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# Shaping Elmbridge

## A New Local Plan

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### Elmbridge Local Plan: Strategic Options Consultation (Regulation 18)

December 2016



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

## Glossary of Acronyms and Initials

- AMR** – Authority Monitoring Report
- CIL** – Community Infrastructure Levy
- DPH** – Dwellings per hectare
- ELR** – Employment Land Review
- EqIA** – Equality Impact Assessment
- FRA** – Flood Risk Assessment
- GBBR** – Green Belt Boundary Review
- GTAA** – Gypsy and Traveller Accommodation Assessment
- HMA** – Housing Market Area
- HRA** – Habitats Regulation Assessment
- IDP** – Infrastructure Delivery Plan
- LAA** – Land Availability Assessment
- LNR** – Local Nature Reserve
- NPPF** – National Planning Policy Framework
- OAHN** – Objectively Assessed Housing Need
- PPG** – Planning Practice Guidance
- SA** – Sustainability Appraisal
- SANG** – Suitable Accessible Natural Greenspace
- SEA** – Strategic Environmental Assessment
- SEL** – Strategic Employment Land
- SFRA** – Strategic Flood Risk Assessment
- SHMA** – Strategic Housing Market Assessment
- SPD** – Supplementary Planning Document
- SSSI** – Site of Special Scientific Interest
- TBHSPA** – Thames Basin Heaths Special Protection Area

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# 1 Introduction

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## What is this Consultation about?

**1.1** This consultation is to seek views on the options for meeting development needs as part of the preparation of a new Local Plan to replace the Core Strategy.

**1.2** In particular, it sets out the Council's preferred option for a new spatial strategy against which new development targets will be established. We are also seeking comments on the future direction on a range of issues which will help inform the development of a new Local Plan.

## What is the Local Plan?

**1.3** The Local Plan is the document which guides the direction of new development in the Borough. It sets targets for the delivery of different types of development, provides guidance on locations as to where this development will happen and establishes which areas should be protected. It also sets out policies by which future planning applications will be determined. The new Local Plan, together with revised and existing documents, will set the direction for future development in the Borough up to 2035.

## How is the Local Plan different to the Core Strategy?

**1.4** In 2011 the Government amended the legislation on plan making. This removed the requirement for us to have a suite of documents – a Core Strategy, Development Management Plan and a Site Allocations Plan. In contrast we were required to prepare a single Local Plan. However, those Local Authorities which had already adopted multiple plans, such as Elmbridge, were allowed to keep using those policies considered to be up to date and preparing multiple plans.

**1.5** As we are reviewing the Core Strategy, and have not yet adopted a site allocations plan (which we called Settlement Investment and Development Plans), we will look to combine these into a single plan called the Local Plan. This plan will set out our overarching approach to the location of new development; the infrastructure required to support that development as well as policies affecting how that new development will come forward such as the type, scale and mix of development on a site. As highlighted above, this consultation is on the overarching spatial strategy with a further consultation on detailed policies and site allocations taking place in the summer of 2017.

## Why have we reviewed the Core Strategy?

**1.6** In 2012, the Government published the National Planning Policy Framework (NPPF) which changed the way that we must plan for new development. Following this, it published Planning Practice Guidance which provided more detail as to how Local Planning Authorities should implement the NPPF. In particular, the Government has required local authorities to meet the housing needs of their areas. Whilst the Council has an adopted Plan setting out a housing target, a number of decisions regarding local plans indicated that our Plan could be

considered out of date as it was adopted prior to the NPPF being introduced. Alongside changes to housing policies, the Government has also set out that all Local Planning Authorities need to ensure they have considered all options for delivery – including reviewing Green Belt boundaries to ensure that only land which is required to be kept permanently open to meet the purposes of Green Belt is retained under that designation.

**1.7** In 2014 the Council therefore committed to a review of the evidence supporting the Core Strategy in order to make a decision as to whether we could continue to use the Core Strategy or whether a new plan was needed. Two key outcomes of the evidence base review showed that the need for housing was significantly higher than our current target and that the approach and policies set out in the Core Strategy needed to be reviewed and various options considered as to how to address development needs in future.

### **How have we approached the review of the Core Strategy?**

**1.8** In undertaking the review of Core Strategy the Council has looked to examine needs and has then assessed whether the existing strategy could meet those needs without having to amend the Plan. Once it was established that needs could not be met through the current Core Strategy, alternative options were considered and it is these options that are set out in this consultation document.

**1.9** Included within this consultation document are the high-level outcomes from the evidence base review. For those wishing to see the final details, the entire suite of evidence base documents can be found on our website. Appendix 1 also sets out an Evidence Base Glossary explaining briefly each of the evidence base documents available.

### **Will we be changing all existing planning policies?**

**1.10** We will be preparing a whole new plan, which will be called the “Local Plan”, for examination to replace the Core Strategy as well as to allocate development sites. However, we will seek to retain many of the policies in the Core Strategy that are in conformity with the NPPF and which continue to meet our objectives for development locally. We will seek to update policies where necessary, changing any references that are out of date and updating justifications with new evidence.

**1.11** We are not proposing to amend the Development Management Plan that was adopted in 2015. As this document is about day-to-day decision-making, it is not affected by policies on the location and scale of development that are set out in the Core Strategy.

**1.12** Our approach to the policies in the Core Strategy and whether they will be retained, amended or replaced is set out in Appendix 2.

### **How can you get involved?**

**1.13** We want to hear your views. You are welcome to comment on every issue and option set out in this document or, if you are interested in just one or two, you can focus your comments on these. We are particularly interested to know if:

- You agree with the Council’s preferred option to meeting, as far as possible, the development needs of the Borough; and

- We have correctly identified all the issues and options that a new Local Plan should address.

**1.14** Your comments will help us to choose the best strategy for the Borough and the mix of development to be delivered up to 2035.

**This statutory consultation runs from 9am on Friday 16 December 2016 until 4pm on Friday 10 February 2017.**

**1.15** We cannot accept anonymous comments and your views must be made in writing. We would like you to send your comments electronically if possible. You can complete the questionnaire on our website submitting your response directly into our consultation or download a copy, complete and email back to us at [planningpolicy@elmbridge.gov.uk](mailto:planningpolicy@elmbridge.gov.uk). If you are unable to access our documents electronically, please contact us via the details set out in paragraphs 1.24 and request a printed copy of the questionnaire that can be completed and returned to us. You will need to clearly mark any additional sheets confirming which part of the document you are responding to.

**1.16** Any comments that you submit will be published on the Council's website and in hard-copy form as appropriate. Signatures and personal contact details such as postal and email addresses will be redacted. Your name will however be published. If applicable, the name of the company / organisation etc. that you represent will also be published.

**1.17** If you need any help with making your comments please contact the Planning Policy Team using the contact details in paragraph 1.24.

**1.18** As part of the consultation, a number of road shows / drop-in events are being held across the Borough. These will consist of exhibitions where the headlines of this consultation document will be displayed. The evidence base documents supporting this consultation will also be available to view. Representatives from the Planning Policy Team will be on-hand to answer any questions you have. Please visit our website for further information.

**1.19** Copies of the consultation document will also be available to view at the Council Offices in Esher and in libraries across the Borough during the consultation period. For locations and opening times, please check the appropriate websites:

- Civic Centre – [www.elmbridge.gov.uk/our-offices](http://www.elmbridge.gov.uk/our-offices)
- Libraries – [www.surreycc.gov.uk/people-and-community/libraries](http://www.surreycc.gov.uk/people-and-community/libraries)

## What happens next?

**1.20** Following the consultation, we will assess all the comments and prepare a statement responding to the issues raised and how we will seek to address them. We will then prepare a more detailed plan which will be published for consultation in July 2017. This will set out for consultation the Council's preferred approach to:

- Our vision and objectives for delivering new development;
- The spatial strategy to deliver the vision and objectives;
- Key sites that will be allocated for development and what they will be allocated for;

- Which existing sites together with the uses on those sites that will be protected from inappropriate development; and
- The strategic policies which will support us in making decisions and determining planning applications to deliver the vision.

### How can I continue to be involved?

**1.21** This consultation marks the first in a series of documents that we will seek the views of our residents and other interested stakeholders on, as set out in figure 1 below. As we progress, each document will become more detailed in terms of our approach to addressing the development needs of the Borough and the identification of sites for future allocation and designation e.g. safeguard against future development.



**Figure 1: Process for delivering a new Elmbridge Local Plan 2015 – 2035 \*Opportunities for community participation in the Local Plan process.**

**1.22** Ultimately, we will be seeking views on a draft Local Plan that we intend to submit to the Secretary of State for examination by a Planning Inspector. The Planning Inspector will examine the content of the plan and the evidence base and consider all comments submitted during the final consultation period to help determine whether the plan is appropriate for adoption by the Council.

**1.23** Those submitting comments at the final consultation stage will be given the opportunity to appear at the examination of the draft Local Plan and have their views heard by a Planning Inspector in public.

### Keeping up-to-date

Even if you do not respond to this consultation, the best way to be kept up to date with the progress of the new Local Plan is by registering on our Consultation Portal. Each time we consult on a Local Plan document we will automatically engage with those who have registered their details.

Register your details at: [consult.elmbridge.gov.uk/consult.ti/system/register](https://consult.elmbridge.gov.uk/consult.ti/system/register)

If you respond to this consultation via e-mail or letter, the Council will automatically register your details on the portal and we will continue to engage with you. If you do not wish for us to continue to contact you regarding the Local Plan, please make this clear in your comments.

We will not disclose personal information to third parties for marketing purposes.

### Contacts

**1.24** The officers in the Council's Planning Policy Team are here to provide assistance throughout the preparation of the Local Plan. Should you have any queries relating to this consultation document or the Local Plan, please contact us by:

**Writing to:** Planning Policy Team,  
Planning Services,  
Elmbridge Borough Council,  
Civic Centre,  
High Street,  
Esher,  
Surrey,  
KT10 9SD

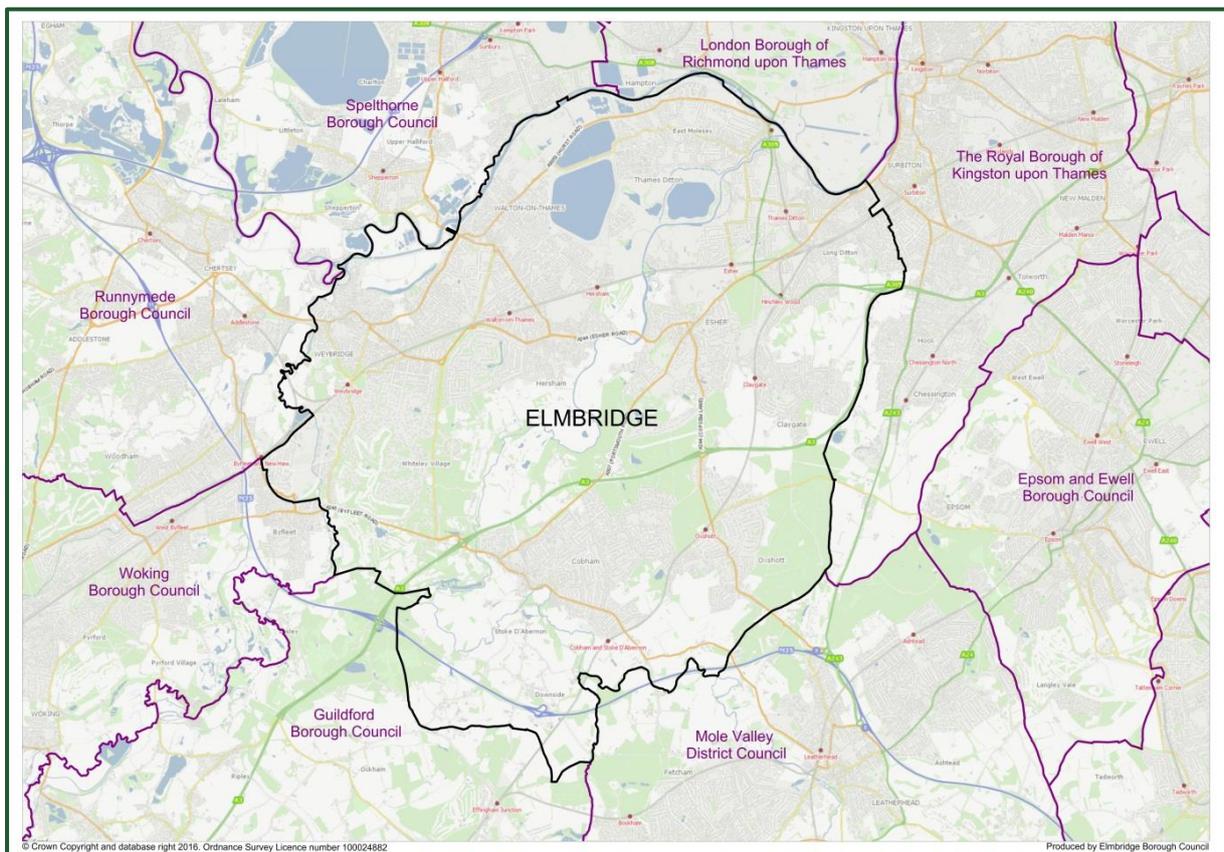
**Emailing:** [PlanningPolicy@elmbridge.gov.uk](mailto:PlanningPolicy@elmbridge.gov.uk)

**Telephoning:** 01372 474474

## 2 The Key Issues for Elmbridge

**2.1** Elmbridge covers an area of 9,634 ha in the north of Surrey and adjoins the London Boroughs of Kingston upon Thames and, across the river, Richmond. Despite being a relatively small Borough in size, it is home to over 150,000 people who live in the towns and villages, each with its own distinctive character. Whilst Walton-on-Thames is the largest centre with the most significant shopping area there is no single dominant town providing a core of services for the entire Borough. Each town and village has its own centre with a range of shops and services which seek to support the needs of that community.

