deal. Because this Local Plan is delayed, there is no acknowledgement of this. That is, Hersham has already provided land for half of its allocation which is not included through no fault of the community. This number of dwellings should be included in the tally of housing requirement, especially considering the severe shortage of future sites in this vicinity.

For the Hersham Area, the following sites give employment which will be lost by these proposals: H5; H8; H9; H10; H11; H15; with only one increased employment area: H14. This is not good for the well being of the community.

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| 1110336 | Martin Baker | | Yes | | Yes | | | | | | | | | | Support noted. |
| 1110668 | Mr Gil Bray | | Yes | | Yes | | | | | | | | | | Support noted. |
| 1110758 | Owen Neal | Sport England | Yes | | No | <p>Please clarify whether draft policy INF2 is intended to apply to sports facilities and playing field land. If so, then Sport England would question whether this is consistent with the relevant paragraph 99 in the NPPF which seeks to protect this provision unless specific exceptional circumstances apply. These are:</p> <p>"Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <p>(a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</p> <p>(b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</p> <p>(c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use."</p> <p>Sport England considers that part 3a of the policy needs strengthening to better protect existing sports facilities and playing field. Currently the drafting allows for the loss of provision if either there is no longer an identified community need or it no longer meet the needs of users and cannot be adapted. Sport England does not consider this is consistent with national planning policy para 99</p> | | | Y | I have set out the reasons why Sport England considers this may not be consistent with national policy. | Again, I have set out modifications to the policy in the main comments box. | | | No, I do not wish to participate at the oral examination | <p>Comments noted.</p> <p>The Council has included an amendment to draft policy INF2 to ensure it is consistent with NPPF paragraph 99 in its proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see Main Modification ref. M7.1</p> |

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| | | | | | | and would argue that the second part of the policy ie "or no longer meets the needs the needs of users and cannot be adapted" should be deleted. | | | | | | | | |
| | | | | | | Further, we consider that draft policy part 3c) would permit the loss of sports facilities to provide for an alternative community use/development. We do not consider this is consistent with para 99c) above and would ask this is amended to strengthen protection of existing sports facilities through removing the words "or an alternative". | | | | | | | | |
| 1110806 | John Bamford | | Yes | | Yes | In my opinion social and community infrastructure plays an essential role in providing good quality of life, stimulating and supporting social cohesion and interaction, as well as developing strong and inclusive communities and healthy lifestyles. | | | | | | | | Support noted. Draft policy INF2 seeks to protect existing social and support the provision of new community infrastructure. |
| 1110906 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | | Support noted. |
| 1110967 | Tom Clarke | Theatres Trust | Yes | | Yes | We consider this policy to provide strong protection for the borough's valued facilities, helping to guard against unnecessary loss in accordance with paragraph 93 of the NPPF (2021). | | | | | | | | Support noted. |
| 1110997 | Ricky Ching | NHS Surrey Heartlands | Yes | | No | | Reviews of the NHS estate are aimed at improving the provision of health care services by increasing efficiencies, including through the repurposing of unneeded and unsuitable buildings. This means that potential disposal of repurposed buildings, as well as the related revenue spending that is saved, can be used to improve NHS facilities and services. Flexibility should be accorded to NHS sites, or that of key infrastructure providers, in relation to the policies aimed at preventing the loss or change of use of social and community facilities and assets. Where such policies are overly restrictive, the repurposing of unneeded and unsuitable health care facilities may be prevented or delayed. Most surplus health care facilities are purpose-built and when at the end of | NHS Surrey Heartlands and Epsom and St Helier Trust recommend that Policy INF2 (3) should set out exceptions and offers positive support for infrastructure providers through flexibility or a streamlined process to facilitate repurposing and reinvestment of capital towards modern and fit-for purpose infrastructure facilities. The loss of existing social and community infrastructure (including health) that forms part of a wider estate plan that will support health should not be subject to any restrictions. | | | No, I do not wish to participate at the oral examination | | Comments noted. The Council considers that draft policy INF2 is appropriate and that it provides sufficient flexibility to allow the NHS to deliver its estates programme. | |

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| | | | | | | | | | | their useful lives, are highly unlikely to be viable or, are suitable for other uses. | | | | | | |
| 1112164 | Rowan Gilbert | NHS Property Services | | | Yes | <p>Policy INF2 stipulates that development which would result in the unnecessary loss of community facilities will not be permitted unless the proposal demonstrates that:</p> <p>a. there is no longer an identified community need for the facilities or they no longer meet the needs of users and cannot be adapted; or</p> <p>b. they will be replaced by alternative and well-located facilities that will continue to serve the similar needs of the neighbourhood and wider community; and</p> <p>c. the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use for which there is a local need has been fully assessed.</p> <p>NHSPS supports the provision of quality health infrastructure, to enable this provision and requires flexibility in its estate. In particular, the capital receipts and revenue savings generated from the disposal of unneeded or unsuitable sites and properties for best value is an important component in helping to provide funding for new or improved NHS services and facilities. Restrictive policies can prevent, or delay required investment in services and facilities. To confirm, a property can only be released for disposal or alternative use by NHSPS once it is confirmed that it is no longer required for the delivery of NHS services by ICBs. Furthermore, NHSPS estate code requires that any property to be disposed of is first listed on "e-PIMS", the central database of Government Central Civil Estate properties and land,</p> | | | | | | 2022 NHSPS Elmbridge Local Plan Reg 19 Reprs.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/564458/PDF/-/2022%20NHSPS%20Elmbridge%20Local%20Plan%20Reg%2019%20Reps%2Epdf | As per 2a. | | | <p>Comments noted.</p> <p>The Council considers that draft policy INF2 is appropriate and that it provides sufficient flexibility to allow the NHS to deliver its estates programme.</p> |

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|--|--|--|--|--|---|--|--|--|--|--|--|--|--|
| | | | | | <p>which allows other public sector bodies to consider their potential use for it. An essential element of supporting the wider transformation of NHS services and the health estate is to ensure that surplus and vacant NHS sites are not strategically constrained by local planning policies, particularly for providing alternative uses (principally housing). Therefore, where SH ICB can demonstrate that healthcare facilities are no longer required for the provision of services, there should be a presumption that such sites are suitable for housing (or other appropriate uses) and should not be subject to restrictive policies or periods of marketing. To ensure Policy INF2 is sufficiently flexible and allows for NHS estate strategies to be implemented effectively, a suggested amendment to part 3 of the policy is set out below:</p> <p>Development proposals that would result in the unnecessary loss of community facilities will not be permitted unless it can be demonstrated that:</p> <ul style="list-style-type: none">a. there is no longer an identified community need for the facilities or they no longer meet the needs of users and cannot be adapted; orb. they will be replaced by alternative and well-located facilities that will continue to serve the similar needs of the neighbourhood and wider community; and the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use for which there is a local need has been fully assessed.d. the loss of change of use of existing facilities is part of a wider public | | | | | | | | |
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| | | | | | | service estate reorganisation | | | | | | | | | |
| 1112270 | Sue Janota | Surrey County Council | | | | <p>With regard to the impact on libraries, it should be noted that libraries in Elmbridge are currently undersized for the populations they service, and additional housing will further impact on the need for more space to deliver essential services. Libraries use the Department for Digital, Culture, Media and Sport (DCMS) standard of 30m² net of public library space per 1000 population to determine space requirements for each area. Care needs to be given to maintaining these standards in the development of the library estate.</p> <p>The desire to redevelop on current library space in Esher, Hersham, Molesey and Weybridge aligns with our long terms plans to refurbish those libraries to ensure they deliver a modern library service. It is essential that a library is re-provided in all these areas and Surrey County Council welcome the opportunity to work jointly with Elmbridge on proposed plans.</p> <p>Any such work would be subject to a full options appraisal which would determine the most suitable location for the library service and services will be co-designed with residents and local stakeholders to ensure we are reflecting the needs of the community. These options appraisals will be undertaken at the appropriate time in line with the proposed housing plans.</p> <p>There will be a requirement to maintain service provision throughout the duration of works, so care needs to be given to the consideration of temporary relocation</p> | | | | | | | | | <p>Comments noted.</p> <p>The Council is working closely with Surrey County Council (SCC) in relation to all sites identified for development that under SCC ownership.</p> <p>Site allocations for development of sites that are home to existing community uses seek to ensure these are retained or re-provided on site where appropriate. This is set out in more detail in the Council's Land Availability Assessment (2022). In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protected.</p> |

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| | | | | | sites during the course of any redevelopment works. | | | | | | | | | | |
| 1112912 | Steve Hinsley | Stephen Hinsley Planning obo PA Housing | | | <p>Policy INF2 3</p> <p>Outmoded community use sites can also provide an opportunity for 100% affordable housing schemes. Therefore, it is suggested that a new c) is added to 3 as follows: Change b) by removing and replace with or, and insert c) the proposal will be for 100% affordable housing The existing c) can be removed</p> | | | | | | | | | | <p>Comments noted.</p> <p>The Council considers that draft policy INF2 is appropriate as the protection of valuable social and community uses is important and must be balanced with the need to deliver much needed affordable housing in the Borough.</p> |

INF3: Health and Wellbeing of Communities

| ID | N | Org | 1 | 1a | 2 | 2a | 3 | 3 | 3 | 3 | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
|---------|--------------|-------------------------|-----|--|-----|---|---|---|---|--|--------------------------------------|---|----|--|---|---|----------------|
| | | | | | | | P | E | J | C | | | | | | | |
| 1107103 | Alan McCann | | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1109573 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1110084 | Susan Mealor | | No | Ch8 INF3 Health and Well being of local communities There has been no consultation with the community of Hershams over the loss of so many community infrastructure sites. There were no notices on Hershams on-line social sites, no communication from councillors, no notices on notice boards. No one seems have known about the Feb/Mar2020 consultation. Thus it cannot be said that the council has fulfilled the requirement to consult fully | No | It is clear from the horrified reaction to the list of recommended building sites in Hershams, that this community has not been aware of any "public" consultations concerning the sites in this local plan. Compare the reaction in recent weeks June/July 2022 to the total of one respondent to the last consultation in February/March 2020. Which incidentally was at a time when many of us had already gone into Covid shutdown, frightened for our lives, prior to the official government edict. 46% of the 657 responses came from Claygate. Thus the plan has not been carried out with the involvement of this community. | | Y | Y | Ch 8 INF3 Health and Wellbeing of communities Not Justified or effective. Developments must contribute to healthy and active lifestyles. Closure of so many facilities does not do this. I note that Hershams has recently accepted a major reduction in green space to support the rebuilding of the local secondary school on its playing fields. This is accepted as necessary. The previous site of the school buildings has been used to build 259 dwellings to fund the deal. Because this Local Plan is delayed, there is no acknowledgement of this. That is, Hershams has already provided land for half of its allocation which in not included through no fault of the community. This number of dwellings should be included in the tally of housing requirement, especially considering the severe shortage of future sites in this vicinity. Community Sites at risk of loss due to the local plan; H1 US 441 63 Queens Road, United Reform Church This building was previously a United Reform Church and then used as a children's nursery. An application to convert to offices has recently been refused planning permission on these grounds: "The proposed development would result in the loss of community use which would not be replaced by equivalent or better provision at the site nor is there any justification that there would be alternative community use in a suitable location in the locality. As such the proposal is contrary to Policies CS16 of the Core Strategy 2011, Policy DM9 of the Development Management Plan 2015 and the NPPF 2019" H6 US40 Hershams Day Centre and Village Hall This site has been threatened with redevelopment for numerous years, and a Community Hall here is highly unlikely to be replaced once the present one is closed. The comments in H1 above apply equally well to H6. This Hall has been cited as an alternative hall in other past proposals | Remove H1, H6, H8, H15 from the plan | | | No, I do not wish to participate at the oral examination | | Objection noted. Hershams Residents committee clarifying many of these concerns during the representation period. The Council has met and exceeded its duty to engage with and consult stakeholders on the preparation and contents of the DELP and has done so in accordance with its <u>Statement of Community Involvement</u> and all relevant planning regulations. The Council utilised a range of advertisement and consultation techniques during the Regulation 18 and 19 stages to reach and engage with the widest possible range of stakeholders. Techniques included online advertisement on the Council's website and social media platforms – Twitter, Facebook, LinkedIn, Instagram and Nextdoor, as well as physical advertisement in a local newspaper – the Surrey Advertiser and posters on the Council's noticeboards located throughout the Borough, including within the Walton and Hershams communities. The DELP was also available to view and read at the Civic Centre and Borough libraries. In addition, | |

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| 1110776 | Owen Neal | Sport England | Yes | | Yes | <p>Sport England welcomes the intention behind the policy to ensure new developments contribute to healthy and active lifestyles. Sport England notes that reference is made to Active Design principles which support well being and greater physical movement. Sport England is unclear whether this is a direct reference to our own Active Design guidance which is based on a set of 10 principles and can be applied to both new and existing developments. If not, then Sport England strongly encourages direct reference to our Active Design guidance which we have co-produced with the former Public Health England. Sport England considers that there is a great deal of synergy between our guidance and draft policy INF3 Part 1.</p> <p>It is important to acknowledge that as highlighted in our Active Design guidance, it is important to mobilise and activate places and spaces to be active, and the role of local champions in utilising these areas to motivate the local community to be physically active. Similarly, it is very important that ongoing maintenance and management is put in place to ensure that active travel routes and active spaces are safe and attractive and encourage ongoing healthy lifestyles.</p> | | | | | | | | <p>Comments noted.</p> <p>An amendment to the supporting text of draft policy INF3 with the suggested reference to Active Design Guidance has been included in the Council's proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see minor modification ref. MM8.7.</p> |
| 1110807 | John Bamford | | Yes | | Yes | <p>In my opinion it is very important to promote the health and wellbeing of residents, workers, and visitors that involves shaping the built and natural environment</p> | | | | | | | | <p>Support noted.</p> <p>Draft policy INF3 seeks to support and deliver this.</p> |
| 1110905 | Health at hand | Health at hand | Yes | | Yes | | | | | | | | | Support noted. |

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| 1112165 | Rowan Gilbert | NHS Property Services | | | Yes | Policy INF3 sets out how the Council expects developments to contribute to healthy and active lifestyles. NHSPS support the provisions set out within the draft policy which will help achieve this. | | | | | 2022 NHSPS Elmbridge Local Plan Reg 19 Reprs.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/564459/PDF/-/2022%20NHSPS%20Elmbridge%20Local%20Plan%20Reg%2019%20Reps%2Epdf | As per 2a. | | | Support noted. |
| 1112271 | Sue Janota | Surrey County Council | | | | We note the policy requirement for Health Impact Assessments. This is welcomed and it is an area that Public Health colleagues are starting to look at. They are keen to involve EBC as work progresses. | | | | | | | | | Support noted. |
| 1108578 | Robert Allvey | | Yes | | No | | Y | <p>The plan is generally competent, however it lacks basic common sense in its execution. Elmbridge encourage electric car charging, cycling and discourage driving however there is nothing to provide the necessary infrastructure that is discussed in the report.</p> <p>The vision of a car free utopia with clean air will not happen unless local or national government make it happen. Developments may discourage cars by not providing parking spaces but people will still have cars and these will be forced to park in other parts of the borough and drive them.</p> <p>The report seem to be suggesting a lot of commercial sites and car parks are abandoned in favour of housing and this will inevitably lead to traffic, congestion and poor air pollution.</p> <p>I assume the rail network and doctors surgeries can accommodate the thousands more people who will become residents.</p> <p>This questionnaire is written by a local council beaucrocat, it seeks to pigeon hole peoples responses into a box ticking exercise based on councils procedure rather than the contents of the report.</p> | Some real answers to the questions you raise would help. | | No, I do not wish to participate at the oral examination | | <p>Comments noted.</p> <p>The Council's Infrastructure Delivery Plan (May 2022) (IDP) and Update (July 2023) detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the quantum of development proposed in the DELP.</p> <p>The IDP and IDP Update have been informed by the preparation of other evidence base documents e.g., Transport Assessment (2022) and via discussions with infrastructure providers as part of the Council's duty to cooperate activities as outlined in the Council's Duty to Cooperate Statement of Compliance (June 2022), Duty to Cooperate Statement of Compliance Update (August 2023) and Statements of Common Ground published with the Core Documents submitted for Examination.</p> <p>The agreed position with our infrastructure delivery partners is that the proposed development strategy can be accommodated</p> | | |

INF4: Play and Informal Recreation Space

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 | |
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| 1107104 | Alan McCann | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1109574 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110338 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110670 | Mr Gil Bray | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110808 | John Bamford | | Yes | | Yes | I support the need to provide space and/or access to suitable play and informal recreation space and accessible routes for children and young people, that enable them to play and move around safely and independently. In my opinion the young people help to retain the vibrancy of a local environment. | | | | | | | | | | | | Support noted. |
| 1110904 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1111051 | Lauren Manoharan | hgh Consulting Sorbon Estates | Yes | | No | Comments on Policy INF4 – Play and informal recreation space: Sorbon Estates has concerns with the requirement in 1 b) of the policy for external play space and facilities to be provided on site on all residential developments with 50 or more family units (as defined as those with 2 or more bedrooms). There may be some instances where a site is constrained by size or other environmental factors and it may not be possible to provide adequate facilities on the site. Furthermore, where a development is a 100% flatted development with one and two bed units, it will generate a very low child yield. It is noted that part d) of the policy advises that where the creation of new play facilities is not feasible, developers will be required to work with the council to deliver enhanced provision nearby. Part 4 of the policy | Y | | Y | Policy INF 4 - Play and informal recreation space Comments on Policy INF4 – Play and informal recreation space: Sorbon Estates has concerns with the requirement in 1 b) of the policy for external play space and facilities to be provided on site on all residential developments with 50 or more family units (as defined as those with 2 or more bedrooms). There may be some instances where a site is constrained by size or other environmental factors and it may not be possible to provide adequate facilities on the site. Furthermore, where a development is a 100% flatted development with one and two bed units, it will generate a very low child yield. It is noted that part d) of the policy advises that where the creation of new play facilities is not feasible, developers will be required to work with the council to deliver enhanced provision nearby. Part 4 of the policy repeats that major housing development of over 50 units are expected to make appropriate provision of play space. It continues that "In determining the amount of play space required the council will consider the type of development, amount, quality and use of existing accessible provision of play space, as well as the anticipate child yield of the development." As noted above, the provision of play space may not be feasible on | 1b) Requiring external play space and facilities on the site as part of new residential developments of over 50 units which comprise predominantly family housing where there is an identified need arising from the development, and it is feasible. 1d) Where there is an identified need for the creation of new play facilities from a development and the creation of new play facilities is not feasible on site, requiring developers to work with the council to deliver enhanced provision nearby. 4. Major housing developments of over 50 units which comprise predominantly family housing and where there is an identified need arising from the development are expected to make appropriate provision of play space. In determining the amount of play space required the council will consider each development on a case by case basis in terms of the type of development, amount, quality, and use of existing | | | | Yes, I wish to participate at the oral examination | Sorbon Estates would like to have the opportunity to participate at the oral part of the examination to further explain to the Inspector why they consider that changes should be made to this policy. | Objection noted. The Council considers that as drafted criterion d of draft policy INF4 would provide the necessary flexibility to accommodate the issues raised and is considered to be appropriate, | |

INF5: Communications

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 | |
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| 1107105 | Alan McCann | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1109575 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110326 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110672 | Mr Gil Bray | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110809 | John Bamford | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110902 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | | | | | | Support noted. |

INF6: Rivers

| ID | N | Org | 1 | 1a | 2 | 2a | 3 P | 3 E | 3 J | 3 C | 3a | 4 | 4a | 4b | 5 | 6 | 7 | |
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| 1107106 | Alan McCann | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1109576 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110305 | Martin Baker | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110673 | Mr Gil Bray | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110810 | John Bamford | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110901 | Adrian Dilworth | Health at hand | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1111011 | Rachel Rae | Environment Agency-Thames Sustainable Places Team | Yes | | No | 10. Chapter 8 (INF6) – Rivers 10.1. We welcome the inclusion of a river policy. However, we note the policy does not include a minimum distance that the buffer zone should be from the top of the bank. We note the supporting wording (paragraph 8.34) has a good policy for buffer zones but this is not reflected in the main policy box. Point 7 of Policy INF6 should include the following: 10.2. To provide a more robust river policy we request the following points are also included: 10.2.1. Culverts/de-culverting 10.2.2. Bank protection Point of clarity and accuracy: Development proposals that contain or are adjacent to watercourses should consider the impact that development can have on them and provide a minimum of a 10metre undeveloped buffer from the river bank, measured from the top of the bank. Buffer zones must be free from built development including lighting, domestic gardens and formal landscaping. Culverting of any watercourse causes adverse ecological, flood risk, geomorphological, human safety and aesthetic impacts. Watercourses are | | | | | | EBC Reg 19 comments from EA 290722.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557306/PDF/-/EBC%20Reg%2019%20comments%20from%20EA%20290722%20Epdf | As per 2a. | Yes, I wish to participate at the oral examination | As a statutory consultee we are happy to participate at the oral examination if it is deemed necessary. | Comments noted. The Council has included the suggested amendments within its proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see Main Modification ref. M7.2 | | |

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| | | | | | <p>important linear features of the landscape and should be maintained as continuous corridors to maximise their benefits to biodiversity and society. Suggested wording: Opportunities for de-culverting of watercourses should be actively pursued. Planning permission will only be granted for proposals which do not involve the culverting of watercourses and which do not prejudice future opportunities for de-culverting. Hard engineering approaches to riverbank protection should be discouraged and opportunities to apply soft engineering and natural flood management techniques should be encouraged. This has multiple benefits, including for contributing to biodiversity net gains, flood storage, Water Framework Directive objectives, and aesthetics. Suggested wording: Engineered river channels are one of the most severe examples of the destruction of ecologically valuable habitat. Proposals for hard engineering approaches to riverbank protection, such as sheet piling, will be discouraged. Soft engineering approaches should be used wherever possible.</p> | | | | | | | | | |
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| 1111075 | Zoe Chick | Surrey County Council | Yes | The RTS does not consider, for the sections we have made representations on, that there is anything that is not legally compliant. We also consider these sections of the Draft Plan to be sound. Please see uploaded document at question 4a for full response. | Yes | <p>We are pleased to see support for the RTS in part 3 of this policy which states, 'The council supports proposals for the wider River Thames Scheme and will work proactively with partners to deliver improvements. Land at Desborough Island will be safeguarded for the creation of new habitat.'</p> <p>We would like to see additional policy wording added to an existing point or as a new standalone point which supports the creation and/or enhancement of water dependent habitat.</p> <p>Recommended action: Additional policy point could be included which states: 'Opportunities to create and/or enhance water dependent habitats to improve rivers will be supported.'</p> <p>Supporting text paragraph 8.32 states that '...Over 15,000 homes and numerous businesses are at risk from flooding.' To reflect the current RTS proposals, it would be more accurate to reference the figures that apply to the stretch of the Thames between Egham and Teddington. The RTS would protect over 11,000 homes and 1,600 businesses in this stretch. We also request similar references are updated if applicable to other sections of the draft plan.</p> <p>Recommended action: The wording of this paragraph could be amended to say: The River Thames between Egham and Teddington has the largest area of developed flood plain in England without flood defences. Over 11,000 homes and 1,600 businesses are at risk from flooding. The council is working with the Environment Agency and other partners to bring forward the River</p> | | | | https://consult.elmbridge.gov.uk/gf2.ti/af/1205954/697833/PDF/-/RTS-PLN-POL-ELM-001%20-%20RTS%20Letter%20Elmbridge%20Local%20Plan%20Representations%20-%20For%20Issue%20220729.pdf | As per 2a. | | Comments noted. The Council has included the suggested amendments within its proposed modifications to the DELP. These have been submitted to the Inspector for Examination. Please see Main Modification ref. M7.2 and minor modification ref. MM8.11 |
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| | | | | | <p>Thames Scheme. This is a programme of projects and investments with the aim of reducing flood risk in communities.</p> <p>Paragraph 8.33 states 'The rivers and watercourses in the borough provide an important habitat and natural corridor to allow the movement of species between suitable habitats and promote the expansion of biodiversity. Through the provision of movement may help wildlife adapt to climate change by providing a migration corridor.'</p> <p>We would like to see the wording of this paragraph amended to express support for development which improves the movement of terrestrial and aquatic species between habitats.</p> <p>Recommended action: We recommend you amend the wording of supporting text paragraph 8.33 to reflect the above statement.</p> | | | | | | | | | |
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9. Site Allocations

| ID | N | Org | 1 | 1a | 2 | 2a | 3 | 3 | 3 | 3 | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
|---------|---------------|--|-----|----|----|--|---|---|---|---|-----------------------------|---|---|----|--|---|--|
| | | | | | | | P | E | J | C | | | | | | | |
| 1106897 | Bhavash Vashi | BVA Planning obo Chalford Property Company Ltd | Yes | | No | <p>Please see link fro full response to question 2.</p> <p>https://consult.elmbridge.gov.uk/reg19/showUserAnswers?qid=8179619&voteID=1106897</p> <p>In summary, it is submitted that the land at Heathside (northern part of parcel 45) should be given much greater consideration by Elmbridge Borough Council as the land is suitable for development, is available and does not have any significant deliverability issues. The Council need to explore further all options, including Green Belt releases, if it is to truly meet or come close to meeting its OAN and pass the tests of Soundness. It is our view, that the Council's, ideological stance of not considering any GB sites has resulted in a defensive and containment strategy that neither delivers the housing the area so desperately needs nor contributes to the economic growth of the borough given the inter-dependency of both housing and economic strategies.</p> <p>To support our response we have prepared a Vision Document for the clients site which is provided and should be read in conjunction with this response.</p> | Y | Y | Y | Y | See response to Qu. 2 above | <p>To allocate more sites for development in order to really meets its OAN housing need.</p> <p>In summary, it is submitted that the land at Heathside (northern part of parcel 45) should be given much greater consideration by Elmbridge Borough Council as the land is suitable for development, is available and does not have any significant deliverability issues. The Council need to explore further all options, including Green Belt releases, if it is to truly meet or come close to meeting its OAN and pass the tests of Soundness. It is our view, that the Council's, ideological stance of not considering any GB sites has resulted in a defensive and containment strategy that neither delivers the housing the area so desperately needs nor contributes to the economic growth of the borough given the inter-dependency of both housing and economic strategies.</p> | <p>Land off heathside Vision Doc.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/541380/PDF/-/Land%20off%20heathside%20Vision%20Doc%2Epdf</p> | | Yes, I wish to participate at the oral examination | We believe that the Council is not doing enough to meet its OAHN and so needs to allocate further sites including our clients at Heathside, Hinchley Wood which has been assessed as set out in our Vision Document. We believe we can contribute to the debate on this issue at EIP and assist the Inspector in his deliberations. | <p>Objection noted.</p> <p>During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.</p> <p>The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022).</p> |

configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality.

The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on

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| 1107932 | Katia Clarke | Planning Potential obo Aldi Stores Ltd. | No | <p>Please see uploaded document at question 4a.</p> <p>In summary, the comments made relate to site allocation D7- 47 Portsmouth Road, Thames Ditton.</p> <p>The site was not included in any previous draft consultation and so this is the first opportunity to comment on the proposed allocation. As such, the respondent questions whether the proposed allocation is legally compliant or sound.</p> <p>The site is owned by Aldi Stores and is being promoted for a medium foodstore development to serve Thames Ditton. The benefits of this development as well as retaining employment/ commercial use is outlined in the representation letter.</p> | No | <p>Please see uploaded document at question 4a.</p> <p>In summary, the comments made relate to site allocation D7- 47 Portsmouth Road, Thames Ditton.</p> <p>The site was not included in any previous draft consultation and so this is the first opportunity to comment on the proposed allocation. As such, the respondent questions whether the proposed allocation is legally compliant or sound.</p> <p>The site is owned by Aldi Stores and is being promoted for a medium foodstore development to serve Thames Ditton. The benefits of this development as well as retaining employment/ commercial use is outlined in the representation letter.</p> | Y | Y | Y | Y | <p>Please see uploaded document at question 4a.</p> <p>In summary, the comments made relate to site allocation D7- 47 Portsmouth Road, Thames Ditton.</p> <p>The site was not included in any previous draft consultation and so this is the first opportunity to comment on the proposed allocation. As such, the respondent questions whether the proposed allocation is legally compliant or sound.</p> <p>The site is owned by Aldi Stores and is being promoted for a medium foodstore development to serve Thames Ditton. The benefits of this development as well as retaining employment/ commercial use is outlined in the representation letter.</p> | <p>As covered in the attached, it is considered that the proposed allocation should be altered to allow the site in question (Site ref: D7 - 47 Portsmouth Road) to be developed for continued commercial use, reflecting the site ownership, commercial history, opportunity to deliver beneficial development, and development constraints.</p> <p>As set out, there is potential for the site to deliver a medium sized foodstore development to meet an identified need in an accessible location, enhancing retail choice and competition in the area to support surrounding residential uses. The proposed residential allocation does not address the current identified need for additional convenience retail provision in the area and would instead deliver additional dwellings without convenient access to supporting infrastructure and facilities.</p> | 2022.07_Reps to Reg 19 Elmbridge Local Plan_5662N.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/542284/PDF/-/2022%2E07%5FReps%20to%20Reg%2019%20Elmbridge%20Local%20Plan%5F5662N%2Epdf | No, I do not wish to participate at the oral examination | <p>Comments noted.</p> <p>The site allocation proposed capacity has been changed from C3 (25 residential units) to Use Class E (Retail) as the representation confirms the availability of the site for this use. The recent appeal decision has also confirmed that a food store is suitable and achievable on the site further to design alterations.</p> |
| 1108127 | Louise Tippett | | No | <p>I am taking a human rights based approach to the law - eg. right to clean air, right to health, rights of nature - in the sense of protecting biodiversity against threat of ecocide.</p> | No | <p>Too much intensification of housing without provision for more infrastructure such as new GP surgeries.</p> <p>H15 - US374 - Hersham library - it is well used and vital part of community. If it is closed - even if the idea of temporary closure - I do not believe it will ever open again. This would impact particularly on children, older people, poorer people, those without cars.</p> <p>H15 US 390 - Royal</p> | Y | Y | | | <p>As in my previous comments: the Government has policies on climate crisis, biodiversity, sustainability and "leveling-up", but the intensity of dwellings without new infrastructure such as buses at a London-type level, proper cycle lanes, new GP surgeries does not comply with the national policies.</p> | <p>1. vastly improved PUBLIC transport; 2 new GP surgeries; 3. commitment in law to maintain Hersham public library; 4. specific climate mitigations for new housing including but not limited to: insulation, solar panels; 5. specific biodiversity mitigations including but not limited to: new and existing areas of land managed for biodiversity</p> | No, I do not wish to participate at the oral examination | <p>Comments noted.</p> <p>The Council's Infrastructure Delivery Plan (May 2022) (IDP) and Update (July 2023) detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the quantum of development proposed in the DELP.</p> <p>The IDP and IDP Update have been informed by the preparation of other</p> | |

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| 1109019 | Ian Powell | | No | Please see full representation response: https://consult.elmbridge.gov.uk/eq19/showUserAnswers?gid=8179619&voteID=1109019 In summary, this representation objects to the draft allocation of ESH11 – 42 New Road, Esher, KT10 9NU and requests that this allocation be formally deleted from the submission version of the Draft Plan. | No | See response to question 1 | Y | Y | Y | Y | See response to question 1 above. | See response to question 1 above. | Bell Cornwell - Regulation 19 - Representation Letter - Mr Ian Powell.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/545636/PDF/-/Bell%20Cornwell%20%2D%20Regulation%2019%20%2D%20Representation%20Letter%20%2D%20Mr%20Ian%20Powell%2Epdf | | No, I do not wish to participate at the oral examination | | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022). The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, |
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any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as

policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii). In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the

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| 1109529 | Lois Mistry | | Yes | | No | Regarding site allocation H15 (Hersham Library) I do not support the allocation for residential units and re-provision of community use. I am a keen library user and benefit from the library services. It is local to me and I will be continuing to use these services even more in the future. | | | Y | | It is not justified to remove the library services that myself and other local residents rely upon. Many residents are not able to access library services that are further from them. | Hersham library is extremely important to the local community and therefore should remain in place. | | | No, I do not wish to participate at the oral examination | | Comments noted. The Hersham Library site allocation (H15) includes a community use within the allocation. It is intended that to meet the requirements of the allocation a development scheme would be required to redevelop the library at ground level and include flats above. Hence the library use would be retained on the site. In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protect and retained where appropriate. |
| 1109577 | Sally Harman | Claygate Parish Council | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1109675 | Mr. Lance Flannigan | | Yes | N/A | No | These representations are made on behalf of The Trustees of Weybridge Cricket Club, who hold a 50 year lease on the Pavilion at Weybridge Cricket Green together with a right to play cricket on the Cricket Green and a right to use the Cricket Green Car Park. The Trustees object to the proposed allocation of the York Road Car Park, Weybridge (Site Allocation Reference WEY13) for 8 residential units on the basis that it is not justified and is not consistent with national policy and so does not meet the test of soundness under Paragraph 35 of the NPPF. | | | Y | Y | The proposed allocation of the York Road Car Park is not justified because it does not represent an appropriate strategy, taking account of reasonable alternatives, and based on proportionate evidence. Specifically, development of the York Road Car Park for housing will result in the loss of a public off street car park which will have the following unacceptable consequences: 1. Given the close proximity of the York Road Car Park and the lack of alternative car parking in the area, the loss of car parking will result in the increased (unlawful) use of the Car Park at Weybridge Cricket Green, which will further restrict or prevent its use by lawful users of the Car Park. This will have an unacceptable impact on the use and enjoyment of Weybridge Cricket Green, (a designated Town or Village Green) by Weybridge Cricket Club and other lawful recreational users. This is contrary to Policies SS2 (a) iv), SS2 (d) i), ENV1.1, ENV1.4 and IMP1.c) of the Reg 19 Draft Elmbridge Local Plan 2037 and amounts to a statutory nuisance under Section 12 of the Inclosure Act 1857 and Section 29 of the Commons Act 1876. 2. It will undermine the vitality and viability of the Weybridge Queens Road Local Centre, contrary to Policies SS2 (c) ii), SS3 3.a), ECO3 and IMP1.d) of the Reg 19 Draft Elmbridge Local Plan 2037. For the reasons set out in 1. and 2. above, the proposed allocation of the York Road Car Park for housing is not | Delete the York Road Car Park (Site Allocation Reference WEY) from the list of allocated sites in Chapter 9. | | | No, I do not wish to participate at the oral examination | My apologies. I do not wish to participate at the oral part of the examination, but the online form is not allowing me to change my answer to Q5.- This has now been amended manually. | Comments noted. WEY13 –York Road Car Park is no longer available for development. |

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| | | | | | | | | | consistent with national policy set out in Paragraphs 8 b), 8 c), 80, 85, 91, 92 and 96 of the NPPF. | | | | | | | |
| 1109741 | Pauline Simpson | | Yes | There cannot be 33 residential units at D3 . The site is not big enough. I suggest this is a misprint | No | See comment for question 1 | | Y | D3 Site allocation - there is not enough space to allocate 33 residential units | 3 (?) residential units | | | No, I do not wish to participate at the oral examination | | Objection noted. The capacity for the site was taken from the 2018 Urban Capacity Study. Since then, planning applications for smaller units on Grace Lodge and 4 Manor Road South have been submitted and refused or dismissed. This site will be reassessed in the Council's next Land Availability Assessment. | |
| 1110077 | Susan Mealor | | No | For the document to be legally valid, the detail must be accurate. Of the site allocations in Hersham, we are aware of these factors: 1. H8 US389 the members of this club say that they have never agreed or been asked that this site be on the list. Thus the list is based on incorrect information. 2. H3 US379 The boundary of this site has been significantly changed since the 2020 consultation/2018 Land Availability Assessment. At that time, the boundary only encompassed the car parking area. Two weeks into this consultation, when the plan detail was added to the document, it was discovered that the same coding numbers are being used for the entire shopping centre site. This puts the | No | Chapter 9: It is clear from the horrified reaction to the list of recommended development sites in Hersham, that this community has not been aware of any "public" consultations concerning these sites. Compare the reaction in recent weeks June/July 2022 to the total of one respondent to the last consultation in February/March 2020. Which incidentally was at a time when many of us had already gone into Covid shutdown, frightened for our lives, prior to the official government edict. Specifically, there has been a large negative response to the inclusion of H15 Hersham Library, as shown by the postcard campaign. This shows that no-one was previously aware of the inclusion of the library as a development site. Had there been meaningful consultations, this would have been known earlier. Thus the plan has not been carried out with the involvement of this community and cannot be said to be sound. | Y | Y | Y | The council has tried to say that listing does not infer loss as planning permission still needs to be obtained. It has NOT brought the attention of residents to Ch9 para 4 which states: "All site allocations require planning permission prior to development. Allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses. Pre-application advice prior to the submission of a planning application is encouraged as well as engagement with infrastructure providers at the earliest opportunity." Thus to be included on the list DOES put all the sites at real risk. The following refers to H15 HERSHAM LIBRARY H15 US374 Not Justified. Chapter 9, site number H15 Hersham Library site should not be in the local plan as a site for redevelopment. It is a betrayal of the covenant set up 60 years ago specifically to ensure that the site was dedicated to a library for ever. This is as appropriate now as it was then. Ch 8 of Local Plan. Providing infrastructure and connectivity, specifically references community art and cultural facilities including libraries (para 8.4) para 8.7, INF2 pt 3. Development proposals that would result in the unnecessary loss of community facilities will not be permitted unless it can be demonstrated that: a) that there is no longer an identified community need for the facilities or that they no longer meet the needs of users. 8.8 Social and community infrastructure plays an important role in providing good quality of life, stimulating and supporting social cohesion and interaction, as well | Remove from the Plan H15 Hersham Library. H1 United Reform Church, H6 US40 Hersham Day Centre and Village Hall H8 US 389 Hersham sports and social club H11 US376 Trinity Hall and 63-76 Molesey Road. H3 US379 Shopping Centre Car Park. Change the reference code so that it covers the whole the shopping centre site, to ensure that we cannot lose our car park to 200 residential units. | | | Yes, I wish to participate at the oral examination | Hersham Library It is apparent from the response of the community that the library is a popular and well used public community asset. The community knows that once the library is closed for the site to be redevelopment, it is unlikely be reopened, which will be a loss for the community of Hersham. In particular the covenant placed when the land was allowed to be used for the library, is still as valid as it was in 1960s. The covenant should be respected and not be allowed to fall victim to current fads and fancies.... Which is precisely why it was written in the first place. Other sites in Hersham should also not be on the plan, be it through covenant reasons, misrepresented ownership, incorrect or missing site facts. | Objection to sites noted. The landowners of site allocation H8 and H10 have confirmed that their sites are no longer available. Site H3- Hersham Shopping Centre site will include parking for the retail and residential use. Site allocation H11 has an 11-to-15-year timescale which allows for consideration of the exact location of a residential scheme, loss of employment and the existing constraints on site. The Hersham Library site allocation (H15) includes a community use within the allocation. It is intended that to meet the requirements of the allocation a development scheme would be required to redevelop the library at ground level and include flats above. Hence the library use would be retained on the site. In addition, draft policy INF2 – Social and community uses seeks to ensure |

Primary School (GB62, also SA47) is on this list! This is a popular school which has had a large new extension, and these is nowhere in Hersham or nearby that could provide a replacement. The school site was added to the green belt land following a public inquiry in 1980s, precisely to protect this educational site. This is a serious failure of oversight by the Officers involved. All of the above points lead me to believe that this document has been not been produced with the care and precision that is needed be legally compliant

extended period when there was no library service available locally. The library is valued by the current population. The building is suitable. Events for children and adults are enjoyed by all who attend, usually subsidised by the volunteers of the Friends of Hersham Library. The reading of paper books has not died out. The social function of a library is no less than it ever was. The provision of computers is a vital link for many residents. A suitable library will not be provided if it shares a site with multiple flats. Whilst it is true that in CH 9 Site allocations, HE15 does state that a community provision can be provided, this does not guarantee that a good library for this community will subsequently exist.

Not positively prepared. Betrayal of the covenant for the library Most important of all is the fact that the site was common land, and when exchanged, a covenant was imposed, to ensure that only a library was built on the site. This was to ensure that the vision and generosity of the founders of the library was preserved for future generations, to eliminate the problems caused by fads and fashions such as this current proposal. The loss of this library will be detrimental to the Community of Hersham, and thus it should be removed from the plan. A covenant must allowed to do what it was set up to do.

Not Effective. The library is already one of the cheapest in Surrey to run, because it is on a freehold site. It is extremely unlikely, that a library service will pay a commercial rent for a lesser facility on a site which it has sold, which had on it a building that was purpose built for the function it had.

OTHER a United Reform Church and SITES ON THE LIST FOR HERSHAM WHICH ARE DISPUTED
H1 US 441 63 Queens Road, United Reform Church
This building was previously then used as a children's nursery. An application to convert to offices has recently been refused planning permission on these grounds:
"The proposed development would result in the loss of community use which would not be replaced by equivalent or better provision at the site nor is there any justification that there would be alternative community use in a suitable location in the locality. As such the proposal is contrary to Policies CS16 of the Core Strategy 2011, Policy DM9 of the Development Management Plan

Elmbridge planning database.
The Council's Regulation 22 Consultation Statement fully details the range of techniques used during the consultation period to contact and engage with stakeholders.

2015 and the NPPF 2019"

H3 US379 Hersham Shopping Centre and Car park

The boundary of this site has been significantly changed since the 2020 consultation/2018 Land Availability Assessment. At that time, the boundary only encompassed the car parking area. Two weeks into this consultation, when the plan detail was added to the document, it was discovered that the same coding numbers are being used for the entire shopping centre site. This puts the community at risk of losing the entire car park to 200 Residential Units, as any developer could reasonably argue that the site US379 refers to the car park. A different code must be used to prevent this. This is careless. In order to remain viable for a supermarket, the car park needs to be large enough. 200 new residential units will require an additional large number of private parking spaces

H6 US40 Hersham Day Centre and Village Hall

This site has been threatened with redevelopment for numerous years, and a Community Hall here is highly unlikely to be replaced once the present one is closed.

The comments in H1 above apply equally well to H6.

This Hall has been cited as an alternative hall in other past proposals for closure of other venues throughout Elmbridge, so the whole of Elmbridge will be affected by the loss of the building.

Hersham Village Hall is the designated site for flood emergencies, being a large capacity building (200 in main hall) and the Elmbridge leisure centre is likely to be one of the first properties to be flooded in any inundation.

It was one of the few sites in Elmbridge suitable for a Testing Centre during the Covid Crisis.

The Day Centre is popular and well used. Its kitchen is used to provide the meals for the Meals-on-Wheels service to the elderly and housebound throughout Elmbridge.

Both the day Centre and Village Hall have recently undergone extensive refurbishments, the first since the buildings were provided cost-free by the developers of the Hersham Shopping Centre, on a site which previously included the Working Men's Club, so it has been a community asset for well over 100 years.

