
Shaping Elmbridge

A New Local Plan



Elmbridge Local Plan: Strategic Options Consultation (Regulation 18)

Summary of Consultation Responses

July 2017



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

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1 Introduction

Purpose of the document

1.1 This Summary of Consultation Responses document provides a record of the consultation methods and community engagement activities that have taken place as part of the Strategic Options consultation for Elmbridge Borough Council's new Local Plan. It details how the Council has complied with the consultation requirements prescribed in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the Council's Statement of Community Involvement (revised and adopted June 2015) in the preparation of the new Local Plan.

1.2 The document also presents a summary of comments received during the consultation, highlighting the key issues identified, and explains the next steps in the process of preparing a new Local Plan.

1.3 This document been prepared so that our residents and other interested parties can see the key issues that have emerged from the responses to the Strategic Options consultation and to provide assurance that their comments have been registered, read, and reported to Councillors.

1.4 This document, alongside all the individual comments to the Strategic Options consultation submitted, was agreed for publication by the Portfolio Holder for Planning Services at an Individual Cabinet Member Decision Making (ICMDM) meeting on 19 July 2017. The individual comments / responses received can be viewed on the [Strategic Options Consultation webpage](#).

The structure of this document

1.5 The remaining part of this Introduction explains the process of preparing a Local Plan and introduces the first stage in the consultation process; the Strategic Options consultation. This includes an explanation of how the consultation undertaken complies with planning regulations and the Statement of Community Involvement. Section 2 discusses the early engagement methods carried out, while Section 3 highlights in detail all the consultation methods adopted. Much of the evidence referenced is set out in the appendices which contain copies of the original documents and materials used. Section 3 also includes information on who was consulted.

1.6 A breakdown of those who responded to the consultation is included in Section 4. Section 5 then provides a summary of key points raised (as set out in the Council's Elmbridge Local Plan: Position Statement, July 2017¹). Sections 6- 13 set out the detailed summaries of each question featured in the consultation response form as well as additional summaries of comments received from duty-to cooperate bodies and those questioning the evidence base. Sections 6 to 13 have been divided into themes to correspond with the

¹ Elmbridge Local Plan: Position Statement, July 2017 (available to view at: elmbridge.gov.uk/planning/local-plan/)

content of the Strategic Options Consultation document. The final section, Section 14, outlines the next steps in the process of preparing a new Local Plan.

A New Local Plan

1.7 Elmbridge's new Local Plan will set out the vision for the Borough and the approach to development between now and 2035. It will set targets for the delivery of different types of development, provide guidance on locations as to where this development will happen, and establish which areas should be protected. It will also sets out policies by which future planning applications will be determined.

Strategic Options Consultation

1.8 As explained in the Statement of Community Involvement 2015, Stage 1 in public participation and preparation of planning documents includes evidence gathering and early engagement. This is where the process of engaging with residents, businesses, service providers, utilities and all other stakeholders begins.

1.9 The first consultation stage in the preparation of a new Local Plan for Elmbridge was the Strategic Options consultation. This document included the Council's preferred option for a new spatial strategy as well as a range of issues that need to be addressed and which will form the detailed contents of a new Local Plan. The Strategic Options consultation did not contain any housing numbers, site allocations or policies.

1.10 The Strategic Options consultation was open from 9am on Friday 16 December 2016 and closed at 4pm on Friday 24 February 2017. The Council originally planned to consult for a period of eight weeks to account for the Christmas break. This meant that the closing date would have been 10 February and so much of the early consultation documentation featured in the appendices will include this date. However, the community requested more time and so a two week extension was granted, resulting in the consultation being open for ten weeks in total and closing on 24 February 2017.

1.11 At paragraph 1.20 of the consultation document it states that the Council will prepare a statement responding to issues raised and how it will seek to address them. For the reasons set out below, this document does not include the Council's response to the issues raised.

1.12 Firstly, the Council received over 3,700 response forms, which generated some 50,000 separate responses. It has therefore taken longer than anticipated to collate, read and summarise the responses to the Consultation.

1.13 In addition, during the Strategic Options Consultation the Government published the Housing White Paper "Fixing our broken housing market" (February 2017). This set out proposals to change national planning policy in areas that could affect the approach taken by the Council in preparing its new Local Plan. In particular, proposed changes to assessing housing needs and the introduction of tests as to when there are exceptional circumstances to amend Green Belt boundaries will require the Council to prepare additional studies.

1.14 Further consultation by the Government is expected Summer 2017 on the details of its proposals set out in the Housing White Paper. Until these details are known and the implications can be fully understood, it is considered premature for the Council to respond in detail to the comments received to the Strategic Options Consultation. This is particularly

pertinent given that the vast majority of the comments focused on how the Objectively Assessed Housing Need (OAHN) figure was calculated; the Green Belt Boundary Review; and whether the exceptional circumstances to amended Green Belt boundaries had been satisfactorily demonstrated.

1.15 In light of the above, it was agreed by Cabinet on 5 July 2017, that a Position Statement (Elmbridge Local Plan: Position Statement, July 2017) be published. The Statement set out the reasons for the delay in the preparation of the Local Plan, as summarised above, and indicated when the Council intends to prepare and adopt an updated Local Development Scheme (LDS).