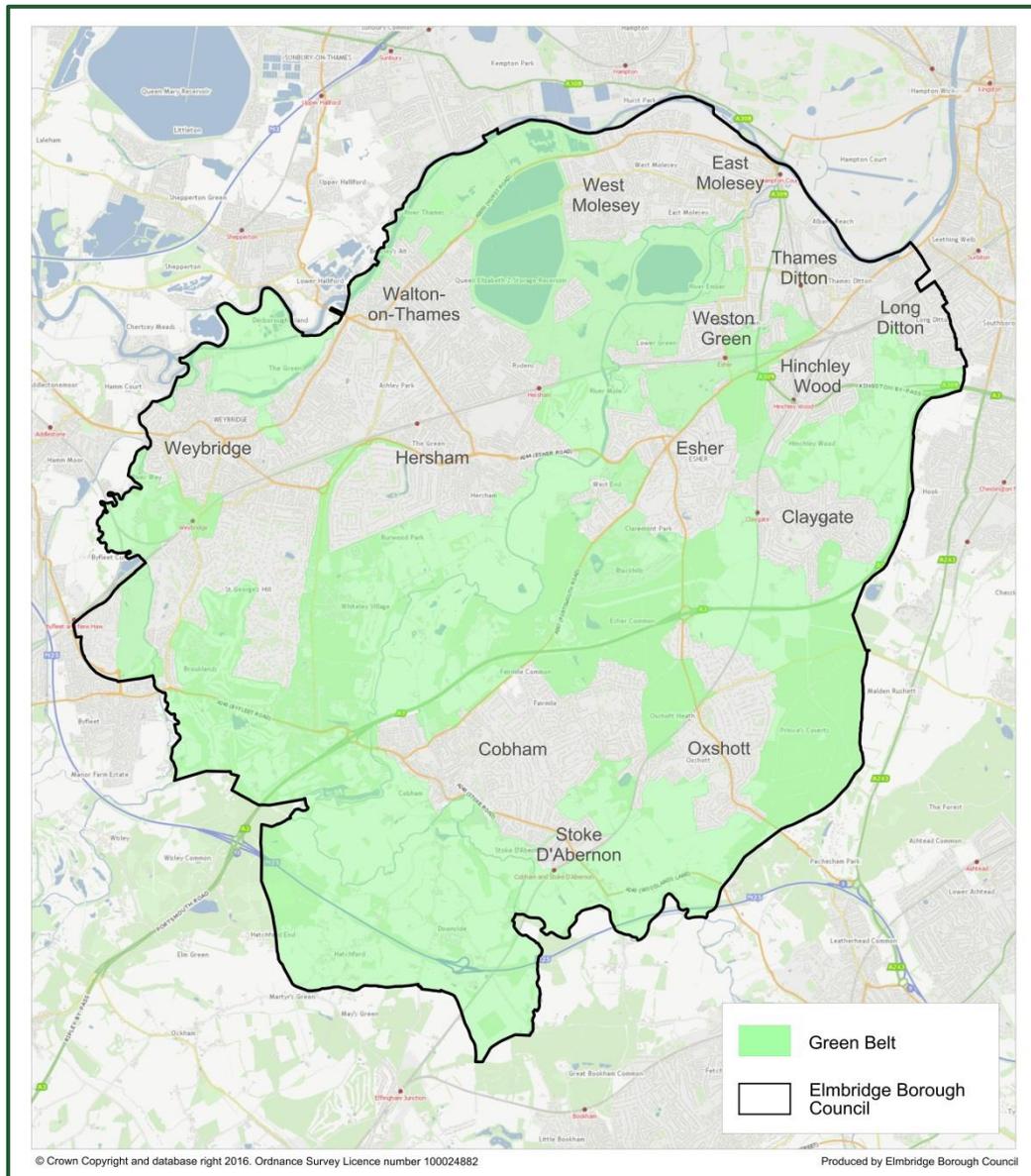
**2.2** This patchwork of towns and villages is a distinct feature of the Borough with these settlements, by and large, being separated by open land which is designated as Green Belt. A key feature of the urban area in Elmbridge is the relatively low-density character within many of its settlements. This character is further enhanced by the significant open spaces that provide space for recreation and leisure as well as providing key breaks in the urban character.



**Figure 2: Elmbridge Borough and neighbouring Boroughs and Districts**

**2.3** The high quality environment and good rail and road links to the capital means that the area is popular with those working in London. Over half the working population commutes into London. These transport links to the capital and proximity to both Gatwick and Heathrow also make the Borough popular for businesses. The Borough is home to a

number of major corporations located, mainly at the Brooklands Business Park to the south of Weybridge. However, the area is not just attractive to major corporations. Elmbridge has one of the highest business start-up rates in the region, with our town centres and sites such as Hershams Technology Park and Molesey Industrial Estate providing space for smaller businesses to develop and grow.



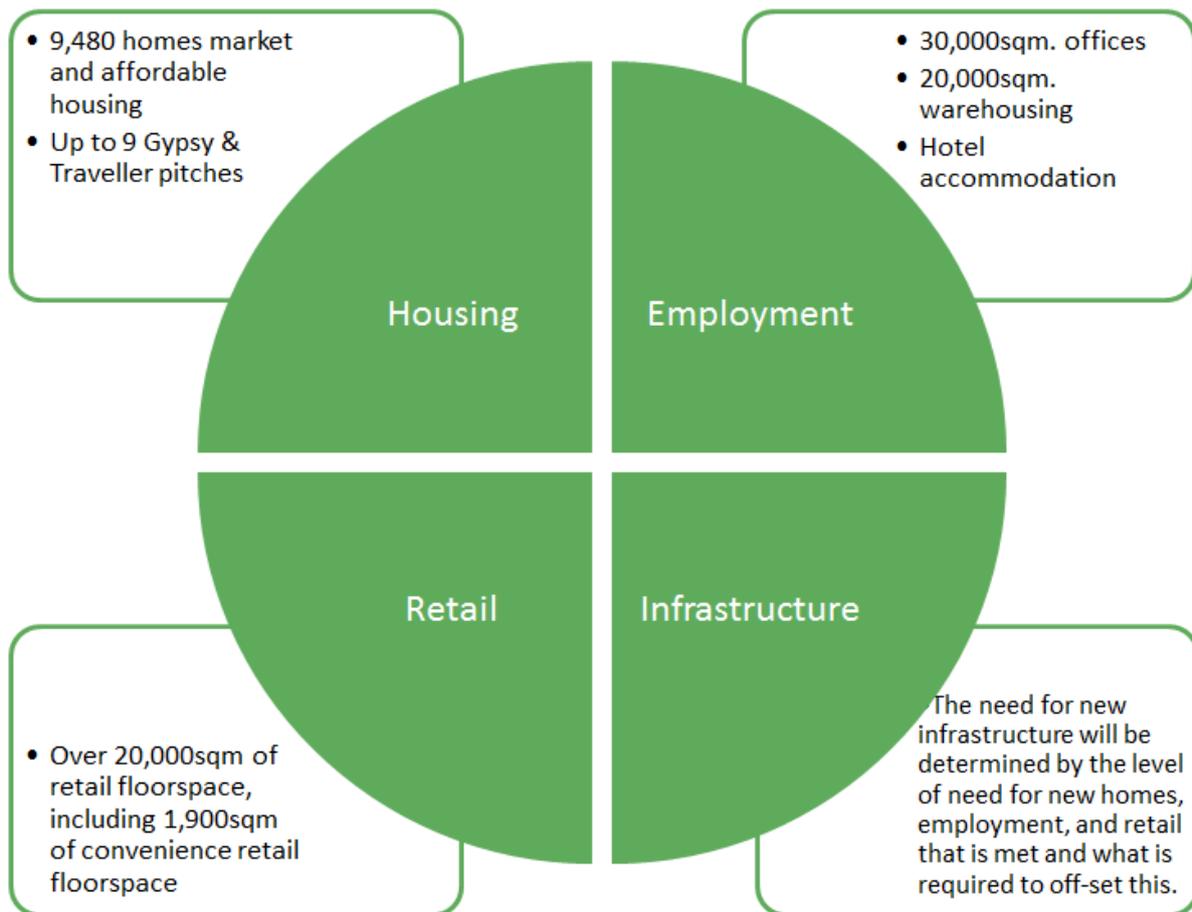
**Figure 3: Elmbridge Borough**

**2.4** The very qualities set out above which make Elmbridge a popular place to live and work, also mean that there is a significant demand for more land on which to build more houses, offices, warehouses and the associated infrastructure to support such new development. We are required by Government to not only assess these development pressures but also set out how we intend to meet them and to what extent.

**2.5** However, it is essential that the approach we take for meeting development needs are sustainable. This means that the social, environmental and economic impacts of development need to be considered. Therefore outlined below are not only the development

pressures we are facing but also other factors which will need to be considered when deciding the most appropriate approach to meeting the Borough's development needs to 2035. Whilst these pressures reflect the current economic, social and political landscape, we will continue to monitor changes such as the decision to leave the European Union or the expansion of Heathrow that could impact on the approach we need to take with the new Local Plan.

**2.6** These development needs are summarised visually in Figure 4.



**Figure 4: A summary of Elmbridge's development needs up to 2035**

## Housing

**2.7** The principal development pressure across London and the South East is for housing. Elmbridge's location, the availability of good services and high quality environment mean that this pressure is reflected locally. In fact the high house prices and pressure for new development is more reflective of London than the rest of Surrey. Therefore when assessing housing needs, we examined needs across an area that included Kingston upon Thames, Epsom and Ewell and Mole Valley (both of which also border Kingston) and formed a logical Housing Market Area (HMA) within which to consider needs.

**2.8** The needs across this HMA are set out in the Strategic Housing Market Assessment (SHMA) and show that 40,005 new homes are required across the HMA between 2015 and 2035 (2,000 new homes per annum). The highest need is recorded in Kingston (14,348 homes; 717 per annum) followed by Elmbridge (9,480; 474 per annum), Epsom & Ewell (8,352 homes; 418 per annum) and Mole Valley (7,814; 391 per annum).

### What is a Housing Market Area?

A Housing Market Area (HMA) is a geographical area defined by household demand and preferences for all types of housing, reflecting the key links between where people live and work. HMAs are defined by similar house prices and rates of change in house prices; household migration and search patterns; and travel to work areas and commuting patterns.

**2.9** In seeking to meet housing needs, we must also ensure that we are providing the right type, size and tenure of housing that our existing and future populations require. A key

focus of this consultation paper is therefore how we seek to provide more affordable housing, smaller homes (one to three bedrooms), and specialist accommodation including the provision of pitches for Gypsies and Travellers and plots for Travelling Showpeople.

### What is a Strategic Housing Market Assessment?

The Strategic Housing Market Assessment (SHMA) is a technical study intended to help the Council understand how many new homes will be required over a twenty year period to meet the needs of existing and future populations. The SHMA sets out the need for market and affordable homes as well as the needs of specific groups such as older people, minority groups, and people with disabilities.

**2.10** It is important to stress that **the housing figure for Elmbridge in the SHMA is not necessarily a target to be**

**transposed into the Local Plan.** Rather, it shows how many new homes would be needed if there were no planning restrictions on development in the Borough. Often referred to as the Objectively Assessed Housing Need (OAHN), it is the starting point for the debate about the number of new homes that the Local Plan will eventually indicate should be built in Elmbridge. Working alongside our communities and neighbouring authorities we will also need to determine whether we can help meet any further housing need arising from the wider HMA. This will be done through the preparation of the Local Plan and will take account of the Green Belt, areas at high risk of flooding and other policies which constrain new development in the Borough. It will also be necessary to take account of the Borough's infrastructure and the limitations it places on new development.

## Offices, Warehousing and Industry

**2.11** These are commonly referred to as employment uses and whilst demand for such uses in Elmbridge are not as significant as housing, it is expected that demand will grow over the next 20 years. Elmbridge's location within the "upper M3" area means that it is a highly valued location for new business and in particular for those in the professional

services, information technology and distribution sectors. It is therefore expected that the focus for growth in employment uses will be for offices and warehousing but that demand for more industrial uses will decline. Whilst further evidence is being commissioned to take account of the new Local Plan timescales and consider changing economic circumstances, such as the decision to leave the European Union, the 2013 Commercial Property Market Study suggests that based on continuing growth within the economy, there is likely to be sufficient demand to support an additional 30,000 to 40,000sqm of office floorspace and an additional 20,000 to 30,000sqm of floorspace supporting warehousing and distribution uses.

## Retail

**2.12** Despite significant and tough competition from online shopping, major centres such as Kingston and the popularity of out of town centres, the Borough's town and village centres continue to be both vibrant and viable. This current vibrancy is reflected in the amount of spend seen within our centres and in the low vacancy rates. The challenge facing us will be to maintain the vibrancy and viability of our centres going forward and ensuring that they reflect the changing demands for shops and services. In particular our town and village centres face pressure from conversion to housing, especially as part of changes to permitted development rights.

**2.13** Evidence from our retail study shows that convenience retail uses (those shops providing day to day goods such as food and drink) are well provided for in the Borough and that even at the highest projections of population growth only an

additional 1,900sqm would be required to meet the growth in demand for convenience goods. However, the demand for non-convenience goods (clothes, furniture, electrical products etc.) means that in order for our town and village centres to maintain their current market share of demand, between 14,000 and 19,000sqm would be required.