H8 US 389 Hersham sports and social club

This is privately owned and run by the

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| | | | | | | | | | <p>members, who have not agreed to its inclusion, it is not available and is therefore not suitable to be included, contrary to the statement in Land Availability Assessment 2022 appendix 5.</p> <p>H10 US 390 is a Public House The Royal George with a restaurant and car parking. The loss of this will also involve loss of employment in the Hersham area.</p> <p>H11 US376 Trinity Hall and 63-76 Molesey Road. This site has a listed building, the Barley Mow, which provides employment as well as a social venue. The off licence next to the public House provides employment. There is also has a children's Nursery, Little Limes Day Nursery on the green area which was the bowls club. It provides a service to local families and employment. All of these would be lost and not replaced. The report 2022 Local Green Spaces does not mention that the bowls club is now used as a children's nursery. It does mention that the site appears neglected but that is because EBC itself has neglected it. The Land Availability Assessment 2022 Appendix 5 has omitted to mention an important building and vital service on the site. It houses a sewerage pumping station, which has significant underground structures and requires 24 hour access in emergencies. At any time large vehicles and road tankers will need access, including at night.</p> | | | | | |
| 1110163 | John Nicol | | No | Please see uploaded document at question 4a for full response. In summary, this representation is promoting land at the northern end of Mill Road, Esher and seeking the removal of the Green Belt and Biodiversity Opportunity Area designations on the site. | No | Please see uploaded document at question 4a for full response. In summary, this representation is promoting land at the northern end of Mill Road, Esher and seeking the removal of the Green Belt and Biodiversity Opportunity Area designations on the site. | Y | Y | Y | Please see uploaded document at question 4a. | | Local Plan Submissions Final.pdf | Yes, I wish to participate at the oral examination | <p>Objection noted. Site allocation US39 is no longer available for development.</p> <p>The landowners have confirmed availability for US33 and US38 in 2023. The 6-10 year timescale allows for employment options to be considered.</p> <p>The Council has commissioned a feasibility study to look at the options for redevelopment and regeneration of the wider area around Lower Green. It is envisaged that this will include options for mixed use development which will include some employment use.</p> |

therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green

also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii). In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the

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| | | | | | | | | | | | | | | | <p>aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.</p> <p>Surrey County Council lead on the biodiversity opportunity area designations in the Borough and the Surrey county.</p> <p>The Draft Local Plan sets out a strategy that aims to protect and enhance biodiversity in the Borough. Biodiversity Opportunity Areas are a key to achieving this outcome. Removal of the designation may be considered to be contrary to this objective. Therefore a compelling case would need to be made as to why the site should have the designation removed</p> |
| 1110307 | Martin Baker | | Yes | | Yes | | | | | | | | | | Support noted. |
| 1110400 | Stephen Heath | | Yes | | Yes | I firmly support the designation of site D7 / US443 / 47 Portsmouth Road, Thames Ditton, KT7 0TA as "residential". This site (the former Guy Salmon car dealership) is completely unsuitable for a supermarket or similar. | | | | | | | | | Support noted. |
| 1110468 | Paul Hazeldine | | No | How can it be legally compliant if I cannot find where to comment on each site allocation? | No | Can't find how and where to comment on each listed site. How can the draft Local Plan be sound if it is difficult, perhaps impossible, to comment on these? | Y | Y | Y | Can't find where to comment on specific sites. | Allow comments to be made against each site. If there is such a facility then it is almost impossible to find - please advise. | | | No, I do not wish to participate at the oral examination | <p>Comments noted.</p> <p>The Regulation 19 consultation questionnaire did not set out a separate section for comments on each site. It was intended that respondents detail their comments on any/all sites they wished to comment on within the questionnaire on chapter 9 of the DELP.</p> |

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| 1110523 | David Peters | | Yes | | Yes | | | | | | | | | | Support noted. |
| 1110545 | Chris Colloff | Thames Water Utilities Limited | No | In relation to the proposed site allocations, it is noted that the spatial strategy does not propose the release of Green Belt land and results in under delivery of housing compared with the objectively assessed needs for the Borough. The Council's justification for this approach is noted, however, if changes are proposed to the spatial strategy in order to address concerns at the Local Plan examination stage we would welcome early engagement on any revised housing figures so that these can be taken into account in our future plans for infrastructure provision. In the event that additional sites are required to reduce the shortfall in housing against the objectively assessed need, or for additional land for commercial use, Thames Water have extensive landholdings within the Borough and there may be potential for land to be released for development. | No | We have previously provided high level comments on water and wastewater infrastructure capacity to serve potential site allocations. As set out above and advised in the draft Local Plan developers are encouraged to engage with Thames Water at an early stage to discuss the infrastructure requirements for their schemes. It is not clear whether the proposed housing provision targets will be found to be sound. In the event that it is not found to be sound we would need to consider the impacts of any increase in housing numbers on water and wastewater infrastructure to help ensure growth and infrastructure are aligned. | | Y | The Local Plan will not deliver the OAN for housing for the borough and it is not clear if this approach will be found to be justified. Previous sites put forward for potential development which may become surplus to requirements have been excluded due to their location in the Green Belt and it is not clear that this approach is justified as minor changes could assist with delivering housing without significant impacts on the Green Belt. In the event that additional sites are required to reduce the shortfall in housing against the objectively assessed need, or for additional land for commercial use, Thames Water have extensive landholdings within the Borough and there may be potential for land to be released for development. Three areas were previously identified around the Queen Elizabeth II Reservoir which have potential to accommodate housing. These were put forward in representations in 2019. In addition there is land that can potentially be made available for development at Esher Sewage Treatment Works. Within the 2016 Green Belt Boundary Review the three parcels of land were included in Local Parcel 69. The assessment of this parcel of land indicated that parcel serves a purpose in relation to checking the unrestricted sprawl of large built up areas and preventing neighbouring towns from merging and to a lesser extent in safeguarding the countryside from encroachment. This assessment looked at the parcel as a whole. The vast majority of the land parcel consists of the Queen Elizabeth II Reservoir. The three sites identified with potential for release are located around the periphery of the reservoir adjacent to existing built up areas and minor adjustments to the Green Belt boundary to remove these sites from the Green Belt could assist with delivering growth within the district with minimal impacts on the Green Belt as the reservoir and its embankments would remain providing a strong and robust Green Belt boundary and would minimise any harm to the wider Green Belt. Land at Esher STW was included within RSA-40 with the 2018 Green Belt Boundary Sub-division Report concluding that the area performed weakly against NPPF Green Belt purposes and that the area should be considered further. It is considered that the land owned by Thames Water has | Should consideration be given to making amendments to the Green Belt to increase housing or commercial development land. Thames Water have significant land holdings in the borough and there are areas where land can potentially be made available for development including the sites appended. | 22.07 Esher STW.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/555463/PDF/-/Elmbridge%20%2D%20Site%20A%20%2D%20Thames%20Water%2Epdf Elmbridge - Site B - Thames Water.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/555465/PDF/-/Elmbridge%20%2D%20Site%20C%20%2D%20Thames%20Water%2Epdf | No, I do not wish to participate at the oral examination | n | Comments noted. | |

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| | | | | | | | | | | potential to assist with delivery of commercial development requirements subject to a review of the Green Belt boundary. Plans of all the sites referred to are appended. In the event a review of the Green Belt boundaries is undertaken, consideration should also be given to removal of Esher STW from the Green Belt given it is a major developed infrastructure site on the edge of the settlement boundary. | | | | | | |
| 1110568 | Matt Harris | Nexus obo of Kingacre Estates Ltd | Yes | N/A | No | Please see uploaded documents at question 4a The representation states that many of the 190 small sites are demonstrably undeliverable. Petrol Stations, Council-Owned Car Parks and community facilities are discussed as well as a section of over estimation of capacity/delivery. In conclusion the representation states that - notwithstanding our objections to the Council's housing strategy as a whole (see our representations to Policies SS3 and HOU1, we consider that the highly unusual approach to the allocation of sites carried out by the Council is unsound. | Y | Y | Y | Please see uploaded documents at question 4a As summarised in the representation using just a few examples, the Council makes over-optimistic assumptions about site availability, deliverability and capacity with many of the sites failing the relevant tests identified in the Framework and consequently unsound. As a consequence, the Council's under-delivery of housing and affordable housing will be even more significant than it identifies. | As part of a fundamental review of the Council's housing strategy it must re-consider the sites to be allocated having regard to their genuine deliverability and the potential to viably deliver much-needed affordable homes. | Elmbridge Site Allocations.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/555569/PDF/-/Elmbridge%20Site%20Allocations%2Epdf | | Yes, I wish to participate at the oral examination | We represent a developer with significant land interests in the borough and to whom the housing strategy in Elmbridge as a whole, and the release of land from the Green Belt, is of fundamental importance. Accordingly, it is essential that we are able to participate in all relevant hearing sessions. | Objection noted. COS22 and WEY11 are no longer available for development. Further to the 2023 ownership checks, five Elmbridge owned car parks are no longer available because they are in greater use than that witnessed in 2020/21. Those remaining are still underused, and others have been given a longer timescale to account for the use to be monitored over a longer period. Many of these sites could include both residential use and retain parking such as Torrington Lodge (CL1). Additionally, car parking can be consolidated in area such as Esher where the smaller Highwayman's car park (ESH08) could be re provided within the Civic Centre site (ESH24). The sites included in Chapter 9 that are in community use all state that this use will be re- provided. These all have longer timescales to allow discussion on how this is provided either on site or at a different location. NHS property services support the identification of health centres and community hospitals included in the site allocations subject to confirmation of health commissioning |

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| 1110719 | Andrew Bennett | Burhill Developments Limited | No | The Plan does not allocate sufficient sites for development to meet the Borough's housing need and is therefore not compliant with national policy. | No | The Plan does not allocate sufficient sites for development to meet the Borough's housing need and is therefore not compliant with national policy. Additionally, the policy does not propose the allocation of Land at Chippings Farm for residential development. | | | Y | We object to this policy because it does not propose the allocation of land at Chippings Farm for residential development. | The policy needs to allocate Land at Chippings Farm for residential development. PLEASE REFER TO ACCOMPANYING REPORT FOR DETAILS. | Response to Elmbridge Draft Local Plan - Bidwells on behalf of Burhill Developments Limited.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556513/PDF/-/Response%20to%20Elmbridge%20Draft%20Local%20Plan%20%20D%20Bidwells%20on%20behalf%20of%20Burhill%20Developments%20Limited%20Epdf | | Yes, I wish to participate at the oral examination | Our objections to the Plan go to the heart of the proposed strategy and therefore require discussion in an open forum. | Objection noted. The Council has assessed the suitability of the promoted site – Chippings Farm for release from the Green Belt designation and it was found that the site was not suitable for release. The assessment is set out in Green Belt Site Assessment Proforma LA-20. |
| 1110735 | Ian Anderson | Lichfields | Yes | | No | The allocations part of the Plan makes no provision for leisure and sports development, to meet needs. The David Lloyd Club helps meets such provision and should be recognised as an appropriate location for additional leisure and outdoor recreation development. Whilst the site falls within the Green Belt, it is our view, given the largely previously developed nature of most of the site, that it adds little to the key purposes of maintaining land within the Green Belt and that its removal and recognition through allocation for leisure and sports / recreation use is legitimate. | Y | | Y | The should consider an make provision for leisure, sports, health and wellbeing and recreation development, to meet needs. The David Lloyd Club helps meets such provision within the Borough and is a major destination for health, racquets and other sports and recreation use and should be recognised as an appropriate location for additional leisure and outdoor recreation development. Whilst the site falls within the Green Belt, it is our view, given the largely previously developed nature of most of the site, that it adds little to the key purposes of maintaining land within the Green Belt and that its removal and recognition through allocation for leisure and sports / recreation use is legitimate. | Removal of Green Belt designations across the David Lloyd site and re-allocation for health and fitness / leisure purposes. | | | No, I do not wish to participate at the oral examination | | Objection noted. The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed? Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as |

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| | | | | | | | | | | destroy it. Don't take pubs, libraries, social clubs, cricket clubs. There were tears when the children's centres were taken. They were a vital resource for people with lower means but weren't known to social services. Children are important, having someone there to talk to and get advice and play was so so great, but now it's all gone. All that investment in those spaces, wasted. I wish I had time to answer all of these, but I don't. Please don't take the libraries, please don't take Waitrose and the other shops (Waitrose is a community hub, not like Tesco's of Sainsbury's, they have helpful, knowledgeable staff who appear to care, it makes you feel good going in there. The others are over busy, faceless and horrible in comparison, and a drive away), please don't take another pub, the Royal George has only just got new owners! Please don't take sports and social clubs just because the general clientele are older. Please give respect to all residents of Elmbridge, not just those with money, those who work in the city, those who are not too old and not too young. | | | | | |
| 1110865 | Mark Tricker | | No | One proposed site in the local plan (Wey 13) does not take account of the fact that there is a right of way to the rear of my property from the identified car park. | No | One proposed site in the local plan (Wey 13) does not take account of the fact that there is a right of way to the rear of my property from the identified car park. Furthermore, the plan removes essential and well-utilised car parking from a shopping area and an area of increasing housing density. | | | Y | As above | Wey 13 should be removed from the local plan | | No, I do not wish to participate at the oral examination | Objection noted. Further to land ownership checks, WEY13 is no longer available for development. | |
| 1110875 | Clare Cross | | Yes | D7 I strongly believe that this is the wrong position for a supermarket. It will have an adverse impact on the area and to local shops. It is more suitable for housing which would be of more benefit to the area. | Yes | | | | | | | | | Comments noted. Site allocation D7 was originally allocated for residential use but the landowners of the site have promoted this for a supermarket in their regulation 19 response. The principle of this use has been accepted at the recent appeal- see planning application . | |
| 1110886 | Adrian Dilworth | Health at hand | Yes | | Yes | I agree to the proposals and under no circumstances do I think the greenbelt should be redeveloped. | | | | | | | | Support noted. | |

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| 1110945 | Sam Osborn | Vail Williams LLP obo Haleon Ltd (GSK CH) Trading Ltd - D Prout | Yes | . | No | We believe the Plan would be sound, subject to minor modifications as set out in our papers which are enclosed in line with national policy. In summary, the representation supports Site Allocation WEY33 for residential development but requests that the capacity is increased to 120 units as a guide. | | | Y | Please see uploaded document at question 4a | Please see uploaded document at question 4a. In summary, the representation supports Site Allocation WEY33 for residential development but have requested that the capacity is increased to 120 units as a guide. | EBC Reg 19 Repts - Site Ref WEY33 - St Georges Avenue Weybridge 28.07.22.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557201/PDF/-/EBC%20Reg%2019%20Reps%20%2D%20Site%20Ref%20WEY33%20St%20Georges%20Avenue%20Weybridge%2028%2E07%2E22%2Epdf | | Yes, I wish to participate at the oral examination | We would like to reserve the right to attend the Examination to fully address the opportunities presented by site WEY33 in terms of capacity unless the suggested increase to approximately 120 units is supported by the Inspector and local authority. | Comments noted. The capacity of site allocation WEY33 set out in the DELP is expressed as the number of units that is supported by the Council in principle on the site. It does not preclude a planning application coming forward with a larger number of homes. |
| 1110950 | Katharine Maclean | | Yes | | No | | | | | | Can you please make a commitment that on all sites currently identified as car parks retain at least 75% of their parking provision if used for housing. This could be achieved by maximising the sites via low level multi-storey parking, or basement parking. Whilst the use of public transport etc. has to be encouraged, these local car parks are vital for local businesses, onward travel (trains) and the community generally. It is of particular importance to our aging local population who need close proximity, to enable accessibility for those with other limitations, and to assist families with young children. Our commuting habits have changes massively, but that doesnt mean there will not be a huge requirement for car parking again in the future. Wiping out all such provision with housing may be a very short term solution. | | | No, I do not wish to participate at the oral examination | | Comments noted. Further to the 2023 ownership checks, five Elmbridge owned car parks are no longer available because they are in greater use than that witnessed in 2020/21. Those remaining are still underused, and others have been given a longer timescale to account for the use to be monitored over a longer period. Many of these sites could include both residential use and retain parking such as Torrington Lodge (CL1). Additionally, car parking can be consolidated in area such as Esher where the smaller Highwayman's car park (ESH08) could be re provided within the Civic Centre site (ESH24). |

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| 1110975 | Owen Neal | Sport England | Yes | <p>Sport England has identified two site allocations where there is potential to affect playing field land; ancillary facilities which support use of the site as playing field or for sport, or prejudice its use for sport.</p> <p>These are Hershams Sports Club listed as site allocation H8 and Old Pauline's Sports Ground listed as site allocation D23. The site allocation should be considered against our Playing Fields Policy and NPPF para 99 to ensure the protection of these sports facilities and associated ancillary provision. Sport England would object to any residential development of these sites if there is any loss of existing provision. Similarly, locating residential development close to sports facilities can prejudice this use eg where cricket is concerned additional risk of ball strike on new housing from use of the cricket pitch can be a real issue and give rise to restrictions placed on the sports club in an effort to protect the new occupiers amenity. Sport England considers that the NPPF's agent</p> | Yes | Subject to the comments above re: protection of existing sports facilities and playing field land. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| | | | | of change principle applies here. It is therefore incumbent upon the proposers of the new residential development to mitigate any potential impact on the new residents as a result of being located within close proximity of the playing field or sports facility. Sport England is not familiar with many of these site allocations but we would object to any further site allocations where other sports facilities or playing field land is likely to be affected or prejudiced unless it complies with any of our exceptions within our playing fields policy. | | | | | | | | | | | |
| 1110986 | Daniel Harley | WSP obo EAL Ltd | Yes | No | These representations relate to the Draft Elmbridge Local Plan site allocation ref. COS6 for 40 Fairmile Lane, Cobham and an available site for development at 6 Kings Warren. The site at 40 Fairmile Lane is allocated for 13 residential units over the next 1-5 years and the site at 6 Kings Warren has not been allocated for development. With consideration of the above tests, we do not feel that the site allocations including allocation ref. COS6 are sound. Limited commentary is provided to rationalise the allocated level of provision at 40 Fairmile Lane, and it is considered that the provision of 13 dwellings is based on previous | Y | Y | Y | Y | Please see uploaded document at question 4a for the full response. In summary, Elmbridge has a pressing housing need and is constrained by large areas of Green Belt and land subject to flooding restrictions such that this Draft Local Plan proposes a housing target which is well short of the housing needed, representing a 22% shortfall. It is therefore crucially important that available sites which are ready to be developed are full optimised, which the current allocations fail to do. A higher allocation of residential dwellings on the site (16 dwellings +) will make the best use of the land available to deliver the optimum number of units on the site whilst retaining and respecting the surrounding vernacular. Failure to optimise sites like 40 Fairmile Lane and 6 Kings Warren in spite of the objectively assessed need for further houses in the borough indicate that the site allocations are neither positively prepared nor consistent with national policy. Additionally, given that lack of proportionate evidence to justify the allocation ref. COS6 over the reasonable alternative of a higher allocation of residential dwellings on the site (16 | | 20220727 Draft Local Plan Reprs.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557287/PDF/-/20220727%20Draft%20Local%20Plan%20Reps.pdf | | No, I do not wish to participate at the oral examination | Comments noted. The capacity of site allocation COS6 set out in the DELP is expressed as the number of units that is supported by the Council in principle on the site. It does not preclude a planning application coming forward with a larger number of homes. 6 Kings Warren is not allocated as it is not considered likely to achieve over 5 net units. If it does achieve more than it would be included in extant planning permissions and form part of the housing trajectory. |

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| | | | | Esher Place Avenue, Esher, KT10 8PZ contains a Veteran Tulip Tree – ATI ID: 6747 at Grid ref: TQ13356484 WEY19 US431 Shell Petrol Filling Station 95 Brooklands Road Weybridge KT13 0RP is adjacent to a Veteran Pedunculate Oak – ATI ID: 13797 at grid ref: TQ07166194. | | | | | | | | | | |
| 1111011 | Rachel Rae | Environment Agency-Thames Sustainable Places Team | Yes | No | Please see uploaded document for full response. We understand the plan seeks to allocate housing sites and employment floorspace. According to our Flood Map for Planning 31 residential sites and four employment sites (see tables below) are located in Flood Zone 3 and 2. However, these sites have not been sequentially tested, and the Exception Test has not been applied, in accordance with paragraphs 161-165 of the NPPF. SFRA and Policy CC5 – Managing flood risk of this plan state these tests must be applied. We therefore consider the plan to be unsound as it is not consistent with national policy or justified by the evidence base. | Y | Y | Y | We note a Level 1 SFRA has been produced. However, for site allocations located in Flood Zone 3 and 2 a Level 2 SFRA must be provided. The Level 2 SFRA should detail flood risk at a site-specific level, the proposed use of the allocation and whether the use is compatible in accordance with Table 3 of the Flood Zones and flood risk tables of the PPG. It should also contain the information needed to apply the Exception Test, if relevant, to enable you to decide if development can be made safe for its lifetime without increasing flood risk elsewhere. The Level 2 SFRA should then be used to inform the Sequential Test and ranking of sites as the extent of flood risk can be compared to other potential sites. Without this we cannot be satisfied that your plan is allocating sites that are at the lowest risk of flooding and whether there are other available sites, appropriate for the proposed development, in areas with a lower risk of flooding. It should be noted, in our response to the Regulation 18 consultation (reference WA/2011/110334/PO[1]06/PO1-L01, dated 9 March 2020) we stated that the Sequential Test must be applied, taking into account the current and future impacts of climate change, to guide development to the areas of lowest flood risk in order to avoid flood risk to people and property. If it is determined that sites within the floodplain must be allocated, a level 2 SFRA will be required. Where necessary, part b of the Exception Test must be applied. Furthermore, your SFRA level 1 dated February 2019 states 'Should the Sequential Test indicate that land outside flood risk areas cannot appropriately accommodate all necessary development; a further Level 2 SFRA will be undertaken to consider the detailed nature of flood risk within | In order to overcome this point of soundness the proposed allocations in your plan must be sequentially tested and where appropriate the Exception Test must be applied. Guidance on applying the Sequential Test and the Exception Test can be found here: Flood risk and coastal change - GOV.UK (www.gov.uk) For more guidance on preparing a level 2 SFRA please visit the Gov.uk website: How to prepare a strategic flood risk assessment - GOV.UK (www.gov.uk) Point of clarity and accuracy: Site specific policies for allocations Having screened all the allocated sites with regards to our remit, we are concerned that the plan does not have site specific policies for some of the allocations. For instance, we note that some of the allocated sites include a designated main river. Main rivers require an undeveloped 10metre buffer zone. The inclusion of a 10metre reduces the amount of developable land available. This detail is not reflected in the allocations. We would expect to see site specific policies, including | EBC Reg 19 comments from EA 290722.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557306/PDF/-/EBC%20Reg%2019%20comments%20from%20EA%20290722%20Epdf | Yes, I wish to participate at the oral examination | As a statutory consultee we are happy to participate at the oral examination if it is deemed necessary. | Objection noted. The Council has commissioned a SFRA Level 2 which is currently being prepared. |

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| | | | | | | | | | each zone and support the application of the Exception Test.' (para 1.3.3). Once the sites have been sequentially tested, and if it is determined that there are no other reasonably available sites, any sites located in Flood Zone 3 must be subjected to the Exception Test, as per paragraphs 163-4 of the NPPF. In accordance with paragraph 165 of the NPPF, both elements of the Exception Test should be satisfied for development to be allocated or permitted. Currently the plan has not fulfilled either test. Without this information the deliverability of the allocations is questionable. We cannot be confident that the allocated sites have sufficient capacity to provide the required housing numbers and employment floorspace that they have been allocated for, whilst not increasing flood risk elsewhere. | maps, which clearly detail how the allocated site will be developed, taking into account any environmental constraints that may affect the amount of developable land available. | | | | | |
| 1111053 | Lauren Manoharan | high Consulting Sorbon Estates | Yes | | No | Chapter 9 – Site Allocations: With regards to the list of site allocations within chapter 9; Sorbon Estates notes that its Abbey House Site is not included on the list of allocations and requests that the site at Abbey House is included within the list of housing site allocations. The full address of the site is Abbey House, Wellington Way, Weybridge, KT13 0TT. It has an extant permission (ref. 2021/2695) for the prior approval of "change of use from Offices (B1a) to residential" for 28 units which can be delivered within 1-5 years. Furthermore, the Council is currently considering a planning application for the redevelopment of the site for residential development comprising 106 one and two bed units which can also be delivered within 1-5 years (application ref: 2022/1272). The above justifies the inclusion of the Abbey House site on the list of site allocations in chapter 9. | Y | Y | Chapter 9 – Site Allocations: With regards to the list of site allocations within chapter 9; Sorbon Estates notes that its Abbey House Site is not included on the list of allocations and requests that the site at Abbey House is included within the list of housing site allocations. The full address of the site is Abbey House, Wellington Way, Weybridge, KT13 0TT. It has an extant permission (ref. 2021/2695) for the prior approval of "change of use from Offices (B1a) to residential" for 28 units which can be delivered within 1-5 years. Furthermore, the Council is currently considering a planning application for the redevelopment of the site for residential development comprising 106 one and two bed units which can also be delivered within 1-5 years (application ref: 2022/1272). The above justifies the inclusion of the Abbey House site on the list of site allocations in chapter 9. | Please include the site at Abbey House, Wellington Way, Weybridge, KT13 0TT on the list of site allocations appropriate and available for the delivery of housing within the next 1-5 years. | | | Yes, I wish to participate at the oral examination | Sorbon Estates would like to have the opportunity to participate at the oral part of the examination to further explain to the Inspector why they consider that changes should be made to this policy. | Comments noted. As Abbey House is listed in the extant planning permissions and forms part of the housing trajectory, it would result in double counting to include it as a LAA site/site allocation. |

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| 1111076 | A Barry | Molesey Road Land Limited | No | In accordance with our comments in respect of SS2, SS3 and HOU1 and ENV4 and ENV5, the ELP is considered unsound and does not accord with the legal requirement to promote Sustainable Development or the Habitats Regulations or the NPPF. As such, major modifications should be brought forward to include additional allocations to meet both housing need and the deficiency in SANG provision. This should include the land East of the Molesey Road, Walton on Thames, close to Hershams Station, identified in the representations by Molesey Road Land Ltd (see attached). | No | Please see comments for question 2 | Y | Y | Y | Y | Please see uploaded document at question 4a | As such, major modifications should be brought forward to include additional allocations to meet both housing need and the deficiency in SANG provision. This should include the land East of the Molesey Road, Walton on Thames, close to Hershams Station, identified in the representations by Molesey Road Land Ltd (see attached). | Site Masterplan.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557482/PDF/-/Site%20Masterplan%20Epdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557483/PDF/-/220728%20Representations%20for%20Molesey%20Land.pdf 210909~1.PDF https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557484/PDF/-/210909%5F1%20EPDF 200308 Reps Vision for Elmbridge Land East of Molesey Rd.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557485/PDF/-/200308%20Reps%20Vision%20for%20Elmbridge%20Land%20East%20of%20Molesey%20Rd%20Epdf MAMOLE~1.PDF https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557486/PDF/-/MAMOLE%5F1%20EPDF | Yes, I wish to participate at the oral examination | We would confirm that we wish to take part in the oral evidence stage of the Examination. This is an important element of the plan which sets the context for the overall strategy adopted. its fundamental failure to meet need and constrain the supply of homes and not to consider the release of Green Belt, fails the legal and policy tests. this requires detailed consideration and evidence at Examination that also reflects on the specific details of sites which demonstrate the exceptional circumstances that exist. Modifications are necessary to meet local needs and deliver sustainable development. In addition, we are promoting development East of the Molesey Road, Walton on Thames which can contribute 10ha of housing and 40ha of SANG and this has a significant bearing on the overall level of provision proposed in the Plan. | <p>Objection noted.</p> <p>During the development of the Draft Elmbridge Local Plan 2037 (DELDP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.</p> <p>The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022).</p> <p>The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan,</p> |
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also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii). In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the

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| 1111105 | Paul Manning | Newsteer Real Estate Advisers obo Leos International Holding Group (Chris Pittock) | Yes | | No | Our client is supportive of the Site Allocations set out in the Draft Local Plan and consider the identification of these crucial if housing delivery targets are to be achieved. However, it is noted that the site at St George's Business Park, Brooklands Road, Weybridge, KT13 0RH is not identified as a proposed Site Allocation, and our client proposes that as this site would be available, suitable and deliverable for residential redevelopment within the Plan period, it should be considered as a Site Allocation within the Local Plan. | Y | Y | <p>Availability Currently the Site is underutilised as an employment business park. Redeveloping the Site for residential use would enable the land to be optimised, both enabling more efficient use of the land within the borough's open area, and also supporting the borough in achieving its housing targets. This is therefore in accordance with proposed Policy HOU2 of the Draft Local Plan.</p> <p>Further, the existing buildings on the Site each have an extensive planning history with permitted development rights. The existing Permitted Development means that already, the Site is capable of providing 169 residential units (assuming approvals across all buildings and floors are implemented). Therefore, these units should be factored into the five-year housing supply, and allocating the site for residential development would bolster the number of units capable of being delivered on the Site through a more comprehensive redevelopment.</p> <p>Suitability The Site is situated on brownfield land within the Weybridge urban area and in a sustainable location. It is within a 20-minute walk to Weybridge Station with bus stops immediately adjacent to the Site along Brooklands Road. Further, the town centre is within walking distance of the Site, which provides the necessary amenities for potential future residents. The location is therefore considered to be suitable, and in accordance with Policy SS3 of the Draft Local Plan which supports a 'brownfield first' approach and sets out that 17.7% of housing is to be delivered in Weybridge, as well as Policy HOU1 and Policy HOU2.</p> <p>As the Site is previously developed, there is already existing access and this is provided off Locke King Road.</p> <p>The Site is within Flood Zone 1 and is therefore not considered to be at risk of flooding and no sequential test would be required.</p> <p>While the Site is within the Thames Basin Heath Special Protection Area 400m – 5km zone, and it has been highlighted by the Council that the Site potentially contains contaminated land, if this Site was to come forward as a Site Allocation for residential use, any development would take the appropriate measures to ensure compliance with both Policy ENV5 and Policy EN7 of the Draft Local Plan.</p> <p>While the Site is partially within a Conservation Area and is located within</p> | St George's Business Park, Brooklands Road, Weybridge, KT13 0RH to be added as a residential site allocation. | 220729_Leos_Elmbridge_Local_Plan_Reps_v1.0.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557569/PDF/-/220729%5FLeos%5FElmbridge%20Local%20Plan%20Reps%5Fv1%2E0%2Epdf | | No, I do not wish to participate at the oral examination | Support and comments noted. St George's Business Park, Brooklands Road, Weybridge is listed in the extant planning permissions and forms part of the housing trajectory, it would result in double counting to include it as a LAA site/site allocation. |
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| | | | | | | | | | <p>close proximity to a heritage asset, the wording of the Site Allocation would ensure that any development for residential use must comply with relevant heritage policies, including Policy ENV10. Further, due to its proximity to heritage assets, any application for development at the Site would be required to be supported by a Landscape and Visual Impact Assessment and take into consideration the heritage assets and the character of the area.</p> <p>The above acknowledges the constraints on the Site, but demonstrates that Site Allocation would still be suitable, as the Site Allocation can be suitably phrased ensure that any development complies with the other relevant policies of the Plan.</p> <p>Deliverability The Council has already accepted that residential use is both suitable and deliverable on the Site; it already benefits from several Permitted Development approvals for conversion of the existing offices to residential units (though these have never been implemented). Allocating the Site for residential use would allow improved optimisation of the Site, in accordance with draft Policy HOU2, as the Site could be redeveloped to make more efficient use of the land through providing a higher density, but more importantly a higher quality development than that which will be achievable through the existing Permitted Development.</p> <p>Summary It is considered that in the absence of a five-year housing supply and a Green Belt Review, that this Site should be allocated for residential use within the emerging Local Plan. The above has demonstrated that it is available, suitable and deliverable and should therefore be included within the calculations of the five-year housing supply. The Site already has Permitted Development approval for residential use and allocating the Site will allow for additional housing units to be provided.</p> | | | | | | | |
| 1111924 | Stuart Crickett | Boyer Planning obo Antler Homes PLC | | | No | 4. MEETING THE HOUSING TARGET Site Allocations The Plan is unsound. It is not justified, effective or consistent with national planning policy. | Y | Y | Y | | 4.14 We strongly urge the Council to reconsider its approach to the allocation of sites, as DLP Chapter 9 does not offer a justified or well-evidenced basis for delivering new housing and other forms of development. The lack of information and the absence of detailed site-specific policies (even for larger sites) is a fatal shortcoming, which signals | 220727 Elmbridge Reg19 Representations obo Antler Homes.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/563582/PDF/-/220727%20Elmbridge%20Reg19%20Representations%20obo%20Antler%20Homes%2E.pdf | | Yes, I wish to participate at the oral examination | Should the DLP be submitted for examination, Antler Homes would welcome the opportunity to participate in the Examination Hearings in order to ensure our concerns with the DLP are presented to the | Objection noted. The detailed assessments of each site allocation in the DELP is set out in the Council's Land Availability Assessment (2022) . Sites allocated within the 1 to 5 years are considered available |

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| 1111963 | Sarah Docherty | Hersham Sports and Social Club | | No | <p>I would like to STRONGLY OBJECT to Elmbridge's Local Plan proposal of 8 residential units to be constructed at 128 Hersham Road, Hersham KT12 5QL - HERSHAM SPORTS & SOCIAL CLUB.</p> <p>Reasons for this is quite simply it is the HEART of Hersham, the COMMUNITY HUB of Hersham. Hersham Sports and Social Club (formally Hersham Comrades Club) was built in 1921 and has served the people of Hersham and its surrounding villages & towns ever since it opened its doors. It has and continues to provide a crucial service to its members and guests alike.</p> <p>We have a very strong members base in which a share of the said property and land are purchased when joining and becoming a member.</p> <p>The proposed development would result in a huge loss for the community and its use and would not be replaced by a better provision nor is there any justification that there would be an alternative community site built or why should there be when this club has served the community of Hersham since 1921.</p> <p>Would you please withdraw your proposal of the 8 residential units to the said property</p> | Y | | | | | | | | <p>Would you please withdraw your proposal of the 8 residential units to the said property</p> | | | | | <p>Objection noted.</p> <p>The Hersham Sports and Social Club site is proposed for removal from the DELP site allocations. This amendment is included in the Council's proposed modifications to the DELP which have been submitted to the Inspector for Examination. Please see main modification ref. M8.1</p> |
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| 1112162 | Rowan Gilbert | NHS Property Services | Yes | | Yes | Please see uploaded documents at question 4a for full response. These representations support the site allocations WEY5, WOT35 and MOL11, and confirm their suitability for development, subject to their healthcare needs. | | | | | 2022 NHSPS Elmbridge Local Plan Reg 19 Reprs.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/564450/PDF/-/WESL01%5F4751%5FSitePlan%2Epdf | | | Support noted. |
| 1112177 | Ellie Laws | Stride Treglown obo Whiteley Village | | | | Given the reference to Whiteley Village within Policy SS3, we consider that the Village should therefore be identified within the Site Allocations list and on a Site Allocation Map. | | | | | https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/564450/PDF/-/WESL01%5F4751%5FSitePlan%2Epdf | | | Comments noted. At this time there are no detailed plans for the site that would require a specific site allocation or policy for continued development of Whiteley Village. Criterion (5)(c) of strategic policy SS3 clearly states that the Council supports the delivery of development that makes an important contribution to Whiteley Village for specialist care facilities and is working with the Trust to produce a Masterplan for the site. |
| 1112911 | Steve Hinsley | Stephen Hinsley Planning obo PA Housing | | | | Site allocations PA Housing have 2 sites which should be included in the site allocations as follows: Former Nursery, Manor Road, Walton-on-Thames 1-5 years 19 residential units Bramcote House, York Road, Weybridge 1-5 years 27 residential units In addition, WOT2 (US350) Leylands House, Molesey Road, Walton-on-Thames needs to be removed from the allocations list as it is no longer deliverable because the site is owned by 2 separate landowners, and the first landowner has indicated that they no longer wish to join PA Housing (the second | | | | | | | Comments noted. The Former Nursery, Manor Road, Walton-on-Thames is listed in the extant planning permissions and forms part of the housing trajectory, it would result in double counting to include it as a LAA site/site allocation. The proposal at Bramcote House would result in a loss of units and therefore is not included in the LAA or site allocations. The Leylands House, Molesey Road site (WOT2) is proposed for removal from the DELP site allocations. This amendment is | |

which strongly align with EBC's. This could involve the delivery of required community uses, Biodiversity Net Gain offsetting, carbon sync and other natural capital opportunities, in association with residential development on any of the Sites. TCE question whether the approach taken with the present suite of allocations is sound, on the basis of the potentially unbalanced spatial strategy. EBC has an opportunity to investigate if there are any other more suitable sites for allocation prior to submission to an Inspector. However, if EBC or an Inspector consider TCE sites to be suitable then TCE would like to confirm the sites as available.

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

In order for EBC to justify the exceptional circumstances for not meeting housing needs in full, a complete understanding of the theoretical development capacity of the borough is required.

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| 1108599 | Susan Mealor | | No | For the document to be legally valid, the detail must be accurate. Of the site allocations in Hersham, we are aware of these factors: 1. H8 US389 the members of this club say that they have never agreed or been asked that this site be on the list. Thus the list is based on incorrect information. 2. H3 US379 The boundary of this site has been significantly changed since the 2020 consultation/2018 Land Availability Assessment. At that time, the boundary only encompassed the car parking area. Two weeks into this consultation, when the plan detail was added to the document, it was discovered that the same coding numbers are being used for the entire shopping centre site. This puts the community at risk of losing the entire car park to 200 Residential Units , as any developer could reasonably argue that the site US379 refers to the car park. A different code must be used to prevent this. This is careless. 3. H11 US 376 The land availability assessment for this site makes no mention of the sewerage pumping station | No | My comments to Question 1 apply here as well. There is no reason to believe the listings for Hersham are less accurate than those for the rest of the borough | Y | Y | Y | Not positively prepared. With respect to the community of Hersham: There are too many errors in the Site Allocations, some are outlined in Q1 above. Not Effective. Too many of the sites appear to be unfeasible in particular the use of all the Hersham car parks and many of the public facilities. Included here are the Site Allocations: H1 US441 (recently rejected by EBC); H6 US40 Day centre and Village Hall. Day Centre is popular and well used and is where the Meals-on-Wheels service prepares the meals for the borough. The Village Hall has recently been refurbished at considerable expense following considerable local demands that the hall be kept for public use. H7 US380 car park, H5 US45 car park; H12 US435 car park; H15 US374 library car park; H3 US379 shopping centre car park. Where are locals meant to park in the future? Not Justified. It is clear from the report on the 2020 consultation, that residents of Hersham were unaware of it. The lack of any publicity within Hersham means that consultation was not valid the results are not justified. | The officers of the council must make a careful review of all the proposed sites listed to ensure that ownership is correct, facts are actually facts, covenants are followed and there is proper consultation with all communities. All Councillors must in future be made fully aware of the implications for their wards, and must make their voters aware. It is up to the officers to do this effectively, and for the councillors to police this properly. It is not for me to work out how to do this. | | | No, I do not wish to participate at the oral examination | Objection noted. A letter was sent to Hersham Residents committee clarifying many of these concerns during the representation period. The Council has met and exceeded its duty to engage with and consult stakeholders on the preparation and contents of the DELP and has done so in accordance with its <u>Statement of Community Involvement</u> and all relevant planning regulations. The Council utilised a range of advertisement and consultation techniques during the Regulation 18 and 19 stages to reach and engage with the widest possible range of stakeholders. Techniques included online advertisement on the Council's website and social media platforms – Twitter, Facebook, LinkedIn, Instagram and Nextdoor, as well as physical advertisement in a local newspaper – the Surrey Advertiser and posters on the Council's noticeboards located throughout the Borough, including within the Walton and Hersham communities. The DELP was also available to view and read at the Civic Centre and Borough libraries. In addition, over 8,200 individuals were directly contacted via letter or email to inform them of the consultation as they were registered on the Elmbridge planning database. |
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on the site which requires 24 hour accessibility with space for emergency pumping equipment and road tanker movements which can include all night working and vehicle movements.

4. Report: Sustainability appraisal for the Draft Plan, June 2022.

New options 2021 para 3.61 lists 33 sites which are so-called available and poorly performing Green Belt sites. Table 9 lists these 33 for both option 5 and 5a, of which 12 were selected for the latest iteration of option 5a. These sites are still in play, as the only option which gives the required number of dwellings has green belt land release (option 5a). Totally unbelievably, the entire site of the Burhill Primary School (GB62, also SA47) is on this list! This is a popular school which has had a large new extension, and these is nowhere in Hersham or nearby that could provide a replacement. The school site was added to the green belt land following a public inquiry in 1980s, precisely to protect this educational site. This is a serious

The Council's Regulation 22 Consultation Statement fully details the range of techniques used during the consultation period to contact and engage with stakeholders.

The landowners of site allocation H8 and H10 have confirmed that their sites are no longer available.

Site H3- Hersham Shopping Centre site will include parking for the retail use.

Site allocation H11 has an 11-to-15-year timescale which allows for consideration of the exact location of a residential scheme, loss of employment and the existing constraints on site.

Site allocations for development of sites that are home to existing community uses, including those within Hersham, seek to ensure these are retained or re-provided on site where appropriate. This is set out in more detail in the Council's Land Availability Assessment (2022). In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protected.

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| | | | | failure of oversight by the Officers involved. All of the above points lead me to believe that this document has been not been produced with the care and precision that is needed be legally compliant | | | | | | | | | | |
| 1109487 | Ann Cowap | | No | Having read the document, but not being legally qualified I am sure that if it was put to the test, it would fail. | No | Local business owners have not been consulted about their inclusion on the plan, and there is a clear contradiction of this on the draft local plan EBC web page | Y | | See previous comment | Local business owners must have been consulted about their inclusion on the plan, and consent given for their inclusion. | | | No, I do not wish to participate at the oral examination | Comments noted. The Council has met and exceeded its duty to engage with and consult stakeholders on the preparation and contents of the DELP and has done so in accordance with its <u>Statement of Community Involvement</u> and all relevant planning regulations. The Council utilised a range of advertisement and consultation techniques during the Regulation 18 and 19 stages to reach and engage with the widest possible range of stakeholders. Techniques included online advertisement on the Council's website and social media platforms – Twitter, Facebook, LinkedIn, Instagram and Nextdoor, as well as physical advertisement in a local newspaper – the Surrey Advertiser and posters on the Council's noticeboards located throughout the Borough, including within the Walton and Hersham communities. The DELP was also available to view and read at the Civic Centre and Borough libraries. In addition, over 8,200 individuals were directly contacted |

provides for parents delivering children to Burhill School.

d. It may well be possible to deliver 200 Residential Units in this area, while maintaining the current quantity and quality of Shops and Car Parking (allowing for the additional requirements of the 200 new residences). However, if any plans are allowed to progress that fall short of that, then this Council could potentially be responsible for the collapse of our village as we know it. do not think the community will stand for that!

e. Para 1 f above applies.

f. We are particularly concerned about the short timeframe associated with this case and the inevitable disruption at the heart of our village during this potentially lengthy project.

3. Site Name New Berry Lane car park
 Site Allocation Ref H7
 Site LAA Reference US380
 Delivery Period 6-10 Years
 Allocated for 7 Residential Units

a. Same arguments as for H3 above (they are adjacent) although reduced concerns over timeframe and scale.

b. However, this car park was originally retained by the Council to specifically provide for the Doctor's Surgery and Burhill School opposite.

c. Once again the level of parking must be maintained (allowing for that associated with the 7 Residential Units) so that sufficient Parking is available for the ever increasing number of people that need to visit the Surgery – more residences implies more people which implies more visits

to a doctor. So we will need more Surgery parking not less.

4. Site Name Car park to the south of Mayfield Road
 Site Allocation Ref H5
 Site LAA Reference US45
 Delivery Period 6-10 Years
 Allocated for 9 Residential Units
 a. Obviously this car park provides for the railway station and is a necessity in a commuter environment.
 b. While there are occasions when it is not full, there are others when it is absolutely full and people have to search elsewhere.
 c. It would appear that the Council assessment regarding utilisation was made during the Covid period.
 d. It is worth registering that while utilisation has increased as Covid regs have relaxed, we are still not yet back to pre Covid ways of living and working.
 e. Para 1f applies

5. Site Name Car Park next to Waterloo Court
 Site Allocation Ref H12
 Site LAA Ref US435
 Delivery Period 11-15 Years
 Allocated 62 Residential Units
 a. Overfill car park for the station but little used - no objection to development

6. Below are some extracts from Council documents (notably the Parking SPD) which are contradicted by the approach of this Draft Plan
 j. "Having a balanced approach to delivering car parking can help stimulate growth in the borough, meet the needs of our residents, whilst also trying to minimise the effect on the environment. It is generally accepted that because of the lack of

public transport in many parts of the Borough, many residents rely on their cars as their main form of travel. This SPD aims to deliver effective parking solutions while taking account of other planning considerations.”

k. “Whilst the Borough benefits from good/ very good rail links to central London, access to other major centres such as Kingston, Guildford and Woking vary. Outside of the key commuter routes, public transport services are more limited, which leads to greater reliance on the private motor vehicle for internal Borough trips. It is not surprising that the Borough has one of the highest levels of car ownership with 1.5 cars per household and 46% of households owning more than two vehicles. Only 12% of households do not own a car, significantly lower than the South East average of 18.6%”

l. “Commuting still plays a significant part for much of the workforce, with both radial and orbital journeys into London and around the region. The average median gross weekly pay for Elmbridge residents is higher than for those who work in the Borough, indicating that a considerable number of residents’ commute to higher-paid jobs within Greater London. Access to a train station is a key consideration for existing and future residents.”

m. “Improving transport infrastructure by; Working in partnership with transport providers and Surrey County Council, as the Highway Authority, to support improvements to transport infrastructure. Those relating to new development will be delivered through the

collection of developer contributions subject to viability. The Council will support improvements to stations and station parking that facilitate increased public transport use."

n. "Public off-street parking will continue to be provided where it supports the economic or recreational use of the immediate area and provides dual use allowing parking for residents and shoppers/employees, particularly in town centres."

o. "well-designed car and cycle parking at home and at other destinations is conveniently sited so that it is well used. This could be off-street to avoid on-street problems such as pavement parking or congested streets. It is safe and meets the needs of different users including occupants, visitors and people with disabilities."

p. "All development proposals will be required to provide cycle and vehicle parking and associated facilities, including electric vehicle charging points in line with the standards set out in the Parking Supplementary Planning Document (SPD). 6. Car free development will be encouraged in appropriate locations and where supported by evidence demonstrating that proposals would not lead to parking stress".

q. "Parking Stress - A pressure on local highway network negatively affecting amenities of local residents caused by limited capacity of on-street parking provision in the area. Factors to take into account when considering whether an area experiences on-street parking stress will

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| | | | | | | be the levels of parking on nearby roads, the availability of spaces in public car parks and whether there are any particular pressures caused by existing uses or developments in the area " | | | | | | | | | | |
| 1111063 | Francis Bealin-Kelly | | No | | No | <p>The plan P23 3.11 (d) (ii) states that it seeks to "make it easy and attractive to walk, cycle and use public transport". YET IT SEEKS TO ELIMINATE PUBLIC PARKING AT TRAIN STATIONS yet it claims that with low unemployment in the area most of the workforce commute including using the trains. These are not compatible</p> <p>Removing the car parks will reduce the accessibility for those that either live to far away to be unable to walk.</p> <p>In addition the Walton Park car park is used to drop kids to Cardinal Newman primary school and this will lead to them dropping children off on the Hershams road and is most likely to cause fatalities over time when a car park is a reasonably safe option</p> | | | Y | removing car parking at trains is counter to the national plan to increase public transport usage | Remove public car parking as a source of brown field sites from the plans. | | | Yes, I wish to participate at the oral examination | Objection noted. Car parks are only included as site allocations when they are underused or could be consolidated into another locations/sites. | |
| 1108947 | Moira Heyburn | | No | If Building on 'Brownsites ' means the destruction of well used community resources that encourage people to walk, encourage community life and nature without proper and fair consultation of the communities it effects how is this legally compliant? | No | <p>How is it justified to take a well-used community Library that enhances community Life, that is easily accessible for the disabled and parents with prams and pushchairs, that people can easily walk to thereby helping tackle climate change, with beautiful gardens encouraging wildlife that has been a part of the community for over 60 years and is still a busy part of community life be pulled down for a block of flats.</p> <p>From HMRC Website Councils remain responsible for</p> | | | Y | Y | <p>How is it justified to take a well-used community Library that enhances community Life, that is easily accessible for the disabled and parents with prams and pushchairs, that people can easily walk to thereby helping tackle climate change, with beautiful gardens encouraging wildlife that has been a part of the community for over 60 years and is still a busy part of community life be pulled down for a block of flats. From HMRC Website Councils remain responsible for overseeing the delivery of a 'comprehensive and efficient' library service by listening to and reflecting the changing needs of their communities. Councils have a statutory obligation to provide a library service, The needs assessment should ensure the council has a thorough understanding of the current provision and, critically, local community needs and views. This is to help inform choices</p> | <p>Posting things online is not good enough as residents who struggle with technology or can't afford computers and the internet or are just busy with work will not be logging onto the council website to try to find information that is made difficult to find and object to.</p> <p>The sheer volume of the 140 pages and innumerable repeating questions on 45 questionnaires is enough to deter anyone who has a learning disability this is therefore unfair and underhand. To give people a fair chance to know of changes that will</p> | | Yes, I wish to participate at the oral examination | To give people a fair chance to know of changes that will affect them or their community they may or may not agree with not take away well used community resources without true and fair consultation. | Objection noted. A letter was sent to residents clarifying many of these concerns during the representation period. A regulation 19 consultation must ask questions about the legal compliance and soundness of the DELP. Guidance notes that were provided on the consultation homepage explained the purpose of the representation period and how to consider legal compliance and the test of soundness. |

Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in

spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii). In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

sites for development, notably station car parks WOT7, WOT31 and CL7, have been allocated without proper consideration of the impact of development. These sites have been allocated with the intent of maximising "the use of sustainable transport modes" (Chapter 4 Local Plan) and have been "located to minimise the need to travel, thereby reducing emissions from road traffic" (Chapter 5 Local Plan). Chapter 8 of the Local Plan (Providing Infrastructure and Connectivity) sets out that "it is essential that an adequate level of appropriate strategic and local infrastructure is delivered to avoid placing undue pressure on existing infrastructure networks and services" and that "national planning policy requires the council to set out how these infrastructure requirements will be met".

Surrey County Council has not yet determined which routes or zones to prioritise in the Elmbridge LCWIP and detailed proposals for improvements along them are at the public consultation

The proposal to allocate station car parks WOT7, WOT31 and CL7 for development is not justified and does not take into account the reasonable alternative that driving to a train station to commute is already a more sustainable method of transport and helps encourage people to travel by train. Station car parks could become even more sustainable if electric cars continue to increase in popularity. In relation to WOT7 (Walton Park station car park) specifically, consideration does not appear to have been given to prospects such as installing a more modern bike storage shed (like the one at Walton-on-Thames station) at the site of the car park and installing electric car charging points, both of which would decrease the carbon footprint of the site.

The proposal in the Local Plan to develop WOT7 (Walton Park station car park) in the next 1-5 years is not effective. It is difficult to see how the plan is deliverable during that time as it would be difficult to implement the required infrastructure. The Local Cycling and Walking Infrastructure Plan has not yet been agreed and no evidence that suitable bus routes could be in place. The Local Plan merely states that "the focus should be on improving connectivity of local railway stations by bus" without any evidence having been provided as to the feasibility of this (not least because the low bridge at Hershams station could be an issue).