1.16 Mindful however of the significant level of interest in the Strategic Options Consultation and the continued preparation of a new Local Plan, it was also agreed on 5 July 2017, that a summary of the consultation responses be published. This was subject to the agreement of the Portfolio Holder for Planning Services at an ICMDM meeting on 19 July 2017. At the same ICMDM meeting, it was also resolved by Cabinet that all consultation responses would be published on the Council's Consultation Portal.

Compliance with the Statement of Community Involvement (SCI) 2015

1.17 The Strategic Options consultation was carried out in accordance with the Council's Statement of Community Involvement (SCI).

1.18 Every planning authority must produce an SCI which must set out how, and at what stages the community can take part in, and influence the plan-making process and the methods which the Council will use to consult with different groups within its area. The overall aim of the SCI is to achieve greater public involvement in the preparation of all future planning documents and in decisions on planning applications. Better public engagement in the process will ensure that decision-making is transparent and accountable so that planning can be more reflective of local needs.

Compliance with Regulation 18 Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

1.19 The consultation was also carried out in compliance with regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). This provides information regarding the preparation of a plan and is mainly concerned with notification procedures. Regulation 18 is set out within the text box below:

Regulation 18 Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended):

Preparation of a local plan

18.—(1) A local planning authority must—

- (a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and
- (b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are—

- (a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;
- (b) such of the general consultation bodies as the local planning authority consider appropriate; and
- (c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).

2 Consultation Preparation

Background

2.1 In October 2014, a decision was taken by the Council to stop preparation of its site allocation document (known as Settlement Investment and Development Plans) and commence a review of the evidence base supporting the housing targets set within the Core Strategy. This decision was made on the basis that a number of similar plans were being challenged at examination as they sought to deliver housing targets in their Core Strategies that were adopted prior to the National Planning Policy Framework (NPPF) and were formed on the basis of an evidence base prepared prior to March 2012.

2.2 As a result, the Council wrote and commissioned various evidence base documents including a [Green Belt Boundary Review, Land Availability Assessment and Strategic Housing Market assessment \(SHMA\)](#). The SHMA presented an Objectively Assessed Housing Need (OAHN) figure for the Borough which was significantly higher than the current housing target. This meant 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 the future. As a result of this evidence, work began on developing Strategic Options for the new Elmbridge Local Plan.

2.3 The decision to undertake a public consultation is for Members of the Council (Councillors) to formally agree. Therefore as part of the consultation preparations, Councillors were fully briefed on the findings of the evidence base and the Governments requirement that Local Authorities must meet their OAHN. It was important that Councillors understood the content of the consultation fully before making a decision to consult with the public and key stakeholders.

2.4 Due to the consultation requiring Council approval before publication, early communication on the forthcoming consultation was limited to Councillors, internal departments and generic articles / interviews in order to introduce the concept of a new Local Plan and the Council's challenge to meet housing need. There was a general reference to the upcoming consultation that would set out the challenges, options and preferred option, but specific information could not be provided until a decision was made by Councillors at Cabinet. The following sets out the early consultation preparations:

Councillors

2.5 Councillors were invited to attend briefings in the Summer of 2016 to explain the results of the evidence base review including the Strategic Housing Market Assessment and the Green Belt Boundary Review and what the implications of these were for the preparation of a new Local Plan. Another meeting was then held on 25 October 2016 to inform Councillors of the options. As well as these formal events, issues were also discussed at Local Plan Working Group and through individual Councillor meetings with officers. The decision to consult on the Strategic Options consultation was discussed at Cabinet on 16 November 2016 and ratified at Council on 7 December 2016. The report is available to view on the [Meetings Calendar](#).

Internal Departments

2.6 Internal department such as Environmental Health, Environmental Care and Housing were informed of the consultation document. A meeting was held for colleagues working in Development Management to keep them informed of the consultation. Staff Forums held in the summer and winter also explained the Council's challenge to meet the housing need.

Elmbridge Review

2.7 An article was featured in the December 2016 Elmbridge Review, which is the official newsletter of Elmbridge Borough Council and hand delivered to every property in the Borough (See Appendix 1). It informed readers that a new Local Plan was required and that it would have to address challenging issues such as meeting the Borough's housing need. This article did not include the consultation dates as the decision to consult on the document had not been ratified by Councillors at Full Council until after the paper had been published. As this was the case, the article informed readers to find out more by visiting the Council's website.

Radio Interview

2.8 The leader of the Council was interviewed by James Cannon at [Radio Surrey](#) on 12 November 2016 at 8.10am. This live broadcast discussed the Government's pressure on local authorities to build more housing and what this meant for the Borough of Elmbridge.

Local Press Meeting

2.9 A meeting was held with the local press on 7 November 2016 to inform them of the consultation document and discuss the key issues before the consultation opened. An article was then published in the Surrey Advertiser on 11 November 2017 introducing the upcoming consultation and urging the public to check the Council's website with regard to details of how to respond.

Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA)

2.10 Throughout the process of plan preparation, the Council is required to assess social, environmental and economic implications of planning policies and proposals. A draft sustainability appraisal scoping report was prepared and informed the Strategic Options detailed in the consultation. It is a statutory requirement that the Scoping Report be sent to the three Environmental Bodies: Environment Agency, Natural England and Historic England. Details of the feedback received can be viewed in the SA/SEA accompanying the Strategic Options consultation.

2.11 A peer review took place at an officer level on 14 October 2016 with feedback provided by officers from Mole Valley District Council and Reigate and Banstead Borough Council. This provided a degree of independent assessment to the Sustainability Appraisal Scoping Report. The document was then included in the suite of consultation documents for residents and stakeholders to view when the consultation opened on 16 December 2016.

3 Strategic Options Consultation

3.1 A formal consultation document and accompanying response form was considered the most appropriate consultation method for seeking views on the Strategic Options. As the Statement of Community Involvement (SCI) states:

The methods used in engaging stakeholders will depend on the type of document being produced, the target audience and the Council’s resources. Legislation does not set out how the Council should approach early engagement and any approach taken by the Council will be limited by the amount of financial and staff resources available. The Council will seek to use the most effective approach both in terms of cost and outcome.

3.2 Officers had already gathered an extensive suite of evidence and identified the main issues facing the Borough. Therefore, the purpose of this consultation was to release this information / evidence and present the options for meeting housing need seeking the views of residents and key stakeholders on a wide range of issues that would help shape a new Local Plan.

3.3 The ultimate purpose of consulting with residents, businesses, colleagues from other departments of the Council, statutory consultees such as neighbouring authorities and other public bodies, landowners and developers is to seek the views of this diverse group of organisations, and secure their subsequent involvement in formulation of a draft Local Plan. The NPPF comments on the importance of “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” when producing local plans.

3.4 Despite legislation not setting out exactly how the Council should approach this stage of consultation, the SCI does contain recommendations on how to provide information, consult and involve people at page 10. Many of the suggested approaches and techniques were adopted and the following section including Tables 1, 2 and 3 set out the methods used.

3.5 The Strategic Options Consultation document provided information about the consultation, explained the key challenges facing Elmbridge, presented the options for meeting the key challenges including a preferred option and examined the key issues the Local Plan will need to address. As well as explaining key concepts in text boxes and providing full commentary to each topic, the document included questions in order to seek people’s views on these matters. For ease of use a glossary of acronyms and initials and an evidence base glossary were included.

3.6 It was important that people read the consultation document before answering the questions, as read in isolation the questions were complex. An online response form contained links back to the document and the response form was also available in a word document to allow people to respond after reading the document.

3.7 The Council made sure that respondents had a number of methods to submit their comments. People could respond to the consultation either by letter or e-mail or people could fill out a hard copy response form and post/ e-mail back to the Council or submit an

online response form using the consultation portal. A copy of the response form is available at Appendix 2.

Table 1: General Consultation Methods Adopted

Method	Details	Evidence
Consultation Webpage - links on Council's homepage, news pages, policy pages and scrolling screen.	Included information on what the consultation is about, how to find out more, how to tell us your views and what happens next. All consultation documents available including link to evidence page.	Appendix 3: Consultation webpage and links
E-mail/letters sent to all those registered on the planning database	1665 people were invited to the consultation as they were registered on the database pre-consultation.	Appendix 4: Consultation E-mail and Letter content. Appendix 5: List of consultees.
Consultation document made available to inspect at Civic Centre and Borough libraries	Hard copy of the Strategic Options consultation document, Statement of Representations procedure and leaflet provided to the Borough's Libraries.	Appendix 6: List of Libraries and content of library letter Appendix 7: Statement of Representations Procedure
Public Notice	Displayed on 29 Council owned noticeboards Public Noticeboards Locations	Appendix 8: Notice displayed on Borough's public noticeboards
Poster	Posters were distributed to community, leisure centres and schools.	Appendix 9: Consultation Poster
Social Media	Tweets were sent out regularly and before a drop in sessions. Facebook was used to advertise the drop in sessions as set out in Table 2.	Appendix 10: Social media- twitter and face book
Notice in local newspaper	Notice in the Surrey Advertiser	Appendix 11: Newspaper notice featured in the Surrey Advertiser.
Exhibition displayed in the Civic Centre Reception Area	Along with the exhibition, officers were present to answer questions at the Council's annual Prospects and Priorities meeting held on the 18 January 2017	Appendix 12: Exhibition boards

Drop in Sessions

3.8 Six drop in events were organised across the Borough so that residents could view the exhibition stands, inspect the consultation document and speak to officers about any aspect of the Strategic Options consultation. These were planned for the evening to allow those who worked in the day to attend. One Saturday event was organised for anyone that could not make an evening event or visit the Council Offices on a week day. Every drop-in session was open to all residents to attend not just those from the locality of where the event was being held.



Figure 1: Drop In Session at Hinchley Wood Secondary School, 19 January 2017.

3.9 Maps of the Borough and inserts of the strategic areas were displayed on tables so that people could easily reference local places. Key evidence base documents were available for reference purposes and detailed leaflets were available to take away (Appendix 14). The table below sets out the dates, time and venues as well as the amount of people that signed the log in sheets which provides an estimated number of those who attended.