### What are permitted development rights?

Permitted development rights allow property owners to undertake small changes to properties without planning permission. These were changed recently by the Government for both shops and offices allowing their use to be changed to a residential use subject to prior notification from Local Planning Authorities but without the requirement to obtain planning permission.

## Tourism

**2.14** Tourist attractions in the Borough consist of traditional parks and gardens, the motoring and aviation Museum at Brooklands, and Sandown Park Racecourse which hosts a number of races and events. In addition, Hampton Court Palace is accessed from Hampton Court Station in Molesey and a series of high profile cycle events following on from the London Olympics has created a growing demand for visitor services and accommodation. However, whilst the evidence on hotel needs prepared by Surrey County Council indicates that there is potential demand for additional hotel accommodation to meet demand from tourist and business visitors, the lower returns means they are often dropped from mixed-use schemes in favour of more profitable types of development.

## Infrastructure

**2.15** Any increase in development will require improvements in infrastructure to support growth. Until a clear direction is agreed with regard to new development, it is not possible to identify the required infrastructure or its desired location. However, it is possible to give an example of the scale of improvements required using school places. For every 100 new homes we will need to ensure 25 primary school places and 18 secondary school places are available. If the housing needs outlined above were to be met in full, 2,350 primary places and 1,700 secondary places would be required. This would roughly translate as 3 new primary schools and 2 new secondary schools.

**2.16** A key issue for the Borough will also be the impact of new development on our road network and the increase in population and their travel movements. We will need to ensure that new development can be accommodated and any potential issues addressed. Given the levels of in and out-commuting we are already aware of 'hot-spots' in our road network particularly at peak-time and at junctions across the Borough. This will also be a key issue for any new Local Plan.

## Key factors limiting development

### Constraints

**2.17** When considering how to meet the development needs of the Borough we will need to carefully consider those factors which limit what can realistically be achieved. This includes a number of natural, built and historic features which restrict development and also the provision of new infrastructure that will be required to support any increase in our population.

**2.18** It will be important, that as part of any new Local Plan, the contribution that the natural, built and historic environments make to the character of our Borough are fully acknowledged.

**2.19** Where appropriate, such features will be protected and enhanced. However, as required by national policy, we have undertaken a review of all constraints on development. This included a review of land currently designated as Green Belt to assess the degree to which this land was meeting the purposes of this designation as set out in national policy.

### What is Green Belt?

The Green Belt is not an environmental or landscape designation but a policy for controlling urban growth. The fundamental aim of Green Belt is to prevent urban sprawl by keeping land permanently open. Therefore the most important attribute of Green Belts is their openness. National policy sets out the purposes of Green Belt as:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

**2.20** The review of Green Belt found that the majority of land currently designated as Green Belt was meeting its purposes or were fully constrained by other factors, such as flooding. However, it also showed that there were areas which did not necessarily meet the purposes of the Green Belt. The review identified around 222ha of land to be weakly performing against the purposes of Green Belt and which is unconstrained or partially constrained by absolute constraints, such as flood plains and Sites of Special Scientific Interest.

### **Land Availability in the Urban Areas**

**2.21** Much of the urban land in Elmbridge has been developed with very few large undeveloped or previously developed sites available or appropriate for redevelopment. To assess the capacity of the urban area, we have prepared a Land Availability Assessment which has identified the potential to deliver approximately 3,700 new homes in the urban areas by 2035.

**2.22** The 3,700 new homes identified in the urban areas is a combination of sites with planning permission that have not yet been implemented (approx. 1,300 new homes); 1,600 new homes on opportunity sites; and approx. 800 dwellings on windfall sites. Opportunity sites are those which have been identified as having

potential for development in the future but do not benefit from planning permission. Windfall sites are those of four homes or less that are on previously developed land, whilst we are unable to identify them, are likely to come forward for development in the future.

#### **What is the Land Availability Assessment?**

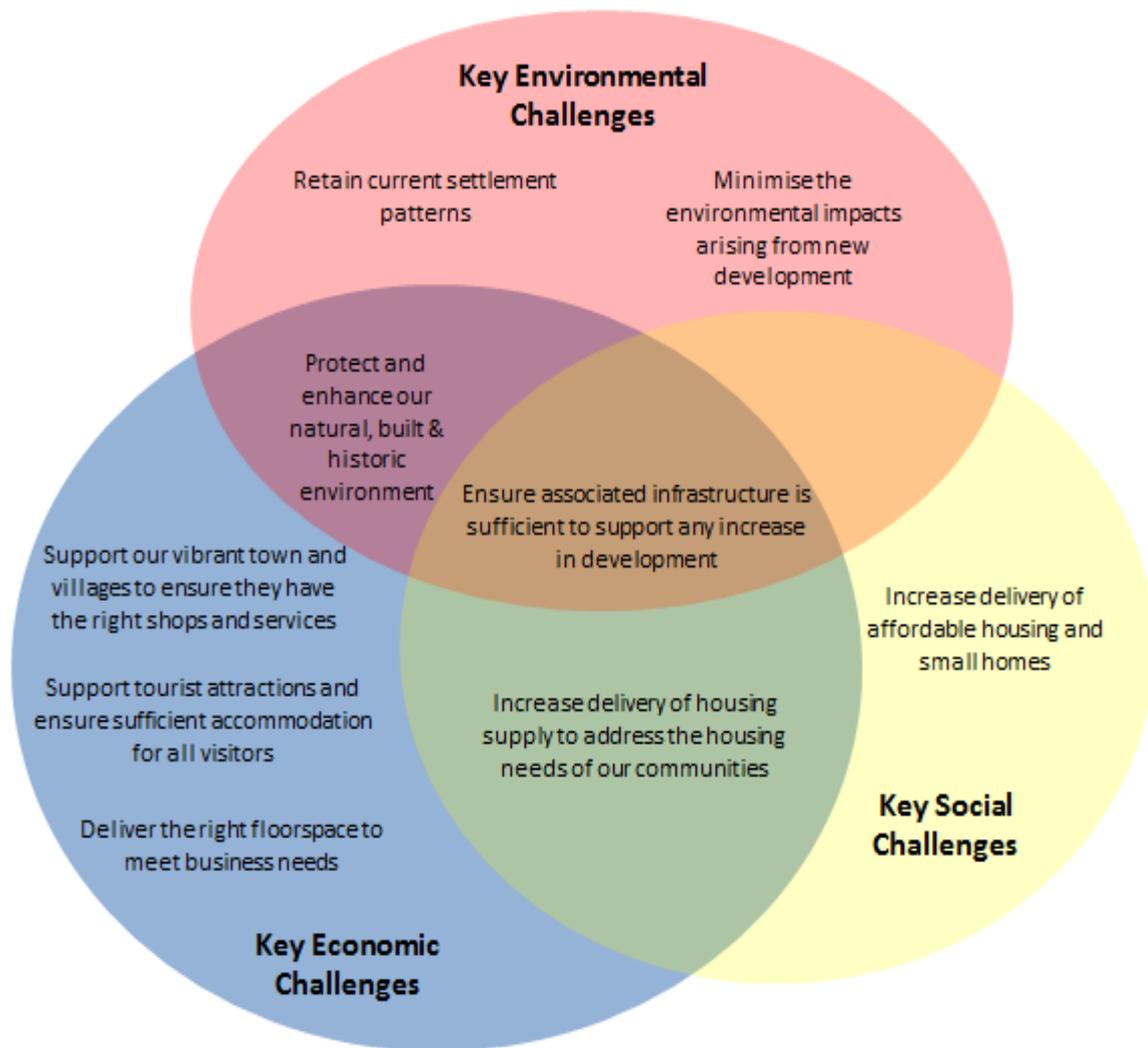
The Land Availability Assessment (LAA) is a key component of the evidence base. It makes realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. It does not allocate sites for housing or employment etc.; this is done via the Local Plan.

### **The Challenge for Elmbridge**

**2.23** The Government has been very clear that the purpose of planning is to achieve sustainable development and has defined this as “ensuring that better lives for ourselves does not mean a worse life for future generations.” This is then expanded and the three key roles of the planning system in achieving sustainable development are defined:

- Economic role
- Social role
- Environmental role

**2.24** To achieve sustainable development there must be gains across each of the three roles and, as such, each cannot be considered in isolation. We will use the Local Plan to maximise the benefits whilst ensuring the disadvantages are limited or addressed to ensure the most sustainable way forward is taken. In order to understand this balancing act we have used the evidence base to set out the key challenges for Elmbridge in the diagram below (Figure 5).



**Figure 5: The key challenges for Elmbridge**

### Questions

The key challenges facing the Borough will inform the vision and objectives the Council adopts in the way it will seek to manage development and growth in the future. It is important that we are addressing both the right challenges and the most important ones to everyone who lives, works and visits the Borough.

Therefore do you:

1. Agree that these are the key challenges facing Elmbridge?
2. Consider there are other challenges that we should be addressing?
3. Consider any particular challenge or challenges that are more important than the others?

## **Appraising sustainability**

**2.25** When preparing any plan we are required to appraise all reasonable options to ensure the most sustainable approach can be taken forward. The starting point for this appraisal is to undertake a scoping exercise as to the main sustainability issues facing Elmbridge.

**2.26** Whilst this paper has principally been prepared to set out the issues facing the Council and, in the next section, asks your opinion on how we address these issues it does set out options for a future spatial strategy. Each of these options has been appraised against the sustainability objectives set out in the Sustainability Appraisal Scoping Paper. The overarching sustainability of each option was considered taking into account where and what development would be likely to come forward. However, a more detailed appraisal of any sites coming forward for development will be undertaken at the next stage. This will enable a more detailed assessment as to the potential impacts of the options available to the Council and any mitigation which may be required.

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## 3 Meeting the Key Challenges

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**3.1** Many of the challenges highlighted in figure 5 are not significantly different to those set out in the Core Strategy. However, one key difference is that our objectively assessed need for housing is significantly higher than our current target. Whilst the Government has stated that we must seek to meet all our development needs in full, it also recognises that some policies in the NPPF will restrict development which may prevent us from meeting all our development needs in full. We therefore have a significant balancing act to try and meet as much of our identified need as possible whilst also balancing the need to ensure sufficient infrastructure to support our communities is delivered and that our built and natural environments are sufficiently protected.

**3.2** The overriding need for new development in the Borough is housing. The objectively assessed housing need (OAHN) for the Borough is 9,480 new homes over the next 19 years to 2035. It is estimated that we can provide 3,700 new homes on previously developed land in the urban areas over this time period. This leaves us with the challenge of exploring how much of the remaining need (5,780 new homes) we can meet. We will also need to consider whether we can meet any of the housing need arising from the wider HMA.

**3.3** As part of the preparation of any new Local Plan, we must therefore consider a range of options as to how we will seek to deliver new development and the degree to which this has a positive or negative impact on the social, environmental and economic issues facing the Borough. Key to the whole plan will be the spatial strategy which sets out the broad locations of where development should and should not take place and the amount of development we will seek to deliver. A proposed new spatial strategy is outlined below and we would like your comments on these options and the preferred option for the new spatial strategy.

**3.4** However, we will also have to consider options as to how development will be delivered within this broad spatial strategy. To help us develop these options we have set out a series of questions on the key areas the plan will cover. We would like to know your thoughts on these issues and this will help us to develop our policies when we prepare the next stage of our Local Plan.

### **A new approach?**

**3.5** Key to any new Local Plan will be our approach to meeting development needs as far as possible. Our current approach, as set out in the Core Strategy, will not allow for any significant increases in housing delivery over and above what has already been planned for. The Core Strategy was prepared to deliver a specific housing target that reflects the capacity of developable land in the urban area. As required by the NPPF, and set out above, we have

examined both the need for development and assessed the constraints<sup>1</sup> on development in the Borough. This indicated both a high level of need but also significant constraints.

**3.6** However, the evidence also indicated that the Borough's Green Belt did have areas which are not performing well against the purposes set out in the NPPF. There is a small amount of land which could be considered to only weakly meet the purposes of Green Belt. As such, and if there were exceptional circumstances, the Green Belt boundary could be amended to allow for some redevelopment of these weakly performing areas.

#### What are exceptional circumstances?

Exceptional circumstances are unique to each area. Some Councils have stated their need to support economic growth as being such a circumstance others have cited the unaffordability of housing in their areas. However, whilst the Government has not said what is an exceptional circumstance they have said that unmet need on its own does not necessarily constitute exceptional circumstances.

**3.7** Set out below are three options for delivering new development that we have considered and assessed using our sustainability appraisal framework.

### Option 1

Maintain existing Green Belt boundaries and deliver all development by concentrating development within the urban area by:

- Significantly increasing densities on all sites in the urban areas; and
- Identifying open spaces such as allotments and playing fields for redevelopment and relocating these uses within the existing Green Belt.
- Using the Duty to Co-operate to enquire as to whether other authorities have the potential to meet some of our need.

**3.8** This option would seek to deliver all of our development need of 9,480 new homes within the urban area on identified sites. Currently our towns and villages reflect a generally suburban character ranging from Victorian terraces (around 60 to 80 dwellings per hectare) to detached homes on large plots (around 10 to 15 dwellings per hectare). Only in our town centres have we seen significantly higher densities such as the Heart at Walton which is over 150 dwellings per hectare.