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| | | | | stage. These station car park site allocations would seem to have been made without sufficient consideration of strategic matters of realistic alternative methods of transport . It is not yet clear whether it will be possible to provide appropriate alternative walking or cycling routes to Hersham, Walton and Claygate stations if these car parks cease to exist. There is no joint evidence base to show that local residents would use these alternative methods of transport should the car parks be developed as the views from residents have not yet been gathered. | | | | | | | | | |
| 1110564 | Andrew Roberts | | No | No | | | Y | <p>I object to the inclusion of Hampton Court station 97 units based (see page 33 of Land Availability Assessment) on there being an extant scheme 2008/1600. This issue was addressed in the Planning Inspector's decision in relation to the 2018/3810. scheme. Appeal A Ref: APP/K3605/W/22/3291461 See para 10 of the Inspector's report: "At the Inquiry, the appellants accepted that the extant scheme would not be viable under current market conditions. It was not relied on as a fallback position. In my view the appellants were right to take that approach".</p> <p>In her 16/03/2022 email me, Elmbridge Council's Head of Planning (Kim Tagliarini) stated: "The owner has confirmed to us that they consider the extant permission viable and until this is proved otherwise at the appeal we must include it". https://www.youtube.com/watch?v=yS0h2ksRFfU See 3:57:36 where representatives for Alexpo confirm that they have not made any representations to Elmbridge in</p> | Remove Hampton Court Station from the site allocation list. | Fwd Draft Local Plan and Hampton Court Station.msg https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/555587/BIN/-/Fwd%20Draft%20Local%20Plan%20and%20Hampton%20Court%20Station%2Emsg | | No, I do not wish to participate at the oral examination | Objection noted. A Planning application (2018/3810) for the Hampton Court Station site was granted at appeal in July 2022 and therefore it is appropriate for the site to be on the extant list in the Land Availability Assessment (2022). |

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| 1110017 | Vanya Bowman | | Yes | Hersham Library should not be included in the local plan campaign - it is a valuable asset to the whole community and should be preserved. The library is a trusted space for many, particularly the most vulnerable, as well as a source of education, knowledge and culture. To re-iterate, I strongly believe that Hersham Library should be removed from the Local Plan. | No | Hersham Library should not be included in the local plan campaign - it is a valuable asset to the whole community and should be preserved. The library is a trusted space for many, particularly the most vulnerable, as well as a source of education, knowledge and culture. To re-iterate, I strongly believe that Hersham Library should be removed from the Local Plan. | | Y | Hersham Library should not be included in the local plan campaign - it is a valuable asset to the whole community and should be preserved. The library is a trusted space for many, particularly the most vulnerable, as well as a source of education, knowledge and culture. To re-iterate, I strongly believe that Hersham Library should be removed from the Local Plan. | Hersham Library should not be included in the local plan campaign - it is a valuable asset to the whole community and should be preserved. The library is a trusted space for many, particularly the most vulnerable, as well as a source of education, knowledge and culture. To re-iterate, I strongly believe that Hersham Library should be removed from the Local Plan. | | | No, I do not wish to participate at the oral examination | | Objection noted. The Hersham Library site allocation (H15) includes a community use within the allocation. It is intended that to meet the requirements of the allocation a development scheme would be required to redevelop the library at ground level and include flats above. Hence the library use would be retained on the site. In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protect and retained where appropriate. |
| 1108951 | Moiya Heyburn | | No | You say these are your aims below yet you wish to pull down a well used and loved community library with gardens that attract wildlife, that local schools and people walk to, to build a block of flats. to use Walton library we would have to drive our car, pay exorbitant parking fees and either walk up a long flight of stairs or use a small lift , great for the elderly, disabled, mothers with toddlers or the claustrophobic and people with health related issues.2.1 The Local Plan needs to respond to a number of significant challenges over the planperiod, | No | How is it justified to take a well-used community Library that enhances community Life, that is easily accessible for the disabled and parents with prams and pushchairs, that people can easily walk to thereby helping tackle climate change, with beautiful gardens encouraging wildlife that has been a part of the community for over 60 years and is still a busy part of community life be pulled down for a block of flats.From HMRC WebsiteCouncils remain responsible for overseeing the delivery of a 'comprehensive and efficient' library service by listening to and reflecting the changing needs of their communities. Councils have a statutory obligation to provide a library service,The needs assessment should ensure the council has a thorough understanding of the current provision and, critically, local | | Y Y | You State below2.8 The needs of businesses are also changing, as well as how people shop and spendtheir leisure time. Our high streets need support to help them adapt to the changing retailmarket and become distinctive hubs for socialisation, community support, leisure and culture.The Plan seeks to positively respond to these issues and changes whilst protecting andenancing the qualities and features that not only make Elmbridge a sought-after place to live,work and visit but also sustainable and fit for the futurels forcing people to go into Walton for library services encouraging local High Streetsto be diverse and thrive or is it just trying to make an at present defunct Walton town centre with secondhand shops, coffee shops, womens clothing stores or closed shops and expensive parking the place to go. I would rather go to Kingston or Woking if I had to drive to a shopping centre. | his plan started on the 17 June with 6 weeks consultation.Local residents have not been informed as to what is happening to/in their community.Without being informed this makes this plan a fait accompli a bit of " Hitch Hikers Guide to the Galaxy" going on here.If you have other plans for Walton and Hersham that will affect the residents. Should the users of the facilities or local residents not be informed?The sheer volume of the 140 pages and innumerable repeating questions on 45 questionnaires is enough to deter anyone who has a learning disability this is therefore unfair and underhand.To give people a fair chance to know of changes that will affect them or their community they may or may not agree with not take away well used community resources without true and fair consultation. | | | Yes, I wish to participate at the oral examination | To give people a fair chance to know of changes that will affect them or their community they may or may not agree with not take away well used community resources without true and fair consultation.The sheer volume of the 140 pages and innumerable repeating questions on 45 questionnaires is enough to deter anyone who has a learning disability this is therefore unfair and underhand. | Objection noted. A letter was sent to residents clarifying many of these concerns during the representation period. The Council has met and exceeded its duty to engage with and consult stakeholders on the preparation and contents of the DELP and has done so in accordance with its Statement of Community Involvement and all relevant planning regulations. The Council utilised a range of advertisement and consultation techniques during the Regulation 18 and 19 stages to reach and engage with the widest possible range of stakeholders. Techniques included online advertisement on the Council's website and social |

including:
 Tackling climate change and moving towards a low / zero carbon economy;
 Protecting and enhancing the natural environment;
 2.2 Elbridge is a collection of separate and distinctive places and local communities each with its own unique local identity, historic assets and attractive green and natural environment which are highly valued by our communities.
 2.4 The carbon footprint of the borough is high and must be addressed to help tackle the climate emergency and improve the borough's resilience to climate change, as well as improve biodiversity and issues of air quality and road congestion.
 2.5 The borough has high-quality green and blue infrastructure that weaves its way through the urban areas and provides invaluable open spaces, highly treasured by local residents. Our urban open spaces play an important role within our green assets/natural capital and help to shape the character of our communities. However, we must continue to protect and

community needs and views. This is to help inform choices about the future strategy and delivery model for the service. Consultation and engagement with users, non-users and local community groups is integral to this work.

media platforms – Twitter, Facebook, LinkedIn, Instagram and Nextdoor, as well as physical advertisement in a local newspaper – the Surrey Advertiser and posters on the Council's noticeboards located throughout the Borough, including within the Walton and Hersham communities. The DELP was also available to view and read at the Civic Centre and Borough libraries. In addition, over 8,200 individuals were directly contacted via letter or email to inform them of the consultation as they were registered on the Elbridge planning database.

The Council's [Regulation 22 Consultation Statement](#) fully details the range of techniques used during the consultation period to contact and engage with stakeholders.

A regulation 19 consultation must ask questions about the legal compliance and soundness of the DELP. Guidance notes that were provided on the consultation homepage explained the purpose of the representation period and how to consider legal compliance and the test of soundness.

The questionnaire that was prepared is based on the Planning Inspectorate's model representation form. This will ensure consistency at examination.

The Hersham Library site allocation (H15) includes a community

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| 1110059 | Sean Barrett | | Yes | | No | Brampton Gardens open space used by local children daily should not be vulnerable and should be ring fenced from any development. | | Y | | Leave Brampton Garden's green space alone | | | No, I do not wish to participate at the oral examination | No | Comments noted. Brampton Gardens is not included as a site allocation in the DELP. Paragraph 99 of the NPPF states that existing open space should not be built on. |
| 1110392 | Anna Wathen | Friends of Hershams Library | No | The Friends of Hershams Library request that the plan to build 13 units and re-provision of community use at the Hershams Library site be removed from the Local Plan on the following grounds. | No | Section SS1(a) and (e) Hershams Library in its present form is valuable as it is one of the few local libraries that provides easy parking for users. The Library is particularly well suited for disabled people as a space is available right next to the ramp into the building. Parents (or other carers) with pre-school age children and elderly people will be affected as they are the groups who are less likely to walk or cycle any distance. These people will then have to use cars to travel a few miles to the next Library, and the people who walk to the Library may well now have to use their cars to travel whereas before they walked. Many parents/carers with children at Primary Schools nearby - viz Bell Farm, Burhill and Cardinal Newman - often bring their children in after school on the way home. This again will not be easy for them if the Library is not there in its present form with or without available parking. f) If the Units are built alongside the existing Library then green space - the garden at the back, front and side - will be lost. If the Library is to be demolished as well to rebuild this is also against Section (f). | | Y | Section ENV9 (b) The Library as it stands at the moment provides a necessary 'community togetherness'. There are many events run in the Library - Knit and Natter groups, Rhyme Time for pre-school age children, Scrabble groups, Story Reading for the slightly older children, entertainment in the school holidays which includes Magic and Science show, Bug Hunting and Craft Work. Tea and coffee mornings/afternoons, book sales and author events are also available on a fairly regular basis. Some of these have been held in the garden when the weather has been good and it is safe for children with their parents/carers. A recent Tea Party resulted in over 130 visits by all age groups to the Library. Last but not least is the general lending out of books to the public - an extremely important service to all age groups. | Section ENV10 We consider Hershams Library to be a heritage asset as it has been in existence since the 1960's. It is part of the appeal of living in Hershams that both young and old have memories of using the Library for so many years. The Library is particularly light and airy which, together with the garden, makes it very welcoming. Together with other reasons in this submission - particularly the Covenant on the land - we therefore ask that Hershams Library should be removed from the Local Plan and remain open in its present form. | | | Yes, I wish to participate at the oral examination | It cannot be claimed that the Library is no longer needed in its present form. The services cannot be provided in a better quality on the existing site as space will be needed for the 13 proposed units as well as a loosely termed 're-provisioning of community use' - not Library. On the 21st July 1961 according to Title Number SY271312 from the Land Registry Department a conveyance was made between the Urban District Council of Walton and Weybridge (known as the Vendors and later becoming Elmbridge Borough Council) and the County Council of the Administrative County of Surrey which contained the following covenant: For the benefit of the Vendor's adjoining land the Purchasers hereby covenant that the land hereby conveyed shall be used for the purpose of erecting a Public Library and for no other purpose without first obtaining the consent of the Vendors such consent not to be unreasonably | Objection noted. The Hershams Library site allocation (H15) includes a community use within the allocation. It is intended that to meet the requirements of the allocation a development scheme would be required to redevelop the library at ground level and include flats above. Hence the library use would be retained on the site. In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protect and retained where appropriate. |

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| | | | | | | - more accidents - IT MOST DEFINATELY SHOULD NOT BE INCLUDED Longmore Estate - The two green spaces on the estate - where will children play - the roads!! Brampton Gardens - again a green space in a domestic area - where will children play - IT MOST DEFINATELY SHOULD NOT BE INCLUDED | | | | | | | | | | |
| 1110460 | Bill Cowap | | No | Whether it is legally compliant or not is beyond my knowledge and will beyond the knowledge of many of the residents of Hersham. It is unfair to request that anyone without a legal background is able to comment. The questionnaire is unduly lengthy and complicated particularly as the respondent has to give planning reasons why they disagree with each proposal. | No | It appears to ignore several matters that affect Hersham residents such as the effect of the loss of community facilities, employment and the enjoyment of the village of Hersham. There are other factors that are not addressed. 1. The Green Belt is made sacrosanct and this in itself creates a major problem in that of Hersham's 1,029 Hectares, 64% is green belt and green spaces which confines any future developments to a already fully developed area. There is no viable area for development apart from H12 US435 which provides 62 residential units on and existing car park. 2. There is one general aspect that needs to be considered in that there are a number of businesses and social outlets that provide employment and amenities to the population of Hersham such as: H3 US379 Hersham Shopping Area - This is a vital area that is central to Hersham's existence and the development of this area will ruin the enjoyment of Hersham village for many of the local populace. H8 US389 Hersham Sports and Social Club. Following enquiries the owner has not been informed of this inclusion in the Local Plan. It is constantly busy and | | | Y | I am of the opinion that National Policy should be carefully reconsidered on a Borough by Borough basis rather than what appears to be a one size fits all policy | I am not legally qualified and it is unfair that the local population is being asked to answer this question. | | | Yes, I wish to participate at the oral examination | As a Chartered Surveyor working for several years in Elmbridge and Westminster I have experience of planning issues and how difficult the process has been made. | Objection noted. The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed? Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring |

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| 1110579 | Glyn Wright | | No | Certain areas submitted as suitable for future development have not been agreed by their occupants / owners. Examples include H8, H9, H10, H13. Also several car parks are included eg H3, H5, H7, without any explanation of alternative parks in the vicinity or how the residential units will be co-located without loss of parking spaces. Perhaps raised on pillars with parking beneath? | No | Given the lack of agreement over designated development sites, the plans cannot be regarded as proper or legal. | Y | Y | Y | Given the lack of attention paid to resident's objections to the above designated development sites and the lack of agreement of occupants/owners to their listing the plan lack coherence and legitimacy and is unfit for submission. | Drafting staff must pay attention to resident's objections to the above designated development sites and provide evidence of agreement by occupants/owners to the listing on the plan. | | | No, I do not wish to participate at the oral examination | Objection noted. H8 and H10 are no longer available for development. Site in employment uses (H9) would need to address the loss of employment through re-location. The longer timescale reflects the time needed to source an appropriate location. Site allocations (H13) for development of sites that are home to existing community uses seek to ensure these are retained or reprovided on site. In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protect and retained. Council owned car parks are included in the site allocations where they are underused (H5 and H7). Site H3- Hersham Shopping Centre site will include parking for the retail and residential use. Additionally, existing parking at H7 could be consolidated within the parking provision for H3. | |
| 1110840 | Brenda Green | | No | There have been difficulties in the website working properly, so in fact there has not been a full six weeks for this consultation. Pages were found to be initially missing from some of the documents. Then put in. Changes have been made. Sometimes it was unclear what site was being referred to. In particular ref US379 (H3) did I | No | There are a number of inaccurate statements within the plan. Changes have been made to site drawings. Proposals are not sound or in the interests of the community . HI / US441 63 Queens Road - why has this been included as planning applications have already been turned down on grounds of loss of a community asset? H6 / US40 allocated for 15 residential units / mixed use. Site is a Village Hall and Centre for the Community. No | Y | Y | Y | The Plan has not been positively prepared when it doesn't seem to be in the interests of the local community. Will it be effective? So much is wrong with it, how can it be effective. Justified. Not when it seems if put into effect it would destroy many aspects of our treasured local community. Surely national policy targets were not intended to cause this much upheaval in local communities? | I am not qualified to comment on how to make the draft Plan legally compliant. I am merely a Hersham Resident who doesn't want to see assets and amenities destroyed and lost forever. To make it sound and effective I hope that you will take notice of the responses from the public and address their concerns. With particular regard to the Hersham Shopping Centre and vital community amenities such as the Village Hall / Centre for the Community and Hersham Library. You need to make the plan | | | Yes, I wish to participate at the oral examination | I have lived in Hersham for most of my 52 years of married life. My husband and I have raised two children here, one of whom still lives locally with her own family. I have loved living in Hersham. Although we have lost some shops and a few amenities over these many years we desperately want to keep those we still have. To | Objection noted. A letter was sent to residents clarifying many of these concerns during the representation period. The Council has met and exceeded its duty to engage with and consult stakeholders on the preparation and contents of the DELP and has done so in accordance with its <u>Statement of Community Involvement</u> and all |

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| | | | | believe refer originally only to the Waitrose Car Park. It now refers to the whole of the Waitrose Site. How can I consider the draft Local Plan to be legally compliant when so many mistakes have been made? | <p>guarantee has been given that these vital social amenities would remain on the site. Loss of vital social and community asset that could not be replicated elsewhere.</p> <p>H11 / US376 Trinity Hall(?) 63-67 Molesey Road (Hersham South Recreation Ground) Initially it proved difficult to find what the exact boundaries of this site were. However, when the map of the site could eventually be accessed it shows included, not only the part of the Recreation Ground to the left of the by-pass, but also Laithwaites and the Barley Mow. a) the Recreation Ground area is still used by people walking through (a quiet area) even though in recent years it has not been maintained, hedges overgrown, flower beds now non-existent, no benches</p> <p>The building on the site (the old Bowls Pavilion) is used by a Day Nursery b) No indication that Laithwaites / site owners area aware of or approve of the site's inclusion c) the Barley Mow is a Grade II Listed Building!</p> <p>Inclusion of this site in the Local Plan would be loss of a community asset that should be being maintained for the community.</p> <p>H15 / US374 Hersham Library Site. Included for 13 residential units and re-provision of community use. This gives no assurance that a Library will remain on this site. This is a vital and much used community asset. Treasured and used by all sections of the community especially the most vulnerable. Several Car Parks have been include in the Local Plan as sites for housing units. I would particularly object to the inclusion of</p> | | | | more sensible, coherent and less confusing, ensure mistakes are corrected and engage more with the public. | | | | steamroller ahead with some of the proposals in this Local Plan would drastically change our lovely community, and once gone it will have changed forever. | <p>relevant planning regulations.</p> <p>The Council utilised a range of advertisement and consultation techniques during the Regulation 18 and 19 stages to reach and engage with the widest possible range of stakeholders. Techniques included online advertisement on the Council's website and social media platforms – Twitter, Facebook, LinkedIn, Instagram and Nextdoor, as well as physical advertisement in a local newspaper – the Surrey Advertiser and posters on the Council's noticeboards located throughout the Borough, including within the Walton and Hersham communities. The DELP was also available to view and read at the Civic Centre and Borough libraries. In addition, over 8,200 individuals were directly contacted via letter or email to inform them of the consultation as they were registered on the Elmbridge planning database.</p> <p>The Council's Regulation 22 Consultation Statement fully details the range of techniques used during the consultation period to contact and engage with stakeholders.</p> <p>A regulation 19 consultation must ask questions about the legal compliance and soundness of the DELP. Guidance notes that were provided on the consultation homepage explained the purpose of the representation period</p> |
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| | | | | | <p>H7 / US380. This is a small car park which is vital to people visiting the local Doctors' Surgery, the Burhill, School, Dentist and Chemist/Pharmacies. Allocated for seven residential units.. How is this to be achieved when public car parking in this area will still desperately be needed - in addition to the increased demand from any potential new housing units. Similarly I would object to the inclusion of other car park development (H5 / US45) - Car Park south Mayfield Road. If car parks are developed where will the car parking (and charging units) be?</p> <p>The Waitrose Proposal for 200 residential units (H3 / US379) would create a massive upheaval. If the intention is for the whole site then it could mean the loss of our shopping centre for a great number of years while development is underway. Our shops must be retained. We don't want to lose a vital asset. It is greatly used by residents of Hersham and surrounding districts. If the intention is to build on the car park, where will the parking be for the residents and the shops?</p> <p>For all these reasons I do not consider the local Plan to be sound.</p> | | | | | | | | <p>and how to consider legal compliance and the test of soundness.</p> <p>The questionnaire that was prepared is based on the Planning Inspectorate's model representation form. This will ensure consistency at examination.</p> <p>Site allocations for development of sites that are home to existing community uses, including those within Hersham, seek to ensure these are retained or re-provided on site where appropriate. This is set out in more detail in the Council's <u>Land Availability Assessment (2022)</u>. In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protected.</p> <p>Site H3 was extended to include the shopping centre in the LAA 2022 following a pre-application for the whole site.</p> <p>Car parks are only included as site allocations when they are underused or could be consolidated into another locations/site.</p> |
| 1110851 | Abigail Bettinson | | Yes | | No | Y | | | Address the issues of parking if parking sites are removed within Claygate village | | | No, I do not wish to participate at the oral examination | <p>Objection noted.</p> <p>CL4 is no longer available for development.</p> <p>Torrington Lodge (CL1) car park is under used and is allocated for a mixed-use development retaining some parking.</p> <p>Network Rail has not confirmed availability, but the car parking</p> |

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| | | | | | | of the village and also force people to park on the local roads legally and illegally, impacting on the quality of life for the residents in the village. People will still need to use cars even if the number is reduced so this could actually be worse for green policies which I am very much in favour of, if insufficient parking is provided as this could increase pollution with the increased congestion. | | | | | | | | | could be reduced to provide some housing. This has a longer timescale to allow for the parking use to be monitored. |
| 1110857 | David Lock | | No | I am not qualified to answer this question - but would be concerned if the national guidelines encouraged a large proportion of local facilities to be re-designated for housing use as, apparently appears to be the case for Hersham. | No | I answered no as a resident of Hersham concerned about the proportion of local facilities to be re-designated for housing use as in Hersham, for example the Village Hall and Library and several of the remaining pubs (the Barley Mow and Royal George) and the Comrades Club. Also, I would expect, as a starting point the local plan to identify with the community important local facilities which the community want to protect - however the current plan appears to identify such sites and designate these for housing. | | Y | I have a question about whether it's justified to generally reduce social and community buildings and land use / car parks when there will be a likely increase in population. Also, I am concerned that only a small percentage of the new housing built under the plan will be genuinely affordable for generations to come - if not I fear that the increased housing will do little to help low income families in the area. | Re-look at other land elsewhere, or in Hersham if necessary, before resorting to re-designating community land use (like the village hall and library) for housing. For example, has the land on the left beyond Sir Richard's Bridge in the direction of Weybridge been considered? | | | No, I do not wish to participate at the oral examination | | Objection noted. Site allocations for development of sites that are home to existing community uses, including those within Hersham, seek to ensure these are retained or re-provided on site where appropriate. This is set out in more detail in the Council's Land Availability Assessment (2022) . In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protected. The landowners of the Royal George (H10) and Social Club (H8) have confirmed that this site is not available. Further to the ownership checks undertaken in 2023, five Elmbridge owned car parks are no longer available because they are in greater use than that witnessed in 2020/21. Some have been kept in the LAA as they are still underused, and others have been given a longer timescale to account for the use to be monitored over a longer period. Additionally, existing |

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| | | | | | <p>findings of evidence based studies that were used to inform the plan. Draft Local Plan Policy HOU1, whilst requiring efficient use of land, it also states that "...all new residential and mixed-use development to demonstrate that it represents the optimal use of land and density, positively responding to the location and the appearance of the surrounding area". To that end, the Land Availability Assessment 2021 para 3.21 states that the council has provided an estimate for each site, based on a range of factors including:-</p> <ul style="list-style-type: none"> • Nature of the area • A consideration of historic development yields achieved on comparable schemes within the locality. <p>However, the density proposed for site D6 US462 of 120 dph does not reflect the nature of the area or development yields in the locality and as a result is contrary to the Draft Local plan guidelines. Below is the evidence showing where the site density allocation is not consistent with the proposed draft plan and evidence based studies:- Continued in following comment box:</p> | | | | | | | | | centres and sites adjacent to train stations. (HOU2 2.a) NPPF defines edge of town as 300m of a town centre boundary or 500m of a station. Based on the Retail Centres Boundary Review 2021 site US462 is an estimated 1000m from both the Bridge Road District Centre and East Molesey District Centre. It is and estimated 1100m from Thames Ditton Station and 1400m from Hampton Court Station and so would sit outside the areas suitable to higher density development. | | | | | | |
| 1110799 | John Haberfield | | Yes | | No | Y | | | | | | | | | <p>The Local Plan should spell out how community centres may be "re-provisioned" and whether planning permission will be granted for new residential units to have associated parking space / charging points.</p> | | | No, I do not wish to participate at the oral examination | | Comments noted. Site allocations for development of sites that are home to existing community uses seek to ensure these are retained or re-provided on site where appropriate. This is set out in more detail in the Council's Land Availability Assessment (2022) . In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protected. |

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| 1111014 | Lucy Morris | Nexus Planning on behalf of Charterhouse Strategic Land | No | Please see uploaded document at question 4a for full response. In summary, the representation is promoting the Former Moore Place Golf Course which is located in the Green Belt. It states that sites which have constraints such as Green Belt should be included in the LAA in accordance with national policy. The LAA/Site allocations are questioned in terms of the availability of some sites as well as suitability in terms of the loss of employment, community uses, garages and car parks. | No | Please see uploaded document at question 4a for full response. In summary, the representation is promoting the Former Moore Place Golf Course which is located in the Green Belt. It states that sites which have constraints such as Green Belt should be included in the LAA in accordance with national policy. The LAA/Site allocations are questioned in terms of the availability of some sites as well as suitability in terms of the loss of employment, community uses, garages and car parks. | Y | Y | Y | Y | The approach being taken by the Council in allocating sites for housing presents a real risk to the delivery of much needed homes and is not considered to be a sound or justified approach. | | Former Moore Place Golf Course Elmbridge Draft LP (Reg.19).pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557335/PDF/-/Former%20Moore%20Place%20Golf%20Course%5FElmbridge%20Draft%20LP%20%5FReg%2E19%5F%2Epdf | Yes, I wish to participate at the oral examination | Please refer to accompanying submission. Please note that Nexus Planning is acting on behalf of Charterhouse Strategic Land. | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022). The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, |
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any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as

also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii). In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the

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| | | | | | | of visitors to the town centre and the parents of the primary school for drop-off/ pick-up. Later in the plan period there may be an opportunity for alternative uses than parking dependent on the speed of change in travel patterns and transport modes. This would enable New Berry Lane Car Park to be fully integrated with the town centre redevelopment proposals, rather than as a standalone allocation resulting in piecemeal development. Quadrant Repurpose and LaSalle Investment Management would therefore welcome discussions with the Council in relation to the comprehensive development opportunities of New Berry Lane Car Park with the Site both in the short and longer terms. | | | | | | | | | | |
| 1110690 | Gareth Garner | Willow Tree Homes | No | Please see uploaded document at question 4a | No | Please see uploaded document at question 4a | | | Y | | Please see uploaded document at question 4a | Regulation 19 Reps - Pharaohs Lodge.pdf https://consult.elmbridge.gov.uk/qf2.ti/a/1205954/557454/PDF/-/Regulation%2019%20Reps%20%2D%20Pharaohs%20Lodge%2Epdf | Overall, it is not considered that the council has prepared a Local Plan which would in any way pass the tests of soundness as set out in the National Planning Policy Framework to be positively prepared, justified, effective or consistent with national policy. The provision of a significant number of smaller brownfield sites would lead to the prevalence of smaller dwellings across the borough which is not in line with the established needs. Furthermore, the selection of smaller sites would not lead to provision of affordable housing on the vast majority. It is considered that there are | Yes, I wish to participate at the oral examination | see separate representations document | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and |

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| | | | | | | | | | | | <p>substantial issues of soundness with the Local Plan in its current form. These matters of soundness can be remedied through adjustments in strategy and approach ahead of the submission of the Local Plan for examination.</p> <p>It is considered that the Pharaohs Lodge site represents an area of land where Exceptional Circumstances could be justified in order to release land from the green belt.</p> <p>Willow Tree Homes is committed to working with the council throughout the next stages of the local plan process.</p> | | | <p>collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022).</p> <p>The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?</p> <p>Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the</p> |
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beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality.

The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that

10. Monitoring Framework

| ID | N | Org | 1 | 1a | 2 | 2a | 3 | 3 | 3 | 3 | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
|---------|-------------|-----|-----|----------|----|--|---|---|---|---|--|---|----|----|---|---|---|
| | | | | | | | P | E | J | C | | | | | | | |
| 1107108 | Alan McCann | | Yes | Not sure | No | Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many. | | | Y | | Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many. | | | | | | <p>Comments noted.</p> <p>The spatial strategy set out in the DELP aims to balance the often competing and conflicting issue of protecting the environment and address the challenges of climate change, and growth to meet economic, housing and infrastructure needs.</p> <p>The proposed spatial strategy is considered to be the best, most sustainable solution to meet the Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. As demonstrated through the evidence base, Duty to Cooperate activities and Statements of Common Ground, the development strategy can also be accommodated without putting undue pressure on the Borough's infrastructure.</p> <p>In addition, draft policies, such as ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located.</p> |

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| | | | | | | | | | | | | | | | | | | | transition away from reliance on private cars. | | | |
| 1112909 | Steve Hinsley | Stephen Hinsley Planning obo PA Housing | | | | Monitoring The list of indicators under Principle 3 do not go far enough. The number of affordable homes from new build and acquisitions should be recorded separately. The following indicator should be added: Total net number of affordable homes delivered (new build and acquisitions) after taking account of demolitions and Right to Buy. | | | | | | | | | | | | | Comments noted. It is intended that the net affordable homes from acquisitions and new build is reported separately under the existing indicator. | | | |
| 1107250 | Victor Bradley | | Yes | | No | A number of indicators are missing to accurately reflect the compliance with various policies stated. eg 1. ENV3 – Local Green Spaces and ENV4 – Development in the Green Belt - No indicator to state no development has taken place on these areas. 2. ENV6 – Protecting, enhancing and recovering biodiversity - No indicator to reflect to state that no nett loss of biodiversity has occurred. | Y | Y | | | | | | | | | | No, I do not wish to participate at the oral examination | Comments noted. 1. Such an indicator is not required and draft policy ENV3 sets out that local green space will be protected. 2. Such an indicator is not required and draft policy ENV6 sets out that a biodiversity net gain is required. | | | |
| 1110041 | Meghan Rossiter | Abri | Yes | | No | | Y | | | | | | | | | | | The monitoring of the delivery of affordable housing should monitor the net affordable homes delivered, as well as linking the level of delivery to the Local Housing Need Assessment target figure of 269 dwellings per annum | 07.2022 Elmbridge Local Plan.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/552089/PDF/-/07%2E2022%20Elmbridge%20Local%20Plan%2Epdf | As per 4. | No, I do not wish to participate at the oral examination | Comment noted. It is intended that the net affordable homes is reported under the existing indicator. |

11. Appendices

| ID | N | Org | 1 | 1a | 2 | 2a | 3 | 3 | 3 | 3 | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
|---------|-------------|-----|-----|----------|----|--|---|---|---|---|-----------|---|----|----|---|---|---|
| | | | | | | | P | E | J | C | | | | | | | |
| 1107109 | Alan McCann | | Yes | Not sure | No | Too much focus on environmental issues and too little on supporting business growth and infrastructure improvements. Also consider number of new properties your intending to squeeze into Weybridge to be far too many. | | | Y | | See above | | | | | | <p>Comments noted.</p> <p>The spatial strategy set out in the DELP aims to balance the often competing and conflicting issue of protecting the environment and address the challenges of climate change, and growth to meet economic, housing and infrastructure needs.</p> <p>The proposed spatial strategy is considered to be the best, most sustainable solution to meet the Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. As demonstrated through the evidence base, Duty to Cooperate activities and Statements of Common Ground, the development strategy can also be accommodated without putting undue pressure on the Borough's infrastructure.</p> <p>In addition, draft policies, such as ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located.</p> |

12. Whole Plan

| ID | N | Org | 1 | 1a | 2 | 2a | 3 | 3 | 3 | 3 | 3a | 4 | 4a | 4b | 5 | 6 | 7 |
|---------|--------------|--------------------------------|-----|--|-----|--|---|---|---|---|----|---|---|-------------------|--|---|--|
| | | | | | | | P | E | J | C | | | | | | | |
| 1107492 | Keith Tohill | CPRE - the countryside charity | Yes | <p>Please see uploaded document at question 4a for full response.</p> <p>Conclusion The preferred Option which became the central plank of the Spatial Strategy of the Draft Plan, of building approximately 70% of the Standard Method figure is the most appropriate, given the many individual circumstances of the Borough and the careful rejection of other Options, after due consideration. The preferred strategy is strongly sustainable, retains the character of the urban areas, meets the NPPF at paragraph 11b with the proviso of the words" meets objectively assessed need "UNLESS", takes account of the many constraints existing and when it comes to possible Green Belt releases; the Council does not consider that exceptional circumstances have been fully evidenced and justified to allow any releases.</p> | Yes | <p>Please see full PDF letter response.</p> <p>Conclusion The preferred Option which became the central plank of the Spatial Strategy of the Draft Plan, of building approximately 70% of the Standard Method figure is the most appropriate, given the many individual circumstances of the Borough and the careful rejection of other Options, after due consideration. The preferred strategy is strongly sustainable, retains the character of the urban areas, meets the NPPF at paragraph 11b with the proviso of the words" meets objectively assessed need "UNLESS", takes account of the many constraints existing and when it comes to possible Green Belt releases; the Council does not consider that exceptional circumstances have been fully evidenced and justified to allow any releases.</p> | | | | | | | <p>CPRE Surrey.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/695441/PDF/-/CPRE%20Surrey%20Epdf</p> | As per 1a and 2a. | No, I do not wish to participate at the oral examination | | Support for the proposed spatial strategy of the DELP noted. |

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| 1107610 | Ian Powell | | No | See letter enclosed at question 4a. | No | See letter enclosed at question 4a. We consider the Draft Plan to be unsound and should fail at examination. We do not support the inclusion draft allocation of ESH11 – 42 New Road, Esher, KT10 9NU and request that this allocation be formally deleted from the submission version of the Draft Plan. | Y | Y | Y | Y | See letter enclosed at question 4a. | See letter enclosed at question 4a. | Bell Cornwell - Regulation 19 - Representation Letter - Mr Ian Powell.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/545572/PDF/-/Bell%20Cornwell%20%2D%20Regulation%2019%20%2D%20Representation%20Letter%20%2D%20Mr%20Ian%20Powell%20Epdf | As per 2a. | No, I do not wish to participate at the oral examination | <p>Objection noted.</p> <p>During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.</p> <p>The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022).</p> <p>The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?</p> <p>Like the Secretary of State, the Council attaches great importance to Green Belt. It is</p> |
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the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place

that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality.

The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii). In light of the considerations set out above, it is the Council's

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| | | | | | old Birds Eye HQ. The Council must now leave open spaces and green belts as they stand to prevent overcrowding to the area. I know of families in Weybridge who deliberately drive & park at Walton-on-Thames train station to catch the train because the two carparks (H5 US45 car park south of Mayfield Road & WOT 31 US356 Station Avenue Car Park) are more convenient and comfortable than the overcrowded Weybridge train station. | | | | | | | | | | |
| 1108534 | Richard Tarboton | | Yes | Yes it is legally compliant as it address the key requirements of the community and the environment. The spatial strategy meets all necessary requirements. | Yes | Yes it is sound as it ensures we persevere the greenbelt which is essential for the long term prosperity of the planet | | | | | | | | | Support noted. |
| 1108569 | Gil Bray | | Yes | | Yes | I have read the "Topic Paper No 1 - How The Spatial Strategy was Formed - 2022" - from cover to cover - and support the argumentation used there in support of the chosen Spatial Strategy absolutely. | | | | | | | | | Support noted. |
| 1108584 | Gavin Wilson | | No | I am very concerned about how the process is being manipulated in Claygate: 1. The Parish Council has been told that its response will represent every household in Claygate. This is ridiculous because a. only one of the parish councillors has actually been voted in; all the others got in simply because they put their names forward; b. attendance by parish councillors at meetings, | No | How can it be sound when it is taking so much amenity away from Claygate residents? Car parks: going. Day Centre: going, but somehow being replaced. Youth Centre: going. The Plan is being portrayed to residents by councillors as the least worst option. The only benefit seems to be that it is 'sustainable' without anyone clarifying what on earth that means. | Y | Y | | I believe the Parish Council should be completely excluded from the communications process. It makes almost no attempt to understand the views of residents, and only one of the 10 councillors has been voted in. It is not representative. | | | No, I do not wish to participate at the oral examination | | The nature of Claygate Parish Council's representation is not a matter of legal compliance or soundness with regard to the DELP. Elmbridge Brough Council do not influence how the Parish Council prepare their representation to the Regulation 19 DELP. Site allocations for development of sites that are home to existing community uses seek to ensure these are retained or re-provided on site where appropriate. This is set out in more detail in the Council's <u>Land Availability Assessment (2022)</u> . In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protected. The definition of sustainable development is included in the Glossary at appendix A2. |

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| | | | | | | Elmbridge residents while seeking to achieve the Government's housing targets. | | | | | | | | |
| 1108700 | Sophie Histon | Histon Allvey Architects | No | The plan designates Moore Place as an Urban Area It is green Belt and in no way an urban area | No | The word Sound does not mean anything | | Y | | Change the allocation of Moore place to Green Belt. The council should be making proposals to allow all their observations to happen and be more aware of the local population. At no point has the lack of local services been mentioned. With increased development the council should make provision to expand the following; Doctors surgeries Sewage plants Train stations need expanding/ improving Local Transport - Electric Shuttle buses should be provided around towns. Additionally, Rivers need protecting from continual sewage overload | | | No, I do not wish to participate at the oral examination | Comments noted. Moore Place is located within the Green Belt and is designated as Green Belt. The Local Plan does not state that Moore Place is an urban area. The Council's Infrastructure Delivery Plan (May 2022) (IDP) and Update (July 2023) detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the quantum of development proposed in the DELP. The IDP and IDP Update have been informed by the preparation of other evidence base documents e.g., <u>Transport Assessment (2022)</u> and via discussions with infrastructure providers as part of the Council's duty to cooperate activities as outlined in the Council's <u>Duty to Cooperate Statement of Compliance (June 2022)</u> , <u>Duty to Cooperate Statement of Compliance Update (August 2023)</u> and Statements of Common Ground published with the <u>Core Documents</u> submitted for Examination. The agreed position with our infrastructure delivery partners is that the proposed development strategy can be accommodated within the borough with the mitigation identified / a policy-led approach. In addition, the DELP includes policies to ensure the infrastructure needed to support the delivery of the aspirations of, and quantum of development proposed, in the DELP is provided. Draft policy INF1 – Infrastructure delivery aims to ensure the required infrastructure needed to accommodate and mitigate the impact of new development in the Borough is delivered in a timely manner, whilst acknowledging that the infrastructure provision with a development must be |

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| | | | | | critically, local community needs and views. This is to help inform choices about the future strategy and delivery model for the service. Consultation and engagement with users, non-users and local community groups is integral to this work. This has not been done, If so I would like to see evidence of when I or my friends were contacted. If you have other plans for Walton and Hershham that will affect the residents. Should the users of the facilities or local residents not be informed ? | | | | | | | | | registered on the Elmbridge planning database. The Council's Regulation 22 Consultation Statement fully details the range of techniques used during the consultation period to contact and engage with stakeholders. Site allocations for development of sites that are home to existing community uses seek to ensure these are retained or re-provided on site where appropriate. This is set out in more detail in the Council's Land Availability Assessment (2022) . In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protected. The Hershham Library site allocation (H15) includes a community use within the allocation. It is intended that to meet the requirements of the allocation a development scheme would be required to redevelop the library at ground level and include flats above. Hence the library use would be retained on the site. In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protect and retained where appropriate. | | | |
| 1109506 1108953 | Sophie Roger | | No | Being an ordinary resident with no legal training, I cannot answer this question. It is incorrect to ask residents to comment in this fashion. Is the intention to discourage comments altogether? | No | Full response | Y | Y | Y | Y | Full response | Please find my answer in addendum document ContinuedQuestionnaire Website20220728 added to my files for submission. | The following attachments are available online: MichaelGoveHousing Secretary.docx https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/549436/DOCX/-/MichaelGoveHousingSecretary%2Edocx EBC Response to Local Plan Sub-Committee for Hershham.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556838/PDF/-/EBC%20Response%20to%20Local%20Plan%20Sub%2DCommittee%20for%20Hershham%2Epdf HershhamLocalPlanExtensionDeadline20220718.docx | This is what is required to improve the Local Plan: • Improve your local knowledge • Ask owners / tenants if the sites are available before including them • Ask residents for suitable sites for re-development before making a final draft • Work in tandem with local organisations, not against them • Lend a positive ear when residents complain, instead of adopting a punishing tone (allow extensions to deadlines, | Yes, I wish to participate at the oral examination | I feel very strongly about the proposals in the Local Plan and I have serious concerns as its validity in terms of soundness, fairness and respect for the residents. I wish to speak at the Oral Examination and will bring documents to support my arguments. | Objection noted. A regulation 19 consultation must ask questions about the legal compliance and soundness of the DELP. Guidance notes that were provided on the consultation homepage explained the purpose of the representation period and how to consider legal compliance and the test of soundness. The questionnaire that was prepared is based on the Planning Inspectorate's model representation form. This will ensure consistency at examination. A1. The allocation of the quantum of development for each settlement area set out in strategic policy SS3 has been driven by the principle of sustainable development, again in accordance with national policy. The Plan seeks to make |

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| | | | | | | | | | | <p>https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556839/DOCX/-/HershamLocalPlanExtensionDeadline2020718%2Edocx</p> <p>HershamFloodMapGetTheData_20220718.png https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556849/PNG/-/HershamFloodMapGetTheData%5F20220718%2Epng</p> <p>HershamFloodMapWarningArea_20220718.png https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556850/PNG/-/HershamFloodMapWarningArea%5F20220718%2Epng</p> <p>HershamShoppingCentreGoogleEarthFlood20220728.png https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556851/PNG/-/HershamShoppingCentreGoogleEarthFlood20220728%2Epng</p> <p>HershamFloodMapPaulVansonCourt20220718.png https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556852/PNG/-/HershamFloodMapPaulVansonCourt20220718%2Epng</p> <p>HershamLibraryEBCStatement20220707.png https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556854/PNG/-/HershamLibraryEBCStatement20220707%2Epng</p> | <p>welcome comments, etc.)</p> <ul style="list-style-type: none"> • Add precise detail on how infrastructure will be improved instead of generalities • Remove inaccuracies • Remove unnecessary padding and repetition. <p>But the main problem is that this task is unachievable, at the very least in Hersham.</p> | <p>as much use as possible of existing suitable brownfield sites, including all publicly owned assets and land holdings. The urban areas of the borough were assessed, identifying the amount of development that could sustainably be accommodated.</p> <p>A2 Yes, these units have been accounted for in the identification of housing need in the Borough, which has informed the quantum of development identified for Hersham in strategic policy SS3. The evidence of housing need is set out in the Council's Local Housing Need Assessment (2020).</p> <p>A3. The DELP does not propose any development on Green Belt land. This is reflected in the brownfield first approach that underpins the proposed spatial strategy. The Council's site allocations and Land Availability Assessment (2022), identifies the specific sites that will contribute to meeting the quantum of development identified in Hersham.</p> <p>Comments regarding nationally set housing targets noted. The DELP proposes a spatial strategy that seeks to meet a reduced housing target equating to 70% of the Borough's housing need.</p> <p>B. – C. A letter was sent to Hersham Residents committee clarifying many of these concerns during the representation period.</p> <p>The Council has met and exceeded its duty to engage with and consult stakeholders on the preparation and contents of the DELP and has done so in accordance with its Statement of Community Involvement and all relevant planning regulations.</p> <p>The Council utilised a range of advertisement and consultation techniques during the Regulation 18 and 19 stages to reach and engage with the widest possible range of stakeholders. Techniques included online advertisement on the Council's website and social media</p> |
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platforms – Twitter, Facebook, LinkedIn, Instagram and Nextdoor, as well as physical advertisement in a local newspaper – the Surrey Advertiser and posters on the Council's noticeboards located throughout the Borough, including within the Walton and Hersham communities. The DELP was also available to view and read at the Civic Centre and Borough libraries. In addition, over 8,200 individuals were directly contacted via letter or email to inform them of the consultation as they were registered on the Elmbridge planning database.

The Council's Regulation 22 Consultation Statement fully details the range of techniques used during the consultation period to contact and engage with stakeholders.

As set out above, A regulation 19 consultation must ask questions about the legal compliance and soundness of the DELP. Guidance notes that were provided on the consultation homepage explained the purpose of the representation period and how to consider legal compliance and the test of soundness.

The questionnaire that was prepared is based on the Planning Inspectorate's model representation form. This will ensure consistency at examination.

E. A Local Plan has limited influence in that it influences development requiring planning permission. The delivery of infrastructure such as bus routes can only be achieved if development comes forward that is required or can contribute to the delivery of such infrastructure.

The Council's Infrastructure Delivery Plan (May 2022) (IDP) and Update (July 2023) detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the

quantum of development proposed in the DELP.

The IDP and IDP Update have been informed by the preparation of other evidence base documents e.g., Transport Assessment (2022), and via discussions with infrastructure providers as part of the Council's duty to cooperate activities as outlined in the Council's Duty to Cooperate Statement of Compliance (June 2022), Duty to Cooperate Statement of Compliance Update (August 2023) and Statements of Common Ground published with the Core Documents submitted for Examination.

The agreed position with our infrastructure delivery partners is that the proposed development strategy can be accommodated within the borough with the mitigation identified / a policy-led approach.

In addition, the DELP includes policies to ensure the infrastructure needed to support the delivery of the aspirations of, and quantum of development proposed, in the DELP is provided.

Draft policy INF1 – Infrastructure delivery aims to ensure the required infrastructure needed to accommodate and mitigate the impact of new development in the Borough is delivered in a timely manner, whilst acknowledging that the infrastructure provision with a development must be proportionate to the size of the development.

Draft policy CC4 sets out how development must contribute to the delivery of an integrated, accessible and safe sustainable transport network and sets out how development should promote active travel and the use of public transport and support a transition away from reliance on private cars.

F. Site H3 was extended to include the shopping centre in the LAA 2022 following a pre-application for the whole site.

Site allocations (H6, H11 and H13) for development of sites that are home to existing community uses seek to ensure these are retained or re-provided on site. In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protected.

Site allocation H5 will remain in the site allocations chapter because it is currently under used. It has been given a longer timeframe so that the use can be monitored further.

H8 and H10 are no longer available for development.

Car parks are only included as site allocations when they are underused or could be consolidated into another location/site. Site H3- Hershams Shopping Centre site will include parking for retail and residential use.

G. The proposed spatial strategy is considered to be the best, most sustainable solution to meet the Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. As demonstrated through the evidence base, Duty to Cooperate activities and Statements of Common Ground, the development strategy can also be accommodated without putting undue pressure on the Borough's infrastructure.

In addition, draft policies, such as ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located.

An option to meet the Borough's identified housing need in full through intensification of urban areas was considered. However, the Council concluded that this option would see the delivery of residential units that would negatively impact the urban

structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities.

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.

The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and

Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's [Topic Paper 1: How the spatial strategy was formed?](#) (June, 2022).

The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR

assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt,

the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality.