Table 2: Council organised drop-in sessions:

Date	Time	Location	Attendees (Signed In)
10 January 2017	7-9pm	Weybridge Library	83
11 January 2017	7-9pm	Cobham Day Centre	118
19 January 2017	7-9pm	Hinchley Wood Secondary School	545
23 January 2017	7-9pm	Walton Playhouse	76
26 January 2017	7-9pm	Civic Centre	67

Public Meetings

3.10 In addition to the drop in sessions held above, officers were invited and attended public meetings organised by local Councillors, Residents Associations and other community groups. The Planning Policy Manager provided a presentation on the Local Plan explaining the content of the Strategic Options. Question and answers then followed. Webcasts of the Local Plan Presentation and Question and Answer Sessions were available to view on the [consultation webpage](#). These were recorded for the Long Ditton and Thames Ditton meetings held at the Civic Centre to ensure that as many people had access to the discussions as possible. The power point presentation was also uploaded onto the consultation webpage allowing people to access this information.

Table 3: Public Meetings

Date	Group
17 January 2017 - 2pm	Cobham and Stoke D'Abernon Residents Association
24 January 2017 - 8pm	Long Ditton Public Meeting hosted by Long Ditton Members
1 February 2017- 8pm	Presentation of the Local Plan hosted by Thames Ditton Residents Association
20 February 2017 - 8pm	Cobham Green Belt (Cobham Heritage Trust and Cobham & Downside Residents Association)

Other communication techniques

3.11 Officers were available to talk to members of public and other interested parties during office hours at the Civic Centre and via the telephone. During the consultation officers also answered questions raised via email and responded to freedom of information requests.

3.12 A frequency asked question (FAQ) sheet was included on the consultation webpage to allow people to easily view and assess the key points of the consultation. This was updated throughout the consultation as people asked further questions (Appendix 15). A specific question and answer sheet was created for one of the strategic areas which provided clarification on a number of key issues (Appendix 16). This was published in response to concerns raised by material being circulated amongst the community. Land registry titles were also produced for the strategic areas to assist with land ownership queries. These FAQ sheets were available at the drop in session again to equip people with the correct information and guidance of how to respond to the consultation.

Who was consulted and how?

3.13 To meet the requirements of Regulation 18 'Preparation of a Local Plan', the Council had to consult:

- each of the specific consultation bodies that the local planning authority consider may have an interest in the subject of the proposed plan;
- such of the general consultation bodies as the local planning authority consider appropriate;
- such residents or other persons carrying on business in the local planning authority's area, from which the local planning authority consider it appropriate to invite representations.

3.14 In total 1655 people were consulted directly via letter or e-mail as they are registered on the planning database. A list of people consulted is available to view at Appendix 5. Consultees were informed that the consultation had begun. Key information on the various methods available to view the document and make comments on the consultation document was also included.

3.15 An e-mail was sent to every Member informing them that the consultation was open on 16 December 2016 (Appendix 17). A similar e-mail was sent to Planning Services and Surrey County Members.

3.16 Although Regulation 18 does not refer to the availability of documents, all information was made available on the Council's website (see Appendix 3), including a link to the consultation document on the planning policy pages, the planning news page and on the Council's homepage including an advert on the scrolling pane throughout the 10 week consultation period. Copies of the document were also available to inspect at the Planning Reception and in all local libraries.

4 Responses to the Strategic Options consultation

4.1 The Elmbridge Local Plan: Position Statement released in July 2017 states that the Council received nearly 3,800 responses to the Strategic Options consultation from individuals / organisations. A final total was not available at that time. Work has since been undertaken to check for duplicates, unclassified respondents and incomplete responses. The data has now been collated and confirmed. In line with the Statement of Community Involvement, the Council will not accept any anonymous or confidential responses.

4.2 The Council received **3,760** complete responses. The responses came from

- 3,613 individual residents (including 127 residents outside the Borough)
- 25 residents groups and associations
- 37 landowners, agents, developers and planning consultants
- 22 Councillors, County Council, Local Planning Authorities, political parties.
- 18 youth groups and sport facilities
- 15 local businesses
- 11 infrastructure providers, including water, transport and health providers.
- 9 heritage and historic environment organisations
- 6 environmental groups
- 3 charity organisations
- 1 faith representative

4.3 Three petitions were also submitted. These came from:

- Bankside Residents (64 signatures)
- James Berry MP (at the time for Kingston & Surbiton) (931 signatures)
- Cobham Residents in opposition to parcel 14 (323 signatures)

4.4 97% of responses received were from residents including those living within Elmbridge and those living outside the Borough as well as those representing the Borough's residents associations and groups. Some 90% of these were from individual Elmbridge residents that provided a full postcode/address.