<sup>1</sup> We consider these to be: Undeveloped land in Flood Zone 3b; Sites of Special Scientific Interest (SSSI); Internationally designated habitats; Suitable Accessible Natural Greenspace (SANG); Registered Park or Garden; Ancient Woodlands; and Registered Commons and Village Greens

**3.9** This option would require all identified opportunities for development to be delivered at very high densities of over 300 dwellings per hectare, more akin to those found in the most urbanised parts of the Country such as central London. Given the relatively small size of our urban development sites such densities would require buildings of over 7 storeys not only in town centres but across the Borough. Whilst this option would seek to protect Green Belt land from redevelopment it would also have a considerable impact on the character of the Borough making it significantly more urbanised and adversely affecting the quality of the environment in which we live.

### **Benefits**

- Seeks to meet needs in full
- Protects Green Belt by preserving current settlement boundaries
- Makes Green Belt work harder
- High density development would deliver smaller, potentially cheaper, market housing

### **Disadvantages**

- Limited number of appropriate sites in the urban area creates a significant risk as to the deliverability of housing need
- Changing character due to increased urbanisation of residential areas as a result of high density development
- Loss of open space in the urban area
- Reduces accessibility of open space to most urban parts of the Borough
- Could affect development viability and the delivery of affordable housing due to the increasing costs associated with high density development
- Difficulties in delivering infrastructure alongside development
- Places pressure on those areas that have historically taken most development
- Will not deliver the desired mix of houses and flats

## Option 2

As far as possible meet development needs whilst maintaining development at appropriate densities in the urban area by:

Increasing densities on sites in the urban area only where it is considered appropriate and does not impact significantly on character;

- Amending Green Belt boundaries where:
  - the designation is at its weakest;
  - the areas are in sustainable locations; and
  - the areas are not, or are only partially, affected by absolute constraints.

Within these areas opportunities for accommodating our development needs will be explored taking into account site constraints, land ownership, the need to support sustainable development, and compliance with other planning policies; and

- Using the Duty to Co-operate to enquire as to whether other authorities have the potential to meet some of our need.

**3.10** Option 2 seeks to balance the needs for housing whilst recognising there are constraints on development within the Borough. However, this option also recognises that there are parcels of land currently designated as Green Belt that are no longer meeting the purposes of Green Belt. As such there is potential for these parcels to enable the Council to meet more of its housing needs whilst maintaining the character of its towns and villages.

### Benefits:

- Protects the character of the urban area
- Protects 97% of the Green Belt ensuring boundaries can endure beyond the plan period
- Maintains existing settlement pattern
- Delivers an increase in housing provision over previous Core Strategy
- Larger sites enable infrastructure to be delivered alongside new development
- Increase in the delivery of affordable housing and smaller units compared to previous Core Strategy
- Potential opportunity to identify land for self / custom-housebuilding

### Disadvantages:

- Will not meet housing needs in full
- Some loss of Green Belt
- Development may be in less sustainable locations on the edge of urban areas
- Increased pressure on highways
- Reliance on other Local Planning Authorities to meet residual needs

### Option 3

Deliver development needs of the Borough in full and explore opportunities to meet needs of other Boroughs and Districts in the HMA by:

- Increasing densities only on sites in the urban area only where it is considered appropriate and does not impact on character; and
- Amending Green Belt boundaries regardless of the strength of Green Belt and allocating sites in these areas for development.

**3.11** The final option considered was to meet needs in full by amending Green Belt boundaries regardless of the strength with which it was delivering against the purposes of Green Belt. Whilst such an approach would meet needs and deliver a significant amount of affordable housing it would fundamentally alter the character of our towns and villages through coalescence, urban sprawl and encroachment of new development into the countryside.

#### **Benefits:**

- Protects the character of the urban area
- Meets housing needs in full
- Seeks to meet the needs of the wider HMA
- Larger sites enable infrastructure to be delivered alongside new development
- Increase in the delivery of affordable housing compared to previous Core Strategy
- Potential opportunity to identify land for self / custom-housebuilding

#### **Disadvantages:**

- The loss of a significant amount of Green Belt
- Significantly increases the risk of settlement coalescence, encroachment into countryside and excessive sprawl
- Fundamental changes to the nature of the Borough and its settlement patterns
- Massive pressure on infrastructure in particular highways

#### **Why is there not an option for “doing nothing”?**

**3.12** We could decide not to amend the Core Strategy and continue to apply its existing policies. This approach would uphold our current position to maintain the Green Belt boundary unchanged and keep densities of development in urban areas at current levels. However, this would effectively mean we are adopting a “planning by appeal” approach for any development not in line with the Core Strategy. This has not been considered as an option for a number of reasons:

- The Government has indicated that where a local authority is not preparing a plan in keeping with its current guidance it will:
  - Intervene and prepare a plan on behalf of that authority.
  - Instruct the Council to prepare a joint plan with another authority
  - Invite the County Council to prepare a plan on behalf of the Borough

- The approach would lead to unplanned development that fails to take account of the cumulative impacts on our infrastructure, such as schools and roads whilst reducing our ability to ensure development contributes to the delivery of the required infrastructure
- Elmbridge Borough Council wants to be plan led and this approach would lead to decisions on development being made by a Planning Inspector thereby removing our ability to control development.

**3.13** In addition, the Government has placed a legal duty on planning authorities, county councils in England and public bodies to engage constructively, actively and on an on-going basis to maximise the effectiveness of their Local Plan preparation in the context of strategic cross boundary matters. This includes for example, the provision of new homes with the hope that if one local authority has insufficient capacity within its area to meet identified needs, the residual can be met elsewhere. The duty to cooperate is not a duty to agree. But local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination. Should we decide not to prepare a local plan, other authorities could challenge the local authority for failing to co-operate effectively and place even greater pressure to release more land for development to meet their needs.

## Our Preferred Option

**3.14** When examining options we have considered the Government's continuing position which places significant importance on Green Belt as a planning designation. The Secretary of State has upheld a number of decisions by Councils across the country preventing inappropriate development on Green Belt. However, the Government has also set out that Councils must also seek to meet housing need and as part of the plan making process consider whether land currently designated as Green Belt still meets those purposes. The Government have also been clear that Councils can only amend Green Belt boundaries as part of the preparation of a local plan and only if there are exceptional circumstances.

**3.15** Option 2 and 3 both seek to amend the Green Belt boundary in Elmbridge. We have therefore had to consider whether there are exceptional circumstances that would enable the Council to take forward such options. These are not defined in national policy and would need to be locally specific. The Government has said that unmet need on its own is not considered exceptional. We have considered what these circumstances could be and how these are exceptional in relation to Elmbridge. The issues that we consider should be recommended to a Planning Inspector as capable of amounting to exceptional circumstances are:

- 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.

**3.16** Based on the evidence collected and on the sustainability appraisal of the options set out above, we consider that Option 2 is to be preferred. This option balances the Government's directive to increase the levels of development, and in particular, housing development in the Borough whilst recognising that there are constraints on the amount of developable land which will prevent us from meeting our development needs in full.

**3.17** A key consideration in choosing this option is the high cost of housing. This is a significant problem facing both our current residents and those people working in the Borough who are unable to find the right housing at the right price to buy or rent. However, the problem is also one facing future generations who will not be able to afford to live in the area they have grown up in or in which they work. As such in making this decision we have given significant weight to the need to deliver not only more affordable housing but we have also considered the need to deliver a better mix of housing. At present, the housing market is delivering significantly more large detached houses than are needed for our growing population. Small sites coupled with the desirability of the area mean that small houses are not as attractive to developers.

**3.18** By increasing the supply of land and bringing forward some larger sites we can seek to increase the supply of the types of homes we need rather than those we do not. We could only seek to release land from the Green Belt for development where it will address the exceptional circumstances outlined above. Such development could be required to not only

deliver a specified level of affordable housing but also provide the right mix of 1, 2 and 3 bedroomed homes.

**3.19** Alongside the need to increase the supply of the right type of housing we do not want to dismiss those policies that have helped to maintain the pattern of our towns and villages and the distinct characters they have. Therefore, we have also placed significant weight on the protection of the overall integrity and function of Green Belt, a policy that continues to be strongly supported by Government, and in ensuring other “absolute constraints”<sup>2</sup> such as the functional flood plain, Sites of Special Scientific Interest and Village Greens are not impacted on by new development. Therefore, we believe that it would only be appropriate in Elmbridge to consider development on those areas of Green Belt that are assessed as only weakly meeting the purposes as set out in national policy recognising that this will impact on our ability to meet our development needs in full. We also believe that by only focusing on the weakest performing areas of Green Belt, this will strengthen the remainder of land designated as Green Belt.

### Preferred Option – Option 2

As far as possible meet development needs whilst maintaining development at appropriate densities in the urban area by:

- Increasing densities on sites in the urban area only where it is considered appropriate and does not impact significantly on character;
- Amend Green Belt boundaries where:
  - the designation is at its weakest;
  - the areas are in sustainable locations; and
  - the areas are not, or are only partially, affected by absolute constraints.

Within these areas opportunities for accommodating our development needs will be explored taking into account site constraints, land ownership, the need to support sustainable development, and compliance with other planning policies; and

- Use the Duty to Co-operate to enquire as to whether other authorities have the potential to meet some of our need.

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<sup>2</sup> We consider these to be: Undeveloped land in Flood Zone 3b; Sites of Special Scientific Interest (SSSI); Internationally designated habitats; Suitable Accessible Natural Greenspace (SANG); Registered Park or Garden; Ancient Woodlands; and Registered Commons and Village Greens

### Questions:

Given the expected levels of demand for land from new development do you:

4. Agree that Option 2 is the most appropriate option? If not, why not, and what other option would you support and why?
5. Consider the suggested exceptional circumstances are sufficient to support the amendment of the Green Belt boundary?

## Key Strategic Areas

**3.20** Following the principle of the Preferred Spatial Strategy (Option 2) we consider there to be three key strategic areas within the Green Belt where the designation could be removed. Each of these areas has been judged to be weakly performing against the purposes of Green Belt and is either unaffected or only partially affected by 'absolute constraints' which limit development opportunities. An initial appraisal of these three areas shows that their potential removal from the Green Belt to meet development needs would provide an appropriate balance of the three roles of sustainable development: economic, social and environmental.

**3.21** The three key strategic areas are:

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

**3.22** The location of each of these three key strategic areas is set out below in Figures 6, 7 and 8. The absolute constraints to development within each key strategic area are highlighted on the maps. These constraints will limit the identification of future development opportunities. Also outlined are other local constraints such as Local Nature Reserves, cemeteries and heritage assets all of which will also determine the type and scale of any development within these areas. It has not been possible to identify all the potential constraints, such as topography, these will also determine the type, scale and location of development within these areas.

**3.23** Within Local Area 58, there is a small section of land that is located in the neighbouring London Borough of Kingston-upon-Thames. It is important to note that our Green Belt Boundary Review does not directly influence the approaches to Green Belt in neighbouring authorities and no recommendations will be made beyond the boundaries of Elmbridge. Area 58 is therefore limited to the area of land within Elmbridge Borough.

**3.24** Within each of the key strategic areas, we will be looking for sites that could be allocated to meet development need. It is important that any site delivers an appropriate level of affordable housing and smaller units given the significant levels needed as set out in

the SHMA. We will undertake viability assessments to establish the potential of any sites in these areas. Sites not considered to be sufficiently contributing to the type of housing needs identified in the SHMA will not be considered to be supporting the exceptional circumstances required to amend Green Belt boundaries.

### Questions

Given the expected levels of demand for land from new development do you:

6. Agree that, given the appropriate exceptional circumstances, these three key strategic areas are appropriate for removal from the Green Belt? If not, why not?
7. Know of any sites within any of the three key strategic areas that could be considered for future development?
8. Consider that other areas of land should be removed from the Green Belt including those that are moderately or strongly performing?

**3.25** Provided within Appendix 3, is a map of all the Local Areas identified and assessed against the purpose of Green Belt.