The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place

greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

H. The Hershams Library site allocation (H15) includes a community use within the allocation. It is intended that to meet the requirements of the allocation a development scheme would be required to

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| 1109078 | Gavin Potts | | Yes | | Yes | I believe the plan is well constructed and is completely appropriate for the needs of Elmbridge for the period under consideration. | | | | | | | | | | | | Support noted. |
| 1109082 | James Buckley | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1109086 | Celia Houlihan | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1109096 | Alan Pemberton | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1109121 | Mandy Phillips | | Yes | Having attended meetings by various Elmbridge Councillors I am confident that the Local plan is legally compliant, | Yes | Having attended meetings by various Elmbridge Councillors, followed the process over several years and reading around the subject I am confident that the Local plan is sound. | | | | | | | | | | | | Support noted. |
| 1109123 | Jez Langham | Elmbridge BC | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1109127 | Linda Stotesbury | | Yes | | Yes | I fully support the draft local plan and think that its principles are sound, and it contains a good a balance between climate, environment, housing and business. I particularly support the priority given to the protection of the Greenbelt and other green spaces in Elmbridge. | | | | | | | | | | | | Support noted. |
| 1109139 | Mrs Pulford | | Yes | I can see that great effort has been made to create a plan for the residents of Elmbridge that adheres to the various rules and regulations. | No | I consider it only in part sound. For example, plan for travel and environment is not sufficient as it does not include and promote the extension of public transport. You plant will please the small number of local cyclist that are using the cycle path to get to work but if you are a young mum with kids or a retired person you need a good local bus service to take you to the nearest town or hospital etc. Our local roads suffer from terrible pollution (child asthma is on the increase) and just offering to extend a cycle path does not tackle pollution. I also feel that there are not enough plans to combat climate change. This could be done by planting or replacing | Y | | I do feel that Walton on Thames is taking the brunt of the Governments housing target and having to provide 452 dwellings per year is unacceptable taking into consideration, the congestion and pollution in our towns and the missing infrastructure! Why has our housing target been doubled from previous year? | As set out before, we cannot continue to increase and build unsocial flat developments and big housing estates without providing the infrastructure with it. We need to promote and support a better public transport i.e. buses, create more green spaces and plant trees or replace the trees that have been chopped down by the Council. We need to tackle pollution to promote solar panels for residential homes via a Council let plan. It is a waste of public money to increase a cycle path that is only used by a minority of people! | | | No, I do not wish to participate at the oral examination | | | | Comments noted. Draft policy CC4 sets out how development must contribute to the delivery of an integrated, accessible and safe sustainable transport network, including bus services, and sets out how development should promote active travel and the use of public transport and support a transition away from reliance on private cars. Tackling climate change and its consequences a priority for the Council and the DELP. The DELP will play a central role in addressing the climate emergency by reducing carbon dioxide emissions and supporting the transition to a low carbon future. For example, strategic policy SS1 - Responding to the climate emergency draft policies CC1 – CC5 set out a suite of policies that require development proposals to reduce carbon | |

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| | | | | | | trees(trees that have been chopped down by the Council because of insufficient funds for maintenance) trees in residential roads. We should also encourage the installtion of solar panels in residential homes and maybe make funds available for this. Although I am pleased that no green belt land has been considered for housing, I feel Walton on Thames is the main target for building unsociable flats and big housing estates. Why can't some of these be built in Oxshott or Cobham? | | | | | | | | | emissions, incorporate renewable technologies, including solar panels and support the delivery of sustainable transport infrastructure. Additionally, to comply with draft policy ENV2 – Landscape, trees and woodlands, development proposals will be expected to protect trees and to make provision for new streets to be tree lined. Whilst draft policy ENV9 – Urban design quality, will require development proposals to demonstrate how they will contribute positively to the public realm and natural environment including the provision of trees in new streets and open spaces. The housing target for the DELP has been informed by the calculation of housing need using the standard methodology, our assessment of local housing needs and our understanding of the borough's environmental constraints in accordance with national policy. The allocation of the quantum of development for each settlement area set out in strategic policy SS3 has been driven by the principle of sustainable development, again in accordance with national policy. The Plan seeks to make as much use as possible of existing suitable brownfield sites, including all publicly owned assets and land holdings. The urban areas of the borough were assessed, identifying the amount of development that could sustainably be accommodated. |
| 1109154 | Peter Parker CBE | | Yes | no comments | Yes | no comments | | | | | | | | | Support noted. |
| 1109164 | Lisa Stamm | | Yes | | Yes | | | | | | | | | | Support noted. |
| 1109185 | Sean McCallion | | Yes | | Yes | | | | | | | | | | Support noted. |
| 1109189 | Elizabeth Laino | | Yes | | Yes | The plan is a sensible one which recognises how much green belt Elmbridge has and how little urban space. Green belt should be protected and housing targets realistic. Elmbridge is one of the most expensive places in the country to live. It sets a sensible target | | | | | | | | | Support noted. |

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| | | | | | | for affordable homes and concentrates on building first time ownership properties.. I fully support it | | | | | | | | | | | | | | |
| 1109218 | Mr Stringer | | Yes | | Yes | | | | | | | | | | | | | | | Support noted. |
| 1109335 | Nigel Haig-Brown | | Yes | | Yes | | | | | | | | | | | | | | | Support noted. |
| 1109344 | Louise Russell | | Yes | | Yes | Thank you for all the work that has gone into the preparation of the plan. What a huge task for Karen Randolph and everyone involved. I would make one strategic observation: It would be good to know the evidence for the decision that three bed and above homes should be no more than 30% of the total 6785 homes. This would seem restrictive for any family with two kids. I think the site allocations is such an emotive issue - I think it needs to be brought out, reviewed and justified separately as it feels tucked away on page 93. | | | | | | | | | | | | | | Support noted. The evidence for the housing mix set out in the DELP is set out in the Council's Local Housing Need Assessment (2020) (LHNA). The housing mix identified in the LHNA reflects the need for different sizes of homes in the Borough. National policy and guidance requires the DELP to set out a spatial strategy that is supported by an available and deliverable set of site allocations that will provide the level of housing development identified in the Plan. This means the Council has to set out the proposed site allocations alongside the strategy/policies in the DELP. |
| 1109362 | Adrian Marriott | | Yes | | Yes | The Plan reflects the views of the local population, protects the Green Belt and makes sensible provision for new housing. Overall a balanced and sustainable solution for Elmbridge | | | | | | | | | | | | | | Support noted. |
| 1109416 | Tamsin Bury | | Yes | | Yes | | | | | | | | | | | | | | | Support noted. |
| 1109442 | Peter Hostler | | Yes | | Yes | | | | | | | | | | | | | | | Support noted. |
| 1109459 | Patrick Bateman | | Yes | | Yes | I am in support of the Spatial Strategy strategy which offers reasonable, responsible, sustainable solutions to complex and the often competing demands. | | | | | | | | | | | | | | Support noted. |
| 1109462 | Nathan Wroughton | Ruxley Heights Residents Association | Yes | | Yes | | | | | | | | | | | | | | | Support noted. |

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| | | | | been open and engaging. I understand that all councilors support the plan. | | sustainable communities. | | | | | | | | | | | | |
| 1109630 | Michael Hepworth | | Yes | | Yes | I have attended local meetings of the Claygate PC for some time, and am firmly of the view that what is left of the Green Belt around the village should be responsibly preserved, whilst understanding the need for additional but affordable housing to be available. What convinced me to support the plan was the soundness of the spatial strategy spelt out and the careful thought which has gone into it. Whilst not perfect from my point of view, I think it to be the wisest and most feasible way forward, and I am grateful to the councillors for their care to propose what I consider to be the best way forward. | | | | | | | | | | | | Support noted. |
| 1109641 | Anthony Sheppard | | Yes | The Council have established compliance with the NPPF. | Yes | The Council have rigorously consulted on and evaluated other options, especially relating to Spatial Strategy. Sound arguments are presented against release of Green Belt. Previous consultations on even limited release of Green Belt revealed overwhelming public opposition to such a policy, with concerns about urban sprawl, coalescence of settlements, environmental damage and loss of greenspace amenities. The density of settlement in Elmbridge, coupled with its proximity to Greater London, make its Green Belt of particular importance. | | | | | | | | | | | | Support noted. |
| 1109666 | Andrew Mitcham | | Yes | | Yes | Those areas identified as remaining green belt and not for future development I support. | | | | | | | | | | | | Support noted. |

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| 1109669 | Richard Preston | | Yes | | Yes | Fully aligned to the spatial strategy proposed in the draft local plan, it's vital we continue to protect the Green Belt, which the council makes clear justifications for | | | | | | | | | | Support noted. | |
| 1109736 | Pauline Simpson | | Yes | | Yes | | | | | | | | | | | | Support noted. |
| 1109762 | Frederick Spence | | No | I consider this a strange question for our Council to be asking the public. One would naturally assume that the organisation, staffed by local government professionals reporting to our elected representatives, that was responsible for managing our local affairs would work within the law. Having said that there are a number of areas that concern me: 1. There is an overall impression that the Council does not actually want the public to respond and has deliberately made this process 'hard work': a. Complexity of this 'comment' process b. Short time for consultation by ordinary members of the public, given that it has taken Council professionals several years to produce this highly detailed document. c. The timing of issue - summer holidays d. Non-availability on website at start | No | As already covered in my response to Q1 there are a number of demonstrably inaccurate statements within the plan which in my opinion make it unsound. There are also several proposals that I do not believe are justified. As that is the case, it is highly likely that the plan will therefore also be ineffective. Further to my points in Q1, I would add that the inclusion of the Barley Mow Public House within the plan (H11 US 376) is an error, given that it is recognised as a Listed Building. I am also concerned about the possibility that Hersham might be deprived of some important Community Assets - Hersham Library (H15 US374) and the Hersham Village Hall (H6 US40). Similarly I cannot understand why the 63 Queens Road Hersham KT12 5LA (H1 US441) is included when planning permission was recently refused on the grounds that this site was also a Community Asset. I am particular concerned about the content relating to Car Parks: 1. General Observations a. The car driving population of Hersham has increased significantly in recent times and continues to do so. b. New arrivals moving out of London tend to be younger with a 'two car need'. | Y | Y | Y | When I attended a Public Meeting on this subject it was made clear that the Plan is an attempt to meet targets laid down by Central Government. Apparently it falls short, but the hope is that it will be close enough to be accepted centrally and avoid the Borough having responsibility for the plan removed. My concern is that so many of the statements in the plan are wrong and some of the key intentions do not play well for the Hersham Community in the long term. The approach conveyed at the Public Meeting seemed to be "trust us - most of these things will never really happen, particularly if there are future changes in central government and its thinking". Regrettably, the 'trust us' concept does not bear scrutiny. Once these ideas are formally ratified as part of the Local Plan they represent a risk to the community because even if a future Planning Request was turned down it will almost certainly be granted on appeal by the Appeals Inspector on the basis that it was included in the Local Plan. There are other parts of the country who do not appear to have the same issues that we have. Maybe Central Government's targets for an already highly populated area are not necessarily that valid. Perhaps our Council should debate that with Central Government rather try to duck the issue, potentially at the expense of residents. | I have stated that there are a number of unsatisfactory elements to this plan both in the detail within its content and some of its direction. I would ask that once the Council has had feedback from the community it takes a step back and re-considers its overall position, particularly with regard to the Hersham Shopping Centre and Parking generally. I would like to see a written commitment that the quantity and quality of shops in the Shopping Centre will be maintained and that the number of parking spaces in, what is now the Waitrose Car Park, will be maintained with additional spaces provided for the residents of the new Units. Otherwise, as a private resident, I am happy to indicate areas of concern. However, I am afraid that responsibility for re-drafting this document rests entirely with yourselves. | | | Yes, I wish to participate at the oral examination | 36 Years ago, I changed my job and had to re-locate my family, at short notice, from the country to somewhere in this general area. It was before the advent of the Internet, Right Move etc and we could only make a limited number of trips to find a property. We ended up buying a house at 'high speed' in a place called Hersham, of which we had no knowledge whatsoever. We took the view that at least we had a home that would last us for a couple of years and, in the worst case, we could move again in slow time. 19 years later we did eventually move – all of 300 yards to another home in Hersham, where we have lived for a further 17 years. One of our sons lives with his family in Hersham, while the other is close by in Weybridge. Says a lot doesn't it! Hersham is a really nice place for a family to live and grow up in – that view is shared by many | Objection noted. A regulation 19 consultation must ask questions about the legal compliance and soundness of the DELP. Guidance notes that were provided on the consultation homepage explained the purpose of the representation period and how to consider legal compliance and the test of soundness. The questionnaire that was prepared is based on the Planning Inspectorate's model representation form. This will ensure consistency at examination. The Council has met and exceeded its duty to engage with and consult stakeholders on the preparation and contents of the DELP and has done so in accordance with its <u>Statement of Community Involvement</u> and all relevant planning regulations. The Council utilised a range of advertisement and consultation techniques during the Regulation 18 and 19 stages to reach and engage with the widest possible range of stakeholders. Techniques included online advertisement on the Council's website and social media platforms – Twitter, Facebook, LinkedIn, Instagram and Nextdoor, as well as physical advertisement in a local newspaper – the Surrey Advertiser and posters on the Council's noticeboards located throughout the Borough, including within the Walton and Hersham communities. The DELP was also available to view and read at the Civic Centre and Borough libraries. In addition, over 8,200 individuals were directly contacted via letter or email to inform them of the consultation as they were | |

of consultation period
 e. Changes to website during the consultation periodic

2. Some statements regarding ownership of properties are incorrect

3. There are a number of occasions where the document states that property owners have been consulted. I know this is not true in all cases.

4. There have been important changes to the plan that have not been clearly communicated. In particular US379 originally referred to the Waitrose Car Park. It now refers to the Hershams Shopping Centre.

c. School leavers, graduates and young workers are now more likely to continue living with their parents which means that 3 or even 4 car dwellings are no longer unusual.

d. You only have to glance around the village to see the impact of this with cars parked on pavements and crammed into what used to be 'front gardens' – or listen to residents who have been blocked into their own driveways

e. Obviously, this plan is aimed at increasing the number of properties which will increase the number residents and therefore the number of vehicles in the area.

f. I understand that there is an argument that Residential Units would not necessarily be built on the actual Car Parks but be built in blocks above. That rather misses the point that, not only may these buildings be tall causing issues for neighbours, but the Units will require additional parking spaces of their own. Underground parking may alleviate this issue, but I suspect that will be expensive particularly if impacted by the water table.

g. I also understand that there is an environmental agenda to reduce the amount of vehicle use and encourage people to walk, bicycle and use public transport. While I support that in principle, to build a 'parking plan' on that basis when there are ever increasing constraints on the time of working people and inadequate bus services, is unrealistic.

h. Following on from the above agenda which includes a move to electric cars and a

new people moving into the area who love the village atmosphere and the community feel. It would be very sad to see that spoilt.

I would like to participate in the oral examination to represent 'people like me'!

registered on the Elmbridge planning database.

The Council's [Regulation 22 Consultation Statement](#) fully details the range of techniques used during the consultation period to contact and engage with stakeholders.

All site allocations proposed in the DELP have been thoroughly assessed to ensure they are available and deliverable in accordance with national policy and guidance. This includes consideration of factors such as access and impact the Borough's transport infrastructure. These assessments are set out in detail within the Council's [Land Availability Assessment \(2022\)](#).

Ownership checks have taken place for all proposed site allocations. This and how each site has been identified and assessed is set out in the Council's [Land Availability Assessment 2022](#)

Site H3 was extended to include the shopping centre in the LAA 2022 following a pre-application for the whole site.

Site allocations for development of sites that are home to existing community uses seek to ensure these are retained or re-provided on site where appropriate. This is set out in more detail in the Council's [Land Availability Assessment \(2022\)](#). In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protected.

Comments regarding nationally set housing targets noted. The DELP proposes a spatial strategy that seeks to meet a reduced housing target equating to 70% of the Borough's housing need.

Car parks are only included as site allocations when they are underused or could be consolidated into another location/site. The ownership checks in 2023 have resulted in the discounting of some of these sites.

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| | | | | | <p>commitment to supply charging points for these, one has to question how that will be facilitated when our car parks will be reduced in size and new residents will be living in flats denying them the option of arranging their own private points.</p> <p>i. Given the above it does seem rather strange (or to use the appropriate language 'not sound') that a central plank of this plan is to reduce the amount of public parking available to residents and visitors.</p> <p>2. Site Name Hershams Shopping Centre, Molesey Road Site Allocation Ref H3 Site LAA Reference US379 Delivery Period 1-5 Years Allocated for 200 Residential Units</p> <p>a. This reference was originally allocated to the Waitrose Car Park. It now applies to the Shopping Centre. I assume that the provision is to build 200 Residential Units over the combined Shopping Centre & Car Park areas.</p> <p>b. The Shopping Centre and its car park are central to the Hershams Community and act as a major attraction for people moving into the village.</p> <p>c. The Waitrose Car Park also provides for all the village centre shops and amenities. Most particularly it provides for parents delivering children to Burhill School.</p> <p>d. It may well be possible to deliver 200 Residential Units in this area, while maintaining the current quantity and quality of Shops and Car Parking (allowing for the additional requirements of the 200 new residences). However, if any plans are allowed to progress</p> | | | | | | | | |
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| | | | | | <p>that fall short of that, then this Council could potentially be responsible for the collapse of our village as we know it. I do not think the community will stand for that!</p> <p>e. Para 1 f above applies.</p> <p>f. I am particularly concerned about the short timeframe associated with this case and the inevitable disruption at the heart of our village during this potentially lengthy project.</p> <p>3. Site Name New Berry Lane car park Site Allocation Ref H7 Site LAA Reference US380 Delivery Period 6-10 Years Allocated for 7 Residential Units</p> <p>a. Same arguments as for H3 above (they are adjacent) although reduced concerns over timeframe and scale.</p> <p>b. However, this car park was originally retained by the Council to specifically provide for the Doctor's Surgery and Burhill School opposite.</p> <p>c. Once again the level of parking must be maintained (allowing for that associated with the 7 Residential Units) so that sufficient Parking is available for the ever increasing number of people that need to visit the Surgery – more residences implies more people which implies more visits to a doctor. So we will need more Surgery parking not less.</p> <p>4. Site Name Car park to the south of Mayfield Road Site Allocation Ref H5 Site LAA Reference US45 Delivery Period 6-10 Years Allocated for 9 Residential Units</p> <p>a. Obviously this car park provides for the railway station and is a</p> | | | | | | | | |
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necessity in a commuter environment.
b. While there are occasions when it is not full, there are others when it is absolutely full and people have to search elsewhere.
c. It would appear that the Council assessment regarding utilisation was made during the Covid period.
d. It is worth registering that while utilisation has increased as Covid regs have relaxed, we are still not yet back to pre Covid ways of living and working.
e. Para 1f applies

5. Site Name Car Park next to Waterloo Court
Site Allocation Ref H12
Site LAA Ref US435
Delivery Period 11-15 Years
Allocated 62 Residential Units

a. I am not very familiar with this car park and cannot therefore comment specifically.
b. However, given the degree of focus in your various documents on commuters and the need to provide parking for them, along with the fact this has an 11-15 Years Delivery Period, I conclude that this is not a serious entry, but a way of 'making up the numbers'.
c. Para 1f applies

6. Below are some extracts from Council documents (notably the Parking SPD) which are contradicted by the approach of this Draft Plan
j. "Having a balanced approach to delivering car parking can help stimulate growth in the borough, meet the needs of our residents, whilst also trying to minimise the effect on the environment. It is generally accepted that because of the lack of public transport in many

parts of the Borough, many residents rely on their cars as their main form of travel. This SPD aims to deliver effective parking solutions while taking account of other planning considerations.”

k. “Whilst the Borough benefits from good/ very good rail links to central London, access to other major centres such as Kingston, Guildford and Woking vary. Outside of the key commuter routes, public transport services are more limited, which leads to greater reliance on the private motor vehicle for internal Borough trips. It is not surprising that the Borough has one of the highest levels of car ownership with 1.5 cars per household and 46% of households owning more than two vehicles. Only 12% of households do not own a car, significantly lower than the South East average of 18.6%”

l. “Commuting still plays a significant part for much of the workforce, with both radial and orbital journeys into London and around the region. The average median gross weekly pay for Elmbridge residents is higher than for those who work in the Borough, indicating that a considerable number of residents’ commute to higher-paid jobs within Greater London. Access to a train station is a key consideration for existing and future residents.”

m. “Improving transport infrastructure by; Working in partnership with transport providers and Surrey County Council, as the Highway Authority, to support improvements

to transport infrastructure. Those relating to new development will be delivered through the collection of developer contributions subject to viability. The Council will support improvements to stations and station parking that facilitate increased public transport use.”

n. “Public off-street parking will continue to be provided where it supports the economic or recreational use of the immediate area and provides dual use allowing parking for residents and shoppers/employees, particularly in town centres.”

o. “well-designed car and cycle parking at home and at other destinations is conveniently sited so that it is well used. This could be off-street to avoid on-street problems such as pavement parking or congested streets. It is safe and meets the needs of different users including occupants, visitors and people with disabilities.”

p. “All development proposals will be required to provide cycle and vehicle parking and associated facilities, including electric vehicle charging points in line with the standards set out in the Parking Supplementary Planning Document (SPD). 6. Car free development will be encouraged in appropriate locations and where supported by evidence demonstrating that proposals would not lead to parking stress”.

q. “Parking Stress - A pressure on local

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| | | | | | | highway network negatively affecting amenities of local residents caused by limited capacity of on-street parking provision in the area. Factors to take into account when considering whether an area experiences on-street parking stress will be the levels of parking on nearby roads, the availability of spaces in public car parks and whether there are any particular pressures caused by existing uses or developments in the area “ | | | | | | | | | | |
| 1109813 | Catriona Riddell | | Yes | | Yes | | | | | | | | | | | Support noted. |
| 1109818 | Caroline Cartwright | | Yes | | Yes | I support spatial strategy.I support the protection of the green belt. | | | | | | | | | | Support noted. |
| 1109832 | Ms Fraser | | Yes | | No | <p>I have the following issues;</p> <p>1) SS2 iii) "offering excellent connection through sustainable transport links to reduce reliance on private motor vehicles". A great statement but not achievable. All you are offering is mention of charging points, more cycling and walking routes. The problem is that not everyone drives, or can afford an electric car and if you can, there are problems with charging it if you live in terraced houses, flats etc. Also, old and disabled people can't walk and cycle more. What is needed is more buses giving access to trains, towns and other facilities, but you don't have any control over buses.....unless you're thinking of starting an EBC fleet??</p> <p>2) The plan states that new housing should be 1/2 bed except like for like replacement. Towns such as Walton (18.5%) and Weybridge (17.7%) have the lion's share of new housing compared to Claygate</p> | Y | | My previous comments provide the explanation. | <p>1) Need buses. You need to either think of providing your own fleet or get together with Surrey County Council and come up with an innovative plan.</p> <p>2) Remove the exception for like for like house size replacement.</p> <p>3) Don't earmark station car parks, community areas, churches etc for house building</p> | | | No, I do not wish to participate at the oral examination | | <p>Comments noted.</p> <p>1) SS2 iii) The delivery of the aspirations/aims set out in strategic policy SS2 will be supported by draft policy CC4, which sets out how development must contribute to the delivery of an integrated, accessible and safe sustainable transport network, including public transport infrastructure such as bus services, and sets out how development should promote active travel and the use of public transport to support a transition away from reliance on private cars.</p> <p>2) The allocation of the quantum of development for each settlement area set out in strategic policy SS3 has been driven by the principle of sustainable development, again in accordance with national policy. The Plan seeks to make as much use as possible of existing suitable brownfield sites, including all publicly owned assets and land holdings. The urban areas of the borough were assessed, identifying the amount of development that could sustainably be accommodated.</p> <p>The home size mix set out in the DELP was identified in</p> | |

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| | | | | | <p>(4.7%) and Cobham/Oxshott (12.8%). The plan also mentions "creation of sustainable, inclusive and mixed communities". Surely if you want to create those mixed communities you should be building more in Claygate and Oxshott and should not give exception for like-for-like houses. Then you could build 1 & 2 bed houses on a previous 4/5 bed plot and you'd achieve more housing and also a more mixed community.</p> <p>3) Site allocations. There are numerous sites in your list of potential areas for housing development which are counterintuitive if you want to keep and promote healthy, sustainable communities. Earmarking station car parks for housing will just mean fewer people use the trains (unless you provide a far reaching bus service that runs all day and evening). Earmarking village halls, car parks, Civic Centre, Hersham Shopping Centre, Churches will again just wipe out any town centre and community places. So this plan is not sound.</p> | | | | | | | | <p>the Council's Local Housing Need Assessment (2020) (LHNA). It reflects the need for different sizes of homes in the Borough.</p> <p>The exemption for like for like replacement of properties is there to ensure homeowners that wish to redevelop their properties are not unfairly penalised.</p> <p>3) All site allocations proposed in the DELP have been thoroughly assessed to ensure they are available and deliverable in accordance with national policy and guidance. This includes consideration of factors such as access and impact the Borough's transport infrastructure. These assessments are set out in detail within the Council's Land Availability Assessment (2022).</p> <p>Site allocations for development of sites that are home to existing community uses seek to ensure these are retained or re-provided on site where appropriate. This is set out in more detail in the Council's Land Availability Assessment (2022). In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protected.</p> <p>Car parks are only included as site allocations when they are underused or could be consolidated into another location/site. The ownership checks in 2023 have resulted in the discounting of some of these sites.</p> | |
| 1109851 | Kathryn Strangeway | | Yes | | Yes | Having seen the presentation which explained the Spatial Strategy proposed within the Draft Local Plan, I would like to express my support for it. The Green Belt is an intrinsic, vitally important part of life within Claygate and, indeed, all of Elmbridge, and I would therefore also like to | | | | | | | | Support noted. |

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| | | | | | | highlight my support for continued protection of the Green Belt and agree with the council's justification for doing so. | | | | | | | | |
| 1109862 | Nigel Cartwright | | Yes | | Yes | I support spatial strategy. I support the preservation of the green belt. | | | | | | | | Support noted. |
| 1109894 | Catherine Davies | | Yes | The draft Local Plan is legally compliant as it sets out the areas for land use and development whilst safeguarding those areas of the Borough which should be preserved for the benefit of local residents and visitors to the area. | Yes | It makes provision for housing development in appropriate locations without affecting very valuable Greenbelt sites which are so important for the health and well-being of residents, wildlife and biodiversity. | | | | | | | | Support noted. |
| 1109922 | Dan Robinson | | Yes | A legal requirement but not necessarily what's required by the community itself | No | It doesn't follow the logical format it should based on geography and layout of the community and infrastructure | Y | Y | The local plan includes sites that take no consideration of access routes, roads, bridges and towns especially in Walton on Thames | I'm not in to legal jargon. That's for the legal people so this is an unfair question. | | | No, I do not wish to participate at the oral examination | Comments noted. All site allocations proposed in the DELP have been thoroughly assessed to ensure they are available and deliverable in accordance with national policy and guidance. This includes consideration of factors such as access and impact the Borough's transport infrastructure. These assessments are set out in detail within the Council's Land Availability Assessment (2022) . |
| 1108105 | Dan Robinson | | No | If the greenbelt map is incorrect, then the LP is not compliant? | No | Inaccuracies in Elmbridge greenbelt mapping | | Y | With Weylands as well, this plan goes against your policy to reduce Carbon emissions as HGV's from all over the country pile through Walton on Thames 24/7/365 and down Rydens Road deemed unsuitable for HGV's. It also contradicts your statement to make sure it is environmentally and mentally healthy for residents, which plainly it is not. When did you last get developers to actually include 30% of affordable houses? How many times was this promised and then reneged? | Get the greenbelt mapping right | | | No, I do not wish to participate at the oral examination | The DELP does not propose any changes to existing Green Belt boundaries or the release of any Green Belt land for development. Weylands is not a site allocated for development in the DELP. Once the DELP is adopted, development proposals will be assessed against the policies it contains, including the requirement to deliver 30% affordable housing on relevant schemes. However, it should be noted that planning applications are determined on their merit and on planning balance. This means that proposals may be granted permission when they do not fully meet the requirements of all policies in the |

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| 1110039 | Nigel Harris | | Yes | | Yes | The plan seems to achieve a large part of the new house building objective without using any green belt land, which is a vital consideration. | | | | | | | | | | | | | | Support noted. | |
| 1110067 | Chloe Unwin | | Yes | | Yes | | | | | | | | | | | | | | | | Support noted. |
| 1110076 | Frank Renton | | Yes | | Yes | | | | | | | | | | | | | | | | Support noted. |
| 1110083 | Mark Herbert | | Yes | | Yes | | | | | | | | | | | | | | | | Support noted. |
| 1110091 | David Corner | | Yes | | Yes | | | | | | | | | | | | | | | | Support noted. |
| 1110092 | Julie Lavender | | Yes | | Yes | | | | | | | | | | | | | | | | Support noted. |
| 1110093 | Ms McAree | | Yes | | Yes | | | | | | | | | | | | | | | | Support noted. |
| 1110094 | Redvers Cunningham | | Yes | | Yes | There was a huge amount of constructive feedback provided by residents to the original draft which this replaces. EBC has done a really good job of taking the views of residents into account, making substantial changes addressing the biggest concerns, whilst still achieving the objectives of them. | | | | | | | | | | | | | | | Support noted. |
| 1110104 | Christine Manly | | Yes | | Yes | I fully support a Local Plan which aims to support the provision of affordable housing of 1/2/3 bedroom houses and apartments but without removing any of our precious Green Belt. However, these homes need to be genuinely affordable. I feel that many opportunities have been lost in the past with the provision of low density 5 bedroom+ housing on some large windfall sites in my area. 2 of my grown up children still live at home because they cannot afford to buy their own homes in the area where their jobs are located. I also fully support the principle that new development should be constructed sustainably and look forward to the forthcoming Climate Change & Renewables SPD | | | | | | | | | | | | | | | Support noted. Draft policy HOU4 seeks to deliver genuinely affordable homes in the Borough through the requirement for relevant schemes to deliver 30% affordable housing, including a range of affordable housing tenures to meet the range of needs in the Borough, informed by the Council's evidence on local housing need set out in the Local Housing Need Assessment (2020) . |

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| 1110150 | Julie Harker | | Yes | I support the Local Plan. It is both legally compliant and fundamentally sound and represents a sensible plan for the future development of Elmbridge. In particular, the Local Plan takes a pragmatic approach to determining housing numbers and provides a welcome commitment to preserve Green Belt. However I would just point out as a point of detail that when it comes to assessing the performance of Green Belt sites there have been some fundamental errors in reports prepared in the past. Most importantly, site SA-11 next to Waverley Road and Blundel Lane has been incorrectly assessed. It is definitely not "weakly performing" by any stretch of the imagination. You only have to look at it. | Yes | I support the Local Plan. It is both legally compliant and fundamentally sound and represents a sensible plan for the future development of Elmbridge. In particular, the Local Plan takes a pragmatic approach to determining housing numbers and provides a welcome commitment to preserve Green Belt. However I would just point out as a point of detail that when it comes to assessing the performance of Green Belt sites there have been some fundamental errors in reports prepared in the past. Most importantly, site SA-11 next to Waverley Road and Blundel Lane has been incorrectly assessed. It is definitely not "weakly performing" by any stretch of the imagination. You only have to look at it. | | | | | | | | | Support noted. Comments on the previous Green Belt evidence base noted. The Council has set out within its Topic Paper 1: How the spatial strategy was formed? (June, 2022) that the Green Belt evidence on the whole undervalues the performance of the Borough's Green Belt sites. |
| 1110168 | Gemma Lawrence-Pardew | | No | Whilst you are legally consulting with regards to the Plan, I would seriously question the extent to which views will be taken into consideration. I say this with knowledge that the retail units within Hershaw Shopping Centre have already | No | Whilst containing at the correct "buzz" words like sustainable, green deliverables, etc. this plan reads with more holes than a sieve. The majority of the report is focused on repeating public mandates in the area of sustainability, which I would know being a professional expert in this area. However, I find it very concerning that every proposal to protect green space is | | Y | Whilst there is a housing crisis, I do not understand why, with this new flexible working environment in which we live, we are looking to build up already suburban areas. In addition, the doing away with local community institutions I find baffling in this time of social upheaval, with the focus on mental health largely owing to isolation caused by the pandemic. These changes will adversely impact mental health as a whole, a national emergency we should be seeking to remediate. | Refocus areas of potential development away from green belt (remove the caveats) and local community areas. I would also like to see far greater detail in how the additional populace will be catered for with regards to existing services - not just in terms of space but in terms of finding the employment required to staff additional nurseries, schools, dentists, doctors surgeries, etc. | | | Yes, I wish to participate at the oral examination | All plans should be considered in light of a Just Transition and I wish to better understand who the proposed buildings are just, in terms of the mental impact with the removal of community areas and services. Being a parent, I also have | Objection noted. The DELP does not propose site allocations or development on the Green Belt or open spaces. Draft policies may include caveats allowing for flexibility in exceptional circumstances, this is in accordance with national policy and guidance. Site allocations for development of sites that are home to existing community uses seek to ensure these are retained or re-provided on site where appropriate. This is set out in more detail in the |

been served with notice of termination for the "proposed" future development. Likewise, the contract award for the renovation of Hershams Golf Course (not currently listed as a critical site and being a greenbelt area) - I believe has already been rewarded to a developer. Whether this has been achieved by a public backhand or otherwise remains to be seen. Given the state of party politics generally at present, nothing would surprise me.

caveated. I also find it laughable that the creation of more homes will lend Elmbridge to being more affordable. With the new flexible working regime, you will simply see Londoners relocate to benefit from suburban life and this plan appears to be creating the concrete playground to better help them assimilate. Those of us who have lived in Elmbridge for many years, have chosen to remain here due to the green spaces, the lack of mid-high rises, the focus on community, etc. That all seems to be being swept away with this plan, particularly given the plan to wipe out local pubs (which I believe the Government had introduced legislation to protect), social clubs, village halls, libraries, churches, etc. Moving on to local resources - I must question how you plan to accommodate the increase in children at nurseries and schools - which are already experiencing a resourcing crises. Same for local surgeries, strain on nearby hospitals, etc. It is not a matter of simply requesting a building be provided, it needs to be staffed. All in all I have no faith that this Local Plan will enhance the area in any way.

genuine concerns regarding the provision of additional resources to cater to childrens needs in terms of schooling, aiding literacy (via libraries), safe spaces to play (sports and social clubs) and so on. The health of the community appears to be being sacrificed for profitability. I say this particularly given the number of second homes that are located within the Elmbridge area - which I see doubling with the housing plans.

Council's Land Availability Assessment (2022). In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protected.

The DELP does not propose the loss of pubs in the Borough. Pubs and other noise generating uses are protected through the agent of change principle set out in national policy. This principle applies to all development in the Borough and the DELP aligns with this approach.

The Council's Infrastructure Delivery Plan (May 2022) (IDP) and Update (July 2023) detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the quantum of development proposed in the DELP.

The IDP and IDP Update have been informed by the preparation of other evidence base documents e.g., Transport Assessment (2022) and via discussions with infrastructure providers as part of the Council's duty to cooperate activities as outlined in the Council's Duty to Cooperate Statement of Compliance (June 2022), Duty to Cooperate Statement of Compliance Update (August 2023) and Statements of Common Ground published with the Core Documents submitted for Examination.

The agreed position with our infrastructure delivery partners is that the proposed development strategy can be accommodated within the borough with the mitigation identified / a policy-led approach.

In addition, the DELP includes policies to ensure the infrastructure needed to support the delivery of the aspirations of, and quantum of development proposed, in the DELP is provided.

Draft policy INF1 – Infrastructure delivery aims to ensure the required infrastructure needed to accommodate and mitigate the impact of new development in the Borough is delivered in a timely manner, whilst acknowledging that the

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| 1110249 | David Greenwood | | Yes | There should be a "I don't know" option here, how would "the man in street" know? I've no idea, I can only take your word for it & this is irrelevant to the points I wish to make. | No | Silly question. What does "Sound" mean? As with Question1, there should be a "I don't know" option here, how would "the man in street" know? I've no idea, Therefore this questionnaire, which is part of the consultation on the plan, is not sound. | | Y | Y | As I submitted to the previous consultation, this plan only considers areas within existing high density areas of Cobham as potential "Sites". It includes privately owned houses. Yet it ignores the vast expanses of large houses some of which are frequently being pulled down and replaced with new large houses and the plots of ALL of them would justify being "Sites" as bigger than many of the ones listed. Where are all of the roads between Cobham centre and Oxshott centre for example? The plan should allow for large inefficient dwellings to be replaced by multiple occupancy developments. As it is biased only to the already dense areas being considered sites then the plan is neither Effective or Justified. There are far more potential brown fields sites (strangely maybe they are more likely to owned by councillors ... ?). To identify retail and community facilities as "Sites" as this does is stupid as increased housing needs MORE retail and community facilities. | Read my answer to question 3. e.g. Take out all the identified private addresses, retail and community facilities from "Sites" and instead add in a minimum occupancy ratio to size of house (or some other measure) such that no large house can be rebuilt with a house the same size or bigger but must be split into multiple smaller units. | | | No, I do not wish to participate at the oral examination | <p>Comments noted.</p> <p>A regulation 19 consultation must ask questions about the legal compliance and soundness of the DELP. Guidance notes that were provided on the consultation homepage explained the purpose of the representation period and how to consider legal compliance and the test of soundness.</p> <p>The questionnaire that was prepared is based on the Planning Inspectorate's model representation form. This will ensure consistency at examination.</p> <p>All site allocations proposed in the DELP have been thoroughly assessed to ensure they are available and deliverable in accordance with national policy and guidance. This includes consideration of factors such as access and impact the Borough's transport infrastructure. These assessments are set out in detail within the Council's Land Availability Assessment (2022).</p> <p>Site allocations for development of sites that are home to existing community uses seek to ensure these are retained or re-provided on site where appropriate. This is set out in more detail in the Council's Land Availability Assessment (2022). In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protected.</p> |
| 1110259 | John Gaule | | Yes | I don't really know as I'm not a lawyer or a planning expert. I presume it's been checked by both. | No | Completely unsuitable for the area. | | Y | | This is gross overdevelopment of the area, destroying and undermining all the reasons why people want to live here in the first place. Of course you should not build on the Green Belt but this alternative solution is also unacceptable. 6,875 units, many of them just human hutches, is far too many. It turns Elmbridge into an extension of the London concrete jungle, with overpopulation and increasingly inadequate infrastructure, everything from schools and medical care to traffic management, public transport and policing. It will do untold damage to the local environment, increase pollution and exacerbate climate change. Clearly a lot of work has gone into this document to ensure it addresses current concerns but as we have seen many times planning objections get brushed aside and | Scrap it and fight the government proposals all the way. | | | No, I do not wish to participate at the oral examination | <p>Objection noted.</p> <p>As set out in national policy, Local Plans must set out a vision and spatial strategy that aims to meet the identified development needs of the Borough. The Elmbridge is home to a very limited number of unconstrained sites that are capable of accommodating new development to meet the Borough's housing/development needs. The DELP therefore proposes a spatial strategy that seeks to meet a reduced housing target equating to 70% of the Borough's housing need.</p> <p>The proposed spatial strategy is considered to be the best, most sustainable solution to meet the</p> |

parties with different agendas overrule sensible decisions. Even current approved plans go too far: e.g. Hampton Court Jolly Boatman site: a massive hotel and 100 flats next to a national monument, affordable housing promised 40%: delivered 12%; and a further 84 flats on Hampton Court Way will cause problems and traffic chaos for years. As would the mooted Sandown and Café Rouge developments. Further to these follies your plan would turn important local amenities such as the Civic Centre and even Esher library into human storage warehouses. The fundamental premise needs overturning. The problem is not too few houses, it's too many people in one area (London and the South East). The population density need levelling up across Great Britain. People should be encouraged to move to less crowded areas of the UK, with employment and even financial inducements if necessary.

Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. As demonstrated through the evidence base, Duty to Cooperate activities and Statements of Common Ground, the development strategy can also be accommodated without putting undue pressure on the Borough's infrastructure.

In addition, draft policies, such as ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located.

An option to meet the Borough's identified housing need in full through intensification of urban areas was considered. However, the Council concluded that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities.

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the

built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

The Council's Infrastructure Delivery Plan (May 2022) (IDP) and Update (July 2023) detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the quantum of development proposed in the DELP.

The IDP and IDP Update have been informed by the preparation of other evidence base documents e.g., Transport Assessment (2022), and via discussions with infrastructure providers as part of the Council's duty to cooperate activities as outlined in the Council's Duty to Cooperate Statement of Compliance (June 2022), Duty to Cooperate Statement of Compliance Update (August 2023) and Statements of Common Ground published with the Core Documents submitted for Examination.

The agreed position with our infrastructure delivery partners is that the proposed development strategy can be accommodated within the borough with the mitigation identified / a policy-led approach.

In addition, the DELP includes policies to ensure the infrastructure needed to support the delivery of the aspirations of, and quantum of development proposed, in the DELP is provided.

Draft policy INF1 – Infrastructure delivery aims to ensure the required infrastructure needed to accommodate and mitigate the impact of new development in the Borough is delivered in a timely manner, whilst acknowledging that the infrastructure provision with a development must be proportionate to the size of the development.

Draft policy CC4 sets out how development must contribute to the delivery of an integrated,

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| | | | | | | | | | | | | | | | accessible and safe sustainable transport network and sets out how development should promote active travel and the use of public transport and support a transition away from reliance on private cars. Site allocations for development of sites that are home to existing community uses seek to ensure these are retained or re-provided on site where appropriate. This is set out in more detail in the Council's <u>Land Availability Assessment (2022)</u> . In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protected. |
| 1110260 | Jo Williams | | Yes | | Yes | | | | | | | | | | Support noted. |
| 1110267 | Tim Armitage | | Yes | The plan looks to have considered all aspects from a solid legal basis | Yes | The council have approached the plan with due consideration to the views of local residents and the councillors and council officers have clearly worked hard to represent such views for which I am grateful. | | | | | | | | | Support noted. |
| 1110269 | Kenneth Porter | | No | I have some objections | No | I have some objections | | | Y | I have objections | not qualified to provide this | | | No, I do not wish to participate at the oral examination | Noted. There are no comments provided in the representation to explain objections. |
| 1110292 | Martin Baker | | Yes | It is well thought out and represents an honest approach to providing housing over the next 15 years | Yes | It is a considered piece of work and is realistic. | | | | | | | | | Support noted. |
| 1110334 | Zoe Rikkerink | | Yes | | Yes | | | | | | | | | | Support noted. |
| 1110349 | Helen Plummer | Manby Lodge Infant School | Yes | | Yes | | | | | | | | | | Support noted. |
| 1110352 | Michael Phillips | | Yes | | Yes | it is careful researched and all proposals and policies are compliant with the NPPF | | | | | | | | | Support noted. |
| 1110389 | Nigel Forrest | | Yes | | Yes | | | | | | | | | | Support noted. |
| 1110396 | Stephen Heath | | Yes | | Yes | | | | | | | | | | Support noted. |
| 1110397 | Geoffrey Herbert | | Yes | The supporting evidence covers the legal requirements. | Yes | Addresses the requirements and seeks to maximize the housing without affecting the standard of life. | | | | | | | | | Support noted. |
| 1110413 | Katharine Maclean | | Yes | | Yes | | | | | | | | | | Support noted. |

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| 1110421 | Nicholas Strauss | | No | I object to the proposed development of the area SA11 at Blundel Lane/Waverley Road. This would destroy a view of outstanding beauty, by far the best if not the only such view in the Oxshott/Cobham area. It is also the beginning, and most attractive, part of much used walks to Cobham and the Danes Hill area of Oxshott. Whoever has assessed this as suitable by reference to the statutory criteria has got it wrong and it is open to legal challenge. | No | See response at question 1. | | | Y | See response at question 1. | Remove the offending development at SA11 | | | Yes, I wish to participate at the oral examination | Strong views | Objection noted. Site SA-11 is not included as a site allocation in the DELP. | |
| 1110430 | Duncan Crane | | No | I am not qualified to answer this question and recommend the council get independent legal advice on this matter. For this reason, I also believe this question is inappropriate for a general audience and responses given may be misleading as a result. Unfortunately, I have not been given the option to say 'I don't know'. | No | The planning policies in general seem well thought out and should provide a positive contribution to Elmbridge and its communities. However there is a lot of potential for conflict of interest between policies and it is not clear how precedence would be established should such a conflict arise. It would be desirable to have a general policy that, where there is a change in use of land (for example the infill of garden for residential development) that a mitigation plan for all other affected policies should be agreed before the proposal is accepted. For example, where gardens are to be infilled for residential development a mitigation plan should be provided for maintaining wildlife corridors or bio-diversity that might otherwise be lost. | | Y | Y | Y | Comparison of alternatives is ineffective. Conflicts between different objectives could make elements of plan undeliverable. Change of use in some areas may lead to unsustainable development. Monitoring framework does not focus sufficiently on measurable outcomes with specific time based measurable targets. It currently focuses almost entirely on inputs and outputs which aren't related to specific policies. | There needs to be a general policy providing for effective mitigation plans for all affected policies where there is a change of use proposed, to be agreed before planning consent can be given. The plan should set out the measurable and quantified triggers which might lead to it's formal review should planning forecasts be incorrect or outcomes not achieved. Specific statement of outcomes with related measures and time based target provided at the policy level for the purposes of monitoring. An annual performance report supported by corrective plans if necessary should be published and sent to every resident in the borough along with their council tax invoice. | | | No, I do not wish to participate at the oral examination | | Support and comments noted. A regulation 19 consultation must ask questions about the legal compliance and soundness of the DELP. Guidance notes that were provided on the consultation homepage explained the purpose of the representation period and how to consider legal compliance and the test of soundness. The questionnaire that was prepared is based on the Planning Inspectorate's model representation form. This will ensure consistency at examination. The draft policies set out within the plan provide the mechanisms by which mitigation for the impact of relevant developments will be delivered. For example, draft policy INF1 – Infrastructure delivery aims to ensure the required infrastructure needed to accommodate and mitigate the impact of new development in the Borough is delivered in a timely manner, whilst acknowledging that the infrastructure provision with a development must be proportionate to the size of the |

In my local area, Cobham, many of the sites earmarked for development represent such a change of use. There should not be a presumption of acceptance of such a change of use unless there is a mitigation plan in place for other affected policies such as environment, employment, infrastructure etc which will be lost due to the change of use. I couldn't see, in the main plan, what alternatives were considered, what trade-offs each alternative would result in, and why the proposed alternative was preferred. In addition, under what circumstances might the council change between preferred options, should the plan not produced the desired outcomes or the projections of need on which it is based should turn out to be incorrect.

development. Such mitigation is negotiated and agreed before planning consent is given.

The effectiveness of the DELP policies will be consistently reviewed through the Council's annual authorities monitoring report process. This is guided by the proposed monitoring framework set out in the DELP. The indicators set out in the monitoring framework are largely measurable/quantifiable and relate to /correlate with the specific targets set out in the corresponding policies. Formal review of the policies to determine if they require changing/updating is triggered when these targets are not met. However, some policies simply cannot have measurable/quantifiable indicators/triggers as they are more aspirational/not easily quantified as they are influenced by a range of factors outside of the control of planning. The annual authorities monitoring report is published and made publicly available to all residents online on the Council's website.

The Council considers that the Sustainability Appraisal (June 2022) (SA) properly weighs and assesses the socio-economic impacts of the proposed spatial strategy in the DELP and identified reasonable alternative in accordance with requirements of national policy and guidance.

The Council has considered several alternative approaches for the spatial strategy to support the place-making vision for the borough and how development need could be addressed during the preparation of the DELP. These options evolved over time in response to several factors, including the wider planning context, the Local Plan evidence base as it is prepared and reviewed, consultation responses (received during the three Regulation 18 consultations) and from collaborative working with neighbouring authorities throughout the preparation of the DELP Duty to Cooperate activities.

Part B2 of the SA sets out in detail how the alternative

converse should apply so that the character of other areas (such as most of residential Oxshott) is protected.

- There are no design codes available to provide protection for local character and ensure excellent buildings.
- Calculations of developer contributions for affordable housing continue to be based on flawed methodology that has been subject to continual abuse.
- The Infrastructure Delivery Plan is weak with heavy reliance on a document that has not yet been produced by Surrey CC. Key to successful development must be the recognition that infrastructure must precede development.

The agreed position with our infrastructure delivery partners is that the proposed development strategy can be accommodated within the borough with the mitigation identified / a policy-led approach.

In addition, the DELP includes policies to ensure the infrastructure needed to support the delivery of the aspirations of, and quantum of development proposed, in the DELP is provided.

Draft policy INF1 – Infrastructure delivery aims to ensure the required infrastructure needed to accommodate and mitigate the impact of new development in the Borough is delivered in a timely manner, whilst acknowledging that the infrastructure provision with a development must be proportionate to the size of the development.

Draft policy CC4 sets out how development must contribute to the delivery of an integrated, accessible and safe sustainable transport network and sets out how development should promote active travel and the use of public transport and support a transition away from reliance on private cars.