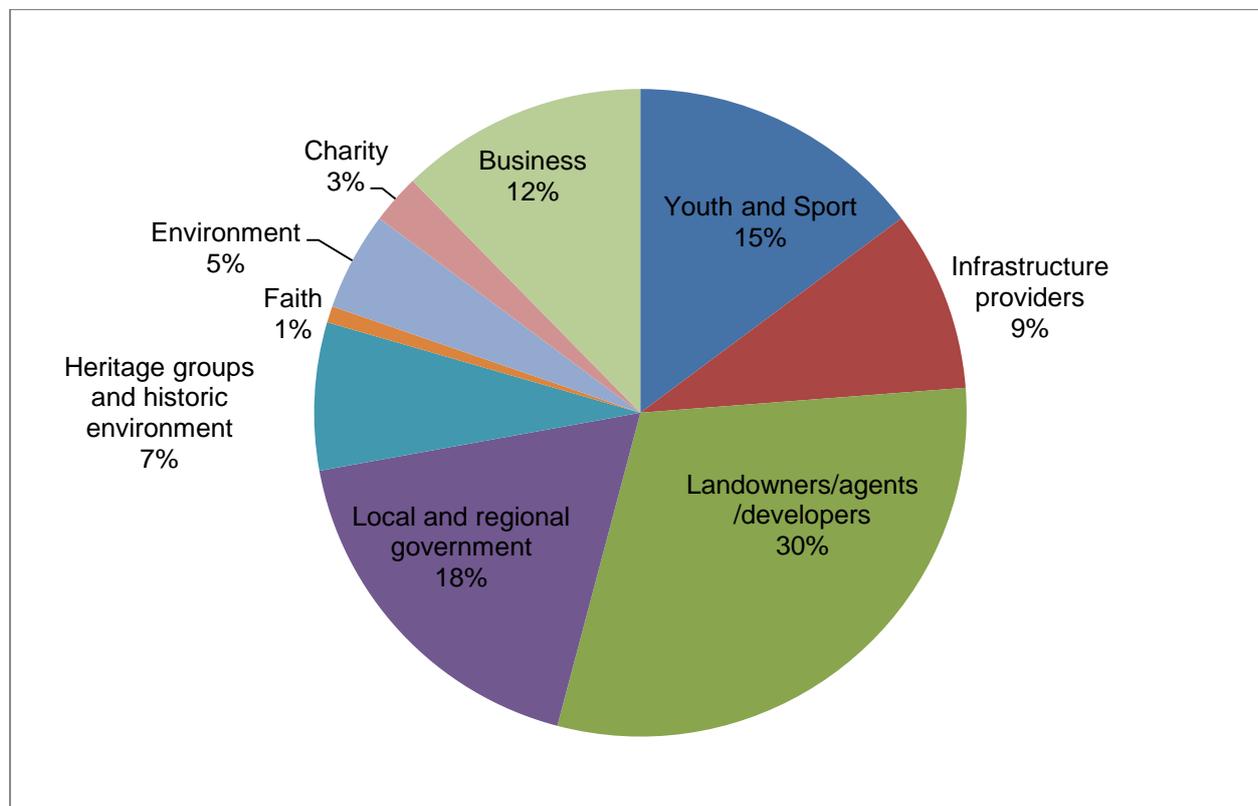
4.5 Overall, the data included in Table 4 demonstrates the amount and percentages of responses received from the eight settlements of Elmbridge. As shown, the majority were from the Cobham, Oxshott, Stoke D'Abernon, Hinchley Wood, Thames Ditton and Long Ditton settlements. Of the 3,436 respondents who gave an address or full postcode, 90% were from these areas.

Table 4: Responses received from respondents with full address/postcode.

Area	Responses received	%
Claygate	46	1
Cobham including Oxshott & Stoke D'Abernon	1,800	52
East & West Molesey	15	<1
Esher	33	1
Hersham	16	<1
Dittons including Hinchley Wood, Long Ditton, Thames Ditton & Weston Green	1,299	38
Walton-on-Thames	91	3
Weybridge	136	4

4.6 3% of respondents were non-residents and not commenting on behalf of a resident groups or associations. The largest proportion of these (at 30%) were planning consultants and agents promoting sites for landowners. In addition many landowners from the strategic sites submitted responses directly. The youth and sport category is high due to the Scouts being based at two of the strategic sites. Additionally many of the Borough's sports organisations made representations that refer to land being promoted or sports grounds located on or nearby the strategic areas. The pie chart below shows the proportion of different groups that submitted responses other than residents.

Figure 2: Comments received from non-residents



5 Overview of key issues raised

5.1 This section of the document provides an overview of the key issues that were raised in the consultation responses. More detailed summaries for each of the questions set out within the consultation document are contained within section 6 of this document. It should be noted that the key issues below are the same as those featured in the Council's Elmbridge Local Plan: Position Statement, July 2007.