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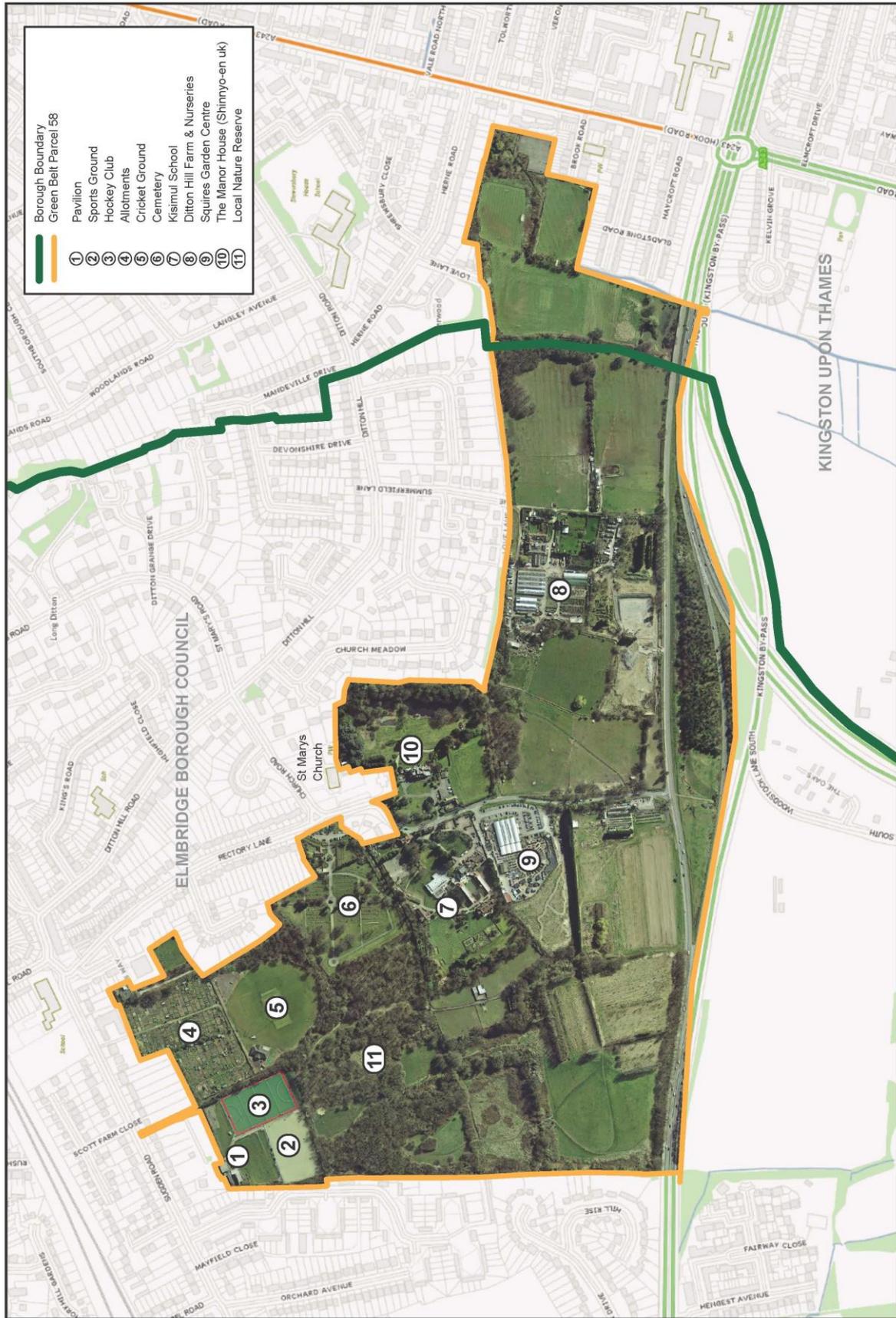
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Figure 6: Land north of Blundel Lane including Knowle Hill Park and Fairmile Park, Cobham (Local Area 14)



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 Produced by Elmbridge Borough Council

Figure 7: Land south of the A3 including Chippings Farm and The Fairmile, Cobham (Local Area 20)



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 Produced by Elmbridge Borough Council

Figure 8: Land north of the A309 and east and west of Woodstock Lane North, Long Ditton (Local Area 58)

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## 4 Key Issues

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**4.1** This section examines the key issues that will define how development comes forward over the next 20 years and seeks your views on how we might plan to address these issues in future. In some instances we do not think there is a need to amend policies significantly to support new development and to be consistent with national policy. Where this is the case we have said so but your views on any potential changes would be welcomed. If we think a new approach is required due to a change in national policy or changes in the evidence supporting our plan we have made suggestions as to a new approach. Any suggestions made at this section will then be used to develop options from which a policy approach can be prepared.

### Housing

**4.2** Elmbridge is one of the least affordable parts of the country to live. Some of this is due to the high cost of housing but it is also due to the type of housing that is built. Over the last few years the provision of larger detached properties (4+ bedrooms) has dominated new supply. Whilst it is not necessarily the case that smaller homes (1 to 3 bedrooms) equal cheaper more affordable homes, they are required to ensure wider choice and balance of supply in the housing market. The supply of smaller homes is particularly important to those seeking their first step on the property ladder, young families moving up the property ladder, and older persons seeking to downsize.

**4.3** We want to deliver a variety of high quality housing that widens the tenures, types and sizes of homes currently available within the Borough in order to meet the needs and demands of different households in our community. This includes smaller homes for those seeking their first step on the property ladder, young families, older people, and Travellers. New housing must take account of local need to give a genuine choice of housing and help create balanced, sustainable and inclusive communities.

**4.4** A key part of any policy to establish a variety of new homes means that we should be seeking to provide the mix of housing in the proportions as set out in our SHMA. Outlined below are the key headlines from this study. In setting future policies, this information will need to be considered carefully alongside issues such as viability, character and design.

**4.5** In order to address this issue we can ask developers to provide certain types of housing as part of a development, such as the mix of flats and houses, and the number of 1, 2, 3 and 4+ bedroomed homes that are provided on different sites. This will be guided by the SHMA, which in addition to identifying the overall amount of housing needed in the Borough, sets out the mix of housing required to meet needs. This information is shown in the table below.

Size of Unit	No. of Units Required	Percentage of Objectively Assessed Housing Need
1	2,654	28%
2	3,982	42%
3	2,749	29%
4+	95	1%
<b>Total</b>	<b>9,480</b>	<b>100%</b>

**Table 1: Mix of housing needed in Elmbridge**  
**Source: Kingston & North East Surrey SHMA (2016)**

### Questions

Based on your knowledge of the housing market in Elmbridge:

9. Do you agree that we should seek to provide more of a balance in terms of the size of new homes being built? If not, why?

10. Given the over delivery of homes with 4 or more bedrooms should we try to limit their delivery in future?

### Densities

**4.6** The approach to new development outlined in the preferred option (option 2) will increase the amount of developable land within the Borough. However, the number of new homes that can be delivered with this approach will depend on the densities at which development is delivered. Higher densities of housing would enable us to do more in meeting the housing needs identified for the Borough.

**4.7** As in many suburban areas there is a wide range of housing styles and types reflecting different eras, styles and demands. These range from higher density flatted and terraced developments through to low density detached houses on large plots. Our highest densities tend to be in the town centres with developments such as The Heart in Walton-on-Thames providing around 150 dwellings per hectare (dph). Elsewhere areas of Victorian terraces provide densities of between 60 and 80dph whereas semi-detached houses tend to be built at a density of around 30dph. Only in those areas with detached houses on larger plots will densities be significantly lower than 30dph.

**4.8** At present, we currently seek a minimum density in our suburban areas of 30dph and 40dph in our town centres. However, the Government has suggested that the most sustainable locations, such as those with good access to public transport and around train stations could be the location for higher density developments. We would like to know your views on the potential of delivering higher density developments in appropriate locations, and where this does not impact negatively on local character.

## Questions

Given the need for both market and affordable housing:

11. Should we seek to increase minimum densities at sustainable locations in the urban areas, such as in town centres and at train stations, above 40 dwellings per hectare, where this would not impact on local character? If yes, what density do you think would be appropriate?

12. Within the three key strategic areas we will be exploring opportunities for accommodating our development needs taking into account site constraints, land ownership, compliance with other planning policies and the need to support sustainable development. If potential housing sites are identified within these areas, do you consider it appropriate to:

- a. deliver at higher densities i.e. above 40 dwellings per hectare, in order to maximise delivery?
- b. support lower density developments that maintain the open character of an area and reflects the surrounding character?

## Housing for Specialist Groups

### Affordable Housing

**4.9** The close proximity of the Borough to the capital and the easy commute and high salaries available within the City are reflected in the high house prices experienced in Elmbridge. The cost of housing when compared to the salaries paid locally means that the Borough is one of the least affordable parts of the Country. This means there is a significant need for more affordable homes within the Borough. The need for more affordable homes is set out in the SHMA as 6,640 between 2015 and 2035 (332 per annum). This information is summarised in the table below for both the Borough and wider HMA.

Local Planning Authority	Social Rented	Affordable Rented	Intermediate	Total Affordable Need
Elmbridge	5,340	180	1,120	6,640
Epsom & Ewell	5,200	300	0	5,500
Kingston upon Thames	13,420	1,520	1,580	16,520
Mole Valley	2,100	-420	980	2,660

Total	26,060	1,580	3,680	31,320
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**Table 2: The need for Affordable Homes in Elmbridge and across the wider HMA**  
**Source: Kingston & North East Surrey SHMA (2016)**

### What is Affordable Housing?

Affordable housing is social rented, affordable rented and intermediate housing often provided by a local authority or housing association to those whose housing needs are not met by the market.

- **Social rented:** often owned by the local authority or housing association with rents being determined nationally. They are generally set low so that people on lower incomes are able to access a home and pay rent without struggling.

**Affordable rented:** subjected to rent controls, affordable rented properties require a rent of no more than 80% of the local market rent.

- **Intermediate housing:** is a home for sale and rent provided at a cost above social rent, but below market levels. This can include shared equity (shared ownership for example) and other low cost homes for sale and intermediate rent.

Homes like shared ownership and intermediate rent are generally for the people in who do not need the full support of social rented housing but cannot afford a market home.

**4.10** Our current policies seek contributions towards affordable housing provision on all appropriate sites. This is either via a financial contribution or via the provision of affordable units on-site. We seek the highest level of affordable housing provision on greenfield sites and those in public ownership. However, there have been considerable changes to housing policies since the adoption of the Core Strategy. The introduction of starter homes as a new type of affordable housing and the adoption of a small sites exemptions policy on planning contributions are just two of the changes that we will need to address within any new Local Plan. Both of these issues are discussed in more detail below.

#### Starter Homes

**4.11** The Government introduced “starter homes” as a new type of affordable housing as

### What is a Starter Home?

Starter homes will be new dwellings (and not previously occupied) available to first time buyers between the ages of 23 and 40. They are to be sold at 20% less than the open market value (capped at no more than £250,000).

part of the Housing and Planning Act. These homes are offered for sale on the open market at a reduced value to first time buyers. To promote the delivery of such homes we have been given a legal duty to support their delivery. To help understand the need for Starter Homes, the Government has established a national register, which allows would be first time buyers to record their interest in the scheme. However, interest can only be registered at present for Walton, Weybridge and Surrey. The need recorded for these areas as of April 2016 was 70, 58 and 1,116 homes respectively.

## **Small Sites Exemption Policy**

**4.12** Government has recently introduced changes to the way in which local authorities can deliver more affordable homes. An exemption has been introduced whereby on developments of 10 units or less and which have a maximum gross floorspace of no more than 1,000sqm, local authorities are no longer able to collect financial contributions towards the provision of affordable housing. The reason for the change is that the Government considers that small sites are being disproportionately burdened by certain planning obligations.

**4.13** As of June 2016, our policy on affordable housing (CS21 of the Core Strategy) had supported the delivery of 373 affordable homes through on-site delivery and supported off-site delivery from financial contributions totalling £6.89m. Since the adoption of the Core Strategy, 919 new homes have been delivered on sites of less than 10 units and where there has been an increase in housing. This equates to 50% of the total number of new homes built during that period (2011 – 2016). In terms of the type of site coming forward for development in the Borough, 91% of current applications providing an increase in new homes are on sites of 10 or fewer units.

**4.14** Following the Government's changes, our current affordable housing policy is now in conflict with national guidance. The consequence we now face is that without the ability to collect affordable housing contributions on small sites, our capacity to deliver the new homes needed by our communities is substantially reduced. Yet, Elmbridge remains the most expensive place to live in the south-east region and 4<sup>th</sup> most expensive in the country; we have a significant need for affordable housing within the Borough; and on the vast majority of sites of 10 or fewer units, the delivery of an affordable housing contributions has never previously been an issue.

**4.15** We have therefore taken the decision to continue to consider Policy CS21 on a case by case basis as part of the decision making process for any relevant application. This approach considers whether local circumstances in regard to affordable housing and the nature of development sites in the Borough are sufficient to warrant the requirement of affordable housing contributions, or whether greater weight should be attached to Government guidance.

## Question

Given the need for affordable housing in Elmbridge and the nature of development sites coming forward do you:

13. Agree with our approach to continue to apply Policy CS21 of the Core Strategy e.g. consider on a case by case basis whether local circumstances are sufficient to warrant the requirement of affordable housing contributions on all sites where there is a net increase in housing and where it is viable?

## Gypsies, Travellers and Travelling Showpeople

**4.16** Elmbridge has a well-established community of Gypsies, Travellers and Travelling Showpeople (hereafter referred to collectively as 'Travellers'). As part of the preparation of our new Local Plan, we are required to assess the housing needs of Travellers<sup>3</sup> within the Borough and provide appropriate accommodation.

**4.17** The latest assessment of need is our draft 2016 Gypsy and Traveller Accommodation Assessment (GTAA). The draft GTAA shows that we should provide between **two** and **nine additional pitches** for Gypsies and Travellers over the next 15 years up to 2031. There is no need for Travelling Showpeople plots. The additional pitches are required to meet the housing needs of concealed households, address issues of 'doubling-up' on existing sites as well as meeting the needs arising from future household formation. The assessment did not identify an immediate need for transit sites however; this issue will need to be kept under review.

### What is a pitch / plot?

For Gypsies and Travellers a pitch is an area which is large enough for one household to occupy and typically contains enough space for one or two caravans (one often being a chalet / mobile home), an amenity block, park area and small area of garden.

For Travelling Showpeople the most common description used to accommodate a single household is a plot. Again this is an area sufficient in size to accommodate residential units however, also the storage of equipment for circuses and events.

**4.18** Whilst there is no current requirement to include the needs of 'non-travelling' Travellers in the GTAA, we are still required to consider the accommodation needs of **all** people residing in or resorting to the Borough. The GTAA therefore identified the number of pitches and plots required in the Borough to meet the needs of 'non-travelling' Travellers. This information is summarised in the table below.

<sup>3</sup> Who is considered a 'Traveller' by the Government for planning purposes and therefore included within the assessment of need as part of the Gypsy and Traveller Accommodation Assessment is set out in Appendix 1.

Household \ Year	2016 - 2021	2021 - 2026	2026 - 2031	Total
Gypsies & Travellers (non-travelling)	16	3	4	23 pitches
Travelling Showpeople (non-travelling)	1	1	0	2 plots

**Table 3: The needs of 'non-Travelling' Households in Elmbridge by 5-year periods**  
**Source: Elmbridge Gypsy and Traveller Accommodation Assessment (2016)**

**4.19** The implication for Traveller households who do not travel and do not meet the planning definition of a Traveller is that their needs form part of the wider housing needs of the area as identified through the SHMA process. Whilst this need forms part of the wider housing need identified, the provision of pitches and plots will need to be balanced against our ability to provide other types of accommodation such as affordable homes and homes for older people.