- Comments regarding the assessment of site SA-11 noted. The Council has set out within its [Topic Paper 1: How the spatial strategy was formed?](#) (June, 2022) that the Green Belt evidence on the whole undervalues the performance of the Borough's Green Belt sites. SA-11 is not included in the DELP as a site allocation for development. The DELP does not propose any development on Green Belt land.
- The Council is currently progressing the production of the Borough's design code. A draft of the design code will be published for a public consultation soon and the Council aims to have the

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| | | | | then properly formulated. | | provides. This had support of the vast majority of residents and businesses and the inclusion of this therefore makes it a sound plan | | | | | | | | | | |
| 1110474 | Jane Pearson | | Yes | | No | 3 issues: 1. High rise is not in keeping with the characteristics of Claygate village. We need to protect this 2. More houses meaning more footfall but less public parking spaces as a result. We cannot lose 3 key parks. Where would residents park for the local shops, train station when on street parking is already full 3. Gypsy and Roma sites - these communities do not respect the wider community which they are part of. Sadly they are know for anti social behaviour and living beyond the law. Unless our police forces properly police this community and pull them in line (which they don't do right now), there's a real risk of these groups destroying and trashing the villages within which we live which will lead to these villages becoming less safe, less desirable and less prosperous as a result | | | Y | See answers against point 2 | 1. No high rise 2. Protection of public car parks 3. No siting of Roma, traveller sites | | | Yes, I wish to participate at the oral examination | To ensure our community voice is heard | 1. There are no allocations for high rise developments in the DELP. 2. There are some public car parks featured in the site allocations, however alternative parking provision will need to be considered as part of any future application. 3. National planning policy and housing legislation is clear that Local Plans must plan for development that meets the housing needs of all groups of people and communities in the area. |
| 1110482 | Agnieszka Williams | | Yes | | Yes | | | | | | | | | | Support noted. | |
| 1110486 | Amy Drago | | Yes | The Draft Local Plan works to satisfy the requirements of UK government yet also working to preserve the Green Belt. The continued protection of the Green Belt is an important characteristic and aspect of Elmbridge and | Yes | The spatial strategy outlined in the Draft Local Plan would work well for Elmbridge. the draft local plan does take in social issues such as affordability and the need for Gypsy/Roma/Traveller pitches. The continued protection for the green belt also addresses the issue of flood plain and flood issues. | | | | | | | | | Support noted. | |

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| | | | | also works to answer climate change and sustainability issues. To focus on 'brown sites' rather than losing green belt. | | | | | | | | | | | | | | |
| 1110513 | Richard Campo | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110514 | Michael Collon | | Yes | Overall Yes, though I think it is risky to propose such a low proportion of the total housing required. | Yes | It is particularly encouraging that the Green Belt is left untouched. | | | | | | | | | | | | Support noted. |
| 1111017 | Wendy Gibbs | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1111020 | Rosamund Rule | | No | I'm not an expert to be able to opine on this. | No | <p>This plan does not seem to be well thought out or to fully consider the impact of removing valuable infrastructure such as station and other car parks from the local area. There are already too many cars and insufficient parking. Removing car parks, especially walton park car park (the one servicing Hersham station) will force more people to park on roads, congestion's them further, and force more drop off and picks ups, also further congesting roads. What plans are there to encourage more sustainable travel to stations to take account of the lack of parking?</p> <p>There is also a huge lack of additional infrastructure planned to service the new homes and families - the trains are already full, the bus routes are not fit for purpose, schools and doctors surgeries are full and drainage can't cope, to name but a few.</p> | Y | Y | Y | Please see previous page. There is a lack of thought of the knock-on effect of removing car parks, particularly station car parks, and a lack of investment in other infrastructure needed when creating new homes in an area already full. | Do not remove Parking, especially near railway stations. Create plans for new or improved infrastructure- new primary schools, doctors surgeries, improved drainage etc. | | | | No, I do not wish to participate at the oral examination | | <p>Objection noted.</p> <p>Car parks are only included as site allocations when they are underused or could be consolidated into another location/site. The ownership checks in 2023 have resulted in the discounting of some of these sites.</p> <p>The Council's Infrastructure Delivery Plan (May 2022) (IDP) and Update (July 2023) detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the quantum of development proposed in the DELP.</p> <p>The IDP and IDP Update have been informed by the preparation of other evidence base documents e.g., Transport Assessment (2022), and via discussions with infrastructure providers as part of the Council's duty to cooperate activities as outlined in the Council's Duty to Cooperate Statement of Compliance (June 2022), Duty to Cooperate Statement of Compliance Update (August 2023) and Statements of Common Ground published with the Core Documents submitted for Examination.</p> <p>The agreed position with our infrastructure delivery partners is that the proposed development strategy can be accommodated within the borough with the mitigation identified / a policy-led approach.</p> | |

d'Abernon and Cobham (the areas with which I am familiar) through protecting its Green Belt against damaging development. I would however endorse the views of local residents as expressed by Fedora and the Waverley Road residents' group) that some potentially harmful inaccuracies need to be corrected: in particular in the Ove Arup report, which could be amended by footnote.

1. This report states that the Waverley Road/Blundel road site, (Site SA-11) is bound on two sides by housing developments. This is incorrect: to the West it is bounded by a single row of some five houses and cottages dating back 100 or so years. The report also fails to acknowledge the unspoilt, outstanding natural beauty of the site, with its stunning views of the Surrey hills, footpaths and sweeping slopes - used for farmland and enjoyed by hundreds of walkers and residents. Within this part of the borough the site is one of the most important,

not propose any development on Green Belt land.

2. The Council has published a [Landscape Sensitivity Study \(2019\)](#), specific to the Borough within the DELP evidence base. A landscape character study specific to the Borough is also being prepared and will be submitted to the Inspector as additional evidence.

3. The Council's [Green Infrastructure Study \(2022\)](#) which was published as part of the DELP evidence base includes detailed mapping of the Borough's green and blue infrastructure.

| | | | | key aspects required to be legally compliant | | consideration of the key aspects required for a Local Plan | | | | | | | | | | | | |
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| 1110582 | Penny Clarke | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110588 | Brian Rawson | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110589 | Roger Turner | Ruxley Heights Residents Association (Surrey) Limited | Yes | | Yes | We believe that the Elmbridge team have done a pragmatic and professional job of developing a New Local Plan for Elmbridge which takes account of the short, medium and long term objectives | | | | | | | | | | | | Support noted. |
| 1110609 | Roger Davies | | Yes | As a retired solicitor and indeed former Acting Borough Solicitor at Elmbridge Borough Council I have considered the documentation in detail and consider this to be legally compliant and very well presented | Yes | Yes, very sound and what Elmbridge needs to take us forward over the next 15 years. | | | | | | | | | | | | Support noted. |
| 1110633 | Jacqueline Wilson | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110634 | Nigel Brockwell | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110683 | Malcolm Clements | | Yes | | Yes | | | | | | | | | | | | | Support noted. |
| 1110478 | Chris Cole | | Yes | | Yes | <ul style="list-style-type: none"> • There is an inherent contradiction between a stated commitment to managing the effects of climate change and any meaningful strategy to reduce the impact of increased traffic. • The impact on Elmbridge of the large Wisley housing development represents an important omission. • There are fundamental errors in the reports assessing the performance of Green Belt sites. Most importantly, site SA-11 next to Waverley Road and Blundel Lane has been incorrectly assessed. • There is no recognition of the need for densification of urban areas such as Oxshott to be progressive and avoid | | | | | | | | | | | <p>Support and comments noted.</p> <ul style="list-style-type: none"> • The Council's <u>Infrastructure Delivery Plan (May 2022) (IDP)</u> and <u>Update (July 2023)</u> detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the quantum of development proposed in the DELP. <p>The IDP and IDP Update have been informed by the preparation of other evidence base documents e.g., <u>Transport Assessment (2022)</u> and via discussions with infrastructure providers as part of the Council's duty to cooperate activities as outlined in the Council's <u>Duty to Cooperate Statement of Compliance (June 2022)</u>, <u>Statement of Compliance Update (August 2023)</u> and Statements of Common</p> | |

the character of areas of comparatively low density being damaged by individual high-density schemes.

- While areas close to local centres and train stations are targeted for flats and infill development, the converse should apply so that the character of other areas (such as most of residential Oxshott) is protected.
- There are no design codes available to provide protection for local character and ensure excellent buildings.
- Calculations of developer contributions for affordable housing continue to be based on flawed methodology that has been subject to continual abuse.
- The Infrastructure Delivery Plan is weak with heavy reliance on a document that has not yet been produced by Surrey CC. Key to successful development must be the recognition that infrastructure must precede development. A noteworthy omission is the lack of commitment to install cycle lanes alongside trunk roads thereby promoting road safety and improving traffic flow.

Ground published with the Core Documents submitted for Examination.

The agreed position with our infrastructure delivery partners is that the proposed development strategy can be accommodated within the borough with the mitigation identified / a policy-led approach.

In addition, the DELP includes policies to ensure the infrastructure needed to support the delivery of the aspirations of, and quantum of development proposed, in the DELP is provided.

Draft policy INF1 – Infrastructure delivery aims to ensure the required infrastructure needed to accommodate and mitigate the impact of new development in the Borough is delivered in a timely manner, whilst acknowledging that the infrastructure provision with a development must be proportionate to the size of the development.

Draft policy CC4 sets out how development must contribute to the delivery of an integrated, accessible and safe sustainable transport network and sets out how development should promote active travel and the use of public transport and support a transition away from reliance on private cars.

- EBC submitted an objection to the application submitted to Guildford Borough Council (GBC) for development of the Wisley Airfield site (planning application ref.: 2023/0072) due to its significant impact on the Borough's transport infrastructure.

The DELP cannot include a policy on sites or schemes that are within a neighbouring authority's district as Local Plans are not cross-boundary unless a joint Local Plan is developed with the neighbouring authority. However, the

potential impacts of proposed development at Wisley Airfield on neighbouring boundaries have been considered in the Council's Transport Assessment (2022) and Infrastructure Delivery Plan (May 2022).

In addition, the Council's Duty to Cooperate Statement of Compliance (June 2022), Duty to Cooperate Statement of Compliance Update (August 2023) and Statement of Common Ground with GBC (July 2023) detail the Council's Duty to Cooperate discussions with GBC, including the matter of the Wisely Airfield development.

- Comments regarding the assessment of site SA-11 noted. The Council has set out within its Topic Paper 1: How the spatial strategy was formed? (June, 2022) that the Green Belt evidence on the whole undervalues the performance of the Borough's Green Belt sites. SA-11 is not included in the DELP as a site allocation for development. The DELP does not propose any development on Green Belt land.
- The proposed spatial strategy is considered to be the best, most sustainable solution to meet the Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. As demonstrated through the evidence base, Duty to Cooperate activities and Statements of Common Ground, the development strategy can also be accommodated without putting undue pressure on the Borough's infrastructure.

In addition, draft policies, such as ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the

Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located.

An option to meet the Borough's identified housing need in full through intensification of urban areas was considered. However, the Council concluded that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities.

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

- The Council is currently progressing the production of the Borough's design code. A draft of the design code will be published for a

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| | | | | | <p>next to Waverley Road and Blundel Lane has been incorrectly assessed.</p> <p>There is no recognition of the need for densification of urban areas such as Oxshott to be progressive and avoid the character of areas of comparatively low density being damaged by individual high-density schemes. While areas close to local centres and train stations are targeted for flats and infill development, the converse should apply so that the character of other areas (such as most of residential Oxshott) is protected. There are no design codes available to provide protection for local character and ensure excellent buildings. Calculations of developer contributions for affordable housing continue to be based on flawed methodology that has been subject to continual abuse. The Infrastructure Delivery Plan is weak with heavy reliance on a document that has not yet been produced by Surrey CC. Key to successful development must be the recognition that infrastructure must precede development. A noteworthy omission is the lack of commitment to install cycle lanes alongside trunk roads thereby promoting road safety and improving traffic flow.</p> | | | | | | | | | |
| 1110695 | Angela Main | | Yes | | Yes | I strongly support the spatial strategy and the continued protection of the green belt. | | | | | | | | Support noted. |
| 1110725 | Philip Steer | | Yes | In particular, as the Chair of the Southborough Residents' Association, I wish to support the proposal to preserve One Tree Hill and the | Yes | In particular, as the Chair of the Southborough Residents' Association, I wish to support the proposal to preserve One Tree Hill and the Stokes Field nature reserve as Green belt, | | | | | | | | Support and comments noted. |

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| | | | | Stokes Field nature reserve as Green belt, as this area is well-used by Southborough Residents. I would also support preserving the surrounding scrub land as this is an integral part of the area in terms of a joined up patch for wild life, and for access. | | as this area is well-used by Southborough Residents. I would also support preserving the surrounding scrub land as this is an integral part of the area in terms of a joined up patch for wild life, and for access. | | | | | | | |
| 1110782 1110744 | K Ernest | | Yes | The plan seems to have been produced in line with legal requirements to consider bio-diversity, flood risk etc. The document appears to cover areas that are required. | Yes | The plan seems to accurately identify local issues, the need to preserve local centres and green spaces with amenity value and the green belt while taking into account the challenges presented by climate change and the need to have building standards and codes and new building that minimises CO2 production and re-use of embodied carbon, and provision of EV charging points. The plan seems to envisage a redevelopment of a lot of community facilities - libraries, hospitals, car parks and community centres to provide residential accommodation but the emphasis on supporting existing communities hopefully means that the functions offered by these facilities will not be lost to the communities served, and that additional facilities will be appropriately provided - e.g schools, services to the elderly. | | | | | | No, I do not wish to participate at the oral examination | Support and comments noted. Site allocations for development of sites that are home to existing community uses seek to ensure these are retained or re-provided on site where appropriate. This is set out in more detail in the Council's Land Availability Assessment (2022) . In addition, draft policy INF2 – Social and community uses seeks to ensure such uses are protected. The Council's Infrastructure Delivery Plan (May 2022) (IDP) and Update (July 2023) detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the quantum of development proposed in the DELP. The IDP and IDP Update have been informed by the preparation of other evidence base documents e.g., Transport Assessment (2022) and via discussions with infrastructure providers as part of the Council's duty to cooperate activities as outlined in the Council's Duty to Cooperate Statement of Compliance (June 2022) , Duty to Cooperate Statement of Compliance Update (August 2023) and Statements of Common Ground published with the Core Documents submitted for Examination. The agreed position with our infrastructure delivery partners is that the proposed development strategy can be accommodated within the borough with the |

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| 1110757 | David HOWE | | Yes | | No | I believe the evidence base to be inconsistent with data previously supplied by EBC as evidence. I believe EBC is not committed to assist Self-Builders The plan does not acknowledge the significant fall in the number of additional homes delivered that occurred when current policy CS21 was introduced in 2011 | Y | Y | Y | 1)The Plan for Self-Builders does not include sufficient detail - requiring a subsequent SPD it defines process but not policy 2)The evidence base conflicts with data EBC has submitted in evidence previously, namely Planning Permission data 3) Elmbridge Planning data systems seem to be flawed and inconsistent | 1) Add the 'Exemption' criteria for Self-Builders from Affordable Housing Contributions suggested, but not detailed into Hou8 eg : must occupy for 3 years? 2) Identify which set of Gross annual Planning Permission data sets (if either) is correct- The one in the evidence base (HDT Action plan) conflicts significantly with the Gross annual Planning Permission figures submitted as evidence by EBC to the Inspectorate since Nov 2018. 3) Delivery of Housing need- Lessons learned from implementation of Policy CS21 2002 to 2011 should be highlighted and the policy reappraised to more closely align with Govt and NPPF guidance. After CS21 introduced in 2011 the average (mean) delivery for the preceding 9 years was an additional 383 units pa. This fell to just 284 additional units pa for the 9 years after the introduction of CS21. EBC now 279th worst Council out of 297 for additional home delivery. Consistently delivering only 58% of need. | 2022Plan Consult Response - v1.docx https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556777/DOCX/-/2022Plan%20Consult%20Response%20%2D%20v1%2Edocx | As per 2, 3a and 4. | No, I do not wish to participate at the oral examination | Back | Objection noted. It is not clear from the representation which areas of the DELP evidence base and what previous evidence submitted by EBC are considered to be inconsistent. Draft policy sets out a policy approach that is supportive of self build applications and is evidence based as set out in the supporting text. This approach is in accordance with national policy and guidance. It does not set out any requirement for a more detail SPD and the Council considers that an SPD is not required to expand on this policy. The affordable housing contributions referred to in draft policy HOU8 are set out in HOU4 – affordable housing. The approach set out in HOU8 is considered to be appropriate given the acute need for affordable housing in the Borough and is supported by the Local Plan evidence base, including the viability assessment (2022) . The DELP evidence base, which has informed the development of the DELP, in particular the Local Housing Need Assessment (2020) , takes into consideration past delivery of housing in the Borough under the existing Local Plan policies. Need to respond to comments. | | |
| 1110762 | David Jardine | | Yes | I hope it will protect the green belt and not allow a sprawl of over development by outside developers who do not care about the local area | Yes | Generally sound but care must be taken to ensure communities are not affected by over development. There must be a sound infrastructure to ensure the wellbeing of all ages and protect the area for future generations | | | | | | | | | | | | Support and comments noted. The spatial strategy set out in the DELP seeks to protect the green belt and no Green Belt land is allocated for development. The proposed spatial strategy is considered to be the best, most sustainable solution to meet the Borough's need for development and additional housing, whilst also ensuring the environment and character of the Borough, including the Green Belt, is protected, conserved and enhanced. As demonstrated through the evidence base, Duty to Cooperate activities and Statements of Common Ground, the development strategy can also be accommodated without putting undue pressure on the Borough's infrastructure. |

In addition, draft policies, such as ENV9 – Urban design quality set out within the DELP will ensure that any development proposals that come forward in the Borough's settlements and urban areas must seek to deliver high quality schemes that complement and enhance the context, character, townscape and landscape of the areas in which they are located.

An option to meet the Borough's identified housing need in full through intensification of urban areas was considered. However, the Council concluded that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities.

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

The Council's Infrastructure Delivery Plan (May 2022) (IDP) and Update (July 2023) detail the key elements of physical and social infrastructure needed in the Borough over the plan period

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| | | | | | their best to be fair and sensible | | | | | | | | | | | | | |
| 1110814 | D E | | Yes | | Yes | <ul style="list-style-type: none"> • There is an inherent contradiction between a stated commitment to managing the effects of climate change and any meaningful strategy to reduce the impact of increased traffic. • The impact on Elmbridge of the large Wisley housing development represents an important omission. • There is no recognition of the need for densification of urban areas such as Oxshott to be progressive and avoid the character of areas of comparatively low density being damaged by individual high-density schemes. • While areas close to local centres and train stations are targeted for flats and infill development, the converse should apply so that the character of other areas (such as most of residential Oxshott) is protected. • There are no design codes available to provide protection for local character and ensure excellent buildings. • Calculations of developer contributions for affordable housing continue to be based on flawed methodology that has been subject to continual abuse. • The Infrastructure Delivery Plan is weak with heavy reliance on a document that has not yet been produced by Surrey County Council. Key to successful development must be the recognition that infrastructure must precede development. A noteworthy omission is the lack of commitment to install cycle lanes alongside trunk roads thereby promoting road safety | | | | | | | | | | | | Support and comments noted. Please see the Council's response to the same comments/issues raised in the representation above (Representation ID 1110478) |

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| | | | | | and improving traffic flow. | | | | | | | | | | | | | | | |
| 1110835 | Karl Steidl | | Yes | | Yes | <p>There is an inherent contradiction between a stated commitment to managing the effects of climate change and any meaningful strategy to reduce the impact of increased traffic.</p> <p>The impact on Elmbridge of the large Wisley housing development represents an important omission.</p> <p>There are fundamental errors in the reports assessing the performance of Green Belt sites. Most importantly, site SA-11 next to Waverley Road and Blundel Lane has been incorrectly assessed.</p> <p>There is no recognition of the need for densification of urban areas such as Oxshott to be progressive and avoid the character of areas of comparatively low density being damaged by individual high-density schemes.</p> <p>While areas close to local centres and train stations are targeted for flats and infill development, the converse should apply so that the character of other areas (such as most of residential Oxshott) is protected.</p> <p>There are no design codes available to provide protection for local character and ensure excellent buildings.</p> <p>Calculations of developer contributions for affordable housing continue to be based on flawed methodology that has been subject to continual abuse.</p> <p>The Infrastructure Delivery Plan is weak with heavy reliance on a document that has not yet been produced by Surrey County Council. Key to successful development must be the recognition</p> | | | | | | | | | | | | | | <p>Support and comments noted.</p> <p>Please see the Council's response to the same comments/issues raised in the representation above (Representation ID 1110478)</p> |

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| | | | | | that infrastructure must precede development. A noteworthy omission is the lack of commitment to install cycle lanes alongside trunk roads thereby promoting road safety and improving traffic flow. | | | | | | | | | | |
| 1110841 | Jennifer Kazandjian | | Yes | | Yes | There is an inherent contradiction between a stated commitment to managing the effect of climate change and any meaningful strategy to reduce the impact of increased traffic. The impact on Elmbridge of the large Wisley development represents an important omission. There are fundamental errors in the reports assessing the performance of Green Belt sites. Most importantly site SA-111 next to Waverley road & blundell lane has been incorrectly assessed. There is no recognition of the need for densification of urban areas such as Oxshott to be progressive & avoid the character of areas of comparatively low density being damaged by individual high density schemes. While areas close to local centres and train stations are targeted for flats & infill development the converse should apply so that the character of other areas such as most of residential Oxshott is protected. There are no design codes available to provide protection for local character & ensure excellent buildings. Calculations of developer contributions for affordable housing continue to be based on flawed methodology that has been subject to continual abuse. The infrastructure delivery plan is weak with a heavy reliance | | | | | | | | | Support and comments noted. Please see the Council's response to the same comments/issues raised in the representation above (Representation ID 1110478) |

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| | | | | | on a document that has not yet been produced by Surrey county council .key to successful development must be the recognition that infrastructure must precede development. A noteworthy omission is the lack of commitment to instal cycle lanes alongside trunk roads thereby promoting road safety & improving traffic flow. | | | | | | | | | | | |
| 1110842 | Brian Draper | | Yes | | Yes | | | | | | | | | | | Support noted. |
| 1110843 | Coenraad Alex Lugt | | Yes | | Yes | <ul style="list-style-type: none"> • There is an inherent contradiction between a stated commitment to managing the effects of climate change and any meaningful strategy to reduce the impact of increased traffic. • The impact on Elmbridge of the large Wisley housing development represents an important omission. • There are fundamental errors in the reports assessing the performance of Green Belt sites. Most importantly, site SA-11 next to Waverley Road and Blundel Lane has been incorrectly assessed. • There is no recognition of the need for densification of urban areas such as Oxshott to be progressive and avoid the character of areas of comparatively low density being damaged by individual high-density schemes. • While areas close to local centres and train stations are targeted for flats and infill development, the converse should apply so that the character of other areas (such as most of residential Oxshott) is protected. • There are no design codes available to provide protection for local character and ensure excellent buildings. • Calculations of developer contributions for affordable housing | | | | | | | | | Support and comments noted. Please see the Council's response to the same comments/issues raised in the representation above (Representation ID 1110478) | |

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| | | | | | continue to be based on flawed methodology that has been subject to continual abuse. • The Infrastructure Delivery Plan is weak with heavy reliance on a document that has not yet been produced by Surrey County Council. Key to successful development must be the recognition that infrastructure must precede development. A noteworthy omission is the lack of commitment to install cycle lanes alongside trunk roads thereby promoting road safety and improving traffic flow. | | | | | | | | | | | | | | |
| 1110845 | Trevor Hedges | | Yes | | Yes | | | | | | | | | | | | | | Support noted. |
| 1110846 | Paul Bartlett | | Yes | I have no reason to believe that the Draft Local Plan is not legally compliant, but as I have no legal nor planning background, I cannot attest to this. I do support the Draft Local Plan and what it means for the borough. More comments below. | Yes | I am supporting Elmbridge's Draft Local Plan 2037, as I value the fact that Elmbridge has taken the stance to protect and preserve the borough's Green Belt land. I fully support the vision statement and hope that the council is given the opportunity to achieve their objectives. Responding to the climate emergency and addressing issues of sustainability shows that Elmbridge is taking a reasonable, mature and appropriate attitude to key issues which impact its residents. This is a proper Local Plan and not simply a 'housing delivery plan'. I would like to encourage the Planning Inspector to view this Draft Local Plan not simply from a facts and figures perspective, but to ask herself or himself whether he or she would like to live in a borough with this vision, this aspiration and this approach to place-making. I do, which is why I am supporting this Draft Local Plan. | | | | | | | | | | | | | Support noted. |
| 1110847 | Fiona Walmsley | | Yes | | Yes | | | | | | | | | | | | | | Support noted. |

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| 1110849 | Clive Atkinson | | Yes | | Yes | This development strategy is appropriate in relation to the number of homes and the location on brownfield sites. This plan is the most appropriate for Claygate and Elmbridge as a whole since it recognises that in developing new sustainable homes, the green belt must be protected - in my view against any development. We have a climate emergency and the environment, green spaces, landscapes, trees and woodlands should be protected at all costs. A brownfield approach is therefore the right approach. | | | | | | | | | | | | Support noted. |
| 1110850 | Alison Crosby-Atkinson | | Yes | | Yes | These housing plans needs to be met from brown field sites and Green Field sites must be preserved. We are facing an environmental catastrophe and so Green Field sites cannot be used for further building. We need to preserve them at all costs. | | | | | | | | | | | | Support noted. The spatial strategy proposed in the DELP is a 'brownfield first' approach with no development allocated in the Green Belt. |
| 1110863 | Richard Harvey | | Yes | | Yes | Anything that prevents the loss of vital green spaces is excellent news. We need to trees and paths for exercise and mitigate awful noise and air pollution from the A3. | | | | | | | | | | | | Support noted. Draft policy CC4 sets out how development must contribute to the delivery of an integrated, accessible and safe sustainable transport network and sets out how development should promote active travel and the use of public transport and support a transition away from reliance on private cars. In addition, draft policy EN7 – environmental quality set out how developments are required to mitigate the impacts of noise and pollution. |

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| 1110864 | Peter Conley | | Yes | | Yes | <p>The local plan has been well thought out and consulted upon. Local authorities are best placed to make planning decisions, they understand the needs of the local community. Elmbridge is a unique and wonderful borough surrounded by Green Belt land that stops the spread of greater London and it is vital that the Green Belt is protected. The pandemic has shown us how important green spaces are to our physical and mental health. In understanding this, the plan makes the most of existing spaces identified for development whilst protecting open spaces and Green Belt so in my opinion totally fulfills the needs of residents in the borough and should be approved.</p> | | | | | | Support noted. |
| 1110867 | Susan Conley | | Yes | | Yes | <p>Elmbridge's local plan has been well thought out, written and consulted upon. I believe Local Authorities are best placed to make decisions about the borough as they understand the needs of people and businesses in the borough. Elmbridge is a unique and wonderful borough surrounded by Green Belt that stops the spread of Greater London and makes it a lovely place to live. The pandemic has shown everyone how important open spaces are for both our physical and mental health. In understanding this the plan makes the most of re-purposing and using existing spaces identified for development while protecting the Green belt - which is vital. The plan fulfills the needs of residents in the borough, provides additional housing,</p> | | | | | | Support noted. |

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| | | | | | | protects the Green Belt and open spaces and should be approved. | | | | | | | | | | | |
| 1110594 | Cobham & Downside Residents Association and Stoke D'Abernon Residents Association... | Cobham & Downside Residents Association and Stoke D'Abernon Residents Association | No | Omission of a formal policy to deal with the impact of the Wisley Airfield Development (WAD) means that the DLP is not legally compliant with the Duty to Cooperate. There is no policy for this strategic site which impacts two Planning Authority areas and there is no extant agreement for mitigation with Guildford Borough Council (GBC). We do not believe that EBC have cooperated with GBC on the WAD in the spirit or meaning of the Planning & Compulsory Purchase Act as amended by the Localism Act. There has been no consideration of joint plan-making arrangements. A loose indication of future discussions in the Statement of Compliance as part of the, as yet unformed, Surrey 2050 Place Ambition, does not satisfy this obligation. No statement of common ground on the subject is in the public domain. This requires modification now rather than risk rejection of the DLP at the outset. | No | A specific strategic policy is necessary to deal with mitigation of the Wisley Airfield Development on Cobham, Downside, Stoke D'Abernon and Oxshott. Its omission renders the DLP unsound in addition to the legal compliance points above. The GBC Local Plan and recently submitted WAD planning application allows the impact to be fully assessed so that mitigation can be planned for should WAD receive consent. EBC limiting themselves to representations to GBC on the WAD application is not a plan. The outline provisions of the GBC Local Plan are unlikely to be met in full by the developer and extra provision may well be required of EBC. The development impacts on health provision, secondary education, travel, transport, local rural lanes and highways and the amenities in Cobham High Street. None of which have been assessed in the DLP or supporting evidence. For example, over one third of the traffic journeys generated by Wisley, as modelled by the developer, come to and through Cobham and Downside. Key Diagram 5 identifies Cobham as a Town Centre. The existing Local Plan identifies it as a District Centre. No justification is given for this and Cobham should be reinstated as a District Centre to ensure its character and diversity of local shops and services is not endangered. The | Y | Y | Y | Y | Please see uploaded document at question 4a | This response is a positive initiative to improve the DLP and avoid mishap in advance of the EIP. | Head of Planning REG19.docx https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/555812/DOCX/-/Head%20of%20Planning%20REG19%2E.docx | As per 1a and 2a. | Yes, I wish to participate at the oral examination | This response process does not allow sufficient scope to fully explain and justify all of the modifications we have proposed. In particular the Wisley Airfield issues are complex and further evidence of this and other matters raised for modification are emerging. This should be expressed at the oral examination. The Council have been asked to make modifications and if implemented or varied it is appropriate for them to be commented on orally as the only remaining route available to do so. Issues such as the status of Cobham Town Centre in Plan 5 and definition and implication of use of the term 'urban area' as a blanket categorisation can be better and more succinctly evidenced orally. | Objection noted. EBC submitted an objection to the application submitted to Guildford Borough Council (GBC) for development of the Wisley Airfield site (planning application ref.: 2023/0072) due to its significant impact on the Borough's transport infrastructure. The DELP cannot include a policy on sites or schemes that are within a neighbouring authority's district as Local Plans are not cross-boundary unless a joint Local Plan is developed with the neighbouring authority. However, the potential impacts of proposed development at Wisley Airfield on neighbouring boundaries have been considered in the Council's Transport Assessment (2022) and Infrastructure Delivery Plan (May 2022) . In addition, the Council's Duty to Cooperate Statement of Compliance (June 2022) , Duty to Cooperate Statement of Compliance Update (August 2023) and Statement of Common Ground with GBC (July 2023) detail the Council's Duty to Cooperate discussions with GBC, including the matter of the Wisley Airfield development. The justification to designate Cobham to town centre is included in the Council's Retail Centres Review 2020/21 which was published as part of the Local Plan evidence base. The Council is currently progressing the production of the Borough's design code. A draft of the design code will be published for a public consultation soon and the Council aims to have the design code adopted in 2024 in advance of the DELP adoption. Although the Council has set out within its Topic Paper 1: How the spatial strategy was formed? (June, 2022) that the Green Belt |

description of Cobham and Oxshott as Urban Areas also pre-empt the outcomes of their description in local detailed Design Codes and they should be re-designated by area/neighbourhood in accordance with the National Design Codes as appropriate e.g. inner suburb, outer suburb, local designated et al.

It is unfortunate that agreed local Design Codes are not available to help interpret the DLP in time for the EIP. Perhaps this can be expedited? It is important that when produced they should assist developers and residents in understanding what is required by way of character, scale, streetscape and landscaping as well as excellent design of individual buildings. We urge EBC to produce them in advance of the EIP. This would help resolve issues we have with SS2, SS3 and HOU1, 2 and 3. However, the NPPF emphasises the desirability of retaining the character and scale of existing built areas so, without restraining efficient use of land, each of these policies should specifically address that principle. It would also help smooth delivery of sustainable development rather than encourage one-off high-density development sites with no transitional consideration to existing character. Policy should be clear that housing need, local character and building forms are to be balanced as per National Planning Guidance notes and National Design Codes. Local confidence in this

evidence on the whole undervalues the performance of the Borough's Green Belt sites.

The Council's Green Belt evidence is relevant to the preparation of the DELP and sets out an assessment of the Borough's Green Belt sites that is in accordance with national policy and guidance. It cannot be removed from the evidence base.

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| | | | | | will smooth the application process and speed up delivery of new homes. The Arup Green Belt Assessment which forms part of the evidence base is not relevant to the DLP process and should be deleted. There is no case or mechanism in the NPPF or guidance to suggest that there are degrees or a hierarchy of Green Belt effectiveness. It is either Green Belt in the Local Plan or it is not. The defining line should be clear and unambiguous. The provisions of the NPPF can then be applied impartially should development proposals of whatever nature come forward. | | | | | | | | | | |
| 1110405 | Guy Greaves | | No | The draft Local Plan does not meet the number of additional dwellings required under the Government's standard method for calculating local housing need. | No | The draft Local Plan does not put forward how it might supply the number of additional dwellings required under the Government's standard method for calculating local housing need. | Y | Y | Protection of Local identities. In Section 2.2 of Chapter 2 of the Draft Local Plan states "Elmbridge is a collection of separate and distinctive places and local communities each with its own unique local identity, historic assets and attractive green and natural environment which are highly valued by our communities." "The vision for Elmbridge 2037' goes on to state "Building on the success of our existing communities, the built environment will be well designed, beautiful and will offer high quality public realms, contributing to the uniqueness of each settlement. Excellent design will safeguard the built, historic and natural environment for the health and wellbeing of existing residents and future generations." Policy SS2 states that the Local Plan will achieve this through 'Sustainable place-making' by, among other things: "Protecting and enhancing our natural, historic and built environment by enhancing the character and qualities of places and contribute positively to local distinctiveness, identity and history in accordance with national planning policy and the policies set out in the Plan." Policy ENV9 requires all new buildings and places "to be of a high quality, beautiful and sustainable, and respond positively and enhance the local context. Development that is not well designed will be refused where it fails to reflect local design policies and the code." However, Appendix A1 replaces Core Strategy | There are marginal areas currently classified as green Belt which could be released for residential development. For example, the draft Local Plan allocates 20 residential units (and mixed use floor space) for the Cafe Rouge, Portsmouth Road, Esher (US276) and 10 residential units at Two Furlongs, Portsmouth Road (US274) but recently refused a planning application for additional housing on the perimeter of the Sandown Race Course. The two properties above are also adjacent to the race course. Why is there a distinction when there is a very serious requirement for additional housing? | | | Yes, I wish to participate at the oral examination | I will be extremely interested in hearing the arguments as to why the draft Elmbridge Local Plan is considered sound or otherwise. | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper |

policies CS3 through to CS12 (the policies which protect those 'unique local identities') before a Design Code is established and becomes enforceable as part of the new Local Plan (should it be adopted in the near future). This lack of co-ordination and timing of the adoption of these two important documents will allow developers to do totally what they please over the time lapse and so, potentially, destroy the individual character of parts of the Borough. Reliance on "excellent design (to) safeguard the built, historic and natural environment for the health and wellbeing of existing and future generations" as stated in 'The Vision for Elmbridge', will not happen unless enforced through a tough and detailed Design Code. For this reason I find the draft Local Plan unsound. Land for new development The draft Local Plan is structured around the best use of previously developed ('brownfield') land (Chapter 1 Section 1.13) but recognises that it may not be sufficient to meet all the new development required. The draft Local Plan also intends to "renew, enhance and protect green and blue spaces across the Borough" which includes the protection of the Green Belt against inappropriate development (Policy ENV4.1). Elmbridge Borough Council currently cannot meet the Government's required 5-year housing land supply (the latest figure of land supply being 3.96 years) and the draft Local Plan is proposing only 6,785 additional dwellings in the plan period which is 'confirmed' in the Land Availability Assessment 2022. This is 70% of the Government's standard method for calculating local housing need. There is huge pressure on all councils to provide more housing in order to meet the demand for dwellings and reduce the continuing escalation of house prices which is exacerbated by the lack of supply. Planning Authorities should take this into account in the preparation of their Local Plans regarding how that demand for housing should be met and not avoid the issue. The release of marginal Green Belt land within Elmbridge Borough Council is therefore a necessity if the identified local housing need is to be met and those sites that are permitted are not to be developed out at unacceptably high densities, totally inappropriate for their locality within the Borough just to make up the numbers. As an aside, I note that the Elmbridge Borough Council's Brownfield Land Register is significantly different to the site

[1: How the spatial strategy was formed?](#) (June, 2022).

The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus

allocations identified in Chapter 9 of the draft Local Plan. For example, is it logical or even viable to consider the redevelopment of the Elmbridge Borough Council's Civic Centre to provide 400 dwellings when redevelopment of major assets is now being considered to be poor for the environment and achieving carbon-net-zero, or have a number of properties been included to boost the possible availability of brownfield sites? For these reasons I find the draft Local Plan unsound. Other specific comments Policy CC3. Why is the requirement for new developments to meet Home Quality Mark 4 star and BREEAM UK Domestic Refurbishment 'Excellent' standards limited to project of 10 or more dwellings. These standards should apply to all new residential developments. Policy HOU3. Although the Assessment of Local Housing Needs undertaken by Cobweb Consulting in 2020 identifies a critical need for additional Extra Care accommodation, that is not reflected in this policy.

harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the

NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality.

The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes

required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flattened development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council is currently progressing the production of the Borough's design code. A draft of the design code will be published for a public consultation soon and the Council aims to have the design code adopted in 2024 in advance of the DELP adoption.

The brownfield land register and land availability evidence are updated annually. The site allocations proposed in the DELP are informed by the [Land Availability Assessment \(2022\)](#).

proposed, in the DELP is provided.

Draft policy INF1 – Infrastructure delivery aims to ensure the required infrastructure needed to accommodate and mitigate the impact of new development in the Borough is delivered in a timely manner, whilst acknowledging that the infrastructure provision with a development must be proportionate to the size of the development.

Draft policy CC4 sets out how development must contribute to the delivery of an integrated, accessible and safe sustainable transport network and sets out how development should promote active travel and the use of public transport and support a transition away from reliance on private cars.

Car parks are only included as site allocations when they are underused or could be consolidated into another location/site. The ownership checks in 2023 have resulted in the discounting of some of these sites.

A regulation 19 consultation must ask questions about the legal compliance and soundness of the DELP. Guidance notes that were provided on the consultation homepage explained the purpose of the representation period and how to consider legal compliance and the test of soundness.

The questionnaire that was prepared is based on the Planning Inspectorate's model representation form. This will ensure consistency at examination.

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| 1110472 | Michael Faulkner-Shotter | | Yes | I find the Draft Local plan to be well prepared and comprehensive | Yes | <p>I believe that more emphasis should be made of the developing trend for home working and more encouragement for developments which identify a specific provision. I feel this will be an integral part of our approach to reducing vehicle movement.</p> <p>I am pleased to see under Protecting the Environment a section - item 10 which hopefully will be instrumental in curbing the creeping trend for many large homes to become even greater through roof development. I believe will be a real problem in the future as densities are raised as a result but with no enhancement to existing infrastructure and services.</p> <p>It would be appropriate to make provision for the additional green space at the earliest stage rather than post development. This would allow new trees, plants and vegetation to be in place as the densities increase.</p> <p>I do not believe that the proposals will result in the provision of smaller homes as indicated unless these are commissioned by Elmbridge. There is currently a distinct shortage of smaller dwellings, particularly for the older person and for younger people, maybe as a result of economics for a developer, hence my thought for more involvement by the authority.</p> <p>Under the section titled Design Quality, the use of the word "beautiful" seems rather subjective in this context.</p> | | | | | | <p>Support and comments noted.</p> <p>National policy and guidance, as well as planning regulations require Local Plans to be evidence based. The Council does not have the required evidence to robust develop a policy on home working. As this is a relatively recent development in our society it is not clear at this stage what such a piece of evidence would be.</p> <p>In addition, it is important to note that although home working has become common place for some, it is not the case for all and Local Plans are required under national policy and guidance to set out a strategy that seeks to meet the development needs of all groups.</p> <p>Provision of additional green space when relevant would be decided before planning permission is granted and development begins. It would form part of the proposal submitted to the Council for determination.</p> <p>Draft policy HOU3 would require all development proposals for residential units to provide a mix of housing units in line with the mix of need identified in the Council's Local Housing Need Assessment (2020).</p> <p>It is agreed that the word beautiful is subjective. However, this is the terminology used in national policy and guidance. Local Plans are required to be consistent with this.</p> |
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| 1110874 | Shirley Tarboton | | Yes | | Yes | It's really important that we consider the short and long term impact when building new houses and this plan takes these impacts into account. We want to preserve green belt space and biodiversity and actually re-wild those spaces already lost to overdevelopment. So building new small affordable homes on brownfield sites is what we need more than large houses. With the move to more remote and hybrid working, there is no longer as strong a need to be able to commute into London, and the spatial strategy of this plan helps us keep London healthy and in turn can boost other parts of the country. | | | | | | | | | Support noted. | |
| 1110890 | Alison Brooks | | Yes | | Yes | | | | | | | | | | | Support noted. |
| 1110934 | Felicity Tarcy | | Yes | | Yes | I support the local plan as it aligns with the Spatial Strategy. In particular as Claygate has busy roads surrounding it but still has a "village" atmosphere . This should be retained so there should be no building on the Green Belt in Elmbridge.The local plan has been properly prepared with lots of consultation where our local community participated and I therefore fully support it. | | | | | | | | | | Support and comments noted. |
| 1110943 | Martin Bone | | Yes | I have taken part in the whole consultation process and believe it to have been carried out correctly in accordance with requirements. | Yes | The latest plan has taken on board the results of previous consultations and I believe it to be sound and reflect as far as possible the views and needs of residents. | | | | | | | | | | Support noted. |

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| 1110947 | Pauline O'Sullivan | Yes | <p>- Oatlands Village is left out of the list of Local Centres in EC03 Para 7.16 but is mentioned in the later associated appendix.</p> <p>- Infrastructure as stated in EC02 para 2.d 'new commercial development should not lead to an unacceptable impact on the surrounding highway network and local amenity'.</p> <p>However this does not include preventing/monitoring one that may be generated by a warehouse or distribution centre added on land immediately adjacent to the Elmbridge boundary that would be dependent on using the Elmbridge road network. This is proposed in Hamm Moor, Weybridge Industrial Park just over the River Wey in Runnymede where a massive increase in HGVs that would use the A317 through the High Street and be hugely detrimental to the already overly congested town. SCC are currently looking at ways to reduce the traffic and its impact on air quality and the life of the town for the community.</p> <p>-The Green</p> | Yes | <p>While I agree with its far reaching ambition it will require a huge amount of monitoring to make sure it is achieved. I feel there should also be EBC monitoring of the collective usage and visual impact of green spaces with a town. Without this many of the ambitions relating to wellbeing, connectivity and pride will not be not be maximised and at worst lost.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| | | | | | must be the recognition that infrastructure must precede development. A noteworthy omission is the lack of commitment to install cycle lanes alongside trunk roads thereby promoting road safety and improving traffic flow. | | | | | | | | | | |
| 1110995 | Elizabeth Lugt | | Yes | Yes | <ul style="list-style-type: none"> • There is an inherent contradiction between a stated commitment to managing the effects of climate change and any meaningful strategy to reduce the impact of increased traffic. • The impact on Elmbridge of the large Wisley housing development represents an important omission. • There are fundamental errors in the reports assessing the performance of Green Belt sites. Most importantly, site SA-11 next to Waverley Road and Blundel Lane has been incorrectly assessed. • There is no recognition of the need for densification of urban areas such as Oxshott to be progressive and avoid the character of areas of comparatively low density being damaged by individual high-density schemes. • While areas close to local centres and train stations are targeted for flats and infill development, the converse should apply so that the character of other areas (such as most of residential Oxshott) is protected. • There are no design codes available to provide protection for local character and ensure excellent buildings. • Calculations of developer contributions for affordable housing continue to be based on flawed methodology that has been subject to | | | | | | | | | | Support and comments noted. Please see the Council's response to the same comments/issues raised in the representation above (Representation ID 1110478) |

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| | | | | | <p>continual abuse.</p> <ul style="list-style-type: none"> The Infrastructure Delivery Plan is weak with heavy reliance on a document that has not yet been produced by Surrey County Council. Key to successful development must be the recognition that infrastructure must precede development. A noteworthy omission is the lack of commitment to install cycle lanes alongside trunk roads thereby promoting road safety and improving traffic flow. | | | | | | | | |
| 1111001 | Dorothy Ford | | Yes | No | <p>The policy of Protecting the Green Belt - avoiding inappropriate development - needs to be strengthened in order to succeed. In order to protect my local Oxshott Green Belt from inappropriate development, Local Plan needs to correct part of the Evidence Base Base. There are inaccuracies relating to the evidence/assessment of Sub-Area 11/GB46 in the Evidence Base documents - due to be submitted to the Secretary of State along with the Local Plan. The evidence is not proportionate as it does not recognise the strengths of this Sub-Area either in words or photos.</p> <p>I have submitted detailed comments/suggestions, with photos to support these, photos in my response to Chapter 3.- as the representative of the 2505 people who have signed the SA-11 "Our Green Belt is Under Threat" change.org petition to demand that the evidence for SA-11 be duly corrected. The EBC Planning Head Ms Tagliarini instructed me many months ago that it was only acceptable</p> | Y | <p>Please see my previous response. In other words, the Local Plan generally is sound - with the exception of the inaccurate, inconsistent, contradictory and disproportionate Evidence Base for Sub-Area 11 that is available in several documents on the EBC website - which EBC officers say indicated to me in June (following the Community group workshop) we're going to be submitted to the Secretary of State along with draft Local Plan.</p> <p>I have therefore submitted comments, a document, and photos in my response to Chapter 3 of the draft Local Plan.</p> | <p>Please see the document and photographs I submitted in response to Chapter 3 of the draft Local Plan. The photos support 3 key strengths of Sub-Area 11/GB 46 that need to be recognised in order for the evidence base to be accurate, sufficiently detailed, and proportionate</p> <ol style="list-style-type: none"> the "strategic views" of the SurreyHills AONB from the popular, accessible SA-11 Public Footpath the cherished, unspoilt landscape view, full of character, which is readily visible to the busy, popular commuter road Blundel Lane - where many drive/walk/cycle or ride horses. The photo I've provided is view from the corner of Blundel Lane & Waverley Road, taken by the Vicar of StAndrew's Church, Oxshott. the positive function of SA-11 as a buffer between a low-density Stoke d'Abernon parish settlement and a higher-density, more diverse settlement of Oxshott parish. The boundaries of the parishes is recognised by EBC's road sign marking the boundary between Oxshott and Stoke D'Abernon; the Church of England website; and the Stoke d'Abernon Residents Association website which includes a map of the | <p>F3099F33-078C-4A8E-A185-09E2F4684A4C.jpeg https://consult.elmbrid.ge.gov.uk/gf2.ti/a/1205954/557292/PJP/-/F3099F33%2D078C%2D4A8E%2DA185%2D09E2F4684A4C%2Ejpeg</p> <p>3808185F-5B1B-41B8-85E5-4BCE2E7F9C49.jpeg https://consult.elmbrid.ge.gov.uk/gf2.ti/a/1205954/557293/PJP/-/3808185F%2D5B1B%2D41B8%2D85E5%2D4BCE2E7F9C49%2Ejpeg</p> <p>SA-11+Response to Reg 19 Consultation.docx https://consult.elmbrid.ge.gov.uk/gf2.ti/a/1205954/557294/DOCX/-/SA%2D11%5FResponse%20to%20Reg%2019%20Consultation%2Edocx</p> <p>6E0BDCA2-75F2-4961-87AA-98B9F2CACA56.jpeg https://consult.elmbrid.ge.gov.uk/gf2.ti/a/1205954/557295/PJP/-/6E0BDCA2%2D75F2%2D4961%2D87AA%2D98B9F2CACA56%2Ejpeg</p> <p>C3C1B626-4D40-40A1-8743-9A36581EF101.jpeg https://consult.elmbrid.ge.gov.uk/gf2.ti/a/1205954/557296/PJP/-/C3C1B626%2D4D40</p> | As per 2a, 3a and 4. | Yes, I wish to participate at the oral examination | <p>I consider attendance necessary in order to ensure that the concerns of the 2505 people who have signed the change.org petition to save my local Green Belt Sub-Area 11 ("Our Green Belt is Under Threat) are duly noted and concerns addressed. There are a few possibilities, such as published an accurate summary of corrected evidence in EBC's Topic 1 paper, or amending the Local Plan's strategic view section to record that glimpses of the Surrey Hills AONB are visible not just from Oxshott Heath - but also from the Sub-Area 11 Public Footpath. Another possibility is to add Sub-Area 11 to the Green Infrastructure map (which currently only includes neighbouring Green Belt Sub-</p> | <p>SA-11 is not included in the DELP as a site allocation for development. The DELP does not propose any development on Green Belt land.</p> <p>Comments regarding the assessment of site SA-11 noted. The Council has set out within its <u>Topic Paper 1: How the spatial strategy was formed?</u> (June, 2022) that the Green Belt evidence on the whole undervalues the performance of the Borough's Green Belt sites.</p> |

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| | | | | | and appropriate to submit this petition during the current Regulation 19 consultation. | | | | | parish boundaries of Stoke d'Abernon. | 0C4CB674-9D6D-4CA8-AC84-05471F9D85CE.jpeg https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557297/PJP/-/0C4CB674%2D9D6D%2D4CA8%2DAC84%2D05471F9D85CE%2Ejpeg | | | Area 15). Development of Sub-Area 11 would reduce the performance of Sub-Area 15 by restricting the views of the wider countryside; and reduce or eliminate the contribution of walks/runs along SA-11's Public Footpath as a contribution to residents' health, happiness and well-being by providing stunning, unspoilt, biodiverse leisure and pleasure/views. | |
| 1111049 | Mark Davies | | Yes | Elmbridge has consulted extensively with its residents at every stage of the Local Plan process and has conducted a thorough review of planning options | Yes | The Local Plan is based on 5 sound principles which are all absolutely crucial going forward namely: Tackling Climate Change Protecting and enhancing the quality of the environment Delivering homes Growing a prosperous economy Providing infrastructure and connectivity. Particularly important for residents is that the Plan supports a development future for the borough free from green belt release - the Green Belt plays such a important role within Elmbridge and must not be compromised in any way. | | | | | | | | | Support noted. |
| 1111062 | Janis Fletcher | | Yes | | Yes | I support the local plan and believe it to be in line with the five guiding principles. I want Elmbridge to retain as many green belt areas as possible whilst still providing enough housing and development for the borough to thrive. Tackling climate change and protecting the environment is important to me. I believe the plan | | | | | | | | | Support noted. |

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| | | | | | | proposals will help to continue to make Elmbridge a desirable area for residents. | | | | | | | | | | | | | |
| 1111068 | Mark Sugden | | Yes | | Yes | | | | | | | | | | | | | | Support noted. |
| 1111077 | S Graves | | Yes | I support my local organisations, the CCHT and CDRA, in supporting the strategies and vision of the EBC DLP 2037 in principle. We believe the DLP to be legally compliant and sound but only with the following modifications to be inserted prior to and during the Examination in Public as appropriate:- Omission of a strategy for impact of the Wisley Airfield Development on Cobham, Stoke D'Abernon and Downside risks rejection of the DLP for lack of recognition of this major strategic cross border project. This development will significantly impact Cobham's infrastructure. It is estimated that a third of traffic movements from this development will be in the direction of Cobham. The Infrastructure Development Plan (IDP) does not place infrastructure as a prior condition | Yes | | | | | | | | | | | | | | Comments Noted. EBC submitted an objection to the application submitted to Guildford Borough Council (GBC) for development of the Wisley Airfield site (planning application ref.: 2023/0072) due to its significant impact on the Borough's transport infrastructure. The DELP cannot include a policy on sites or schemes that are within a neighbouring authority's district as Local Plans are not cross-boundary unless a joint Local Plan is developed with the neighbouring authority. However, the potential impacts of proposed development at Wisley Airfield on neighbouring boundaries have been considered in the Council's <u>Transport Assessment (2022)</u> and <u>Infrastructure Delivery Plan (May 2022)</u> . In addition, the Council's <u>Duty to Cooperate Statement of Compliance (June 2022)</u> , <u>Duty to Cooperate Statement of Compliance Update (August 2023)</u> and <u>Statement of Common Ground with GBC (July 2023)</u> detail the Council's Duty to Cooperate discussions with GBC, including the matter of the Wisley Airfield development. The Council's <u>Infrastructure Delivery Plan (May 2022) (IDP)</u> and <u>Update (July 2023)</u> detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the quantum of development proposed in the DELP. The IDP and IDP Update have been informed by the preparation of other evidence base documents e.g., <u>Transport Assessment (2022)</u> and via |

to development and is weak on specific delivery and funding. The deliverability of the DLP is therefore questionable. Recognition that reduction on reliance on the car requires different solutions in the IDP for different areas of the Borough. Flood protection of existing assets not just new development to be included in the IDP in particular Plough Corner Conservation Area. The concept of a hierarchy of Green Belt performance in assessments by Arup are flawed. Land is either Green Belt or it is not. Improved provision for protection and replacement for trees under threat by development. Design Codes must protect the character of our streets as well as produce excellent individual buildings. This is particularly important because if we are to suffer a greater density of dwelling it is fundamental that effective design codes are adhered to and outcomes monitored.

discussions with infrastructure providers as part of the Council's duty to cooperate activities as outlined in the Council's Duty to Cooperate Statement of Compliance (June 2022), Duty to Cooperate Statement of Compliance Update (August 2023) and Statements of Common Ground published with the Core Documents submitted for Examination.