Strategic Development Options

- 5.2** The vast majority of respondents opposed any amendment to the Green Belt boundaries in order to meet housing needs. Responses considered Green Belt to be sacrosanct and that there are no exceptional circumstances under which it should be amended. It was stated that Green Belt was being targeted as an 'easy-option' and that amending the boundary now would lead to further amendments in the future i.e. the thin end of the wedge. A significant number of these responses also disagreed with the methodology used in assessing the Green Belt and the findings of this study
- 5.3** Many of the respondents opposing the release of Green Belt suggested that the Council had not done enough to find sites in the urban areas and that it must seek to deliver much higher densities in our existing town and district centres. However, in contrast to these comments many residents who live in more densely developed areas opposed the further intensification of their areas.
- 5.4** The Green Belt Boundary Review completed by ARUP was considered by many to be fundamentally flawed due to perceived inconsistencies and the subjective nature of the assessment and, as such, could not be used to justify the Council's preferred option. Such comments came from both those opposing the release of Green Belt but also from those supporting more widespread amendments to Green Belt boundaries.
- 5.5** A significant number of respondents suggested alternative options should have been considered. Options put forward included:
- Undertaking further work to identify surplus land in other local authority's areas to meet Elmbridge's housing needs;
 - Building a new town or village; and
 - Doing nothing and maintaining the Council's existing strategy and housing target.
- 5.6** Whilst in a minority, there were responses submitted that supported the Council's preferred approach recognising that there needed to be a balance between protecting Green Belt whilst also seeking to meet housing need. There were also responses that suggested the Council release more land from the Green Belt in order to meet housing needs and that it should do more to increase the supply of affordable housing. A number of sites were put forward in both the urban area and Green Belt where such development could take place.

Key Strategic Areas

- 5.7** The majority of respondents did not support amendments to Green Belt boundaries in any of the three areas set out in the Consultation. Many considered these areas to be strongly performing against at least one of the purposes of Green Belt and that the Green Belt Boundary Review was fundamentally flawed. Each of these areas was also considered to offer opportunities for recreation and as such believed to be an important part of the overall character of the area. A number of site specific issues were raised with regard to the potential loss of important habitats, protected species, increased flood risk and the impact on local infrastructure.
- 5.8** There was some support for removing these areas entirely or partially from the Green Belt. Some responses highlighted whether the entire parcel had to be removed from Green Belt or whether development could be restricted to specific areas. Responses were also received outlining what land was, and was not, available for development within each of these areas.

Assessment of Housing Need

- 5.9** A large number of respondents disagreed with the assessment of housing need. These respondents believe the assessment is fundamentally flawed as it is a projection based on ONS data and does not take into account issues that may constrain the supply of housing such as insufficient infrastructure and environmental constraints. Many respondents also suggested that the impact of the decision to leave the European Union should be taken into account as this could potentially impact on future housing needs. It was also suggested that other cross-boundary strategic issues should be clearly understood prior to assessing our housing need. These revolved around external influences that could impact on the Borough's need for new homes and included issues such as the review of the London Plan, Crossrail 2, and the proposed expansion of Heathrow Airport.

Affordable Housing

- 5.10** Many respondents recognised that housing within the Borough was unaffordable. Whilst some responses considered affordability to be sufficiently exceptional to support amendments to Green Belt release, the majority of respondents did not consider this to be the situation. There was also significant doubt expressed that the Council had sufficient powers to be able to secure affordable housing on developments in the Green Belt.
- 5.11** However, a significant number of responses felt that it was not for the Council to intervene in the market and provide more affordable homes in high value areas. It was suggested that affordable homes should be provided elsewhere where homes were less expensive.

Housing Mix

- 5.12** There was significant support for limiting the number of homes with 4 or more bedrooms. Many of the responses stated that the Council permitted too many large homes and that the focus of the Council should be on permitting smaller, less expensive properties. Particular concern was given to providing homes for older people and young families. However, many of the respondents did not consider the

need to provide a better mix of housing as being of sufficient importance to warrant the amendment of Green Belt boundaries to support new development.

- 5.13** In contrast, there was also significant disagreement over whether the development of larger homes should be restricted. Responses highlighted that the Borough should remain upmarket and exclusive stating that it was one of the reasons people chose to live here. Some respondents considered that higher density, smaller housing would have a negative impact on the character of some areas and those in need of smaller homes should live elsewhere. It was also stated that the mix of housing should be determined by market forces, not the Council and that any housing mix should include a proportion of larger homes. There was also concern that 4 bedroomed homes were not necessarily to be considered as 'larger luxury homes' and limits should only be placed on 5 plus bedroomed homes.

Infrastructure

- 5.14** The impact of future development was a major concern with a huge number of respondents stating that infrastructure was already at capacity. The most common concerns raised were with regards to highway capacity, public transport, insufficient school places and access to GP services. With regard to transport there was support for more integration between trains, buses, cycling and walking in order to reduce the pressure on roads. It was suggested that more lobbying of Government was required to deliver improvements to the transport network.

Employment Land

- 5.15** A number of responses outlined that more consideration should be given to the potential for delivering mixed employment / residential development across the Borough and that the Council should be flexible in making decisions as to the loss of employment land on a case by case basis which reflected market conditions. It was also suggested that further work was required to ensure evidence was complete before any decision on either the loss or protection of employment sites was made.
- 5.16** However, there were also responses stating that it was important to retain employment uses in the Borough. Some of these respondents suggested that the Council should have a policy to actively resist the loss of employment land and the conversion of offices to residential units.
- 5.17** Contrary to the statements seeking to protect employment land, a number of people felt that employment land should be redeveloped for housing especially if this would protect the Green Belt and even if this resulted in a loss of jobs locally.

Character of the Area

- 5.18** Whilst many respondents supported the increased densification of the urban area in order to safeguard the Green Belt, there were equal concerns regarding the impact of more infill development at higher densities on the character of existing communities and in particular the loss of open spaces within settlements. Many respondents also expressed fears that amending Green Belt as set out in the Preferred Option would lead to coalescence and loss of countryside which would fundamentally change the character of those areas.