#### Question

14. Are there any other aspects of Government policy which you think we should consider with regard to meeting the accommodation needs of non-travelling Travellers.? If yes please explain further.

### Housing for older people

**4.20** We need to provide suitable homes for the current and projected growth in the number of older people living in our community and those households with specialist accommodation requirements. Different types of homes are required to offer a real choice, be it smaller well-located market housing or more specialised homes offering improved safety and support suited to the various needs of people.

**4.21** Focusing on needs within our community, our evidence shows that between 2015 and 2032, the number of people aged 65 and older living in Elmbridge is set to increase by 8% (an additional 13,600 people). Whilst many older households will wish to remain in their own home and will be able to do so either independently, or with a level of social-support, others may wish to downsize or have the support they require 'on-site'. Smaller homes in suitable locations provide the opportunity to downsize, allowing households to retain a level of independence whilst remaining in their community or, by providing the chance to move to an alternative area with improved access to local facilities in a home that is more manageable. Others may require more specialised accommodation that caters for their needs. This is often provided in the form of Sheltered, Enhanced Sheltered or Extra Care Housing.

**4.22** Our evidence shows that there is an additional need of 1,366 Sheltered, Enhanced Sheltered, and Extra Care Housing units required within the Borough up to 2035. This equates to 66 units per annum. The majority of the demand (975 units; 74%) is for Sheltered accommodation followed by Extra Care Housing (195 units; 15%) and Enhanced Sheltered (156 units; 12%).

### **Accessible housing**

**4.23** Within our communities there are also a number of people that require accessible accommodation for example, wheelchair accessible. Good design such as level access and flush thresholds to properties, a WC at entry level, door openings of a suitable width and care with the design and internal and circulation space can help to ensure that future accommodation is adaptable and wheelchair friendly. Factors to be considered include a building's layout, materials and lighting which can also help people with dementia, reduced mobility or sight loss to continue to live as independently as possible. Focusing on wheelchair accessible homes, our evidence shows there is an unmet need of 232 households.

### **Families**

**4.24** Compared to the HMA authorities and Surrey as a whole, we have the largest proportion of households that have at least one dependent child<sup>i</sup> (47% of all households). We need to carefully plan for our families' needs ensuring we provide the right size and tenure of accommodation. A particular focus will be providing suitable accommodation in the affordable housing sector to address issues of overcrowding.

### **People who wish to build their own home**

**4.25** Self-build and custom housebuilding is also another relatively new concept introduced by the Government to increase homeownership and the supply of new homes.

**What are the different types of housing that are specifically designed to meet the accommodation needs of older people?**

**Sheltered** - accommodation for elderly or disabled people consisting of private independent units with some shared facilities and a warden.

**Enhanced sheltered** - a term used that reflects the additional care and support needs of older residents in sheltered housing but not high enough levels to require Extra Care Housing.

**Extra Care Housing** - is types of self-contained and independent housing developed for frail older people, with varying levels of care available on-site.

**What does Self-Build and Custom Housebuilding mean?**

Self-build and custom housebuilding are two terms which refer to people who are seeking to acquire serviced plots of land in an area in order to build a home for them to occupy. Self-build usually means that you are directly involved in organising the design and construction of your new home. Custom build usually means working with a specialist developer to help you deliver your home.

Those seeking to build their own property in Elmbridge are able to register their interest in a plot of land via an on-line register. Established in January 2016, 55 expressions of interest have been received as of 1<sup>st</sup> September 2016.

### Question

15. Do you consider there to be any other specific housing needs that are an issue within Elmbridge and that we should seek to address as part of the new Local Plan?

## The Economy

### Offices, warehousing and industry

**4.26** We want to ensure that Elmbridge continues not only to be a great place to live but also an area attractive to businesses and workers. To do this we need to balance the need for housing with the need to support and grow our economy.

**4.27** Elmbridge is a key economic location that is close to London but also with excellent access to strategic national and international transport networks. The Borough has one of the best performing local economies in the Country and is ranked 20<sup>th</sup> in the UK competitiveness index. The area provides employment opportunities for residents not only in the Borough but across the north Surrey and South West London area. Businesses are located not only in our major business parks and industrial estates such as The Heights at

#### What is Strategic Employment Land (SEL)?

These are sites designated in the Core Strategy because they are considered to be strategically important in terms of the economy either locally or sub regionally. There are currently 11 sites designated as SEL in the Core Strategy.

Brooklands and Molesey Industrial Estate but also in a range of other smaller office developments and industrial estates that support smaller companies. These support a wide, and growing, range of business from major multinationals through to small

start-up businesses with 1,020 additional businesses in the area since 2012 and 3,600 new jobs created since 2011.

**4.28** As highlighted earlier we expect there to be sufficient demand to fill an additional 30,000 to 40,000sqm of offices and 20,000 to 30,000sqm of warehousing. Our current policies seek to ensure that the most important sites with employment uses on them are retained to support economic growth and job creation within the Borough. The most important of these sites are designated as “Strategic Employment Land” and uses are restricted to offices, warehousing and industrial uses. This means that the redevelopment of these strategic sites to housing or retail for example will be strongly resisted. We feel that it remains important to protect those areas considered to be strategic and as such we are proposing to retain the current policy in the Core Strategy that prevents the loss of our most important areas of employment land to other uses. We will then need to consider which employment areas should be designated as being “strategic”, in the next consultation.

## Questions

16. Do you agree that the Council should seek to protect our most important and strategic employment areas from redevelopment to uses other than offices, warehousing and factories?

17. If not what degree of flexibility do you consider would be appropriate with regard to alternative uses in such areas?

## Brooklands

**4.29** The redevelopment of Brooklands over the last two decades into a key location for business not only in Surrey but across the region has been a major success. The area is now home to a large array of businesses including multinational corporations such as Sony, Samsung and Cargill that are attracted by its excellent connections not only into London but also to both Heathrow and Gatwick.

**4.30** The area, which is directly south of Weybridge, offers a mixture of employment uses with high quality offices at The Heights and Velocity through to large format warehousing and distribution centres on the Brooklands Industrial Estate. With over 36ha of land in B2/B8 uses and over 22ha of land supporting high quality offices it is one of the largest business parks in the upper M3 area.

**4.31** However, the area is constrained. Like our other employment areas it is tightly bounded by residential development but the area is also constrained by the Green Belt running between The Heights and Brooklands Industrial Estate; a Scheduled Ancient Monument (the former Brooklands Race Track); and an area of Suitable Accessible Natural Greenspace (SANG). In addition to these constraints the area also suffers from severe congestion, in particular at rush hour. The A245 towards the A3 in particular is a congestion hotspot.

**4.32** In line with our current policy in the Core Strategy, we will seek to explore opportunities for intensification within all our designated employment areas. However, there is the potential to explore the opportunity for amendments to the Green Belt boundary at Brooklands to deliver further opportunities for employment uses at this site. In particular any opportunities for expansion could support improvements to the road network to reduce congestion. Any exploration as to any further opportunities would also need to ensure that other constraints such as SANG and the heritage constraints are not affected by any further expansions.

**4.33** As for all amendments to the Green Belt boundary this would require exceptional circumstances. These would need to be very strong as the Green Belt at Brooklands has been assessed as being strongly performing. Any exploration into amendments at

### What is Suitable Accessible Natural Greenspace (SANG)?

SANG are areas of open space that are provided to offset the impact of new housing development on the Thames Basin Heaths Special Protection Area. These must be retained in perpetuity and are funded through contributions from new development.

Brooklands would then need to consider what exceptional circumstances might be, such as the potential to address congestion and to continue to support such a vital economic asset.

### Questions

18. Do you think that there are any exceptional circumstances that would support the amendment of the Green Belt boundary at Brooklands to support the further development of employment uses at this site?

19. Other than Green Belt what other barriers do you consider could prevent further development at Brooklands?

### Sandown Park Racecourse

**4.34** Whilst the Borough as a whole is not an obvious tourist destination there are a number of attractions in Elmbridge that draw in a wide range of visitors. The Core Strategy recognises this and as such includes a policy that encourages the development of existing tourist attractions and hotels to meet needs. Tourism remains an important part of the economy which we need to continue to support and a key part of this will be supporting our main tourist attractions.

**4.35** One of the main attractions in the Borough is Sandown Racecourse which is not only a sporting venue but also a major conference and exhibition centre attracting 120,000 visitors every year to the 25 race fixtures, nearly 100,000 visitors to public exhibitions and over 25,000 people attending private events. The racecourse also supports over 100 permanent jobs and over 4000 temporary staff supporting race fixtures and events. However, the racecourse, stadium and supporting facilities are ageing and are likely to require improvement to meet the changing demands of race goers and conference organisers during the lifetime of the Local Plan. Though as the site is set wholly within the Green Belt careful consideration needs to be given to any improvements that balances the long term future of this key asset, its impact on infrastructure and the desire to preserve the character of the area. Therefore in order to ensure Sandown remains one of the regions key race and conference venues we will need to consider how best to support the future needs of this venue through the Local Plan.

### Question

20. We will seek to maintain our broad support for tourism related development as set out in the Core Strategy. However, to recognise the importance of Sandown Park Racecourse as both a sporting and exhibition venue should we:

- Encourage the redevelopment of Sandown Racecourse to provide improved and extended conference and hotel facilities?

## Retail provision in our town and village centres

**4.36** The key issues to address with regard to our town and village centres is how to ensure that they remain vibrant in the face of not only our changing shopping habits but the way we all now spend our free time. However, there are limited development opportunities within which to deliver additional retail floorspace within our town centres. They are tightly bound by residential areas or physical barriers such as the Thames. It will be a challenge to meet the levels of development required to retain market share when faced with competition from centres such as Kingston and Guildford.

**4.37** Our current policy, in line with the NPPF, seeks to focus all new retail development in our town centres and to protect existing primary and secondary retail frontages from

### What primary and secondary retail frontages?

Primary frontages are those central areas in town centres where the majority of the shops are located and where uses such as takeaways, restaurants and offices are restricted. Secondary frontages will have a greater number of these uses alongside shops and tend to be towards the edge of town centres.

inappropriate changes of use. The Core Strategy protects the main “primary” shopping frontages for retail uses and seeks to restrict the further erosion of these by stopping them from changing to other town centre uses such as restaurants, dentists, financial advisers, bars and takeaways. These uses are directed to secondary frontages. This approach seeks to retain our town centres as places to shop whilst also recognising their importance in meeting a much wider range of demands.

### Question

21. Given changing consumer habits should we:

- Maintain our policy of focussing new retail development to town and village centres?
- Continue to protect primary shopping areas from other uses as set out in the current Core Strategy?
- Consider allowing other important uses in primary high street shopping frontages such as doctor’s surgeries, dentists and libraries?

## The natural and built environment

### Open space

**4.38** We have 276 open spaces within our urban areas covering 1,850 ha and these are a key feature of our environment. These range from small pockets of amenity space through to large open spaces such as Hurst Park that covers 27 hectares of land in Molesey. National policy gives open spaces a significant level of protection. All open spaces are protected from inappropriate development unless they can be re-provided in an appropriate location to the same or better standard, they are surplus or it is for an alternative leisure and recreation use.

**4.39** In addition, the NPPF sets out that we can establish what are known as Local Green Space for areas that are demonstrably special to the local community. These Local Green Spaces would then have the same level of protection as Green Belt. In our Development Management Plan we set out policies on both these areas and we are not proposing to change these policies. However, Local Green Spaces can only be established through the preparation of a Local Plan and we will look to designate such spaces where appropriate to give greater protection to those open spaces that meet the criteria set out by Government.

#### Local Green Space

The NPPF sets out that the designation should only be used where the green space is:

- in close proximity to the community it serves;
- demonstrably special and holds a particular, local significance because of its beauty, history, recreational value, tranquillity or richness of wildlife; and
- not an extensive tract of land.

#### Question

22. Should the Council continue to give a high level of protection to all open spaces and designate those spaces that meet the criteria for Local Green Spaces?

### Biodiversity and the Thames Basin Heaths Special Protection Area

**4.40** We are required by national policy to set out a strategic approach and plan positively for the creation, protection and enhancement of a network of Green Infrastructure and biodiversity. Our policies in the Core Strategy set out clearly our commitment to supporting biodiversity and maintaining an effective and multi-functional network of Green Infrastructure. We do not propose to change this commitment, which is in line not only with national policy but our own aspirations.

**4.41** However, alongside supporting key national and local designations such as Sites of Special Scientific Interest (SSSI) and Local Nature Reserves (LNR) we must also ensure that new development does not impact on the internationally designated Thames Basin Heaths Special Protection Area (SPA) which stretches across the three counties of Surrey, Hampshire and Berkshire. Whilst only a small part of our Borough is covered by this habitat

we are required to mitigate against the impact of all development within a 5km zone surrounding the SPA. To do this we require all new development within this zone to provide support to the creation of Suitable Accessible Natural Greenspace (SANG). These SANGs provide alternative areas for residents to visit that provide a similar experience to visiting the SPA without adversely impacting on what are sensitive habitats.

**4.42** Without the commitment to supporting SANGs, the Council would have to refuse all new residential applications within the buffer zone. As such we are not proposing to amend this policy and we will continue to ensure any new development in this zone is adequately mitigated.