The agreed position with our infrastructure delivery partners is that the proposed development strategy can be accommodated within the borough with the mitigation identified / a policy-led approach.

In addition, the DELP includes policies to ensure the infrastructure needed to support the delivery of the aspirations of, and quantum of development proposed, in the DELP is provided.

Draft policy INF1 – Infrastructure delivery aims to ensure the required infrastructure needed to accommodate and mitigate the impact of new development in the Borough is delivered in a timely manner, whilst acknowledging that the infrastructure provision with a development must be proportionate to the size of the development.

Draft policy CC4 sets out how development must contribute to the delivery of an integrated, accessible and safe sustainable transport network and sets out how development should promote active travel and the use of public transport and support a transition away from reliance on private cars.

While the preference would be for the infrastructure required to mitigate the impacts of development to be delivered first, this is rarely feasible on the scale of sites proposed in the Borough due to the need for providers to finance and deliver the infrastructure. The infrastructure will likely be delivered alongside new development, or where a site may be larger the development

and infrastructure will have a phased delivery plan.

Local Plans are forward looking and can only set requirements that are delivered through new development. They cannot influence anything unless planning permission is required. In addition, requirements must be relevant to the development itself, hence the DELP cannot include policies that require works to existing assets not related to the development site.

Although the Council has set out within its Topic Paper 1: How the spatial strategy was formed? (June, 2022) that the Green Belt evidence on the whole undervalues the performance of the Borough's Green Belt sites. The Council's Green Belt evidence sets out an assessment of the Borough's Green Belt sites that is in accordance with national policy and guidance.

The Council is currently progressing the production of the Borough's design code. A draft of the design code will be published for a public consultation soon and the Council aims to have the design code adopted in 2024 in advance of the DELP adoption.

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| 1106825 | Joe Chambers | | Yes | | No | <p>I do not believe, at this juncture, sufficient detail is shared as to how the local infrastructure will be able to meet the growing number of houses that will be occupied. When set against the quantum of LAA, the lack of parking, lack of scalable local thoroughfares, and environmentally the lack of charge points for EV's leaves a glaring gap in the plan.</p> | Y | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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The Council's [Infrastructure Delivery Plan \(May 2022\)](#) (IDP) and [Update \(July 2023\)](#) detail the key elements of physical and social infrastructure needed in the Borough over the plan period to support the delivery of the quantum of development proposed in the DELP.

The IDP and IDP Update have been informed by the preparation of other evidence base documents e.g., [Transport Assessment \(2022\)](#) and via discussions with infrastructure providers as part of the Council's duty to cooperate activities as outlined in the Council's [Duty to Cooperate Statement of Compliance \(June 2022\)](#), [Duty to Cooperate Statement of Compliance Update \(August 2023\)](#) and Statements of Common Ground published with the [Core Documents](#) submitted for Examination.

The agreed position with our infrastructure delivery partners is that the proposed development strategy can be accommodated within the borough with the mitigation identified / a policy-led approach.

In addition, the DELP includes policies to ensure the infrastructure needed to support the delivery of the aspirations of, and quantum of development proposed, in the DELP is provided.

Draft policy INF1 – Infrastructure delivery aims to ensure the required infrastructure needed to accommodate and mitigate the impact of new development in the Borough is delivered in a timely manner, whilst acknowledging that the infrastructure provision with a development must be proportionate to the size of the development.

Draft policy CC4 sets out how development must contribute to the delivery of an integrated, accessible and safe sustainable transport network and sets out how development should promote active travel and the use of public transport and support a transition away from reliance on private cars.

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| 1111079 | Mike Partridge | | Yes | | Yes | In Chapter 3 SS3 I have queried how the total number of housing units for Claygate were arrived at. I would suggest the Plan should address this aspect in a little more detail to clarify how the total units in a specific geographic area (i.e. Claygate) is broken down. | | | | | | | | | Support and comments The quantum of development identified in Claygate within strategic policy SS3 is derived from the development under construction in Claygate, extant planning permissions in Claygate and the deliverable sites within Claygate detailed in the Council's Land Availability Assessment (2022) , which was published with the DELP evidence base. A non-implementation discount (or lapse rate) has also been applied to the figure. |
| 1111083 | Ann Davies | | Yes | At every stage of the Local Plan process Elmbridge has consulted extensively with its residents. It has carried out a thorough review of planning options. | Yes | The Local Plan is based on five sound principles which are all crucial: Protecting and enhancing the quality of the environment -Tackling climate change -Building homes -Growing a prosperous economy -Providing infrastructure and connectivity The fact that the Plan supports a development future for the borough without releasing Green Belt is particularly important for residents. The Green Belt plays such an important role within Elmbridge and must not be compromised in any way. | | | | | | | | | Support noted. |
| 1111757 | Georgina Pacey | Runnymede Borough Council | | | No | Please see uploaded document at question 4a | Y | | Please see uploaded document at question 4a | Please see uploaded document at question 4a | Runnymede letter to Elmbridge BC Reg 19 July 2022.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/562603/PDF/-/Runnymede%20letter%20to%20Elmbridge%20BC%20Reg%2019%20July%202022%20Epdf | Overall, for the reasons set out in this letter, it is considered that the Housing Strategy which underlies the EBC Local Plan is unsound, as it fails to be positively prepared in the face of intense housing needs in the Borough and surrounding area. Alternative spatial strategies involving Green Belt release, and which would mean the majority/all of the Council's OAN could be met do exist, and these options | Yes, I wish to participate at the oral examination | Runnymede Borough Council would like to be given the opportunity to appear in person at the Examination in Public to discuss the matters raised in their letter. | Objection and comments noted. The Council has set out its response to the comments/issues raised by Runnymede Borough Council in their representation in its Statement of Common Ground . |

scored well in the Council's SA. It is considered that these options should again be reconsidered in order to ensure that no stone has been left unturned in meeting EBC's housing needs. It is considered a relevant consideration that no Local Authority has been identified to meet any unmet needs which arise from Elmbridge. To clarify, RBC does not consider it will be able to assist Elmbridge. RBC has already had to amend its Green Belt boundaries to meet its own needs through the Runnymede 2030 Local Plan.

The housing needs in Elmbridge and its HMA are acute. Elmbridge should therefore reconsider its position on Green Belt release, considering the significant value and benefits of a small amount of Green Belt release against the potential harm.

Please note that Runnymede Borough Council would like to be given the opportunity to appear in person at your Examination in Public to discuss the matters raised in this letter.

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| 1109881 | Tal Kleiman | Horsham District Council | Yes | Please see uploaded document at question 4a | No | To be clear, we are neither supporting nor objecting on grounds of soundness. However, the form requires one option to be chosen. Please see attachment for HDC's view | | | | | We are not seeking to modify the Local Plan. Please see attachments. | Final_Elmbridge Planning Policy_18Feb2020.pdf 211108 Elmbridge Response FINAL.pdf 220719 Elmbridge Reg 19 Response.pdf | We are not in a position where we are able to assist your authority in terms of taking any of your unmet housing need. | No, I do not wish to participate at the oral examination | <p>Comments noted.</p> <p>The Council submitted its evidence base relating to the comprehensive review of the Borough's Green Belt to the Inspector. The evidence base is available online on the Council's Local Plan Examination webpage.</p> <p>The Council reached the conclusion that the exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not fully evidenced and justified and (applying paragraph 11(b)(i) of the NPPF) that this provides a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered potentially suitable for release and allocation for development is set out in Section 6 of <u>Topic Paper 1: How the spatial strategy was formed?</u></p> <p>EBC notes Horsham District Council's position they are not in a position to assist in meeting Elmbridge's unmet housing need.</p> |
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| 1109777 | Tomas Pugh-Cook | Reigate and Banstead Council | Yes | | Yes | <p>HousingWe note that you have assessed the need for additional homes over the plan period using the 2014, 2016 and 2018 household projections, and in accordance with the NPPF and PPG, are using the 2014 household projections as part of the governments standard methodology for calculating local housing need. It is therefore understood that the housing need for the borough equates to 647 dwellings per annum and 9,705 homes over the plan period. We appreciate that housing need is not necessarily the same as the local plan's housing requirement. Within Elmbridge Borough Council's Land Availability Assessment (2022) and Local Plan Appendices A5, the table displayed highlights a housing land supply shortfall of 2,141 (-22%) using approach 1 and a shortfall of -2,918 (-30%) using approach 2. It is understood that approach 1 sets out the land supply figures taken from the assessment including a windfall site allowance, whilst approach 2 considers a non-implementation approach to determine 'under delivery discount'.As part of our continued Duty to Cooperate work, we received a letter from you titled 'Elmbridge Borough Council Local Plan: Meeting housing need' on the 18th October 2021. We responded on the 22nd October 2021 stating our housing position as unchanged. Elmbridge is within a housing market area that includes the Royal Borough of Kingston</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| | | | | | <p>upon Thames, Epsom and Ewell Borough Council and Mole Valley District Council, as stated within your Land Availability Assessment 2022. We therefore remain unchanged in our position in that Reigate and Banstead Borough Council is not within the same housing market area as Elmbridge and it would serve limited purpose to work together on this issue of housing need. We understand that EBC are constrained for development within the borough. We support the shift to the provision of smaller units to meet the challenge of housing need. We also support the 'brownfield first' approach to development. It is understood that EBC has chosen not to release green belt to accommodate development, and that the evidence gathered in the Green Belt Boundary Review (2019) and supplementary reports, due to a lack of strategic exceptional circumstances to release land from the Green Belt. This is in line with the NPPF 2021 (para 140) which states that: "Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans." Gypsies and Travellers Within our representation letter at the regulation 18 stage, titled: 'Elmbridge Local Plan: Strategic Sites Consultation (Regulation 18)' dated 24th February 2017, we raised concern that it appears that the needs for sites for caravans, houseboats and mobile park homes for</p> | | | | | | | | |
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| | | | | | households who do not fall into the government's "planning" definition of traveller and gypsy. It is therefore pleasing to see that para 6.57 of the Draft Local Plan has considered the need for these types of accommodation as is required. We note that Opinion Research Services (ORS)'s methodology, used by Elmbridge is a joint methodology, agreed between Elmbridge, RBBC and Tandridge District Council. There are no specific cross-border issues that have been identified, and we welcome use of this joint methodology, ORS have continued their service in producing the 2020 assessment having assessed RBBC's need in 2017. | | | | | | | | | | |
| 1110992 | Luke Dickson | Mole Valley District Council | Yes | Please see uploaded document at question 4a | No | Please see uploaded document at question 4a | Y | Y | Please see uploaded document at question 4a | Please see uploaded document at question 4a | 2022.07.20 MVDC Response to EBC Reg 19 Submission LP.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557235/PDF/-/2022%2E07%2E20%5FMVDC%20Response%20to%20EBC%20Reg%2019%20Submission%20LP%20Epdf | MVDC notes that EBC's Local Plan target is 6,785 additional homes and that this is 70% of the local housing need figure of 9,705 homes. In the Statement of Common Ground, MVDC acknowledges the significant development constraints faced by EBC. It is MVDC's view that because local housing need figures do not take account of Green Belt constraints, any local authority with significant Green Belt land is unlikely to be able to meet its local housing need figure in full (57% of EBC is designated as Green Belt, while the figure for MVDC is 76%). | No, I do not wish to participate at the oral examination | | Comments noted. The Council has set out its response to the comments/issues raised by Mole Valley District Council in their representation in its Statement of Common Ground . |

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| 1111896 | Mr Crickett | Boyer Planning obo of Antler Homes PLC | No | See uploaded document at question 4a for full response Duty to Cooperate and Sustainability Appraisal conclusion and summary 9.1 It is considered the DLP has a host of defects relating to soundness, legal compliance and the Duty to co-operate 9.2 Such concerns can be summarised as: • Failure to take positive steps through the Duty to Co-operate to seek to resolve the unmet development needs of the Borough through co-operation with neighbouring authorities • Failure to take positive steps through the DtC to seek to resolve the unmet development needs arising across the HMA and adjoining authorities • Concern the plan will not provide strategic policies to address a period of at least 15-years from the likely adoption date of the DLP • Failure to meet the Borough's minimum housing needs in accordance with national policy and guidance • Failure to recognise the very clear exceptional circumstances in the Borough and to accordingly undertake and review the existing Green Belt boundaries to ensure at least minimum housing development needs are met in full | No | See uploaded document for full response Duty to Cooperate and Sustainability Appraisal conclusion and summary 9.1 It is considered the DLP has a host of defects relating to soundness, legal compliance and the Duty to co-operate 9.2 Such concerns can be summarised as: • Failure to take positive steps through the Duty to Co-operate to seek to resolve the unmet development needs of the Borough through co-operation with neighbouring authorities • Failure to take positive steps through the DtC to seek to resolve the unmet development needs arising across the HMA and adjoining authorities • Concern the plan will not provide strategic policies to address a period of at least 15-years from the likely adoption date of the DLP • Failure to meet the Borough's minimum housing needs in accordance with national policy and guidance • Failure to recognise the very clear exceptional circumstances in the Borough and to accordingly undertake and review the existing Green Belt boundaries to ensure at least minimum housing development needs are met in full • Failure to offer a justified and clearly evidenced basis for the proposed housing allocations, and concerns that the DLP will not be effective in meeting even the lower housing requirement identified by the Council • Failure to propose an effective strategy | y | y | y | y | See uploaded document for full response Duty to Cooperate and Sustainability Appraisal conclusion and summary 9.1 It is considered the DLP has a host of defects relating to soundness, legal compliance and the Duty to co-operate 9.2 Such concerns can be summarised as: • Failure to take positive steps through the Duty to Co-operate to seek to resolve the unmet development needs arising across the HMA and adjoining authorities • Concern the plan will not provide strategic policies to address a period of at least 15-years from the likely adoption date of the DLP • Failure to meet the Borough's minimum housing needs in accordance with national policy and guidance • Failure to recognise the very clear exceptional circumstances in the Borough and to accordingly undertake and review the existing Green Belt boundaries to ensure at least minimum housing development needs are met in full • Failure to offer a justified and clearly evidenced basis for the proposed housing allocations, and concerns that the DLP will not be effective in meeting even the lower housing requirement identified by the Council 9.3 It is important to recognise that the Council should only submit a plan for examination once it considers it to be sound. This includes the requirement to have robust evidence to support the strategy being proposed by the submitted plan. 9.4 In our view, the council cannot reasonably claim that it considers the DLP and its evidence base to be sound. Particularly once the issues raised within our representation (and doubtless the representation of others) have been taken into account and objectively considered. | 9.5 We would encourage the Council to seek to address the issues we have raised and to reconsider its current direction of travel regarding the DLP. And not to submit this plan for Examination. 9.6 Antler would welcome the opportunity to discuss the Land at Blundel Lane with the Council and its ability to contribute towards the Borough achieving a sound Plan. | 220727 Elmbridge Reg19 Representations obo Antler Homes.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/563435/PDF/-/220727%20Elmbridge%20Reg19%20Representations%20obo%20Antler%20Homes%2Epdf | As per 1a, 2a, 3a and 4. | Yes, I wish to participate at the oral examination | Should the DLP be submitted for examination, Antler Homes would welcome the opportunity to participate in the Examination Hearings in order to ensure our concerns with the DLP are presented to the appointed Inspector(s) in person. | Objection noted. The Council has undertaken active and on-going Duty to Cooperate activities with its partners and statutory consultation bodies in accordance with the requirements of the Duty to Cooperate, including with neighbouring authorities, during the development of the DELP. These activities are detailed in the Council's Duty to Cooperate Statement of Compliance (June 2022) , Duty to Cooperate Statement of Compliance Update (August 2023) and Statements of Common Ground published with the Core Documents submitted for Examination. The matter of meeting the Borough's housing need, both within the Borough itself or with assistance from other authorities has been explored. However, this has not been identified as a deliverable option as all neighbouring authorities have confirmed that they cannot assist in meeting some / all of Elmbridge's unmet housing need. All DtC partners have confirmed that they consider the Council has adequately discharged its duty to co-operate in preparing the plan. As such, the Council considers that it has met its Duty to Cooperate in full and this is detailed within the documents mentioned above. When the Council commenced preparation of the DELP it was intended that it would have 15-year plan period. However, due the impact of the Covid 19 pandemic, as well as the uncertainty around the Government's proposed changes to national policy and the need to consider the implications of these proposed changes, for the DELP preparation, the anticipated timeframe in which the Local Plan would be adopted has been delayed. Leading to the publication of a draft plan with a plan period of less than 15 years. Taking a pragmatic and proportionate approach to the evidence base, the Council is mindful that to extend the plan |
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circumstances in the Borough and to accordingly undertake and review the existing Green Belt boundaries to ensure at least minimum housing development needs are met in full

- Failure to offer a justified and clearly evidenced basis for the proposed housing allocations, and concerns that the DLP will not be effective in meeting even the lower housing requirement identified by the Council
- Failure to propose an effective strategy capable of meeting specialist accommodation needs
- Failure to adequately consider reasonable alternatives in the SA and the selection of a preferred option which does not perform well
- Likelihood that the DLP as currently proposed will necessitate review of the Green Belt boundaries before the end of the plan period, undermining one of the essential characteristics of the Gren Belt – its permanence.

9.3 It is important to recognise that the Council should only

capable of meeting specialist accommodation needs

- Failure to adequately consider reasonable alternatives in the SA and the selection of a preferred option which does not perform well
- Likelihood that the DLP as currently proposed will necessitate review of the Green Belt boundaries before the end of the plan period, undermining one of the essential characteristics of the Gren Belt – its permanence.

9.3 It is important to recognise that the Council should only submit a plan for examination once it considers it to be sound. This includes the requirement to have robust evidence to support the strategy being proposed by the submitted plan.

9.4 In our view, the council cannot reasonably claim that it considers the DLP and its evidence base to be sound. Particularly once the issues raised within our representation (and doubtless the representation of others) have been taken into account and objectively considered.

period to 15 years would require various elements of the evidence base to be revisited and updated, which has significant time and cost implications. Moreover, a 15-year plan period is not a legal requirement but guidance. Neither the Examining Inspector, nor the Council, are bound to follow guidance and may depart from it provided that its done consciously and with reasons.

The Council is among a minority of local authorities that are continuing to bring forward their local plans in the current planning climate and it is considered that adopting a local plan should be the priority in light of the Government's national objective to ensure all local authorities have a local plan in place.

During the development of the Draft Elmbridge Local Plan 2037 (DELDP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.

The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's [Topic Paper 1: How the spatial strategy was formed?](#) (June, 2022).

The Council reached the conclusion that the necessary

submit a plan for examination once it considers it to be sound. This includes the requirement to have robust evidence to support the strategy being proposed by the submitted plan. 9.4 In our view, the council cannot reasonably claim that it considers the DLP and its evidence base to be sound. Particularly once the issues raised within our representation (and doubtless the representation of others) have been taken into account and objectively considered.

exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of

settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to

intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality.

The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to

be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

All site allocations proposed in the DELP have been thoroughly assessed to ensure they are available and deliverable in accordance with national policy and guidance.

Draft policy HOU6 – Specialist accommodation seeks to meet the need for specialist older persons accommodation such as extra care and care homes, supporting such development where local need can be demonstrated.

The Council has considered several alternative approaches for the spatial strategy to support the place-making vision for the borough and how development need could be addressed during the preparation of the DELP.

required by the housing needs assessment), affordable housing and important essential social and physical infrastructure such as new schools and healthcare services.

No agreement has been reached with neighbouring authorities to help provide for the housing needs of the borough and therefore the authority does not meet another fundamental test of soundness as it has also failed in its duty to cooperate.

No agreement has been reached with neighbouring authorities to help provide for the housing needs of the borough and therefore the authority does not meet another fundamental test of soundness as it has also failed in its duty to cooperate.

Objection to policies SS1, SS2, SS3, HOU1 No Green Belt release is planned which is a reversal of the positive approach proposed at the Reg. 18 stage. It is suggested that to make the plan "sound" a positive spatial strategy would consider bringing forward new highly sustainable site allocations at Stoke Hill, Cobham and Manor Park, Claygate] as larger development sites that can be repurposed and released from the Green Belt to enable the comprehensive delivery of new and affordable housing and essential social and physical infrastructure. This would be justified as exceptional circumstances in accordance with the NPPF.

to 647 dwellings per annum and over the plan period 9,705 homes." Policy SS3 (1)(a) explains that the Plan will make provision for 6,785 net additional homes with at least 30% to be affordable new homes. This represents a shortfall of 2,790 homes (or 30% of the objectively assessed housing needs using the standard method). Policy HOU 1 sets out a minimum housing provision figure of 452 dwellings per annum against the calculation set out in the standard method of 647 dwellings per annum and an identified need of 269 dwellings per annum of affordable housing. Policy HOU1 is therefore "unsound" as it fails to positively plan for its housing need by proposing only 70% of the standard method requirement, i.e. it will therefore only deliver 6,785 homes against a housing need of 9,705 homes.

[ntations%20to%20Reg%2019%20Local%20Plan%20Review%20%2D%20Manor%20Park%2Epdf](https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/563611/PDF/-/220729%20Representations%20to%20Reg%2019%20Local%20Plan%20Review%20%2D%20Manor%20Park%2Epdf)
[220729 Representations to Reg 19 Local Plan Review - Stoke Hill.pdf](https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/563611/PDF/-/220729%20Representations%20to%20Reg%2019%20Local%20Plan%20Review%20%2D%20Stoke%20Hill%2Epdf)
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infrastructure. This would be justified as exceptional circumstances in accordance with the NPPF.

working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's [Topic Paper 1: How the spatial strategy was formed?](#) (June, 2022).

The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

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The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing

boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

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In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council acknowledges that Elmbridge is an expensive borough in which to live, with a high affordability ratio and an acute need for affordable homes. Through the preparation of the

draft Local Plan, the Council has explored opportunities for increasing the provision of affordable housing over the plan period through increasing the delivery of market housing. However, the Council reached the decision that the exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not fully evidenced and justified. A decision that took full account of the benefit of delivering a greater number of market homes to enable to the Council to deliver a greater proportion of its identified affordable housing need of 269 dwelling per annum (dpa), set out in the [Local Housing Need Assessment \(2020\)](#) (LHNA). Concluding that the benefit of doing so did not outweigh the harm in releasing and developing on the Green Belt.

The Council acknowledges that it will not be possible to meet the Borough's affordable housing need in full through the approach set out in the proposed spatial strategy. However, in light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the Draft Elmbridge Local Plan 2037 is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Moreover, national policy and guidance do not require identified affordable housing need to be met in full ([NPPF paragraph 62](#) and [PPG Housing & Economic Needs Assessment paragraph 024](#)). The Council also has additional models/methods of delivering affordable housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal](#) (SA) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes - 16,300 homes over the plan period through the release of green belt sites and optimisation of development in existing urban areas (see option 3 of Regulation 18 Options Consultation, 2018). Whilst this option would meet development needs, including the need for affordable housing in full, it would fundamentally alter the character of the Borough's towns and villages through coalescence, urban sprawl and encroachment of new development into the countryside due to the release of Green Belt land necessary to achieve the quantum of development. In addition, this option was found to have the most significant negative impacts of all the options considered by the Council, largely due to the impact of distributing development widely across the Borough.

The Council notes the information submitted in relation to sites Stoke Hill and Manor Farm. These are located within Green Belt sub-area 2 and 3 which were not identified as sub-areas needing further consideration for release in the

serve any of the purposes of Green Belt designation as set out in paragraph 134 of the NPPF.

In conclusion therefore, the site should be included within the LPA's next update to its Land Availability Assessment as a suitable, available and deliverable development site, and, as part of the ongoing emergence of the LPA's new Local Plan, the site should be identified as one which can be released from the Green Belt and should also be included as part of a prospective development site for the advancement of option 5 as that preferred option is fine-tuned through the plan making process.

option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's [Topic Paper 1: How the spatial strategy was formed?](#) (June, 2022).

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Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots

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| 1111014 | Lucy Morris | Nexus Planning on behalf of Charterhouse Strategic Land | No | Please see uploaded document at question 4a | No | Please see uploaded document at question 4a | Y | Y | Y | Y | <p>Please see uploaded document at question 4a for full response.</p> <p>CONCLUSION</p> <p>7.1 As has been demonstrated through these representations, there are significant issues relating to the soundness of the Local Plan which need to be rectified. The Plan is not positively prepared, justified, effective or consistent with national policy.</p> <p>7.2 It is clear that the spatial strategy has been pre-determined and the Council explicitly did not want to meet the housing requirement in full. Whilst a brownfield-first approach is acceptable in principle, this should not be at the expense of significantly under-delivering against housing need in a Borough which is one of the least affordable within the country. The Plan makes no attempt to tackle these issues and the Draft Plan will only exacerbate this issue.</p> <p>7.3 The allocation of solely brownfield sites within the urban area will have a significantly harmful impact on the character of the Borough. The Council has failed to demonstrate how the majority of the sites are developable or deliverable as required under national policy. The chosen spatial strategy will fail to deliver not only the scale, but also the mix, of housing required, including much needed affordable housing.</p> <p>7.4 The evidence base is clear that there are areas of the Borough, such as the Former Moore Place Golf Course, which perform poorly against the purposes of the Green Belt and have been recommended for release from the Green Belt. The Council has completely disregarded this evidence and has deliberately chosen to proceed with a Plan which will not help deliver the homes it needs.</p> <p>7.5 The designation of the Former Moore Place Golf Course as a Local Green Space is wholly unjustified and is an attempt to restrict a highly suitable and sustainable site from delivering high quality development.</p> <p>7.6 A Local Plan predicated entirely on the political resolve of the Council's elected Members in blatant defiance for the professional advice of their planning officers and the evidence base is simply not a sound and robust approach to plan-making where the English planning system operates on a plan-led basis.</p> | Please see uploaded document at question 4a | Former Moore Place Golf Course Elbridge Draft LP (Reg.19).pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557335/PDF/-/Former%20Moore%20Place%20Golf%20Course%5FElmbridge%20Draft%20LP%20%5FReg%2E19%5F%2Epdf | As per 3a. | Yes, I wish to participate at the oral examination | Please refer to accompanying submission. Please note that Nexus Planning is acting on behalf of Charterhouse Strategic Land. | <p>Objection noted.</p> <p>During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.</p> <p>The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022).</p> <p>The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?</p> <p>Like the Secretary of State, the Council attaches great importance to Green Belt. It is</p> |
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the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

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The Council has assessed the suitability of the promoted site – Moore Place Golf Course for release from the Green Belt designation and it was found that the site was not suitable for release. The assessment is set out in Green Belt Site Assessment Proforma SA-50.

The council's approach and criteria for the designation of Local Green Space is set out in the Local Green Space Study 2023 and takes full account of the NPPF and PPG principles. The study explains what constitutes 'local in character' and an 'extensive tract of land'. It is considered that the site meets those requirements.

The [Local Green Space Study Addendum 2023](#) provides the detailed response to the representation..

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| 1111026 | Tom Cole | Montagu Evans on behalf of Quadrant Repurpose and LaSalle Investment Management | | Please see uploaded document at question 4a | | Please see uploaded document at question 4a | | | Please see uploaded document at question 4a | Please see uploaded document at question 4a | <p>Hersham Green- Regulation 19 Local Plan Representations.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557381/PDF/-/Hersham%20Green%20Regulation%2019%20Local%20Plan%20Representations%2Epdf</p> <p>7060- PL01 - Location Plan.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557382/PDF/-/7060%2D%20PL01%20%2D%20Location%20Plan%2Epdf</p> | <p>We note the remaining allocations in Hersham include New Berry Lane Car Park (Site H7). Our Clients suggest that in the short term the Council should consider identifying the car park as supporting the needs of visitors to the town centre and the parents of the primary school for drop-off/ pick-up. Later in the plan period there may be an opportunity for alternative uses than parking dependent on the speed of change in travel patterns and transport modes. This would enable New Berry Lane Car Park to be fully integrated with the town centre redevelopment proposals, rather than as a standalone allocation resulting in piecemeal development. Quadrant Repurpose and LaSalle Investment Management would therefore welcome discussions with the Council in relation to the comprehensive development opportunities of New Berry Lane Car Park with the Site both in the short and longer terms.</p> | | As above. | <p>Comments noted.</p> <p>SS3 – During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough’s identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.</p> <p>The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough’s residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council’s Topic Paper 1: How the spatial strategy was formed? (June, 2022).</p> <p>The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough’s Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council’s decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?</p> <p>Like the Secretary of State, the Council attaches great importance to Green Belt. It is</p> |
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CC1 – CC3 – the impact of the DELP policies on the viability and deliverability of development in the Borough have been assessed in the Council's [Viability Assessment \(2022\)](#), which concluded the policies taken together would not negatively impact the viability on development in the Borough.

HOU1 – Please see response above in relation to comments made on strategic policy SS3.

HOU2 - The Council is currently progressing the production of the Borough's design code. A draft of the design code will be published for a public consultation soon and the Council aims to have the design code adopted in 2024 in advance of the DELP adoption.

HOU6 – As outlined above, the impact of the DELP policies, including the proposed affordable housing requirements, on the viability and deliverability of development in the Borough have been assessed in the Council's [Viability Assessment \(2022\)](#).

Additional text suggested for site allocation H3 is considered appropriate and will be changed to reflect the mixed-use development proposed.

Further discussions with the council regarding site allocation H7 is supported.

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|---------|---------------|---|-----|--|-----|---|--|--|---|---|---|------------|--|
| 1111075 | Zoe Chick | Surrey County Council | Yes | The RTS does not consider, for the sections we have made representations on, that there is anything that is not legally compliant. We also consider these sections of the Draft Plan to be sound. Please see uploaded document at question 4a for full response. | Yes | | | | | https://consult.elmbridge.gov.uk/gf2.ti/af/1205954/697833/PDF/-/RTS-PLN-POL-ELM-001%20-%20RTS%20Letter%20Elmbridge%20Local%20Plan%20Representations%20-%20For%20Issue%20220729.pdf | Comments relate to individual policies. These comments are set out above under the relevant policies. | | Support and comments noted. A response to the comments relating to individual policies within the DELP have been provided within the responses relating to the relevant sections of the DELP. |
| 1112930 | Steve Hinsley | Stephen Hinsley Planning obo PA Housing | | Please see uploaded document at question 4a | No | Please see uploaded document at question 4a for the full response. •the need for affordable housing in Elmbridge is underestimated by the LHNA – it is at least 484 dwellings per annum • there is a high need for affordable 3 and 4 bed properties which the draft policies of the LP fail to acknowledge, and an insufficient number of these affordable family homes will be delivered as a result • the LHNA has failed to take account of the needs of existing households paying more than an affordable rent in the private rented sector • an analysis of the ELHN Paper reveals that “exceptional circumstances” exist for the Council adopting an alternative approach to the standard method, and the conclusions in that Paper do not stand up to scrutiny • recent delivery of affordable housing has averaged about 64 dwellings per year. In context, this represents 13% of the need (PA assessment) or 24% of the need according to the LHNA, nowhere near even the 30% “minimum” affordable housing target in policy HOU1 of the draft LP (or 150 affordable dwellings which is 30% of the | | | Please see uploaded document at question 4a | Please see uploaded document at question 4a | SHP022003 Reg 19 reps elmbridge LP.pdfhttps://consult.elmbridge.gov.uk/gf2.ti/a/1205954/569695/PDF/-/SHP022003%20Reg%2019%20reps%20Elmbridge%20LP%20Epd | As per 2a. | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough’s identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough’s residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council’s Topic Paper 1: How the spatial strategy was formed? (June, 2022). The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough’s Green Belt through the preparation of the new Local Plan, were not present and, |

overall housing requirement of 452 in policy HOU1) • over the next 5 years there is nothing in the LP to suggest that supply of affordable homes will increase above the recent delivery rates • Elmbridge is the least affordable authority in the country outside London • Without the Council reviewing its Green Belt boundaries and allocating more major sites for housing in this LP on which affordable housing can be provided through s.106, sufficient affordable homes will not be met, the need for affordable homes will continue to rise, there will continue to be an increase in the number of households on the Housing Register, more households will be forced to leave the Borough and local businesses will continue to fail to recruit and retain the staff necessary for economic sustainability in Elmbridge. • In short, this draft Local Plan is unsustainable and unsound.

therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is

generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and

configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality.

The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council acknowledges that Elmbridge is an expensive borough in which to live, with a high affordability ratio and an acute need for affordable homes. Through the preparation of the draft Local Plan, the Council has explored opportunities for increasing the provision of affordable housing over the plan period through increasing the delivery of market housing. However, the Council reached the decision that the exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not fully evidenced and justified. A decision that took full account of the benefit of delivering a greater number of market homes to enable the Council to deliver a greater proportion of its identified affordable housing need of 269 dwelling per annum (dpa), set out in the [Local Housing Need Assessment \(2020\)](#) (LHNA).

Concluding that the benefit of doing so did not outweigh the harm in releasing and developing on the Green Belt.

The Council acknowledges that it will not be possible to meet the Borough's affordable housing need in full through the approach set out in the proposed spatial strategy. However, in light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the Draft Elmbridge Local Plan 2037 is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Moreover, national policy and guidance do not require identified affordable housing need to be met in full ([NPPE paragraph 62](#) and [PPG Housing & Economic Needs Assessment paragraph 024](#)). The Council also has additional models/methods of delivering affordable housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

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|---------|------------|---------------------------------|----|---|--|---|---|---|---|---|---|---|--|---|--|---------------------------------------|--|
| | | | | | in flood zone 1 & 2, has no tree constraints, a good access point from the Portsmouth Road and can accommodate apartments or commercial uses. The site is being promoted for development by the landowner and has no legal constraints to development. It is the only discounted site that is stated to 'have physical constraints that cannot be overcome' each other discounted site is given a reason e.g. Trees and that this constraint cannot be overcome in the plan period rather than in perpetuity. It effectively states these unspecified constraints can never be overcome and the site stands alone in this evidence base document. We ask the document is reconsidered and the reasons for exclusion of each of the sites in this document are explored fully before they are discounted. | | | | | | | | | | | | |
| 1109345 | Sophie Rae | WSP obo The Julien Family Trust | No | Please see uploaded document at question 4a | No | Please see uploaded document at question 4a | Y | Y | Y | Y | Please see uploaded document at question 4a | Please see uploaded document at question 4a | Rodona Road 29 July 2022 FINAL.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557574/PDF/-/Rodona%20Road%2029%20July%202022%20FINAL%2Epdf Document 2 - Repts to 2019 Issues and Options Consultation.pdf Document 3 - Inspectors Decision dated 16.04.22.pdf Document 4 - Extract from Inspectors Report.pdf Document 5 - 9 March 2020 letter.pdf Document 6 SGHRA 28.07.22.pdf | The Plan as drafted is unsound. An in-principle prohibition on any Green Belt release across the Borough ensures that much needed homes for local people will not be delivered. Without adequate justification, this is unsustainable as an approach and is not in accordance with national planning policy. A sensible conversation has to take place to identify suitable sites such as Rodona Road, for Green Belt release so that the housing need can be addressed. We | Yes, I wish to participate at the oral examination | Yes, please refer to submitted letter | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options |

have set out proposed changes to the Plan and Proposals Map to render it sound and legally compliant.

for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's [Topic Paper 1: How the spatial strategy was formed?](#) (June, 2022).

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The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

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In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council has assessed the suitability of the promoted site – Land at Rodona Road for release from the Green Belt designation and it was found that the site was not suitable for release. The assessment is set out in Green Belt Site Assessment Proforma GB16.

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|---------|---------------|---|-----|--|----|---|---|---|---|---|--|--|----------------------|--|---|
| 1109749 | Vincent Gabbe | VRG Planning On behalf of Damian Norris, Sharon Giffen and Bruce Fenn | Yes | | No | We believe that the Local Plan is not positively prepared, justified or consistent with national policy, because the Green Belt boundary has not been considered sufficiently with regard to minor boundary changes, or with regarding the Green Belt Review. In particular, this representation is concerned with the area of Green Belt covering 24 and 26 Spencer Road, East Molesey, as identified on the attached plan at Appendix 1. This area is designated as Green Belt, but comprises two houses and the associated gardens. Given that the area comprises two dwellings, it is difficult to see how this land can perform the functions of Green Belt. The delineation also does not present a logical or defensible Green Belt boundary, as required by the National Planning Policy Framework. A defensible boundary would follow the edge of the Spencer Park ownership and exclude these two dwellings. This would mean that the boundary would follow the edge of the urban area and a dense landscaping buffer. Whilst the Green Belt review has included a review of minor Green Belt boundaries, this only appears to relate to mapping errors and not other changes that may be needed. Other Local Authorities have extended their Green Belt reviews more widely to include this. By delineating the Green Belt boundary to include two dwellings | Y | Y | Y | Finally, we note that the Green Belt Review (Methodology and Assessment) undertaken by Arup on behalf of the Council and published in 2016 considered the land in question to perform poorly against the National criteria for Green Belt. Specifically, the document states the following in relation to Parcel 77: - Purpose 1: To check the unrestricted sprawl of large built-up areas: score of 1 out of 5. - Purpose 2: To prevent neighbouring towns from merging: score of 0 out of 5. - Purpose 3: Assist in safeguarding the countryside from encroachment: score of 2 out of 5. - Overall Summary: Weak (on a scale of weak, moderate and strong). Whilst additional Green Belt review documents were released in 2018 and 2019, these acknowledge that Government policy regarding the purposes of Green Belt remain unchanged since the original assessment. The results of the 2016 review therefore remain relevant. The Council's own technical evidence therefore confirms that the land in question performs weakly against the National criteria for Green Belt. This is further evidence supporting removal of the land in question from Green Belt. | The Local Plan proposals map should be amended, to exclude numbers 24 and 26 Spencer Road, as identified on the attached plan delineated in blue on the attached plan. | Elmbridge Local Plan Representations - 24 and 26 Spencer Road Final.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/549960/PDF/-/Elmbridge%20Local%20Plan%20Representations%20%2D%2024%20and%2026%20Spencer%20Road%20Final%20Epdf | As per 2a, 3a and 4. | No, I do not wish to participate at the oral examination | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022). The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper |
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within the built up area, this has removed the ability of these dwellings to secure planning permission for extensions or alterations that they should be entitled to deliver. The planning history for number 26 Spencer Road confirms that the Green Belt status means that securing planning permission for any extension to address existing deficiencies to the property has become impossible.

[1: How the spatial strategy was formed?](#)

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Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

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In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

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Paragraph 3.13 of the LAA 2022 explains that in accordance with the PPG the council undertook a filtering / sieving process so that only sites that have a realistic potential were assessed in more detail.

All sites from the LAA 2022 have been included in Chapter 9 of the DELP.

Further ownership checks have taken place and sites in the 1-5 year period are either in the planning system or the owners have confirmed availability.

There are sites under 5 units included in the site allocations.

the plan period. We also challenge the deliverability of a large proportion of the site allocations in the draft Plan. The Council has not identified strong reasons for not meeting its full need when its own evidence suggests that parts of the Green Belt are weakly performing and could be released without harm to the overall protection offered.

Inspector's questions and, as necessary, understand the Council's position. If the Inspector agrees that the spatial strategy should be reviewed, our client's site is an important consideration as it is a deliverable and suitable site for release from the Green Belt. As set out in our representations we disagree with much of the evidence relied on within 'Topic Paper 1' and we wish to participate to engage in this further, as necessary.

of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's [Topic Paper 1: How the spatial strategy was formed?](#) (June, 2022).

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The Council acknowledges that Elmburgh is an expensive borough in which to live, with a high affordability ratio and an acute need for affordable homes. Through the preparation of the draft Local Plan, the Council has explored opportunities for increasing the provision of affordable housing over the plan period through increasing the delivery of market housing. However, the Council reached the decision that the exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not fully evidenced and justified. A decision that took full account of the benefit of delivering a greater number of market homes to enable the Council to deliver a greater proportion of its identified affordable housing need of 269 dwelling per annum (dpa), set out in the [Local Housing Need Assessment \(2020\)](#) (LHNA). Concluding that the benefit of doing so did not outweigh the harm in releasing and developing on the Green Belt.

The Council acknowledges that it will not be possible to meet the Borough's affordable housing need in full through the approach set out in the proposed spatial strategy. However, in light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the Draft Elmburgh Local Plan 2037 is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Moreover, national policy and guidance do not require identified affordable housing need to be met in full ([NPPF paragraph 62](#) and [PPG Housing & Economic Needs Assessment paragraph 024](#)). The Council also has additional models/methods of delivering affordable housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example,

EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal](#) (SA) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes - 16,300 homes over the plan period through the release of green belt sites and optimisation of development in existing urban areas (see option 3 of Regulation 18 Options Consultation, 2018). Whilst this option would meet development needs, including the need for affordable housing in full, it would fundamentally alter the character of the Borough's towns and villages through coalescence, urban sprawl and encroachment of new development into the countryside due to the release of Green Belt land necessary to achieve the quantum of development. In addition, this option was found to have the most significant negative impacts of all the options considered by the Council, largely due to the impact of distributing development widely across the Borough.

The Council has assessed the suitability of the promoted site –

in the failure to both boost housing supply and make a contribution towards addressing the housing needs of neighbouring authorities as required by paragraph 60 of the NPPF.

[stone%20ED2%2DIn spectors%2Dinitial%2 Dieter%2D24May%2 Epdf](#)
[App 05 Calverton v Nottingham City 2015 EWHC 1078 Admin.pdf](#)
<https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/553372/PDF/-/App%2005%20Calverton%20v%20Nottingham%20City%202015%20EWHC%201078%20Admin%2Epdf>
[App 06 St Albans v Hunston Properties 2013 EWCA Civ 1610.pdf](#)
<https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/553368/PDF/-/App%2006%20St%20Albans%20v%20Hunston%20Properties%202013%20EWCA%20Civ%201610%2Epdf>
[App 07 Hundal v S Bucks DC 2012 EWHC 7912 Admin.pdf](#)
<https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/553371/PDF/-/App%2007%20Hundal%20v%20S%20Bucks%20DC%202012%20EWHC%207912%20Admin%2Epdf>

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When the Council commenced preparation of the DELP it was intended that it would have 15-year plan period. However, due the impact of the Covid 19 pandemic, as well as the uncertainty around the Government's proposed changes to national policy and the need to consider the implications of these proposed changes, for the DELP preparation, the anticipated timeframe in which the Local Plan would be adopted has been delayed. Leading to the publication of a draft plan with a plan period of less than 15 years.