Environment

- 5.19** Many respondents expressed concern with regard to the impact on the environment, from increased health risks arising from pollution through to the potential loss of habitats and protected species. A large number of responses considered the Council should continue to give a high level of protection to open spaces in the urban area and should designate all open spaces as Local Green Space if they meet the criteria. However, there were contrary viewpoints suggesting that some open spaces such as playing fields could be relocated to the Green Belt in order to free up land in the urban area for housing development.

Housing White Paper

- 5.20** During the Strategic Options Consultation the Government published a white paper on housing entitled “Fixing our broken housing market” (February 2017). A large number of respondents referred to the white paper and the Government announcements that it was not weakening its policy on Green Belt.

6 Consultation Summaries: Introduction

6.1 The following sections set out the consultation summaries for each question featured in the response form and follow the key themes. Each includes a breakdown of the number of responses received and provides a summary of the key points raised in the comments. Each summary generally follows the same format as described below:

- The title and overview of the issue
- Consultation question
- Summary of responses graph
- Overview of numbers of comment received
- Comments from those who responded 'Yes'
- Comments from those who responded 'No'
- Comments from those who responded 'Don't know'
- Comments from those who did not select an option

6.2 To prevent repetition, some of the questions have been presented in terms of key issues. This applies to Infrastructure, Heritage and Traveller Accommodation questions as the responses provided all cover the yes, no and don't know options. An additional consultation summary has also been prepared setting out the comments received with regard to particular evidence base documents. These being the Green Belt Boundary Review, the Strategic Housing Market Assessment and the Retail Assessment. There is also a separate summary detailing those responses from the duty to co-operate bodies such as local authorities, environmental bodies and key infrastructure providers.

6.3 It should be noted that any views expressed are not necessarily the views of Elmbridge Borough Council unless stated.

7 Consultation Summaries: Key Challenges

The Key Challenges

7.1 The key challenges facing the Borough will inform the vision and objectives the Council adopts in the way it seeks to manage development and growth in the future. The Consultation Document highlighted the following key environmental, social and economic challenges for the area:

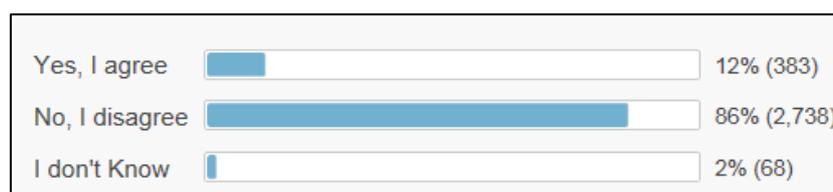
- Increasing delivery of affordable housing and small homes
- Ensuring associated infrastructure is sufficient to support any increase in development
- Increasing delivery of housing supply to address the housing needs of our communities
- Minimising environmental impacts arising from new development
- Retaining current settlement patterns
- Protecting and enhancing the natural, built and historic environment
- Delivering the right floorspace to meet business needs
- Supporting our vibrant towns and villages to ensure they have the right shops and services
- Supporting tourist attractions and ensuring sufficient accommodation for all visitors

Consultation question

7.2 In order that the Local Plan addresses both the right and most important challenges for the Borough, the consultation document asked:

Question 1. Do you agree that these are the key challenges facing Elmbridge?

Summary of responses



7.3 A total of 3,189 people responded to Question 1 selecting one of the three options above. Of these 2,925 provided further comment. An additional 21 respondents did not select one of the three options above but provided further comment.

Comments from those who responded 'Yes'

7.4 Of the 383 respondents in agreement with the key challenges, 226 provided further comment. The majority of these acknowledged that more housing is needed in the UK, particularly in the South East and that Elmbridge needs to take a share. People felt that this was particularly true of the need for smaller affordable homes. Higher density housing, particularly in town centres, was felt to be an option to be explored further. There was a

recognition that difficult choices are necessary and that the Council is under considerable pressure. A number argued that addressing this need, however, must not be to the detriment and quality of existing areas. Some argued that some challenges are more pressing than others and infrastructure pressures were highlighted as a significant issue locally. It was acknowledged that there is a challenge to create a balance between future development and protecting existing communities, with a number of respondents suggesting that more strategic planning is required across borough boundaries.

Comments from those who responded ‘No’

7.5 Of the 2,738 people disagreeing with the Council’s assessment of the challenges set out in Section 2 of the consultation document, 2,670 provided further comment.

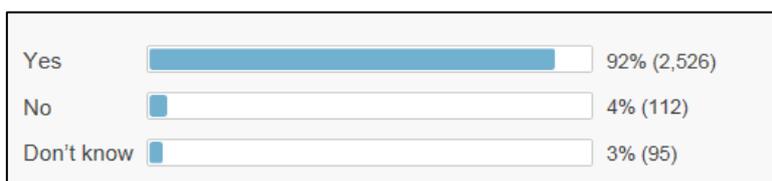
7.6 The additional comments made at Question 1 from those answering ‘No’ were often very similar to and repeated those comments made under Questions 2 and 3. Therefore the responses to these three questions have been combined into a single summary of the responses and set out below.