#### Question

23. Do you agree with our approach to biodiversity and mitigating the impact of new development on the Thames Basin Heaths habitat?

### Heritage and Historic environment

**4.43** There are a number of different heritage assets in the Borough of international, national and local importance including Conservation Areas, Listed Buildings, Historic Parks and Gardens, Scheduled Monuments and Areas of Architectural Importance and Potential. They are important as individual entities but together they create our unique historic environment. They not only add architectural, historic, artistic and archaeological value but also provide social, economic and environmental aspects which are identified within recent government guidance. This also recognises that they are irreplaceable resources which are vulnerable both to gradual and dramatic change and that they should be conserved in a manner appropriate to their significance.

**4.44** We have adopted a positive strategy for the conservation and enjoyment of its historic environment through both the Development Management Plan and the Heritage Strategy. These resist the loss of heritage assets whilst recognising that there is potential to allow some redevelopment especially where this supports the long term protection of that asset and its key features. This pro-active approach recognises that Heritage is an asset rather than a constraint to development.

#### Questions

24. Do you agree that our strategic and pro-active approach to supporting our heritage assets is appropriate?

25. If not, what approach do you think we should take?

### Design and character

**4.45** Elmbridge is characterised by the different design and character of areas within the Borough. There is no particularly dominant town centre or settlement hierarchy. Some areas are uniquely historic with a few modern “one-offs”; others are typical examples of the phases

and fashions of urban and suburban developments, while many retain their “village” character and community. Recognising and understanding these different components helps to identify character as well as capacity and is essential in guiding and delivering successful and sustainable development. The Council seeks to identify areas and encourage development within these built-up / brownfield areas where it is appropriate and sustainable whilst ensuring the character of the area is maintained.

### Questions

26. Do you agree that the Council’s current approach to considering design and character is appropriate?

27. If not what approach do you think we should take?

## Addressing the environmental impacts of development

**4.46** New development will inevitably place greater pressure on the environment. An increase in the numbers of residents or businesses will mean greater pressure on resources and increases in emissions such as carbon dioxide and nitrogen dioxide. Increases in such pollutants also play a role in climate change which in turn increases the levels of flood risk faced by our residents. It is therefore important for us to ensure that we seek to reduce the impact of development on the environment and ensure that new development is adequately located and built to take account of changes in our climate. Outlined below are some of the issues we will seek to address within the new local plan.

### Flooding

**4.47** Many of our residents will have been affected by flooding in the last few years. Whether this is from the rivers that flow through the Borough, or from other sources, it has a massive impact on the lives of those affected. To minimise the impact of new development on flood risk national policy sets out that we must direct development to the lowest appropriate area of flood risk and that all development at risk of flooding must be designed to minimise risk, ensure it is safe and does not increase the risk of flooding elsewhere. This national approach is currently reflected not only in our Core Strategy but also our recently adopted Flood Risk Supplementary Planning Document and one which we are proposing to maintain.

**4.48** However, since the adoption of the Core Strategy there have been changes in the way that advice and guidance on flood risk is provided. Until recently the Environment Agency provided detailed advice on all types of development at risk of flooding. However, due to a significant reduction in their funding the Environment Agency now do not provide detailed advice on small-scale development.

**4.49** Our Strategic Flood Risk Assessment highlights that many of our residential areas are in areas at risk of flooding and that there is likely to be a cumulative impact from small-scale development in the Borough on increasing flood risk. When coupled with the lack of detailed advice on small-scale development, the current situation has created difficulties in ensuring the cumulative impacts of small-scale development on flood risk are addressed.

**4.50** At present we manage this by requiring all development that is, or could be, affected by flooding to provide a detailed Flood Risk Assessment outlining the impact of a development on flood risk and what is being done to address these impacts. Whilst this has been effective we recognise that, due to the significant amount of existing residential development in areas at risk of flooding, a specific policy relating to small-scale development may be beneficial in determining applications and reducing the financial burdens on householder applications.

### What is Strategic Flood Risk Assessment?

This document sets out the areas that are most at risk of flooding in future. These are set out as flood risk zones ranging from zone 3b which is flood plain to flood zone 1 which is a 1 in 1,000 year risk.

### Question

28. Should we look at including a policy providing more detailed advice on what is required to limit the cumulative impact of small scale development on flood risk?

## Sustainable transport and travel patterns

**4.51** Elmbridge 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%. This has contributed to high levels of pollutants in certain areas with seven areas being in Air Quality Management Areas (AQMAs) where pollution levels are above national minimum standards. For this reason the Core Strategy sets out policies that looked to:

- Direct development to the most sustainable locations close to public transport and existing services;
- Require major developments to prepare transport assessments and travel plans;
- Apply maximum parking standards, including the consideration of zero parking for town centre developments where appropriate; and
- Protect and improve footpaths, bridleways and cycle paths to encourage more sustainable modes of transport

### Questions

29. Do you consider the existing policies seeking to reduce the impacts of new development with regard to delivering more sustainable travel patterns outlined above are still appropriate?

30. Are there other approaches we should consider?

## Infrastructure Delivery

**4.52** We have worked hard with Surrey County Council and other infrastructure providers to improve infrastructure to meet needs. As set out in the Core Strategy we prioritised the collection of developer contributions and were one of the first authorities in the Country to start collecting the Community Infrastructure Levy (CIL). To date we have collected nearly £12m and allocated almost £6 million pounds to support infrastructure improvements. As set out in the Core Strategy we prioritised the delivery of new school places and working with the County have ensured that there are now sufficient primary places to meet planned needs to 2026. Whilst the majority of funding has come from the County Council we have supported the expansion of those schools most affected by new development by allocating £2.8m to Surrey County Council to support school expansions. This has assisted the delivery of an additional 1,260 places across 7 schools.

### What is the Community Infrastructure Levy?

It is a charge on new development. It raises funds towards new infrastructure and is payable on development of more than 100sqm, or any development that involves the creation of an additional dwelling. Our CIL charge is:

- £125 per sqm for residential dwellings
- £50 per sqm for retail development

**4.53** Alongside improvements to strategic infrastructure such as schools we have also used some of the money raised to support more local projects. These have helped, for example, to secure improved safety at crossings near schools, improved community facilities and provided improved access to open spaces. In total we have allocated over £1m to important local improvements to infrastructure.

**4.54** However, we realise that further infrastructure improvements will be required to support any increase in development. Again schools will be a key focus for us but we will also need to ensure that improvements are made to the road network, public transport, health provision, community facilities and leisure facilities. In particular the impacts of additional development on both the local and strategic road networks will be considered through detailed modelling. This modelling will be used to identify congestion hotspots and outline potential solutions.

**4.55** As with our current approach we will continue to seek developer contributions from developers to help deliver new infrastructure. As part of this we will review our current Community Infrastructure Levy charges and how these can be used alongside other developer contributions to secure the necessary infrastructure to support growth.

## Questions

31. What do you consider to be the essential infrastructure items required to support new communities e.g. the potential development of the 3 key strategic areas?

32. What smaller infrastructure improvements do you think could be made within your local area to address some of the negative impacts arising from new development?

## Any other issues?

**4.56** This document sets out what we think are the key challenges facing Elmbridge with regard to managing new development over the next 20 years and our approach to balancing the competing demands for land and concerns that inevitably arise from proposals to increase development. However, we recognise that there may be other issues or options we have not considered that you would like to raise. If there are, we would like to hear these and consider them as part for this consultation.

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## Appendix 1 - Evidence Base Glossary

Included within this consultation document are the high-level outcomes from the evidence base review. For those wishing to see the final details, the entire suite of evidence base documents can be found on our website: <http://www.elmbridge.gov.uk/planning/sdps/evidence-and-supporting-docs/>

Set out below is a list which briefly explains each of the evidence base documents. Identified are those evidence base documents that have been prepared and those that will need to be prepared and / or updated to inform the further preparation of the new Elmbridge Local Plan. This list may be added to as and when appropriate.

Document	Date	Description
Alternative Development Options	September 2016	Outlines the alternative strategic options for the delivery of housing and development growth within the Borough.
Authorities Monitoring Report	December 2016	An annual report designed to monitor the implementation of our current policies.
Employment Land Review & Functional Economic Area	Functional Economic Area completed. Employment Land Review update being prepared.	The aim of the study & review is to enable the Council to make decisions relating to the potential allocation of employment sites for redevelopment; the designation of key areas of commercial property as strategic employment land; and the possible implementation of article 4 directions.
Settlement Assessment	September 2015	Examines the economic, social and environmental roles of each of the eight settlements in order to understand their sustainability and potential to accommodate additional development.
Duty to Cooperate Scoping Statement	January 2015	Sets out how we will cooperate with other local planning authorities and organisations, to ensure that cross-boundary and strategic planning matters are addressed as part of the preparation and implementation of the Local Plan.
Equalities Impact Assessment (EqIA)	November 2016	Explores the equality implications of Local Plan policies and identifies any mitigation measures that could be implemented to ensure any negative impacts are reduced to an acceptable level. The EqIA will be reviewed at each stage of the preparation / publication of the Local Plan.

Document	Date	Description
Exceptional Circumstances	September 2016	Sets out the factors that the Council considers to be 'exceptional circumstances' to justify any proposed amendment to the Green Belt boundary.
Green Belt Boundary Review (GBBR)	March 2016	Provides an assessment of how different areas of land perform against the purposes of the Green Belt as set out in national planning policy. The review identifies any land that no longer meets the aims and purposes of Green Belt.
Gypsy and Traveller Accommodation Assessment (GTAA) (Draft)	December 2016	Identifies the need for pitches for Gypsies and Travellers <sup>4</sup> and Travelling Showpeople and Circus People <sup>5</sup> across the Borough.
Habitats Regulations Assessment (HRA) – Stage 1 Initial Screening Report	November 2016	The purpose of the Habitats Regulation Assessment (HRA) is to identify any aspect of the emerging Local Plan that would have the potential to cause a likely significant effect on protected sites, either in isolation or 'in combination' with other plans and projects. The Initial Screening Report is the starting point for this process and focuses on the three Strategic Options and whether these options alone or 'in combination' are likely to have a significant effect.
Heritage Strategy	December 2015	The strategy provides a framework for how we understand, preserve, manage, integrate, interpret and promote our heritage in both the immediate and long term future.

<sup>4</sup> For the purposes of planning Gypsies and Travellers means persons of a nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such.

In determining whether someone is a Gypsy or Traveller for the purposes of planning, consideration is given to:

- a) Whether they previously led a nomadic habit of life.
- b) The reasons for ceasing their nomadic habit of life.
- c) Whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

<sup>5</sup> For the purposes of planning, Travelling Showpeople and Circus people are members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers.

Document	Date	Description
Infrastructure Delivery Plan (IDP)	To be prepared	Sets out infrastructure requirements e.g. transport, schools needed to support proposed growth. In addition, an assessment of the potential funding sources for the infrastructure required to support growth is made.
Kingston & North East Surrey Strategic Housing Market Assessment (SHMA)	June 2016	Defines those areas with strong links and similarities to the housing market in Elmbridge and which form a coherent Housing Market Area (HMA). An assessment is then undertaken for the HMA to identify how many new homes will be required over a twenty year period, to meet the needs of existing and future populations. The SHMA sets out the need for market and affordable homes as well as the needs of specific groups such as older people, minority groups, and people with disabilities.
Land Availability Assessment (LAA)	September 2016	Seeks to identify sufficient sites to demonstrate a five year supply of housing and pitches for Gypsies and Travellers in the context of the Core Strategy. It also sets out the Objectively Assessed Housing Needs (OAHN) for the Borough and whether or not this can be met within the context of the existing spatial strategy. The LAA identifies development opportunities to meet the needs of our economy including commercial/industrial/warehousing and retail.
Local Green Space (LGS) Assessment	September 2016	Identifies those areas of open space that have particular importance and value to the community that are to be designated as Local Green Space and protected against future development.
Open Space and Recreation Assessment (OSRA)	October 2014	Provides a review of existing open space provision in terms of quantity, quality, accessibility and wider value to the community. Sets open space standards and identifies surpluses and deficiencies.
Retail Assessment	April 2016	Provides evidence on the existing and future roles of the Borough's Town, District and Local Centres and assesses future demand for retail floorspace having regard to the expected levels of growth in Elmbridge and neighbouring authorities as well as changes in consumer behaviour.
Review of Absolute Constraints	September 2016	Identifies constraints to development e.g. Sites of Special Scientific Interest, Flooding etc., for areas of land within the Green Belt that would prevent development from taking place as the potential impacts cannot be mitigated.
Strategic Flood Risk	May 2015	Provides information on flood risk from all sources (rivers, surface water, groundwater

Document	Date	Description
Assessment (SFRA)		sewers, and artificial sources) across the Borough to help ensure that development is directed away from areas of flood risk or where it does take place, that it is safe and the risk of flooding is minimised.
Suitable Accessible Natural Greenspace (SANG) Assessment	To be prepared	If additional SANGs are required to mitigate higher levels of housing growth, this report will provide an assessment of land to determine whether it could be designated as a SANG.
Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Scoping Report	September 2016	An assessment process that aims to ensure that social, environmental and economic considerations are integrated into the plan making process. SA/SEA is applied at each stage of plan production and the process and key decisions are audited in a series of reports. The Scoping Report represents the first stage of the SA/SEA process.
Transport Assessment	To be published	Provides the Council with an up to date understanding of the impact of future development scenarios on the local and strategic road network in Elmbridge and just beyond over the next 20 years. The assessment shows whether the existing road network has the capacity to support the proposed development options or whether mitigation measures will need to be identified to off-set the impact of any proposed development.
Viability Assessment	To be prepared	Supports the setting of developer contributions e.g. affordable housing, Thames Basin Heath Special Protection Area, to ensure that development is not financially overburdened and is achievable. It will also consider the ability of key strategic development areas to provide sufficient levels of affordable housing and smaller homes to meet the exceptional circumstances required to justify release from the Green Belt.