Taking a pragmatic and proportionate approach to the evidence base, the Council is mindful that to extend the plan period to 15 years would require various elements of the evidence base to be revisited and updated, which has significant time and cost implications. Moreover, a 15-year plan period is not a legal requirement but guidance. Neither the Examining

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| 1110753 | Jennifer Woods | Lichfield s obo Cala Homes (Thames Ltd) and Brooklands College | Yes | | No | <p>Please see uploaded documents at question 4a</p> <p>In summary, Brooklands College site is being promoted. If sub divided it would have satisfied the exceptional circumstance test for removal.</p> <p>EBC has confirmed itself previously that exceptional circumstances exist to allow Green Belt release, though a political decision was made to not progress with this in the Draft Local Plan. It is our view that exceptional circumstances do exist, for the release of this land from the Green Belt on the basis of:</p> <p><input type="checkbox"/> EBC being unable to meet is objectively assessed housing need through its preferred approach;</p> <p><input type="checkbox"/> A large proportion of the Brooklands College site is previously developed land, and the Green Belt designation means that future development by the College to improve its existing facilities will be subject to the high policy bar this designation results in;</p> <p><input type="checkbox"/> The site does not perform highly against the five purposes of the Green Belt; and</p> <p><input type="checkbox"/> The site is within 400 metres of Weybridge Train Station (the closest possible band assessed), that this train station has a very good service quality (second best in the Borough) and that Weybridge is a second tier settlement (district centre) and has the two largest employment sites in the Borough.</p> | Y | Y | Y | Y | <p>Please see uploaded documents at question 4a</p> <p>In terms of the above, the Local Plan has not taken a sound approach to meeting its identified housing need including not adequately considering Green Belt release to meet these needs. Having reviewed the evidence base it is not sound to discount sustainable and available sites such as Brooklands College.</p> | <p>Please see uploaded documents at question 4a</p> | <p>Elmbridge Borough Council Local Plan. Representations on behalf of Brooklands College and Cala 29.07.2022.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/557133/PDF/-/Elmbridge%20Borough%20Council%20Local%20Plan%2E%20Representations%20on%20behalf%20of%20Brooklands%20College%20and%20Cala%202%2Epdf</p> | As per 2a. | Yes, I wish to participate at the oral examination | <p>We wish to be able to continue the engagement with the Local Plan process. The Local Plan has not taken a sound approach to meeting its identified housing need including not adequately considering Green Belt release to meet these needs. Having reviewed the evidence base it is not sound to discount sustainable and available sites such as Brooklands College.</p> | <p>Objection noted.</p> <p>During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.</p> <p>The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022).</p> <p>The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?</p> <p>Like the Secretary of State, the Council attaches great importance to Green Belt. It is</p> |
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assessed housing need, does not enable the delivery of sustainable development. The Plan is therefore unsound.

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required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flattened development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council has assessed the suitability of the promoted site – Chippings Farm for release from the Green Belt designation and it was found that the site was not suitable for release. The assessment is set out in Green Belt Site Assessment Proforma LA-20.

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|---------|---------------|-----|----|---|----|--|---|---|---|---|--|--|---|--------------------------|--|---|---|
| 1110553 | Mark Behrendt | HBF | No | Please see uploaded documents at question 4a for full response Localism Act 2011 requires plan making authorities to “engage constructively, actively and on an ongoing basis in ...” as part of the preparation of the local plan. The evidence presented by the EBC indicates the lengths that the Council went to identify local authorities across the south east that could help address any of its unmet needs. What is evident is that no other authority was either willing or able to help EBC meet their unmet needs. However, our main concern with the approach Elmbridge and its partners within the HMA took with regard to addressing unmet needs is that engagement has not been constructive. For example, only one piece of joint work has been completed by the Council’s in the HMA – the strategic housing market assessment. As such since the scale of the issue was identified no further evidence was prepared jointly as to how needs might be met in full across the HMA. Most | No | Please see uploaded documents at question 4a for full response There appear to have been discussion between officers and written correspondence between the leaders of each Council all stating how they cannot meet needs and asking who can help. Whilst this is necessary there is no evidence of joint work to assess how needs could be met once it became clear that there were to be significant shortfalls in meeting housing needs. The Councils have failed to grapple with the issue at hand collectively and not looked to be constructive in seeking to meet needs. In particular the lack of political engagement within the HMA is concerning. Constructive cooperation should result in those with the authority to make decisions meeting to discuss the cross border and strategic issues, however, no attempt seems to have been made within the HMA to bring together political leaders to discuss differences and seek a potential solution. Instead, rather than co-operate constructively they have looked to adopt an approach that is each authority for themselves. The Council point to the Surrey Leaders Group and the preparation of the Local Strategic Statement and Surrey 2050 Place Ambition as the primary mechanism for discussion between politicians on cross border issues. However, other than a recognition of the issue within the Local Strategic Statement very little is offered as to discussion, let alone outcomes, with regard | Y | Y | Y | Y | Please see uploaded documents at question 4a for full response Therefore, whilst EBC have actively engaged with a wide range of partners as part of their duty to co-operate this has resulted in very little joint work and no positive outcomes with regard to unmet housing needs. There is little evidence that the Council and its neighbours have grappled with this issue, in particular the lack of any joint evidence with regard to assessments of constraints is a sign that there was no real attempt made to try and address the issue of housing needs. As such the HBF do not consider the Council to have shown that they have engaged constructively with the cross-border issue of its own unmet housing needs as well as wider unmet needs in neighbouring areas and as such have not met the duty to co-operate. | Please see uploaded documents at question 4a for full response With regard to demonstrating effective and on-going joint working paragraph 27 of the NPPF states that strategic policy making authorities should prepare and maintain one or more statements of common ground (SoCG) documenting the cross-boundary matters to be addressed. Whilst the Council’s Duty to Cooperate Compliance Statement references those SoCGs that have been agreed we could not find copies of these in the Council’s published evidence. As such, it will be necessary for all SoCGs agreed to be published on submission to ensure that they can be properly considered at examination. | HBF rep EBC Reg 19 July 22.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/555514/PDF/-/HBF%20rep%20EBC%20Reg%2019%20July%2022%2Epdf | As per 1a, 2a, 3a and 4. | Yes, I wish to participate at the oral examination | To set out ours and our members concerns with regard to the Elmbridge Local Plan. | Objection noted. The Council has undertaken active and on-going Duty to Cooperate activities with its partners and statutory consultation bodies in accordance with the requirements of the Duty to Cooperate, including with neighbouring authorities, during the development of the DELP. These activities are detailed in the Council’s Duty to Cooperate Statement of Compliance (June 2022) , Duty to Cooperate Statement of Compliance Update (August 2023) and Statements of Common Ground published with the Core Documents submitted for Examination. The matter of meeting the Borough’s housing need, both within the Borough itself or with assistance from other authorities has been explored. However, this has not been identified as a deliverable option as all neighbouring authorities have confirmed that they cannot assist in meeting some / all of Elmbridge’s unmet housing need. All DtC partners have confirmed that they consider the Council has adequately discharged its duty to co-operate in preparing the plan. As such, the Council considers that it has met its Duty to Cooperate in full and this is detailed within the documents mentioned above. |
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|---------|---------------|-----------------------------|----|---|----|--|---|---|---|---|--|--|---|------------|--|---|---|
| | | | | notably there was no joint Green Belt Review or even work to ensure a consistent assessment of the Green Belt and what constituted exceptional circumstances. | | to how unmet needs in Elmbridge could be met. There is limited evidence as to how this activity has been constructive in addressing the issue of unmet needs and not just looked to defer the issue of unmet needs to a future strategy, contrary to what is required by paragraph 61-022 of PPG. Indeed, it is notable that in their discussion with Spelthorne BC (SBC) it is stated on page 96 that SBC stress that the Surrey 2050 place ambition must not be seen as a spatial framework for the county and used as tool for the wider county approach to meeting EBC's unmet needs. It is therefore questionable whether the activity at the Surrey Leaders is an effective one for discussing the strategic issue of Elmbridge's unmet housing needs. | | | | | | | | | | | |
| 1110599 | Rosalind Gall | Solve Planning Ltd obo Acre | No | Please see uploaded documents at question 4a | No | Positively prepared – the plan does not set out a strategy that meets, as a minimum, the borough's objectively assessed housing need (OAN). The Council's Housing Needs Assessment May 2022 is clear that no exceptional circumstances exist in Elmbridge to justify an alternative approach to the standard method. The plan will have a significant shortfall in relation to the OAN figure and is not positively prepared. Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. However, given the plan does not set out a strategy to meet the OAN and there are alternative strategies | Y | Y | Y | Y | Please see uploaded documents at question 4a | Please see uploaded documents at question 4a | Reg 19 Repts Obo Acre - With App.pdfhttps://consult.elmbridge.gov.uk/gf2/ti/a/1205954/557396/PDF/-/Reg%2019%20Reps%20Obo%20Acre%20%2D%20With%20A%20pp%20Epdf | As per 2a. | Yes, I wish to participate at the oral examination | It is considered that the fundamental issues with the soundness of the plan warrant further discussion through oral examination. Further as set out in the accompanying representations, we consider there are exceptional circumstances to justify Green Belt release. Should the Inspector direct the Council to allocate further sites, it will be important for participation in the oral examination so that any questions the Inspector may have regarding omission sites | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements |

that have been consulted on at the Regulation 18 stage that could resolve this, the draft plan does not set out the most appropriate strategy and is therefore not justified.

Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities. Along with the inability to meet its OAN, the plan will be unable to provide sufficient affordable housing to meet this acute need.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. The plan is inconsistent with the NPPF as it fails to deliver sufficient housing to meet the OAN.

can be discussed.

of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's [Topic Paper 1: How the spatial strategy was formed?](#) (June, 2022).

The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local

communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality.

The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also

conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council has assessed the suitability of the promoted site – Painshill Bungalow, Portsmouth Road, Surrey Cobham, KT11 1DN release from the Green Belt designation and it was found that the site was not suitable for release. The assessment is set out in Green Belt Site Assessment Proforma LA-18.

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| 1110600 | Andrew Black | Andrew Black Consulting obo Esher Rugby Club | No | Please see uploaded documents at question 4a These representations are made on behalf of Esher Rugby Club in response to the regulation 19 consultation for the draft Elmbridge Local Plan 2037 | No | Please see uploaded documents at question 4a. The club has been in discussions with the council for over 10 years on its aspirations for the existing site. The club has engaged with the council and community, at considerable expense, over a number of years to illustrate how the club could grow and evolve sustainably in order to meet the long term needs of the club, its players, its supporters and the wider community in addition to unlocking a highly appropriate area of land for housing growth in order to fund the plans for the club. It is with considerable disappointment that the current local plan does nothing whatsoever to recognise or support the aspirations of Esher Rugby Club, and indeed other sports clubs within the borough. Whilst the aspirations of the council to protect the green belt in Elmbridge are recognised, the resulting strategy which is now being promoted in this consultation is not considered sound in accordance with the tests within the National Planning Policy Framework | Y | Y | Y | Y | Whilst the approach of the council to avoid release of any green belt land is acknowledged this has resulted in a significant under supply of housing in the plan period. The focus on brownfield sites is recognised and it is reiterated that the council previously agreed that the southern portion of this site would fall to be considered as previously developed land. However, the provision of a significant number of smaller brownfield sites would lead to the prevalence of smaller dwellings across the borough which is not in line with the established needs across the borough. Furthermore, the selection of smaller sites would not lead to provision of affordable housing on the vast majority of these sites. It is considered that there are substantial issues of soundness with the Local Plan in its current form. These matters of soundness can be remedied through adjustments in strategy and approach ahead of the submission of the Local Plan for examination. | It is considered that in order for the plan to be found sound, additional housing sites will be required and the land at Esher Rugby Club is a highly logical site for allocation given the unique benefits which would be derived from the development of the southern element for housing and provision of significantly upgraded recreation facilities. Overall, it is considered that exceptional circumstances exist in order for the southern element of the site to be released from the green belt for housing development. | Regulation 19 Repls - ERFC - Compressed.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556105/PDF/-/Regulation%2019%20Reps%20%2D%20E RFC%20%2D%20Compressed%2Epdf | As per 2a, 3a and 4. | Yes, I wish to participate at the oral examination | Esher Rugby Club has been working with the council for sometime on the local plan process. There are crucial elements of the plan where the club would like to provide evidence to the inspector on including the following: - Spatial Strategy - Housing Target - Five Year Housing Land Supply - Affordable Housing - Sustainability Appraisal - Green Belt - Site Selection Process - All Site Allocations | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022). The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed? Like the Secretary of State, the Council attaches great importance to Green Belt. It is |
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the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place

that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality.

The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii). In light of the considerations set out above, it is the Council's

position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council acknowledges that Elmbridge is an expensive borough in which to live, with a high affordability ratio and an acute need for affordable homes. Through the preparation of the draft Local Plan, the Council has explored opportunities for increasing the provision of affordable housing over the plan period through increasing the delivery of market housing. However, the Council reached the decision that the exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not fully evidenced and justified. A decision that took full account of the benefit of delivering a greater number of market homes to enable to the Council to deliver a greater proportion of its identified affordable housing need of 269 dwelling per annum (dpa), set out in the [Local Housing Need Assessment \(2020\)](#) (LHNA). Concluding that the benefit of doing so did not outweigh the harm in releasing and developing on the Green Belt.

The Council acknowledges that it will not be possible to meet the Borough's affordable housing need in full through the approach set out in the proposed spatial strategy. However, in light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the Draft Elmbridge Local Plan 2037 is sound and that a strategy that seeks to protect the existing

boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Moreover, national policy and guidance do not require identified affordable housing need to be met in full ([NPPE paragraph 62](#) and [PPG Housing & Economic Needs Assessment paragraph 024](#)). The Council also has additional models/methods of delivering affordable housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal](#) (SA) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes - 16,300 homes over the plan period through the release of green belt sites and optimisation of development in existing urban areas (see option 3 of Regulation 18 Options Consultation, 2018). Whilst this option would meet development needs, including the need for

from the Green Belt, with housing need being an 'exceptional circumstance' for doing so.

[OSHLAA%20submissi on%2Epdf](#)

[11-12-2020 Suzanne Parkes Elmbridge Council.pdf](#)
<https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556247/PDF/-/11%2D12%2D2020%20Suzanne%20Parkes%20Elmbridge%20Council%2Epdf>

[AL\(0\)_015_Proposed Site Plan_F.pdf](#)
<https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556248/PDF/-/AL%5F0%5F%5F015%5FProposed%20Site%20Plan%5F%2Epdf>

[AL\(0\)_001_Site Location.pdf](#)
<https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556249/PDF/-/AL%5F0%5F%5F001%5FSite%20Location%2Epdf>
[Call for Sites Proforma.pdf](#)
<https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556250/PDF/-/Call%20for%20Sites%20Proforma%2Epdf>

[26-07-2022 Elmbridge Council.pdf](#)
<https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556251/PDF/-/26%2D07%2D2022%20Elmbridge%20Council%2Epdf>

[AL\(0\)_014_Proposed Site Plan_E.pdf](#)
<https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/556252/PDF/-/AL%5F0%5F%5F014%5FProposed%20Site%20Plan%5F%2Epdf>

out in the Council's [Topic Paper 1: How the spatial strategy was formed?](#) (June, 2022).

The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's

existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the

NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality.

The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes

required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flattened development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council has assessed the suitability of the promoted site – Land at the Fairmile, Portsmouth Road, Cobham release from the Green Belt designation and it was found that the site was not suitable for release. The assessment is set out in Green Belt Site Assessment Proforma LA-20.

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| 1110972 | Andrew Munton | Reside Developments | No | No, the plan fails to plan for the necessary housing need for the area. The council has chosen to not release any green belt land. All of the points to the fact the council has not undertaken its roll in respect to its Duty to Cooperate. | No | We are extremely disappointed and concerned with this Reg 19 local plan, which fails the most vulnerable people in the borough. This plan fails to deliver even its minimum OAN of 9,615 homes year, only providing 6,985 homes, which is 73% of its minimum need. In other words, over 25% of the population needing new homes in Elmbridge is being left without homes. In addition, the council is already failing its electorate, where it cannot demonstrate a 5-year supply of housing land (published at 3.96 over a year ago) and has failed the Housing Delivery Test reaching only a meagre 58% and is therefore in a position where the Presumption of sustainable development is engaged. The reason for not meeting the OAN in the revised local plan is cited as being to protect the green belt and to build only building on brownfield land. However, the green belt is not an environmental designation, and the green belt's fundamental aim to prevent urban sprawl (NPPF). However, there is not an embargo on releasing and building on green belt land, where there are exceptional circumstances. In fact it has already helped by steering development to the existing brownfield sites. However, these seem to have been exhausted, otherwise one assumes more brownfield sites would have been included to the meet the OAN. Para 141 of the NPPF specifically points to using brownfield first, | Y | Y | Y | Y | We are extremely disappointed and concerned with this Reg 19 local plan, which fails the most vulnerable people in the borough. This plan fails to deliver even its minimum OAN of 9,615 homes year, only providing 6,985 homes, which is 73% of its minimum need. In other words, over 25% of the population needing new homes in Elmbridge is being left without homes. In addition, the council is already failing its electorate, where it cannot demonstrate a 5-year supply of housing land (published at 3.96 over a year ago) and has failed the Housing Delivery Test reaching only a meagre 58% and is therefore in a position where the Presumption of sustainable development is engaged. The reason for not meeting the OAN in the revised local plan is cited as being to protect the green belt and to build only building on brownfield land. However, the green belt is not an environmental designation, and the green belt's fundamental aim to prevent urban sprawl (NPPF). However, there is not an embargo on releasing and building on green belt land, where there are exceptional circumstances. In fact it has already helped by steering development to the existing brownfield sites. However, these seem to have been exhausted, otherwise one assumes more brownfield sites would have been included to the meet the OAN. Para 141 of the NPPF specifically points to using brownfield first, but then, once exhausted, there being exceptional circumstances for green belt land release. Not providing sufficient housing to meet its needs and the extremely high affordability ratios are clear exceptional circumstances for releasing green belt land for new homes. This has been tested at many EiPs up and down the country, including locally at neighbouring Guildford, Waverley and Woking to name but a few. To release no green belt land and fail to meet the OAN renders the plan unsound. It has clearly therefore not been Positively Prepared and the choice to not release any green belt land is not Justified. Furthermore, the plan cannot be consider to be Effective, where it is not providing for over 25% of its housing need, and is not Consistent with national policy, which requires councils to meet its OAN. The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and | The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective. In addition, the full OAN should be met | | | Yes, I wish to participate at the oral examination | Given the severe retrograde step the council has taken in failing to deliver its OAN and not release any green belt land, it is important that this is fully explored with the council and no stone left unturned. This can only be fully achieved by appearing in person and ensuring our questions are tested. | Objection noted. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022). The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed? Like the Secretary of State, the Council attaches great importance to Green Belt. It is |
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but then, once exhausted, there being exceptional circumstances for green belt land release. Not providing sufficient housing to meet its needs and the extremely high affordability ratios are clear exceptional circumstances for releasing green belt land for new homes. This has been tested at many EIPs up and down the country, including locally at neighbouring Guildford, Waverley and Woking to name but a few. To release no green belt land and fail to meet the OAN renders the plan unsound. It has clearly therefore not been Positively Prepared and the choice to not release any green belt land is not Justified. Furthermore, the plan cannot be considered to be Effective, where it is not providing for over 25% of its housing need, and is not Consistent with national policy, which requires councils to meet its OAN. The Reg 18 plan did, correctly in our view, include some well-considered and assessed green belt land release. One example is Local Area 14, which was one of three strategic areas that was proposed by the council. This area was assessed in the Reg 18 SA and was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective. Since the Reg 18 document, nothing in green belt policy has changed and there are

was found to be sound. This technical position has not changed and the site/area remains a sound proposal for green belt release and should be reintroduced to ensure the plan is Sound, Positively Prepared and Effective. Since the Reg 18 document, nothing in green belt policy has changed and there are therefore no reasons for the council's retrograde step in its strategy to exclude any green belt land release. This is a political decision, not a planning policy decision. As well as not delivering market housing, this will also have a knock-on effect of delivering much needed affordable housing. In 2019, the council's HHRSS paper report that there were 1,801 applications on its waiting list. In 2019, the same HHRSS report stated that the council has the second highest ratio of house prices to income in the South East at 15.08 (2017). This gap has been widening considerably, where the ratio was 9.65 in 2003. Not only does this point to the need for more housing and meeting the OAN (this would also add to the exceptional circumstances for releasing green belt land for housing), but it also points to needing to deliver more than the OAN. This means that the failing to deliver the OAN is even worse than not providing 27% of the need, as more is needed in Elmbridge. This clearly points at the plan being Ineffective, not Positively prepared or Justified and not Consistent with national policy.

the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall. Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment. The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place

therefore no reasons for the council's retrograde step in its strategy to exclude any green belt land release. This is a political decision, not a planning policy decision.

As well as not delivering market housing, this will also have a knock-on effect of delivering much needed affordable housing. In 2019, the council's HHRSS paper report that there were 1,801 applications on its waiting list. In 2019, the same HHRSS report stated that the council has the second highest ratio of house prices to income in the South East at 15.08 (2017). This gap has been widening considerably, where the ratio was 9.65 in 2003. Not only does this point to the need for more housing and meeting the OAN (this would also add to the exceptional circumstances for releasing green belt land for housing), but it also points to needing to deliver more than the OAN.

This means that the failing to deliver the OAN is even worse than not providing 27% of the need, as more is needed in Elmbridge. This clearly points at the plan being Ineffective, not Positively prepared of Justified and not Consistent with national policy.

that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality.

The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii). In light of the considerations set out above, it is the Council's

position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council acknowledges that Elmbridge is an expensive borough in which to live, with a high affordability ratio and an acute need for affordable homes. Through the preparation of the draft Local Plan, the Council has explored opportunities for increasing the provision of affordable housing over the plan period through increasing the delivery of market housing. However, the Council reached the decision that the exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not fully evidenced and justified. A decision that took full account of the benefit of delivering a greater number of market homes to enable to the Council to deliver a greater proportion of its identified affordable housing need of 269 dwelling per annum (dpa), set out in the [Local Housing Need Assessment \(2020\)](#) (LHNA). Concluding that the benefit of doing so did not outweigh the harm in releasing and developing on the Green Belt.

The Council acknowledges that it will not be possible to meet the Borough's affordable housing need in full through the approach set out in the proposed spatial strategy. However, in light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the Draft Elmbridge Local Plan 2037 is sound and that a strategy that seeks to protect the existing

boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Moreover, national policy and guidance do not require identified affordable housing need to be met in full ([NPPE paragraph 62](#) and [PPG Housing & Economic Needs Assessment paragraph 024](#)). The Council also has additional models/methods of delivering affordable housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example, EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal](#) (SA) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes - 16,300 homes over the plan period through the release of green belt sites and optimisation of development in existing urban areas (see option 3 of Regulation 18 Options Consultation, 2018). Whilst this option would meet development needs, including the need for affordable housing in full, it

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| | | <p>guidance - it has failed to identify how it can deliver Local Housing Needs in accordance with the Standard Method. It has failed to justify why delivering only 70% of local needs is acceptable. The Council is suggesting it can deliver 6,787 dwellings out of the 9,705 units identified using the standard method. Part of the evidence base that seeks to demonstrate how the 6,787 figure can be delivered is the Site Allocations list which is based on the latest Land Availability Assessment (2022) - having considered both it is evident that sites will not come forward and hence the estimated capacity is considered undeliverable. The Council has not considered all available options to meet its LHN in that it has adopted a Brownfield first approach and not fully explored green belt release which is justified due to the exceptional circumstances surrounding the identified shortfall in the capacity of the urban areas.</p> | <ul style="list-style-type: none"> • Has the plan been positively prepared i.e. based on a strategy which seeks to meet objectively assessed requirements? NO • Is the plan justified? NO • Is it based on robust and credible evidence? NO • Is it the most appropriate strategy when considered against the alternatives? NO • Is the document effective? NO • Is it deliverable? NO • Is it flexible? NO • Will it be able to be monitored? Not considered • Is it consistent with national policy? NO | | <p>Effective - the Plan will be unable to deliver its policy to deliver 6,787 units (which represents only 70% of LHHN) within the plan period. The flexibility does not exist to meet its LHN as the evidence base to the Plan acknowledges that the capacity of the urban areas cannot be increased without causing unacceptable harm. The only way the plan can deliver further capacity is through a review of green belt boundaries. the plan is not flexible enough to accommodate such a review - such a major change would require a formal review and public consultation.</p> <p>Justified - the strategic approach is based on a 'brownfield first approach' which only delivers 70% of LHN. This is not considered an appropriate strategy and is unlikely to be deliverable as the evidence base that forms the basis of the site allocations is flawed. The Land Availability Assessment has not been robustly considered whether the sites will realistically come forward, especially in the light of competing policies.</p> <p>Consistent with national policy - the Plan is considered to be inconsistent with national policy for the reasons identified above.</p> | <p>summarise our concerns to set the context or our proposed amendments. Summary of concerns The Council's Plan is based on only meeting 70% of local housing needs (LHN) over the Plan period, which is inconsistent with national policy, which states that local planning authorities should seek, as a minimum, to meet local needs.</p> <p>The shortfall in delivery of housing is further reduced when the housing allocations (upon which the Council is dependent in order to meet its 70% figure) is scrutinised. Our analysis of the Site Allocations (See Chapter 9 of the Plan) reveals that a significant number of sites identified for residential development are unlikely to come forward; meaning that over the plan period the Council will fail to deliver its strategic objective. This analysis will be presented to the EIP (A summary of this analysis is attached alongside the recommended changes to the plan -see 4a below) Furthermore, the Council has accepted that no exceptional circumstances exist to challenge the LHN figure generated by using the standard method and having considered options which include discounting further densification of its urban areas, and accepting that neighbouring authorities are not able to meet any of its shortfall, the Council maintains that its plan is 'sound' and can go forward to adoption.</p> <p>This objection has concluded that the plan fails to meet the tests of Soundness (as set out in the NPPF) in that the Plan:</p> <ul style="list-style-type: none"> • has not been 'properly prepared', as it fails to identify 'a strategy which, as a minimum, seeks to meet the areas objectively assessed needs', as required by the NPPF, • is not 'justified', as the | <p>g%2019%20Draft%20Plan%2Epdf</p> <p>Regulation 19 draft LP- Site Allocations Assessment.pdf https://consult.elmbrid.ge.gov.uk/gf2.ti/a/1205954/557332/PDF/-/Regulation%2019%20draft%20LP%2D%20Site%20Allocations%20Assessment%2Epdf</p> | | <p>Housing Strategy which grossly underprovides in terms of its identified LHN, an decision which the Plan fails to adequately justify. Such under provision will not meet the housing needs of the Borough and by concentrating of the urban areas may lead to a disproportionate housing mix which delivers too many flatted units and too few homes with gardens.</p> <p>Concentrating on increasing the density of existing sites to increase the capacity of the urban areas could undermine the viability of some sites due to the increased costs of construction (e.g. the need to provide underground parking), this could have a consequential effect of reducing the quantum of affordable housing.</p> <p>The Council has not demonstrated that the densities identified for individual sites allocated in the plan are acceptable/deliverable in the context of prevailing densities. We wish to challenge the Council's site allocations which we consider to be unrealistic as</p> | <p>Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.</p> <p>The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022).</p> <p>The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of Topic Paper 1: How the spatial strategy was formed?</p> <p>Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of</p> |
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statements of national planning policy, where relevant"1.

considered that adopting a local plan should be the priority in light of the Government's national objective to ensure all local authorities have a local plan in place.

The Council has undertaken active and on-going Duty to Cooperate activities with its partners and statutory consultation bodies in accordance with the requirements of the Duty to Cooperate, including with neighbouring authorities, during the development of the DELP. These activities are detailed in the Council's Duty to Cooperate Statement of Compliance (June 2022), Duty to Cooperate Statement of Compliance Update (August 2023) and Statements of Common Ground published with the Core Documents submitted for Examination. The matter of meeting the Borough's housing need, both within the Borough itself or with assistance from other authorities has been explored. However, this has not been identified as a deliverable option as all neighbouring authorities have confirmed that they cannot assist in meeting some / all of Elmbridge's unmet housing need.

All DtC partners have confirmed that they consider the Council has adequately discharged its duty to co-operate in preparing the plan. As such, the Council considers that it has met its Duty to Cooperate in full and this is detailed within the documents mentioned above.

During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt.

The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part

of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's [Topic Paper 1: How the spatial strategy was formed?](#) (June, 2022).

The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, therefore paragraph 11(b)(i) of the NPPF provided a strong reason for restricting the scale and distribution of housing development in the borough. A detailed breakdown of the reasoning behind the Council's decision, including a commentary on each of the Green Belt sites considered for allocation for development is set out in Section 6 of [Topic Paper 1: How the spatial strategy was formed?](#)

Like the Secretary of State, the Council attaches great importance to Green Belt. It is the Council's position that, on the whole, the Green Belt Boundary Review, 2016 and 2018 (GBBR, 2016 and 2018) assessments, produced by Ove Arup, undervalue the performance of the Green Belt sites against the purposes of Green Belt as well as their role in ensuring the fundamental aim of Green Belt - preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all the sites, either via Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are

considered to perform 'weakly' against the purposes of the Green Belt in the Arup assessments, they still perform some function. Moreover, neither the 2016, nor 2018, GBBR assessment identified any part of the Green Belt as no longer performing against the purposes overall.

Moreover, the Council considers that the release of land from the Green Belt (for the purposes of housing development) would negatively affect the borough's existing settlement pattern, thus harming the character of Elmbridge's existing communities. The borough, which adjoins Greater London, has a dispersed pattern of settlements and its urban areas are tightly bounded by the Green Belt. Reflecting the urban morphology, the Green Belt is closely interwoven with the borough's settlements and is generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

It is the Council's position that an intensification strategy would not promote a sustainable pattern of development and that the benefits of meeting local housing need through such an approach is significantly and demonstrably outweighed by the impact on the built-form and character of the Borough's existing urban areas and is not acceptable when assessed against the policies in the NPPF when taken as a whole, in particular paragraph 11(b)(ii).

In light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the DELP is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Finally, a strategy that seeks to deliver the aspirations of the Borough's communities aligns with a key objective of the Government's proposed reforms of the planning system and the local plan making process, which seek to ensure local communities have a greater say in what is built in their neighbourhood.

The Council acknowledges that Elmburgh is an expensive borough in which to live, with a high affordability ratio and an acute need for affordable homes. Through the preparation of the draft Local Plan, the Council has explored opportunities for increasing the provision of affordable housing over the plan period through increasing the delivery of market housing. However, the Council reached the decision that the exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not fully evidenced and justified. A decision that took full account of the benefit of delivering a greater number of market homes to enable the Council to deliver a greater proportion of its identified affordable housing need of 269 dwelling per annum (dpa), set out in the [Local Housing Need Assessment \(2020\)](#) (LHNA). Concluding that the benefit of doing so did not outweigh the harm in releasing and developing on the Green Belt.

The Council acknowledges that it will not be possible to meet the Borough's affordable housing need in full through the approach set out in the proposed spatial strategy. However, in light of the considerations set out above, it is the Council's position that the spatial strategy proposed in the Draft Elmburgh Local Plan 2037 is sound and that a strategy that seeks to protect the existing boundaries of the Borough's Green Belt and character of its urban areas is a true reflection of the communities' aspirations for the Borough.

Moreover, national policy and guidance do not require identified affordable housing need to be met in full ([NPPF paragraph 62](#) and [PPG Housing & Economic Needs Assessment paragraph 024](#)). The Council also has additional models/methods of delivering affordable housing in the Borough outside of obligations/contributions through the planning process that will contribute towards addressing the Borough's need for affordable homes. For example,

EBC's Housing department deliver 100% affordable housing schemes in its function as a housing provider.

A simple quantitative analysis demonstrates that the approach proposed in the DELP of seeking 30% affordable housing on relevant schemes could deliver up to 135 affordable dpa if the Council's proposed housing target of 452 homes per annum (circa 6,800 dwellings over the plan period) were adopted. 135 affordable dpa is around 50% of the total 269 dpa need for affordable homes identified in the Council's LHNA. In order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full.

The Council's [Sustainability Appraisal](#) (SA) sets out how the Council considered and appraised an alternative strategy that would deliver a similarly large quantum of homes - 16,300 homes over the plan period through the release of green belt sites and optimisation of development in existing urban areas (see option 3 of Regulation 18 Options Consultation, 2018). Whilst this option would meet development needs, including the need for affordable housing in full, it would fundamentally alter the character of the Borough's towns and villages through coalescence, urban sprawl and encroachment of new development into the countryside due to the release of Green Belt land necessary to achieve the quantum of development. In addition, this option was found to have the most significant negative impacts of all the options considered by the Council, largely due to the impact of distributing development widely across the Borough.

The Council has considered several alternative approaches

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| | | | <p>known to be living on unauthorised moorings. As such the Plan fails to address the specific housing requirements of Boat Dwellers contrary to para 60 NPPF.</p> <p>In addition, despite the fact the Council were aware of this issue and agreed back in 2019 that the need for houseboat moorings should be assessed, the plan was drafted without the benefit of any such assessment, the assessment was not completed until February 2022 and was not put into the public domain and added to the Evidence Base until after a planning appeal in mid March 2022. Emerging Policy is not informed or shaped by this need assessment and its findings are not even documented in draft policy such as SS3 Scale and Location of good growth. No new policy is proposed to address the need identified.</p> <p>Furthermore, the public have been given just one opportunity, now, to comment on the need assessment published earlier this year. This</p> | <p>There is no national planning policy for livaboard boaters so this is a matter for local plan policies. In 2019 Elmbridge Cabinet approved stakeholder consultation on a range of options to seek a long-term solution to manage the ongoing issues of mooring without consent on the River Thames. It was noted that up to 80 boats were moored without consent in Elmbridge and there was a need to address this in the Local Plan. But this has not happened.</p> <p>Para 1.2 of the Pre - submission draft Local Plan states that it will form the basis on which planning applications in the borough will be determined replacing the 2011 Core Strategy and 2015 Development Management Plan. Appendix A1 lists the policies it will replace. They are all 2011 Core Strategy policies. There is no evidence officers have reviewed Policy DM13 in the context of unauthorised moorings on the River Thames as stated in the 2019 Cabinet Report.</p> <p>The 2015 Plan includes Policy DM 22 for Recreational Uses of waterways addresses the need to resist the loss of facilities, encourage new/ improved facilities, public access to the river and the bank and make further permanent moorings for recreational not residential uses as agreed at the 2022 Appeal Hearing for boats a West Molesey.</p> <p>Since mid 2019 the approach of Elmbridge is to prevent not address this need.</p> | <p>drafted and submitted for consultation without the benefit of any assessment of the needs of boaters and has not been amended to reflect the need identified as late as February 2022. The only mention I can find of river boat moorings is in HOU4 Affordable Housing criteria 9 which notes that affordable housing is not required for residential schemes involving river boat moorings. Whilst there are other policies for specialist housing needs for Travellers, Elderly and specialist care there is no policy for those seeking to live on boats on the River Thames. There has been no proper, thorough, methodical assessment of the availability of suitable sites/ new moorings for this use. Whilst the Council has a saved policy (DM22 for Recreational uses of waterways) which anticipates the need for further permanent moorings of houseboats for recreational uses, it has failed to draft a similar policy for permanent residential moorings.</p> <p>The Council withheld the February 2022 Need Assessment from the 16th March 2022 appeal hearings for 5 moorings at West Molesey and could not say how the needs of the households who occupied 4 of the 5 boats would be met. One Appellant was not seeking a residential mooring as he did not live on his boat. The Planning Inspector had this to say in his decision letter issued 26 April 2022 (appeals APP/K3605/W/21/3266924, APP/K3605/W/21/3266928, APP/K3605/W/21/3266934, APP/K3605/W/21/3266936, APP/K3605/W/21/3266938)</p> <p>50. The Council admitted at the Hearing that neither the policies relied upon for the appeals, nor any within the development plan, concern permanent residential moorings. Thus, there was no evidence before me of an understanding of need Appeal Decisions and no provisions made for sites to address it. Given that the Council has a substantial waterfront edge and where the wider area is evidently popular for boat moorings, I am surprised that this is the case, and I can sympathise with the appellants' assertion that the Council has repeatedly failed to address this.</p> <p>The draft Local Plan is not justified as the proposed strategy as set out in the June 2022 Boat Dwellers Site Assessment paper, which was added to the pre submission Local Plan Evidence Base at the start of Reg19 consultation process, is not drafted to</p> | <p>existing moorings where permanent residential occupation is permitted</p> <p>b) Assess the capacity of these moorings for additional boats/ extension/ infill</p> <p>c) Identify realistic, achievable and appropriate criteria for the determination of applications for new permanent moorings so that such applications are not determined using INF6-Rivers and saved policy DM13</p> <p>d) Amend INF6-Rivers to make clear the River also provides potential for residential uses and make clear what sections of the River are to have a 10m wide buffer.</p> <p>e) commit to a detailed Site Assessment appraisal. As much of the river bank is understood to be in the Green Belt, allocate land or areas of riverbank (including those areas already used by unauthorised moorings on existing wharfs and stretches of the river bank which are unregistered) suitable for permanent residential moorings suitable to meet the need identified (ie for low cost, private moorings) which can, if relied on, be taken out of/ inset from the Green Belt so that those seeking planning permission can be certain any applications for moorings will not be treated as inappropriate development.</p> <p>f) commit to future monitoring/ update of need every 5 years.</p> <p>There should be an appropriate sustainability appraisal of any new / amended policy.</p> | | | | | | <p>(2022) and <u>Boat Dwellers Site Assessment (2022)</u>.</p> <p>The Boat Dwellers Accommodation Assessment, produced by Opinion Research Services, identifies a need for 10 licensed permanent moorings on the Thames through the EBC area over the next 5 years from January 2022, based on interviewed boat dwellers plans for the next 5 years. It was not possible to produce a robust estimate of the need beyond 5 years. However, the Boat Dwellers Site Assessment concludes that there is currently no public land available along the River Thames within EBC area or its neighbouring authorities for the allocation of additional moorings to meet the need identified in the Boat Dwellers Accommodation assessment.</p> <p>A mixed methodology was used for the Boat Dwellers Need Assessment, including a desk based review of preexisting needs assessments, other relevant local studies, existing national and local policy, guidance, and best practice, as well as a review of the Environment Agency responsibilities relating to the Thames from licensing to water quality; telephone interviews with the National Bargee Travellers Association and the Canal and Rivers Trust; and a scoping focus group with 4 boat dwellers on the Thames in Elmbridge carried out by video to avoid the risk of Covid infection. These fed into the methodology and questionnaire for a face-to-face 'doorstep' survey of boat dwellers living on the Thames through Elmbridge. This questionnaire was agreed with the Council and the interviews took place in early January 2022, with 25 interviews achieved.</p> <p>The NPPF tests of soundness require the Council's evidence base to be proportionate. Although it is made clear in the assessment report that it was not possible to engage with every boat dweller in the Borough, Opinion Research Services made every reasonable attempt to contact, engage with and interview boat dwellers in the</p> |
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on line form fails to provide enough space to detail all the concerns. This will be the one and only chance to comment on its methodology, assumptions and findings. That is so unfair when previous stages of the Local Plan have provided opportunity to comment on other reports forming the Evidence Base. It was left up to liveaboard boaters to discover that the need assessment had in fact been published and now formed part of the Local Plan Evidence Base. The approach taken by Elmbridge Council lacks fairness, transparency and proper engagement with those most affected by this matter.

I am not aware of any sustainability appraisal of the policy approach proposed by Elmbridge Council. No change is proposed to draft Policy and the Council do not seek to insert any additional policy to address the need identified.

This failure to a) complete the Evidence Base in an appropriate and timely fashion, and

On 8th August 2019, just three months after the June 2019 Cabinet report and before the results of the stakeholder consultation had been reported back to Members, the Planning Compliance Team issued 9 Enforcement Notices for a number of moorings located north west of Cherry Orchard Gardens and adjacent to the tow path.

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

A second report was taken to Elmbridge Cabinet in September 2019 to report back on the Stakeholder consultation. The report noted that any enforcement could have implications on making a liveaboard boater homeless. Work on a need assessment was expected to commence in 2019 and conclude in early 2020 to inform the approach taken in the new Local Plan. This did not happen.

Rather than follow the planning process, in July 2020, the Leader of Elmbridge Council contacted the Chief Executive of the EA saying 'I am writing to you as a

address this matter or the issues relied on at the March 2022 appeal hearings for boaters at West Molesey.

The draft Local Plan is not effective as there is no evidence of any effective joint working with other local authorities with boundaries fronting the River Thames (including the north bank of the River on the boundary with Elmbridge) and no common policy approach by these authorities to deal with the issue of residential river boats. This is unacceptable. Whilst there are other joint policy approaches for flood risk and biodiversity along the River Thames, there are none for the provision of moorings for those who choose to live on their boats.

For similar reasons it is questionable whether the Duty to Co-operate has been complied unless an agreement by neighbouring local authorities to do nothing and hope the problem drifts downstream would count.

The plan is not consistent with para 62 NPPF as it fails to address an identified housing need and in the absence of any national policy for residential river boats fails to include a positive policy to address this need/ issue.

Borough to inform the assessment of need for additional moorings and it is the Council's position that it is a robust piece of evidence.

In accordance with paragraph 62 of the NPPF, the DELP seeks to reflect the identified needs of boat dwellers through the fair consideration of any application for the provision of additional moorings. This is articulated in criterion 8 of draft policy INF6 – Rivers, which states that new moorings will be supported where compliant with the criteria relating to river character, use and community benefit set out in a) – d) of criterion 8 of INF6. These criteria are proposed to ensure that whilst the aim of promoting a positive and supportive approach to the provision of additional moorings where appropriate is achieved, the existing character and use of the Borough's rivers is protected.

b) address or indeed acknowledge a specific housing need for residential moorings on the River Thames is a clear breach of para 62 NPPF which states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

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

The Need Assessment was published February 2022 but the Council failed to submit this evidence at the March 2022 appeals for 5 moorings in this Borough. As the appeal decision letter published April 2022 for these moorings records:

51.... I am told that the Council is now currently undertaking a needs assessment. However, this is not currently in the public domain and so there is no evidence before me on the level of demand for permanent residential moorings and whether this would be addressed or met through a future development plan examination process or by some other means, and the timescales for doing so.

There are issues with this study.
-only 25 interviews were completed over one weekend in January 2022
-terminology is not explained
-it omits any plan to show the location of the boats thought to be lived on and where interviews were completed.
-it assumes permanent moorings are available for year round residential use.
-it is not clear if all parts of the riverside were accessed.

The study found a need for at least 10 -16 residential moorings on the Thames in Elmbridge 2022-2027

In 2022 Site Assessment Paper is woefully inadequate and was completed too late to incorporate findings into the draft Local Plan. Only public landowners were contacted. It fails to assess existing capacity. There is no consideration of policy constraints (Green Belt, flooding, wildlife designations), ownership or site factors/ constraints (nature of river bank/ depth of water/access to river bank/ services/ structures like locks and bridges). It ignores the availability of the purpose built wharf near Cherry Orchard Gardens, West Molesey where, in April 2022 permission was granted on a temporary basis for one such mooring and where scope exists for additional moorings.

This is the first opportunity to comment on the need assessment and Site Assessment paper. Elmbridge claim that whilst the assessed need would not be met through a site allocation policy, draft Policy INF6 would assist in ensuring that any windfall proposals for boat dweller accommodation are considered and this would be kept under review. Policy INF6-Rivers is concerned with the special character and setting of the River Thames, sustainable travel and leisure uses, new habitat creation, opportunities for tourism and river based recreation and leisure activities and appropriate riverside development. Para 8.31 of the justification to this policy states that the river is '...an important natural and cultural asset

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| | | | | | <p>providing leisure, ecological, environmental, landscape and economic benefits, this role will be protected and promoted'</p> <p>There is no mention or acknowledgment that the River also provides a home for livaboard boaters. Criteria 8 concerns new moorings or other floating structures. Given the Council's objections to 5 of the moorings at West Molesey it is unclear how any proposal for a new mooring would satisfy these requirements.</p> <p>Policy INF6 refers in the justification to the need for 10m wide river side buffer zones-no details are provided. INF6-Rivers is not drafted with residential moorings in mind and as a policy will not assist address the need identified Read in conjunction with saved Policy DM13 it will be relied on to thwart speculative applications for new residential moorings which is why a bespoke policy is needed.</p> | | | | | | | | | |
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| 1110384 | Rex Walden | Residential Boat Owners' Association | No | With regard to the provision of Residential Moorings the Need Assessment which forms part of the Evidence Base and will inform policy is fatally flawed therefore the Plan cannot be legally compliant. ORS failed to consult with organisations who have specific knowledge of the situation and terminology on the river Thames. Instead they spoke to Canal & River Trust who have no direct knowledge of, or responsibility for, the Thames. ORS did not consult the Environment Agency Thames Waterway Management who are the Navigation Authority. Neither did they consult the Residential Boat Owners' Association (RBOA) to contribute to their report. A simple Google search would have told them of RBOA's existence, Founded over 50 years ago, RBOA are regularly consulted by local and central government departments on all matters concerning residential boating and moorings. The RBOA partnered | No | Because the ORS report is seriously flawed the needs of the local live aboard community are inadequately assessed. ORS talk about "Licensed" moorings. There is no such thing. Moorings, on the Thames are not "Licensed". Because the ORS report does not indicate the specific locations of the boaters interviewed it is impossible to know precisely what they are referring to. The only "official" visitor moorings on the Elmbridge side of the river are EA moorings at Hurst Park, the Weir Pub. Gridley Miskin (Walton), Walton Towpath Moorings (which includes moorings outside the Anglers Pub) Desborough Island Mooring (which is where the Trawler referenced in the report is sited) and finally Weybridge Moorings. There are a small number of permanent moorings bankside which are owned by the riparian hereditaments who could, of course, have private arrangements with boaters. It should be noted that there is no equivalent of the landlord and tenant act so the boater will have no protection in law. There are also moorings available in marinas and boatyards. The vast majority of these are classified as leisure moorings and typically they are on 12 month rolling contracts. These contracts will have a clause that specifically excludes their use by a vessel that is the boaters home. Consequently, anyone who is living on their boat is in breach of the contract and likely to be removed at a | Y | Y | Y | Please see previous comments - the ORS report on which the local plan relied with regards to the needs of the boating community is fatally flawed therefore the plan as a whole cannot be deemed to be Positively prepared or Effective. Neither can it be considered to be Consistent with national policy as there is no provision for or consideration of the needs of those who live afloat. | The Need Assessment which forms part of the Evidence Base should be revisited in conjunction with organisations who have knowledge of the situation on the Thames and terminology with a proper detailed plan of the location and status of moorings referred to. | | | No, I do not wish to participate at the oral examination | n | Objection noted. Please see the Council's response to the representation above (Representation ID 1109517), which responds to the same comments/issues raised here. |
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with British Waterways to help them develop the residential moorings policy that is still being used by BW successor organisation the Canal & River Trust (CRT). Similarly, RBOA were involved in the development of the current residential mooring policy adopted by the Port of London Authority (PLA) for the tidal Thames. The same is true of the waterways in East Anglia where the RBOA were consulted by the Broads Authority and the Middle Levels Navigation Commissioners to advise and guide their respective residential moorings policy.

moments notice. It is a fact that the operators of these moorings are extremely sensitive about this issue to the extent that many of them refused access to ONS staff conducting the Census in 2021.

There are however, residential moorings at D'Oyle Carte Eyot which is sited in Weybridge just downstream from Shepperton Lock.

There are circa 30 residential moorings on the island. All of the boaters were removed in 2015-16 when the then owner put the island up for sale. It was eventually sold, and the current owner tidied up the island, cleared vegetation from the moorings, and let it be known in 2021 that they were once again available.

It took about 3 months before every mooring was taken. Interestingly at least one of the vessels had hitherto been moored for several years in Desborough Cut, moored without consent at no cost to the owner. One of the arguments used against those of us trying to persuade authorities to provide long term moorings is "they will never pay". Here is a clear demonstration that that is not the case, if there is suitable provision in the right location people will pay. In this case pay handsomely, the fee is in the order of £450 per metre per annum.

At one point ORS reference "Inhabited" moorings, they don't make it clear what they mean by that term. It seems ORS probably do not understand that a residential mooring is a specific class of mooring, they talk about

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| | | | | | <p>permanent moorings without further description. ORS use terms to describe moorings that are not familiar to Thames boaters. Had ORS consulted the EA they would have learnt that they have Base Moorings, Transient Moorings, Visitor Moorings and Residential Moorings. Base Moorings are long term moorings, most are floating pontoons or if not, they are designed to be safe in strong stream conditions and are provided with electrical power and fresh water points however, they specifically refuse to allow them to be used by residential boaters. Transient Moorings are at locks and intended for overnight use by boaters in the course of navigation, there are no restrictions on their use. Visitor Moorings are intended for overnight use and boaters are allowed to use them free of cost for 24 hours and thereafter for a maximum of two more days for a fee of £5.50 a day. Again there are no restrictions on their use. Finally, the EA have one Residential Mooring it is in Kingston on Thames, it has space for just 12 vessels and has existed, unaltered since Thames Conservancy days. ORS conducted their survey in January, arguably trying to conduct a survey of this type in the winter is of questionable value. Many live aboard boaters, probably the majority, find a "safe haven" for the winter months so they are unlikely to be bankside unless they have found a very secure mooring. During the period of the ORS survey the river was moving on and off</p> | | | | | | | | | |
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| | | | | | Yellow and Red Boards indicating strong stream conditions. The Plan attached to the ORS report is of very limited, if any, value. There is no key it just claims to show the area covered so one assumes that is depicted by the dark blue line. If that is the case the upstream (left hand side) shows they didn't survey anywhere near the Weybridge mooring (where coincidentally the Vice Chairman of the RBOA was moored during part of the period when ORS claimed they carried out the survey) If the plan is to be believed the ORS survey followed the course of the Old River around Desborough Island but ignored Desborough Cut where there were at that time at least 12 vessels which are peoples homes. Finally, again if the plan is to be believed, most of the time the ORS researcher was on the opposite side of the river to Elmbridge. The most worrying aspect is that Elmbridge appear to have accepted this very flawed plan. | | | | | | | | | | | |
| 1110412 | John Casey | | No | The plan was drafted without the benefit of an assessment of the needs of liveaboard boaters and which was not completed until February 2022. This assessment was withheld from the boaters and their legal teams, even during a planning appeal hearing on 15 March 2022. This withholding of such a vital document from us and the planning Inspector shows the contempt | No | The plan is not positively prepared in so far as it fails to consider, let alone address, the needs of Boat Dwellers. The Council has known that boats are occupied on the River Thames and are exercising their legal right under the Thames conservancy act 1932 to moor their boats to their land under riparian rights as we do. It is very obvious to us who live on the River, that there are many more liveaboard boats in the EBC area than ORS was unable to contact. It was pointed out to the Council at the March 2022 appeal hearings, there is no specific | | Y | Y | Y | Not effective, as there is no evidence policy approach either by EBC or neighbouring councils to deal with the issue of residential river boats | Not justified the plan is not drafted to address the matters or issues relied on at the March 2022 appeal hearings for boaters at West Molesey. It highlights EBCs determination to remove all liveaboards from the borough as they have promised their residents they would | | Yes, I wish to participate at the oral examination | Our (my wife and myself) future living accommodation and lifestyle could very well be affected by this. | Objection noted. Please see the Council's response to the representation above (Representation ID 1109517), which responds to the same comments/issues raised here. |

EBC holds for the due process of law. Also the plan fails to address the specific housing requirements of Boat Dwellers contrary to para 60 NPPF. The approach is in clear breach of para 62 NPPF which states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. The Plan was prepared without proper regard to those who live on boats on the River Thames and fails to address the needs of those known to be living on boats in the EBC area. The northern boundary of Elmbridge Borough is formed by the River Thames. This ORS survey uses phrases and descriptions which do not exist e.g. licenced moorings, there are no such thing as a licenced mooring. It uses EBC terminology e.g. unauthorised and illegal moorings giving the impression that all boats moored in the Borough of EBC are unconsented or illegal. This, of course, is

policy for liveaboard boaters in national planning policy. Section 5 NPPF is concerned with 'Delivering a sufficient supply of homes'. This is unchanged from the July 2018 and 2019 versions. Paragraph 62 NPPF 2021 states as follows 'Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes). This also remains unchanged since 2018. The Local Plan Evidence Base had not identified a need for houseboat dwellers because no study had been commissioned to address this. The 2017 GTAA by ORS was only required to address the needs of Gypsy-Travellers and did not interview or include the needs of those living on boats on the river. There is no policy in the current Local Plan to address the needs of house boat dwellers nor is there a policy in the pre submission Local Plan. It is far from clear what 'wider corporate commitments' would help meet the need. There is no evidence that Officers have reviewed Policy DM 13 or how that would assist in addressing the issue of residential moorings. On 8 Aug 2019, the compliance team issued 9 enforcement notices for

very inaccurate. It also fails to mention that many boats are moored to land where the boaters(including ourselves) are legally asserting their ownership of the Land. This was explained to ORS by the boaters but has not been included. The plan is in clear breach of para 62 NPPF which states that the size ,type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

a number of moorings located north west of Cherry Orchard Gardens and adjacent to the tow path. The Notice failed to explain what purpose the moorings were being used for (ie storage, recreational, residential) but it was clear the concern was with the residential use made of the boats. Some Notices claimed there was land based development where there was none. The Plans attached so some Notices failed to identify the correct location of the moorings. Although the Notices were appealed the Planning Inspectorate determined that the owner/occupiers of the boats had no right of appeal as the bank of the river was unregistered land. The notices came into effect on the 9th September and required the cessation of the use of the land for the permanent mooring of boat/s and the removal of any structures, fencing or enclosures, which have been erected in association with the use of the land for the permanent mooring of boat/s, within one month from the date of which the notice takes effect. In June 2020 planning applications were however submitted and validated for 5 moorings at West Molesey. These applications were refused for a variety of reasons including different reasons to those cited in the enforcement notices. With the exception of one mooring ,the appeals were dismissed. Permission was granted for one mooring on part of a pre-existing wharf for a family with a young child in March

process. What is unclear is why they failed to follow their own advice and prepared and consulted on the new local plan without first establishing the evidence base which would confirm the need for more permanent residential moorings. NPPF makes clear that the development plan is supposed to be the starting point for decision making and the planning system should be genuinely plan led, providing a framework for addressing housing needs. Yet in July 2020, the Leader of Elmbridge Council and the Chief Executive of the Council contacted the Chief Executive of the EA saying 'I am writing to you as a last resort to seek your intervention to resolve a seemingly intractable problem of illegally moored boats along the Thames in Elmbridge'. At this stage Elmbridge Council had still failed to commission a houseboat survey or attempted to address the issue, other than take enforcement action in an attempt to rid themselves of the problem. The Council were clearly aware of the existence of river boats occupied residentially a full 2 years before the Reg19 stage of this Local Plan. This issue is not unique to Elmbridge. During October 2019, Friends, Families and Travellers carried out a survey of 356 people from the Liveaboard Boater community using the Survey Monkey platform to ascertain experiences of healthcare services, and the challenges faced when accessing care. The study noted that it was difficult to

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| | | | | | <p>ascertain the population of Liveaboard Boaters in the UK. Information from the Residential Boat Owners Association highlights suggested that at least 15,000 people live afloat in Great Britain but FFT noted that it was unclear how this figure had been calculated. The National Bargee Travellers Association estimate that over 50,000 or more people are currently living on boats. In 2021 EBC commissioned ORS to undertake the first survey of liveaboard boaters in the district. 51.... I am told that the Council is now currently undertaking a needs assessment. However, this is not currently in the public domain and so there is no evidence before me on the level of demand for permanent residential moorings and whether this would be addressed or met through a future development plan examination process or by some other means, and the timescales for doing so. The Local Plan EIP will be the first opportunity for the findings to be examined. The study provides some useful information but omits any assessment of the existing availability of existing residential or leisure moorings. The remedy is simple, EBC should now fulfill their legal obligation by encouraging permanent residential moorings. But as you can see below their current online posts are still showing EBC is intent on removing all residential moorers and are using terms like illegal and Unconsented for boaters that of course are neither illegal or unconsented</p> | | | | | | | | | |
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| 1110471 | Pamela Smith | National Bargee Travellers Association | No | <p>The south bank of the River Thames forms the entirety of the northern boundary of Elmbridge. This is around eight miles of river bank. Yet the draft Local Plan was prepared without regard to those who live on boats on the River Thames and the pre-submission Local Plan fails to address the needs of those known to be living on so-called 'unauthorised moorings'. The Plan therefore fails to address the specific housing requirements of Boat Dwellers contrary to paragraph 60 of the NPPF.</p> <p>In addition, despite the fact the Council was aware of this issue and agreed in 2019 that the need for moorings should be assessed, the plan was drafted without the benefit of any such assessment, the assessment was not completed until February 2022 and was not put into the public domain and added to the Evidence Base until after a planning appeal in mid March 2022. Emerging Policy is not informed or shaped by this needs assessment and its findings are</p> | No | <p>The plan is not positively prepared in so far as it fails to consider, let alone address, the needs of Boat Dwellers. The Council has known that boats are occupied on the River Thames within its jurisdiction and are moored on what the Council refers to as 'unauthorised moorings' for at least five years.</p> <p>Specifically the Council has failed to consider the accommodation needs of Bargee Travellers – itinerant Boat Dwellers – who do not have or seek a permanent residential mooring, but by virtue of the Public Right of Navigation, codified in Section 79 of the Thames Conservancy Act 1932, have the right to anchor, moor or remain stationary for a reasonable time in the ordinary course of pleasure navigation on the River Thames. According to Moore v British Waterways [2013] EWCA Civ 73, paragraph 63, the length of time that can be considered 'reasonable' cannot be determined in advance. This is a Common Law right and cannot be extinguished by Planning Policy, Planning Enforcement or a Local Plan.</p> <p>Section 8 of the Housing Act 1985 places a statutory requirement on local housing authorities to carry out a periodical review of housing needs to assess and understand the needs of people residing or resorting to their district. Section 124 of the Housing and Planning Act 2016 includes a duty (under Section 8 of the 1985 Housing Act that covers</p> | Y | Y | Y | Y | <p>The plan fails the soundness test for the following reasons The draft Local Plan is not positively prepared as it fails to address or acknowledge the need for permanent and temporary residential moorings for Boat Dwellers. In the absence of any national policy or guidance it is critical this matter is not omitted from Local Plans where, as in the case of Elmbridge, there is a substantial length of the River Thames within the borough. This is in conflict with the NPPF and draft policy HOU3 Housing Mix which seeks to deliver the right homes to address local housing needs. The pre-submission Local Plan was drafted and submitted for consultation without the benefit of any assessment of the needs of boaters and has not been amended to reflect the need identified as late as February 2022. There has been no proper, thorough, methodical assessment of the availability of suitable sites or new moorings for this use.</p> <p>The draft Local Plan is not justified as the proposed strategy as set out in the June 2022 Boat Dwellers Site Assessment paper, which was added to the pre submission Local Plan Evidence Base at the start of Regulation 19 consultation process, is not drafted to address this matter or the issues relied on at the March 2022 appeal hearings for boaters at West Molesey.</p> <p>The draft Local Plan is not effective as there is no evidence of any effective joint working with other local authorities with boundaries fronting the River Thames (including the north bank of the River on the boundary with Elmbridge) and no common policy approach by these authorities to make provision for residential boats. This is unacceptable. Whilst there are other joint policy approaches for flood risk and biodiversity along the River Thames, there are none for the provision of moorings for Boat Dwellers. For similar reasons it is questionable whether the Duty to Co-operate has been complied with.</p> <p>The plan is not consistent with paragraph 62 of the NPPF as it fails to address an identified housing need and in the absence of any national policy for residential boats fails to include a positive policy to address this need.</p> <p>Continuation of Question 2 ... in Elmbridge".</p> | <p>Policy SS1 'Scale and location of good growth' should acknowledge and recognise the need for 10-16 permanent residential moorings 2022-2027 and the need to monitor and update this need within 5 years. Issues with the robustness of the 2022 need assessment should be addressed. There is not enough space provided on this online form to include this.</p> <p>The Local Plan should include a bespoke policy, appraised for sustainability, which will:</p> <ol style="list-style-type: none"> 1. Provide, and work with other local authorities with boundaries fronting both the north bank and the south bank of the River Thames to provide, a network of 14 to 56 day temporary residential moorings for itinerant boat dwellers. 2. Identify and safeguard existing moorings where permanent residential occupation is permitted. 3. Provide a presumption of planning consent for the existing residential use of recreational/leisure moorings. 4. Assess the capacity of the above moorings for additional residential boats, extension and/or infill. 5. Identify realistic, achievable and appropriate criteria for the determination of applications for new permanent residential moorings so that such applications are not determined using INF6-Rivers and saved policy DM13. 6. Amend INF6-Rivers to make clear the River Thames also provides potential for residential use of boats and make clear what sections of the River are to have a 10m wide buffer. 7. Commit to a detailed Site Assessment appraisal. As much of the river bank is understood to be in the Green Belt, allocate land or areas of riverbank (including those areas | <p>2022-07-26 NBTA comments Elmbridge local plan 2037.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/554443/PDF/-/2022%2D07%2D26%20NBTA%20comments%20Elmbridge%20local%20plan%202037%2Epdf</p> | As per 1a, 2a, 3a and 4. | No, I do not wish to participate at the oral examination | <p>Objection noted.</p> <p>Please see the Council's response to the representation above (Representation ID 1109517), which responds to the same comments/issues raised here.</p> |
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not even documented in draft policy such as SS3 Scale and Location of good growth. No new policy is proposed to address the need identified.

Furthermore, the public has just one opportunity, now, to comment on the needs assessment published earlier this year. This will be the one and only chance to examine its methodology, assumptions and findings. It was left up to Boat Dwellers to discover that the needs assessment had in fact been published and now formed part of the Local Plan Evidence Base. The approach taken by Elmbridge Council lacks fairness, transparency and proper engagement with those most affected by this matter. It is hard to avoid the conclusion that the February 2022 Boat Dweller Accommodation Needs Assessment was deliberately withheld.

There appears to be no sustainability appraisal of the policy approach proposed by Elmbridge Council. No change is proposed to the

the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in, or resorting to, their district with respect to places on inland waterways where houseboats can be moored. 'Houseboat' in this context means a boat or similar structure designed or adapted for use as a place to live.

Contrary to the Council's assertion in the draft Local Plan that there is no Statutory Guidance regarding this matter, in March 2016 the Department of Communities and Local Government (DCLG) published its draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats. Later in 2016 the DCLG confirmed to the NBTA that the Draft Guidance should be treated as the final guidance until the finalised version was published.

Given that the requirement to determine the accommodation needs of Boat Dwellers was only introduced by the Housing and Planning Act 2016, there is no established method to determine need. In addition, there is no specific policy for Boat Dwellers in national planning policy. Section 5 of the NPPF is concerned with 'Delivering a sufficient supply of homes'. This is unchanged from the July 2018 and 2019 versions. Paragraph 62 of the NPPF 2021 states:
"Within this context, the size, type and tenure of housing needed for different groups in the community should be

At this stage Elmbridge Council had still failed to commission a Boat Dweller Accommodation Needs Assessment or make any attempt to address the issue with a bespoke planning policy. The Council's only action had been to serve Enforcement Notices with a very short compliance period. The planning applications submitted mid 2020 were refused in December 2020. The Council was clearly aware that boats were occupied residentially without planning consent for permanent residential use a full 2 years before the Regulation 19 stage of this Local Plan. It also was of the opinion this was a material change in use of the river bank, inappropriate development in the Green Belt and required special justification to secure planning permission.

In 2021 Elmbridge Council commissioned ORS to undertake the first survey of liveaboard boats in the district. It is estimated that there were 40 live aboard boats moored on the Thames in Elmbridge which is less than the figure assumed by the Council in 2019. Only 25 interviews were completed (62.5%). The study was published in February 2022 but the Council failed to submit this evidence at the March 2022 appeals for 5 moorings in this Borough, failed to even tell the hearing that the study had been completed and could not tell the Inspector when or how any need would be addressed through future development plan examination. Compared to the numbers quoted in 2019, the study appears to have omitted to even consider the needs of itinerant Boat Dwellers.

The 2022 Elmbridge Boat Dwellers study found a need for 10 permanent moorings on the Thames in Elmbridge for the 25 interviews undertaken. However, if the rough estimate of up to 40 liveaboard boats in the district is accepted, the modelling would suggest a need for up to 16 permanent moorings. This is in addition to a need for temporary mooring space for Bargee Travellers. The survey also identified a need for improved services such as waste disposal and potable water.

In June 2022 Elmbridge Council published a Site Assessment Paper to explain how the accommodation needs of Boat Dwellers could be met within the Borough as part of the Local Plan (2037). Yet, by this stage the Council was finalising the pre submission version of the Local Plan. The Paper

already used by unauthorised moorings on existing wharves and stretches of the river bank which are unregistered) suitable for permanent residential moorings suitable to meet the need identified (ie for low cost, private moorings) which can, if relied on, be taken out of or inset from the Green Belt so that those seeking planning consent can be certain any applications for moorings will not be treated as inappropriate development.
8. Commit to future monitoring and updating of need every five years.

draft Policy and the Council does not seek to add any policy to address the need identified. This failure to complete the Evidence Base in an appropriate and timely fashion, and address or even acknowledge a specific housing need for moorings on the River Thames, is a clear breach of paragraph 62 of the NPPF which states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)". This also remains unchanged since 2018.

On 5th June 2019 a report was taken to Elmbridge Cabinet to seek approval to commence stakeholder consultation on a range of options to seek a long-term solution to manage the ongoing issues of [sic] mooring without consent on the River Thames. At the time Elmbridge, Spelthorne and Runnymede Borough Councils were considering options along the specified area of the River Thames due to what was referred to as 'the unreasonable and persistent nature of mooring without consent' which it was claimed was having a detrimental effect on those living in the locality.

It was noted that there had been an increase in the number of boats moored allegedly without permission on the River Thames and that there was a community of regular river users who go about their lives on the river as a way of life. The report claimed that owners who wish to live aboard a boat as a permanent residence need to have an approved residential mooring. The report stated as follows for Elmbridge

explains how the Council identified the availability of land. In May 2022 it wrote to the owners of public land along the River Thames to ask if they had any land available to accommodate 10 permanent residential moorings. Copies of these letters are not provided with the Site Assessment report. It is not known if those contacted were asked to identify land suitable for 10 moorings, or several smaller sections of bank suitable for fewer moorings. All replied that they were unaware of any suitable sites and Richmond Council referred to its Policy LP19 which contains a presumption against new proposals. The Council failed to contact private landowners or to consider the potential of any unregistered stretches of water. The site assessment failed to establish if there was capacity at existing moorings for extra boats and ignored the availability of the purpose built wharf near Cherry Orchard Gardens, West Molesey. There are many other omissions and the site assessment did not even document the nature of landownership of the river bank.

The pre submission Local Plan was published for public consultation just one month after this very brief report published in June 2022. The Council relies on this very inadequate Site Assessment to claim there was no public land available along the River Thames within Elmbridge or its neighbouring authorities suitable for the allocation of boat dweller accommodation. Yet in February 2022 the ORS study had identified that approximately 40 boaters were moored on the Thames in Elmbridge.

Elmbridge concludes at paragraph 5.2 by stating that whilst the assessed need would not be met through a site allocation policy, draft Policy INF6 would assist in ensuring that any windfall proposals for boat dweller accommodation are considered and this would be kept under review. There is no acknowledgment in Policy INF6 that the Thames provides a home for Boat Dwellers who moor permanently, temporarily or live itinerantly on their boats. Contrary to the claims of Elmbridge Council, Policy INF6-Rivers is not drafted with residential moorings in mind and will not help to address the need identified in the February 2022 assessment for more permanent moorings for residential boats. In addition, it will be read in conjunction with saved Policy DM13 which also fails to support, or help identify, suitable locations for residential

"16. Elmbridge has in the region of 50 to 80 boats moored along the River Thames without consent between the boundary with the London Borough of Kingston at Surbiton/ Thames Ditton and Weybridge where the river leaves the Borough. At the time of writing, only a handful of these boats are currently moored on Elmbridge land (Cigarette Island) and the remainder on a mixture of private and public landowners."

It is clear from reading the June 2019 Cabinet report that in early 2019 Elmbridge Council was aware of this issue, had received numerous complaints and were investigating this matter with other authorities. The 2019 Cabinet report went on to state as follows:

"49. The Local Plan evidence (in particular the Gypsy and Traveller Accommodation and Assessment) has not identified a need for houseboat dwellers. The need for other affordable housing is contained within the North East Surrey Strategic Housing Market Assessment. This need is being met through the existing local policies, new Local Plan and wider corporate commitments. As part of the review of Development Management policies Officers will review Policy DM13 Riverside Development and Uses and consider introducing specific criteria on mooring and floating structures similar to Richmond's Policy LP-19. However, this review and adoption will not be

moorings. Together these policies will thwart speculative applications for new residential moorings which is why a bespoke policy is needed.

completed until late 2020/early 2021.”

This statement is misleading. The Local Plan Evidence Base had not identified a need for Boat Dwellers because no study had been commissioned to address this and the 2017 GTAA by ORS did not interview or include the needs of those living on boats on the river. There is no policy in the current Local Plan to address the needs of Boat Dwellers nor is there a policy in the pre submission Local Plan. There is no evidence that Officers have reviewed Policy DM13 or how that would assist in addressing the issue of residential moorings.

Paragraph 1.2 of the Pre -submission draft Local Plan states that it will form the basis on which planning applications in the borough will be determined, replacing the 2011 Core Strategy and 2015 Development Management Plan. Appendix A1 lists the policies it will replace. They are all 2011 Core Strategy policies. There are no new or updated development management policies in the pre-submission Local Plan. There is no evidence officers have reviewed Policy DM13 in the context of so-called 'unauthorised moorings' on the River Thames as stated in the 2019 Cabinet Report.

The 2015 DM Plan includes Policy DM22 for Recreational Uses of Waterways which addresses the need to resist the loss of facilities, encourage new or improved facilities, public access to the river and the bank and (criteria e):

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| | | | | | <p>"Permitting further permanent moorings or houseboats provided they protect the appearance of the riverside and do not add to river congestion".</p> <p>Noticeably absent from the 2011 Core Strategy, the 2015 Plan or pre-submission Local Plan is any policy for residential use of the waterways and for permanent moorings for residential as opposed to recreational boats.</p> <p>Also absent from the 2011 Core Strategy, the 2015 Plan or pre-submission Local Plan is any consideration of the accommodation needs of itinerant Boat Dwellers, who by virtue of the Public Right of Navigation, codified in Section 79 of the Thames Conservancy Act 1932, have the right to anchor, moor or remain stationary for a reasonable time in the ordinary course of pleasure navigation on the River Thames.</p> <p>In addition, the reference to Policy LP19 for the London Borough of Richmond is misleading as this states quite clearly at criteria A:</p> <p>"There is a presumption against new proposals for houseboats, including extensions to existing houseboats, and other moorings or floating structures designed for permanent residential use".</p> <p>Criteria B then lists the criteria that need to be complied with for moorings or other floating structures. It is clear the approach adopted by LB Richmond is not a model that will facilitate the provision of residential moorings.</p> <p>This statement gives a</p> | | | | | | | | | |
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clear indication in mid 2019 that the policy approach in Elmbridge was to prevent rather than accommodate the needs of boaters on so-called 'unauthorised moorings' and this approach was not informed by any assessment or appraisal of the use made of these boats or any appreciation of the need to identify how many of these boats were providing residential accommodation for persons who were homeless, in need of accommodation, choose to live on their boats and/or have resorted to living on boats due to the shortage of other affordable housing. A second report was taken to Elmbridge Cabinet in September 2019 to report back on the Stakeholder consultation. The report noted that any enforcement could have implications on making a liveaboard boater homeless, and that the Council had failed to carry out an assessment of Boat Dwellers needs as required under Section 124 of the Housing and Planning Act 2016 and that an assessment should be carried out before any further action. The work was expected to start in 2019 and the findings would inform the approach taken in the new Local Plan.

It is clear Elmbridge Council understood the process. What is unclear is why it failed to follow its own advice and chose to prepare and consult on the new local plan without first establishing the evidence base which would confirm the need for more temporary and

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| | | | | | permanent residential moorings. The NPPF makes clear that the development plan is supposed to be the starting point for decision making and the planning system should be genuinely plan led, providing a framework for addressing housing needs. Yet in July 2020, the Leader of Elmbridge Council contacted the Chief Executive of the Environment Agency saying: "I am writing to you as a last resort to seek your intervention to resolve a seemingly intractable problem of illegally [sic] moored boats along the Thames | | | | | | | | | | |
| 1110476 | Paul Thatcher | | No | Having read the report there are errors with in it that make it inaccurate, without the required survey reports they are not able to provide a basis for the future | No | There are too many errors that fail to adequately provide for the needs of boaters | | Y | The ors report has been ignored and the obligations that carries | Additional information from this survey is needed | | | Yes, I wish to participate at the oral examination | Open forum for discussion with relevant bodies and local people | Objection noted. Please see the Council's response to the representation above (Representation ID 1109517), which responds to the same comments/issues raised here. |

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| 1110570 | Fatmir Kastrati | | No | <p>The plan was drafted without the benefit of an assessment of the needs of liveaboard boaters and which was not completed until February 2022. This assessment was withheld from the public including the boaters their legal teams, even during a planning appeal hearing on 15 March 2022. This withholding of such a vital document from us and the planning Inspector shows the contempt and disregard EBC holds for due process and the law. The plan fails to address the specific housing requirements of Boat Dwellers contrary to para 60 NPPF. The approach is in clear breach of para 62 NPPF which states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.</p> | No | <p>The Plan was prepared without proper regard to those who live on boats on the River Thames and fails to address the needs of those known to be living on boats in the EBC area. This ORS survey uses phrases and descriptions which do not exist e.g licenced moorings, there is no such thing as a licenced mooring. It uses EBC terminology e.g unauthorised and illegal moorings giving the impression that all boats moored in the Borough of EBC are unconsented or illegal. This, of course is very inaccurate. It also fails to mention that many boats are moored to land where the boaters(including myself) are legally asserting their ownership of the Land. This was explained to ORS by the boaters but has not been included. The plan is not positively prepared in so far as it fails to consider, let alone address, the needs of Boat Dwellers. The Council has known that boats are occupied on the River Thames and are exercising their legal right under the Thames conservancy act 1932 to moor their boats to their land under riparian rights as I do. There are many more liveaboard boats in the EBC area than ORS was unable to contact. It was pointed out to the Council at the March 2022 appeal hearings, there is no specific policy for livaboard boaters in national planning policy. Section 5 NPPF is concerned with 'Delivering a sufficient supply of homes'. This is unchanged from the July 2018 and 2019 versions. Paragraph 62</p> | | | | | | <p>The remedy is simple, EBC should now fulfill their legal obligation by encouraging existing permanent residential moorings and creating more of them as the problem clearly doesn't go away by just bullying people around who have nowhere else to go. Thank you</p> | | | <p>Yes, I wish to participate at the oral examination</p> | <p>I would like to attend as it will directly affect my home, lifestyle and well being. I am evolved directly in the legal process against the EBC planning policies.</p> | <p>Objection noted. Please see the Council's response to the representation above (Representation ID 1109517), which responds to the same comments/issues raised here.</p> |
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| | | | | | <p>NPPF 2021 states as follows Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).</p> <p>This also remains unchanged since 2018. The Local Plan Evidence Base had not identified a need for houseboat dwellers because no study had been commissioned to address this. The 2017 GTAA by ORS was only required to address the needs of Gypsy-Travellers and did not interview or include the needs of those living on boats on the river.</p> <p>There is no policy in the current Local Plan to address the needs of house boat dwellers nor is there a policy in the pre submission local plan. It is far from clear what 'wider corporate commitments' would help meet the need.</p> <p>There is no evidence that Officers have reviewed Policy DM 13 or how that would assist in addressing the issue of residential moorings</p> <p>On 8 Aug 2019, the compliance team issued 9 enforcement notices for a number of moorings located north west of Cherry Orchard Gardens and adjacent to the towpath.</p> <p>The Notice failed to explain what purpose the moorings were being used for (ie storage, recreational, residential) but it was</p> | | | | | | | | | |
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| | | | | | <p>clear the concern was with the residential use made of the boats. Some Notices claimed there was land based development where there was none. The Plans attached so some Notices failed to identify the correct location of the moorings. Although the Notices were appealed the Planning Inspectorate determined that the owner/occupiers of the boats had no right of appeal as the bank of the river was unregistered land. The notices came into effect on the 9th September and required the cessation of the use of the land for the permanent mooring of boat/s and the removal of any structures, fencing or enclosures, which have been erected in association with the use of the land for the permanent mooring of boat/s, within one month from the date of which the notice takes effect. In June 2020 planning applications were however submitted and validated for 5 moorings at West Molesey. These applications were refused for a variety of reasons including different reasons to those cited in the enforcement notices. With the exception of one mooring ,the appeals were dismissed. Permission was granted for one mooring on a part of a pre-existing wharf for a family with a young child in March 2022. This was the councils aim from the beginning, they had promised their residents in their election pamphlets that they would do this. Even during our planning applications process, 2 council leaders and the chief</p> | | | | | | | | | |
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| | | | | | <p>executive of EBC wrote to the chief executive of the EA stating 'I am writing to you as a last resort to seek your intervention to resolve a seemingly intractable problem of illegally moored boats along the Thames in Elmbridge'. Our group have never been illegally moored. This unethical and outrageous behaviour was designed to get us moved off of the land which I am legally asserting my ownership of, by means of adverse possession. The whole purpose of the enforcement notices is 1) to make the land we are legally occupying unusable, that is why EBC has acted in this way using underhanded and dirty tactics, being bullish and deceiving as well as colluding with the Environment Agency (who wants the land for themselves by the way) and other groups who want us out of here to achieve their goal. They have made us poorer by having to pay for a lot of legal costs while they spend our tax money on pointless marygoround of red tape and bureaucracy. They are employed by us to take care of our needs which they seem to forget. Not letting the appeal hearing know that they had the ORS study in their possession at that time. 2 Not consulting with anybody until it was too late to be included in the local plan(very convenient). 3 Putting on the pretence of trying to find land for residential boaters but not contact us who can supply such land on existing moorings (ironic comedy). While they actively block all applications for</p> | | | | | | | | | |
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| | | | | | <p>residential moorings. A boat is a chattel not a building and boats add to the ambience and character of any river. EBC and EA have no residential moorings on any of this extensive riverbank that forms the norther boundary of EBC. It is clear Elmbridge Council understands the process. What is unclear is why they failed to follow their own advice and prepared and consulted on the new local plan without first establishing the evidence base which would confirm the need for more permanent residential moorings. NPPF makes clear that the development plan is supposed to be the starting point for decision making and the planning system should be genuinely plan led, providing a framework for addressing housing needs. Yet in July 2020, the Leader of Elmbridge Council and the Chief Executive of the Council contacted the Chief Executive of the EA saying 'I am writing to you as a last resort to seek your intervention to resolve a seemingly intractable problem of illegally moored boats along the Thames in Elmbridge. At this stage Elmbridge Council had still failed to commission a houseboat survey or attempted to address the issue, other than take enforcement action in an attempt to rid themselves of the problem and push it up/down stream. The Council were clearly aware of the existence of river boats occupied residentially a full 2 years before the Reg19 stage of this Local Plan. This issue is not unique to Elmbridge. During</p> | | | | | | | | |
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| 1110583 | Steven Cross | | No | <p>The plan Completely fails boat dwellers on moorings and live aboard boats with no regard to their rights to do so to para 60 NPPF. EBC agreed to back in 2019 that the need for house boat's should be assessed and was not completed until 2022 and was not put to the public until March 2022. The approach taken by EBC lacks fairness transparency and proper engagement.</p> | No | <p>No positive plan for the need's of boat dwellers the EBC have known about occupied boats on the river at least 5 years. The housing act sec 8 1985 places a requirement on local authorities to carry out annual housing needs to understand people residing to their district. S124 of the housing act 2016 includes a duty under section 8 of the housing act that cover's for periodic review of housing needs resorting to residing in to their district on water ways house boats as a place to live. March 2016 Government DCLG published a draft guidance on the need to include house boat's and people living in different circumstances caravan house boat . There is no established method to determine needs with a 14 step process based on the model DCLG 2007 Gy - Travellers. March 2022 appeals for 5 moorings west molesey section 5NPPF delivering a sufficient supply of homes this is unchanged since 2018 and 2019 the need for affordable housing this still remains unchanged 2018. 5 June 2019 to seek approval to commence on a solution to manage issues on river Thames illegal moorings at the Elmbridge Runnymede Spelthorne Council's we're considering options along a specific area of the Thames to have a approved residential mooring's. Elmbridge has at least 50 to 80 boats moored along the river molesey has a large community of boats where I reside on my boat cherry orchard road the was recently featured on BBC1 inside out 2019.</p> | | | | | | | <p>You need to include people who live on boats house boat's and come up with a decisive plan to address this issue people on boat's are here and we are here to stay and not be pushed to the wayside. EBC should consider residential moorings for boats and come up with a plan.</p> | | | <p>Yes, I wish to participate at the oral examination</p> | <p>I would like to attend as my wellness and settlement will be detrimental. I'm also In a legal process with EBC on Planning policies.</p> | <p>Objection noted. Please see the Council's response to the representation above (Representation ID 1109517), which responds to the same comments/issues raised here.</p> |
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| | | | | | | This statement is misleading it has not identified a need for house boat dwellers no study has been found to address this 2017 GTAA by ORS was only required to Gypsy travellers not house boats on the river. | | | | | | | | |
| 1110597 | Erion Gjika | | No | The plan was drafted without the benefit of an assessment of the needs of liveaboard boaters and which was not completed until February 2022. This assessment was withheld from the public including the boaters their legal teams , even during a planning appeal hearing on 15 March 2022. This withholding of such a vital document from us and the planning Inspector shows the contempt and disregard EBC honlds for due process and the law. The plan fails to address the specific housing requirements of Boat Dwellers contrary to para 60 NPPF. The approach is in clear breach of para 62 NPPF which states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. | Yes | The Plan was prepared without proper regard to those who live on boats on the River Thames and fails to address the needs of those known to be living on boats in the EBC area. This ORS survey uses phrases and descriptions which do not exist e.g licenced moorings, there is no such thing as a licenced mooring. It uses EBC terminology e.g unauthorised and illegal moorings giving the impression that all boats moored in the Borough of EBC are unconsented or illegal. This, of course is very inaccurate. It also fails to mention that many boats are moored to land where the boaters (including myself) are legally asserting their ownership of the Land. This was explained to ORS by the boaters but has not been included. The plan is not positively prepared in so far as it fails to consider, let alone address, the needs of Boat Dwellers. The Council has known that boats are occupied on the River Thames and are exercising their legal right under the Thames conservancy act 1932 to moor their boats to their land under riparian rights. There are many more liveaboard boats in the EBC area than ORS was unable to contact. It was pointed out to the Council at the March 2022 appeal hearings, there is no specific policy for | | | EBC should fulfill legal obligation by encouraging existing permanent residential moorings. | | | Yes, I wish to participate at the oral examination | Because this going to effect my home and my future. 1 | Objection noted. Please see the Council's response to the representation above (Representation ID 1109517), which responds to the same comments/issues raised here. |

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| | | | | | <p>livaboard boaters in national planning policy. Section 5 NPPF is concerned with 'Delivering a sufficient supply of homes'. This is unchanged from the July 2018 and 2019 versions. Paragraph 62 NPPF 2021 states as follows Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes). This also remains unchanged since 2018</p> <p>The Local Plan Evidence Base had not identified a need for houseboat dwellers because no study had been commissioned to address this. The 2017 GTAA by ORS was only required to address the needs of Gypsy-Travellers and did not interview or include the needs of those living on boats on the river.</p> <p>There is no policy in the current Local Plan to address the needs of house boat dwellers nor is there a policy in the pre submission local plan. It is far from clear what 'wider corporate commitments' would help meet the need.</p> <p>There is no evidence that Officers have reviewed Policy DM 13 or how that would assist in addressing the issue of residential moorings. On 8 Aug 2019, the compliance team issued 9 enforcement notices for a number of moorings located north</p> | | | | | | | | | |
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| | | | | | <p>west of Cherry Orchard Gardens and adjacent to the towpath. The Notice failed to explain what purpose the moorings were being used for (ie storage, recreational, residential) but it was clear the concern was with the residential use made of the boats. Some Notices claimed there was land based development where there was none. The Plans attached so some Notices failed to identify the correct location of the moorings.</p> <p>Travellers carried out a survey of 356 people from the Liveaboard Boater community using the Survey Monkey platform to ascertain experiences of healthcare services, and the challenges faced when accessing care. The study noted that it was difficult to ascertain the population of Liveaboard Boaters in the UK. Information from the Residential Boat Owners Association highlights suggested that at least 15,000 people live afloat in Great Britain but FFT noted that it was unclear how this figure had been calculated. The National Bargee Travellers Association estimate that over 50,000 or more people are currently living on boats. In 2021 EBC commissioned ORS to undertake the first survey of liveaboard boaters in the district. 51.... I am told that the Council is now currently undertaking a needs assessment. However, this is not currently in the public domain and so there is no evidence before me on the level of demand for permanent residential moorings and whether</p> | | | | | | | | |
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| | | | | | | <p>this would be addressed or met through a future development plan examination process or by some other means, and the timescales for doing so</p> <p>The Local Plan EIP will be the first opportunity for the findings to be examined. The study provides some useful information but omits any assessment of the existing availability of existing residential or leisure moorings.</p> | | | | | | | | |
| 1110123 | Talal Kheir | The Water Gardens board | Yes | <p>Application Ref: 2018/3810 Appeal Ref: APP/K3605/W/22/3291461</p> <p>The Local Plan as drafted by the Elmbridge Borough council is locally compliant and based on a multitude of residents representations</p> | Yes | <p>We are a board that represents 24 detached houses in the Wilderness, East Molesey KT8 0JT. We Fully support Elmbridge in objecting to the proposed Jolly Boatman Hampton Court development. The 97 dwelling development will be of little help to solving local housing needs as the proposing offshore company, whose origin of finances and directors are unknown, may not even be advertised in the UK, and simply be Investment opportunities elsewhere.</p> <p>Facing the Historic river setting of Hampton Court Palace, a National Treasure, this is one of the most important sites in the UK and must not to be marred by inappropriate building.</p> <p>The proposed Jolly Boathouse Development is totally excessive in scale and would adversely dominate the skyline, activity, access and character of the local area and was previously rightly rejected by Elmbridge Council.</p> <p>The site is essentially an island and all access</p> | | | | | | | | <p>Comments noted.</p> <p>The planning application that this representation refers to has since been granted at appeal.</p> |

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| | | | | | <p>to the land is across a busy pavement and cycle route and onto an already convoluted junction of a busy main road which leads to the only Thames river crossing between Kingston and Walton. This pathway will have to be transversed by all deliveries, refuse collection, residents and hotel cars, buses and emergency vehicles leaving pedestrians and cyclists vulnerable. The increased vehicle access will greatly inhibit the flow of traffic at this important junction next to the Bridge.</p> <p>The proposed underground parking is totally inadequate for Hotel staff and guests, residences, shops and train commuters and would overflow to local streets.</p> <p>The Station was built to exploit tourism to Hampton Court and Molesey. The threatened removal of parking to Elmbridge residents and Hampton Court by Network rail is indefensible and would flood the local streets with commuter's cars which in turn would stifle local businesses.</p> | | | | | | | | | | |
| 1109125 | Peter Russell Mcgarry | | No | Inadequate non-ionizing EMF international guidelinesThe various agencies setting safety standards have failed to impose sufficient guidelines to protect the general public, particularly children who are more vulnerable to the effects of EMF. The International Commission on Non-Ionizing Radiation | Yes | | | | | <p>Since there is controversy about a rationale for setting standards to avoid adverse health effects, we recommend that the United Nations Environmental Programme (UNEP) convene and fund an independent multidisciplinary committee to explore the pros and cons of alternatives to current practices that could substantially lower human exposures to RF and ELF fields. The deliberations of this group should be conducted in a transparent and impartial way. Although it is essential that industry be involved and cooperate</p> | <p>International EMF Scientist Appeal.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/546668/PDF/-/International%5FEMF%5FScientist%2DAppeal%2Epdf</p> | As per 1a and 4. | No, I do not wish to participate at the oral examination | | Comments noted. However, the mandate of the United Nations is not something the DELP can influence. |

Protection (ICNIRP) established in 1998 the "Guidelines For Limiting Exposure to Time-Varying Electric, Magnetic, and Electromagnetic Fields (up to 300GHz)"¹. These guidelines are accepted by the WHO and numerous countries around the world. The WHO is calling for all nations to adopt the ICNIRP guidelines to encourage international harmonization of standards. In 2009, the ICNIRP released a statement saying that it was reaffirming its 1998 guidelines, as in their opinion, the scientific literature published since that time "has provided no evidence of any adverse effects below the basic restrictions and does not necessitate an immediate revision of its guidance on limiting exposure to high frequency electromagnetic fields"². ICNIRP continues to the present day to make these assertions, in spite of growing scientific evidence to the contrary. It is our opinion that, because the ICNIRP guidelines do

in this process, industry should not be allowed to bias its processes or conclusions. This group should provide their analysis to the UN and the WHO to guide precautionary action. Collectively we (2,500 scientists from worldwide organisations) also request that: 1. children and pregnant women be protected; 2. guidelines and regulatory standards be strengthened; 3. manufacturers be encouraged to develop safer technology; <https://www.emf.scientist.org/>

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| | | | | not cover long-term exposure and low-intensity effects, they are insufficient to protect public health. https://www.emfscientist.org/ | | | | | | | | | | | | |
| 1109584 | John Nicol | KG Creative Consultancy on behalf of Burnlave Properties Limited in respect of Land at the Northern End of Mill Road, Esher | No | The plan seeks to displace active employment uses within three areas owned by the Council to deliver housing in years 6-10, when the adjoining land owned by our client is available to deliver housing, including a high proportion of affordable housing now. The density adopted by the Council on one of these three sites is very high, when compared to the other two and we believe there is an error such that it will not deliver the housing numbers suggested. | No | The Plan relies on releasing employment land for residential use. Some of this employment floorspace is almost fully occupied and some has recently been refurbished and let. The future of the existing tenants of this space is uncertain and therefore delivery of housing here is uncertain and unsound. Our clients own the adjoining land that can be delivered and whilst Green Belt it is used for stabling and horseculture and is despoiled. In our submissions our clients site is highly suitable for housing development and is deliverable with a significant proportion of affordable housing. | Y | Y | Y | As noted above we do not consider that the Council will be able to deliver residential use on the proposed sites at Mill Road, Esher, even in years 6-10. If they could it would be to the significant detriment of a number of existing businesses here, with the potential for loss of jobs and employment floorspace. Further we believe there is an error in the density adopted on one of the sites such that the number of units suggested will not be achievable and the Council would fail to deliver its overall housing numbers in the later years of the plan. | To delete one or more of the four housing designations at Mill Road and to include our clients land at the northern end of Mill Road as a housing designation instead, as explained in more detail in our written submissions. This site is deliverable and available for housing development with a significant proportion of affordable housing proposed. It has no constraints to delivery and environmental benefits would arise from a riverside walk, open space and biodiversity area. | Local Plan Submissions Final.pdf https://consult.elmbridge.gov.uk/gf2.ti/a/1205954/552629/PDF/-/Local%20Plan%20Submissions%20Final%2Epdf | As per 1a, 2a, 3a and 4. | Yes, I wish to participate at the oral examination | It will be important to explain to the Inspector the consequences for employment floorspace and job retention in Elmbridge of the Councils proposed designation of the four areas of land at Mill Road for residential. Also the error we believe exists in the density proposed on one of the sites such that overall housing numbers will not be delivered. Further the contribution that development of the subject site can make to housing provision and delivery in Elmbridge and in particular affordable housing in light of the Councils poor performance on delivery and its significant lack of existing housing supply. Further the poor contribution that the site makes to the Green Belt and that the suggestion the site has 'standing water' is erroneous. Given it is in the main grazed by horses its biodiversity value is poor, contrary to the sites designation. There is no evidence base to underpin the | Objection noted. Site allocation US39 is no longer available for development. Landowners have confirmed availability for US33 and US38 in 2023. The 6-10 year timescale allows for employment options to be considered. During the development of the Draft Elmbridge Local Plan 2037 (DELP) several options for the approach to the spatial strategy were identified, including options that sought to meet the Borough's identified housing need in full through 1) the intensification of our urban areas and 2) the optimisation of our urban areas alongside the release of land from the Green Belt. The options were informed by national policy and guidance; the draft Local Plan evidence base; on-going discussions with neighbouring authorities and other strategic partners as part of the duty-to-cooperate; consultation with the Borough's residents and stakeholders in three Regulation 18 consultations; and collaborative working between officers and Councillors. A detailed, step by step account of the formulation and consideration of the options for the DELP spatial strategy, including the relevant elements of the evidence base; sustainability appraisal of each option; national policy and guidance context; and outcome of each public consultation, is set out in the Council's Topic Paper 1: How the spatial strategy was formed? (June, 2022). The Council reached the conclusion that the necessary exceptional circumstances required to amend the boundaries of the Borough's Green Belt through the preparation of the new Local Plan, were not present and, |

generally fragmented. This renders it particularly vulnerable to erosion while it makes a significant contribution to environmental character as part of a green network. This is in addition to serving fundamental Green Belt purposes of preventing neighbouring towns from merging into one another and safeguarding the countryside from encroachment.

The development of Green Belt sites would result in the outward expansion of our existing communities and would lead to the dilution of the sense of place that our residents value so highly.

The Council's preferred development strategy and decision not to release land from the Green Belt in order to meet housing need in full is strongly supported by our communities as demonstrated by the responses received to the Regulation 18 consultations. It also accords with the Government's commitment to allow local authorities, working with their communities, to determine how many homes can be built, taking into account those aspects that should be protected, including Green Belt and the character of the area.

Although the option to meet the Borough's identified housing need in full through intensification of urban areas would protect the existing boundaries of the Green Belt, the Council considers that this option would see the delivery of residential units that would negatively impact the urban structure and grain of local communities through the continued sub-division of plots beyond the scope of 'optimising' / making efficient use of land, which would be contrary to the NPPF, including paragraph 11(a).

The Council also considers that the size, height and bulk of the new structures required to intensify urban areas would be substantially different to the existing scale of buildings in these areas and would negatively impact on the built form (the function, shape and

configuration of buildings as well as their relationships to streets and open spaces) and the character of our existing urban areas and communities. This is set out in the Council's sustainability appraisal of the intensification option in the [Sustainability Appraisal \(2022\)](#). Therefore, it is the Council's position, that the development of schemes at the densities promoted through the intensification of urban areas option could not be integrated sensitively into the locality.

The Council also considers that in order to meet development need through the intensification of our urban areas, the availability of on-site parking would need to be reduced or eliminated in order to achieve the intensified yields required. Whilst the Council supports the drive towards sustainable modes of travel and reducing reliance on the private car, it considers that the infrastructure required to support this model shift to sustainable transport across the borough is not currently in place. Therefore, reducing or eliminating on-site parking would result in increased street parking and push parking stress to neighbouring areas. As such, the option to intensify urban areas would again be contrary to paragraph 11(a) of the NPPF.

Amenity and other open space would also need to be limited on sites to achieve the intensified yields required. This would place greater pressure / reliance on the borough's public open spaces. The lack of amenity and other open spaces would also conflict with other policies in the draft Local Plan.

Moreover, an intensification strategy would likely not deliver the balance in the type of homes required within the Borough. It is considered that a strategy of intensification would constrain the delivery of new homes to flatted development when the need is for a range of homes to be provided and, in terms of affordable homes, larger homes as set out in the Council's [Local Housing Need Assessment \(2020\)](#).