## Appendix 2 - Core Strategy Policies

As set out in this consultation document, we will be preparing a whole new Local Plan to replace the Core Strategy. However, we will be seeking to retain many of the policies in the Core Strategy that are in conformity with the National Planning Policy Framework (NPPF) and which continue to meet our objectives for development locally.

Set out below is the list of policies contained within the Core Strategy and how we intend to approach each one as part of the preparation of a new Local Plan. As can be seen some, such as the Spatial Strategy will be entirely replaced however, others only require amending and the general approach of the policy will be retained. It should be noted that the numbering of all policies will change and that the title will also be amended where appropriate.

Document		Status	Why
CS1	Spatial Strategy	Replace	The existing spatial strategy is not sufficiently flexible to allow the Council to increase the delivery of new homes and other forms of development to meet its development needs. A new spatial strategy will be pivotal to the Local Plan showing how the Council intends to plan for sustainable development.
CS2	Housing provision, location and distribution	Replace	A new target for the number of homes to be provided within the Borough up to 2035 will be set out in the Local Plan. This will balance objectively assessed housing need alongside those designations and policies that limit development opportunities.
CS3	Walton on Thames	Amend & Retain	We are minded to continue with the concept of individual settlement area policies within the new Local Plan. Setting out a vision for each settlement areas, these policies will be locally distinctive identifying the strengths, weaknesses, opportunities and threats to the areas. The accompanying maps will be updated to identify the broad location of any new development opportunities identified and any improvement schemes that are set to take place.
CS4	Weybridge		
CS5	Hersham		
CS6	Whiteley Village		
CS7	East and West Molesey		
CS8	Thames Ditton, Long Ditton, Hinchley Wood & Weston Green		
CS9	Esher		
			Following the ward boundary review that was implemented at the local elections on 5

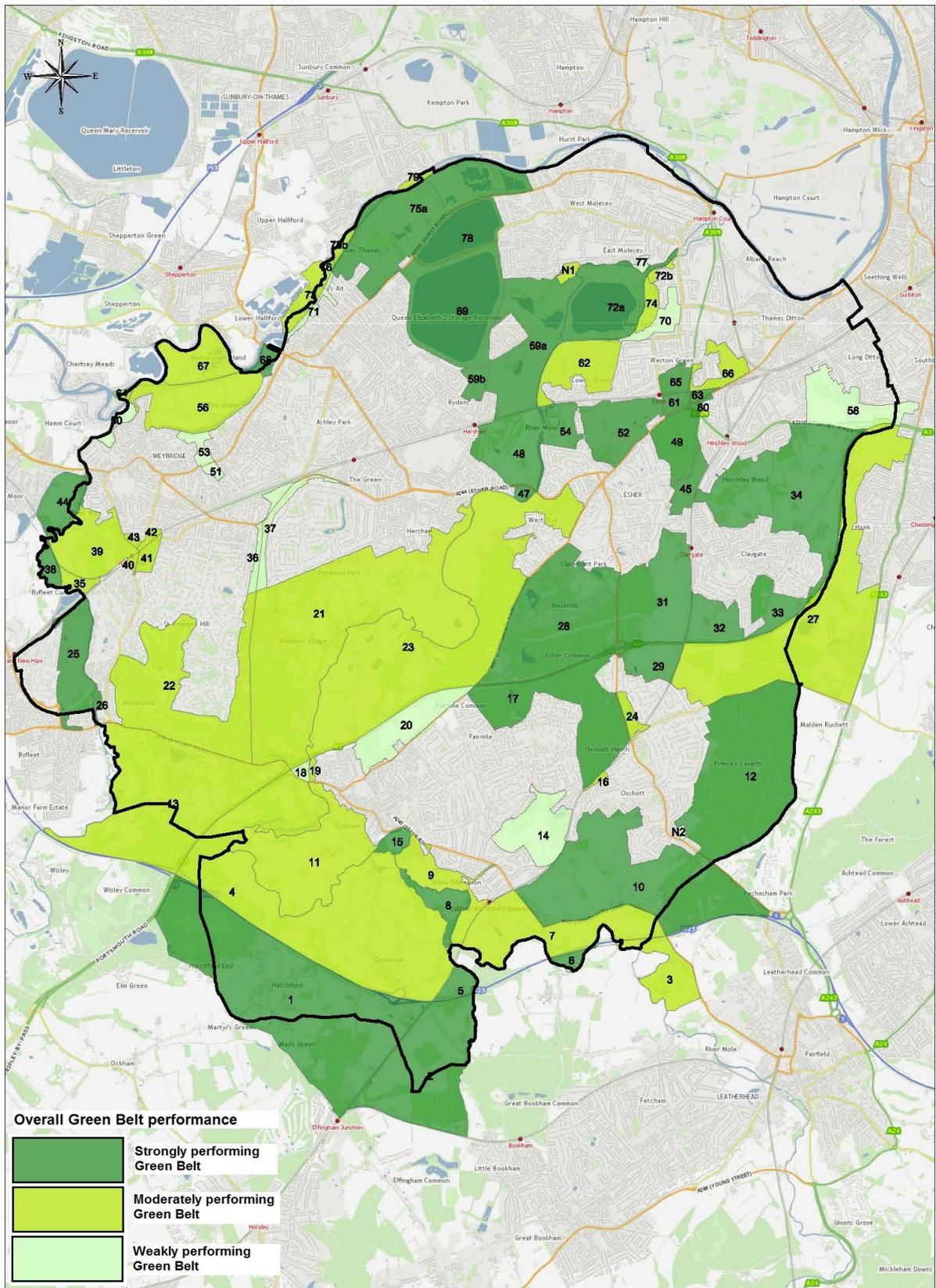
Document		Status	Why
CS10	Cobham, Oxshott, Stoke D'Abernon & Downside		May 2016, the boundaries of each settlement area will be redrawn as appropriate.
CS11	Claygate		
CS12	The River Thames Corridor and its Tributaries	Amend & Retain	Amendments will be made to bring the policy up to date e.g. reflecting the adoption of the Development Management Plan and replacing references to Core Strategy Policies and the proposed Site Allocations Plan.
CS13	Thames Basin Heaths Special Protection Area	Amend & Retain	Amendments will be made to bring the policy up to date e.g. reflecting the most up to date standards and mitigation measures. Consideration may also need to be given to the identification of additional Suitable Accessible Natural Greenspace (SANG) to mitigate higher levels of housing growth.
CS14	Green Infrastructure	Amend & Retain	Amendments will be made to bring the policy up to date e.g. reflecting the adoption of the Development Management Plan and replacing references to Core Strategy Policies and the proposed Site Allocations Plan. References to previous national policies and guidance will also be removed. The inclusion of Local Green Spaces as part of the Green Infrastructure network will also be required should these be allocated.
CS15	Biodiversity	Amend & Retain	Amendments will be made to bring the policy up to date e.g. reflecting the adoption of the Development Management Plan and replacing references to Core Strategy Policies and the proposed Site Allocations Plan. References to previous national policies and guidance will also be removed.
CS16	Social and Community Infrastructure	Amend & Retain	Amendments will be made to bring the policy up to date e.g. reflecting the adoption of the Development Management Plan and replacing references to Core Strategy Policies and the proposed Site Allocations Plan. References to previous evidence base studies such as the Education Provision Assessment will be replaced with the most up to date evidence base. In addition, should certain forms of infrastructure be required to support the delivery of the spatial strategy e.g. new schools, these will be identified.
CS17	Local Character, Density and Design	Amend & Retain	Amendments will be made to bring the policy up to date e.g. reflecting the adoption of the Development Management Plan and replacing references to Core Strategy Policies and the proposed Site Allocations Plan. Changes to the sub-section on Development Density may be required to reflect the drive to use land within the urban areas,

Document		Status	Why
			particularly in the town centres and at train stations, more efficiently providing this does not impact on local character. The potential development of the three key strategic areas also raises questions regarding density that will need to be reflected in the new Local Plan.
CS18	Town Centre uses	Replace	The latest evidence base documents including the Retail Assessment, Settlement Assessments and Land Availability Assessment will be used to set out the level of new development being planned for including, the identification of any key sites. Should any changes to town centre boundaries and primary and secondary frontages be proposed, these will also need to be reflected. Amendments will be made to bring the policy up to date e.g. reflecting the adoption of the Development Management Plan and replacing references to Core Strategy Policies and the proposed Site Allocations Plan. Changes to national guidance and the permitted development order may also need to be reflected.
CS19	Housing type and size	Amend & Retain	Amendments will be made to bring the policy up to date e.g. reflecting the adoption of the Development Management Plan and replacing references to Core Strategy Policies and the proposed Site Allocations Plan. The most up to date evidence contained within the Strategic Housing Market Assessment in terms of the type, size and tenure of new homes required within the Borough will also need to be reflected.
CS20	Older People	Amend & Retain	Amendments will be made to bring the policy up to date e.g. reflecting the adoption of the Development Management Plan and replacing references to Core Strategy Policies and the proposed Site Allocations Plan. The most up to date evidence contained within the Strategic Housing Market Assessment in terms of the type, size and tenure of new homes required within the Borough will also need to be reflected.
CS21	Affordable Housing	Replace	Our priority of providing more affordable homes remains however, since adopted there have been a number of changes to the planning framework that need to be reflected in a new policy. Our intended approach to requiring affordable housing on varying sizes and sites and at certain percentages will be set out. The thresholds and percentages will be set taking account of the level of need identified in the Strategic Housing Market Assessment; an up to date assessment of viability; the latest Government policies and guidance; and the consideration of local circumstances.

Document		Status	Why
CS22	Gypsies, Travellers and Travelling Showpeople	Replace	The policy will need to be replaced and the new policy identify the number of pitches and plots required to meet the needs of Gypsies and Travellers as identified in the Traveller Accommodation Assessment. The policy will also need to be amended to ensure that changes to national planning policy are reflected including the criteria based policy for allocating sites and dealing with ad hoc planning applications. Consideration will also need to be given as to how we will seek to meet the accommodation needs of 'non-travelling' Gypsies and Travellers. References to the proposed Site Allocations Plan will also need to be removed.
CS23	Employment land provision	Replace	The latest evidence from our Commercial Property Market Study, Employment Land Review & Functional Economic Area Study will need to be reflected in a new policy that sets out the level of new commercial development to be accommodated in the Borough up to 2035 and how this will be achieved. The allocation of employment sites for redevelopment; the designation / changes of key areas of commercial property such as strategic employment land; and the possible implementation of article 4 directions will need to be reflected. Amendments will also be made to bring the policy up to date e.g. reflecting the adoption of the Development Management Plan and replacing references to Core Strategy Policies and the proposed Site Allocations Plan. Changes to national guidance and the permitted development order may also need to be reflected.
CS24	Hotels and Tourism	Amend & Retain	Amendments will be made to bring the policy up to date e.g. reflecting the adoption of the Development Management Plan and replacing references to previous national policy. The latest evidence base studies will be reflected alongside any current strategies for boosting hotel provision and tourist provision. Should certain sites be identified to provide hotel accommodation these will be identified.
CS25	Travel and Accessibility	Amend & Retain	Amendments will be made to bring the policy up to date e.g. reflecting the adoption of the Development Management Plan and replacing references to previous national policy. The latest evidence base studies will be reflected alongside any current strategies for supporting more sustainable forms of travel. Consideration will also be given to policy on parking spaces given changes in national policy. Should certain large scale road improvements be identified that are required to deliver the spatial strategy, these will be set out.
CS26	Flooding	Replace	Our priority of reducing the overall and local risk of flooding in the Borough remains

Document		Status	Why
			however, the policy will need to be replaced to reflect our most up to date evidence as set out in the Strategic Flood Risk Assessment 2015. This includes the widening of the policy to take account of all potential sources of flooding and the cumulative impacts of small scale / minor development. The policy may also need to be amended to take account of the change in advice now received from the Environment Agency on varying scales and the type of development. Amendments will also be made to bring the policy up to date e.g. reflecting the adoption of the Development Management Plan and replacing references to Core Strategy Policies, the proposed Site Allocations Plan, and previous Government policy and guidance.
CS27	Sustainable Buildings	Replace	Since adopted the Government has moved away from the Code for Sustainable Homes and a large amount of controls to reduce carbon emissions and make new development more energy efficient is covered by building regulations. The policy will therefore need to be replaced to reflect the most up to date national requirements for example, the range of Technical Standards for Housing. Consideration will also need to be given to the Housing Optional Standards which can be required, with evidence, through Local Plan policies.
CS28	Implementation and Delivery	Replace	This policy will be replaced. In a new policy will be our approach to implementing and delivery the new spatial strategy and replaced / amended policies within our new Local Plan. The on-going implementation of our Local Plan and working with neighbouring authorities and other bodies as part of the duty to cooperate will be reflected as well as potential changes to our Charging Schedule and Community Infrastructure Levy (CIL) that may be required to deliver the infrastructure that is essential to support our planned growth.
CS29	Monitoring	Replace	Our Local Plan will have a number of new targets and policies that we must monitor and report on as part of the annual Authorities' Monitoring Report. This policy and section will be updated to reflect national and local indicators, and any contingencies in place should we not be delivering against them.

# Appendix 3 - Elmbridge Green Belt Boundary Review - Local Areas



Operator:	
Department:	
Drawing Number:	
Date:	08/09/16
Scale:	



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