Consultation question

7.7 Questions 2 and 3 in the consultation document asked:

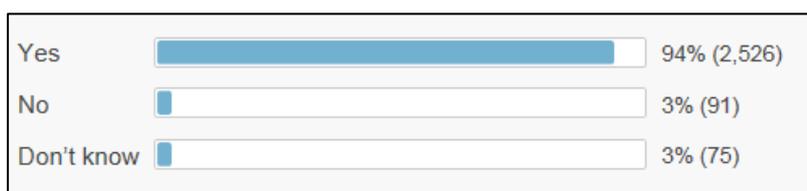
Question 2. Do you consider there are other challenges that we should be addressing?

Summary of responses



7.8 Of the 2,733 respondents that selected one of the three options above, 2,541 provided further comment. These are grouped and summarised below.

Question 3. Do you consider any particular challenge or challenges that are more important than others?



7.9 Of the 2,692 respondents that selected one of the three options above, 2,530 provided further comment. These are grouped and summarised below. Furthermore, many of the issues raised are expanded on in the relevant sections of this document.

Quality of life

7.10 There were significant concerns that the Council had not highlighted the need to maintain the quality of life of (particularly) existing but also future residents. Many of these responses also linked quality of life to the provision of infrastructure, maintaining the Green Belt and reducing pollution. They identified quality of life as being one of the key reasons why many people move into the Borough. There were concerns that any increase in housing development would significantly threaten and reduce quality of life and that the Council should commit to protecting the quality of life of existing residents. Some comments were also made that delivering housing is not / should not be a priority or is not possible as the area is overcrowded and overpopulated already. Many felt that as they have paid a premium price for their property and / or high levels of Council tax they should have the area preserved the way it is and should not have to fund or see their area changed for affordable housing. Other responses stated that the aim of the Local Plan should be to create successful, mixed sustainable communities which include services, employment and leisure opportunities that balance social, economic and environmental concerns.

Infrastructure

7.11 There were serious concerns raised relating to both existing infrastructure provision and the likely impact on infrastructure arising from further new development. Many respondents considered that the impact on infrastructure should be more comprehensively assessed and addressed earlier in the plan making process by the Council. It was emphasised that if any development were to take place, then the required infrastructure should be in place before any new dwellings were built. The overwhelming majority argued that infrastructure is already deficient and improvements should be made regardless or instead of additional housing being built. Both general and specific concerns relating to infrastructure were raised, with the issues below identified as priorities:

- **Schools:** There were concerns that there are currently insufficient places at both primary and secondary level to meet current demand and that further growth in housing would make this current situation worse. In line with the location of respondents, particular concern was raised with regard to schools in Cobham, Stoke D'Abernon, Long Ditton and Hinchley Wood. There were also concerns about the increased population negatively affecting the quality of education provision and that it is or may not be possible to increase the number of schools, teachers or places required.
- **Roads:** There were serious concerns around congestion and lengthy journey times, with a large proportion of respondents stating that this is a major challenge for the Borough to address (even before any additional housing is built). Concerns included road safety, the impact of the school run and the state of repair of the Borough's roads. Many respondents considered the impact of new development to be too severe to address. A particular concern related to the impact of M25 and the A3 on the Borough's local roads and how congestion on these strategic networks leads to local roads being used as alternative routes. It was also felt by some that more should be done to promote cycling and the delivery of cycle lanes to reduce congestion, whereas others felt these should not be provided or should be reduced as they take up limited road space.

- **Road safety** was raised consistently in the responses and that this should be a priority for the Council, particularly in relation to the speeds of and condition of roads and the provision of additional cycle lanes to encourage this form of transport as per some of the responses noted above.
- **Parking:** The increasingly limited amount of car parking across the Borough was raised and in particular the impact housing growth would have on car ownership and the need for more parking in retail areas and at train stations, as well as the need for sufficient parking for any new properties.
- **Public transport – Rail:** Current services were considered to be congested with no extra capacity to meet existing or future needs. Railway stations are considered by many respondents to not have the ability to support housing growth in terms of the number of trains, increased platform sizes or improved parking facilities.
- **Public Transport – Buses:** It was felt that there are too few bus services locally requiring more people to drive and isolating those who do not have access to a car, with concerns about ongoing cuts to services also being commonly cited.
- **Pavements:** The need to improve both the quality and amount of pavements were raised as a challenge in addition to the need for more road crossings in busy areas.
- **Health / emergency services:** There were serious concern that health services, both primary and secondary, are insufficient to meet the needs of the current population. Waiting times for GP appointments featured heavily within the responses but there were also some concerns regarding dental appointments. There was concern that hospitals will not be able to meet growing demands and queries about how the Council could address this given that there are no hospitals in the Borough. There were also concerns about a lack of police and fire stations in the area and the ability to actually recruit enough staff to meet the increased demands on these services.
- **Flooding:** Concerns related to both flooding from rivers and surface water. It was suggested that both drainage and flood defences were inadequate at present and needed to be improved, and that increased house building (particularly on Green Belt locations) would make flooding more likely and more intense.
- **Leisure facilities:** It was suggested that improvements are required to existing facilities to ensure there is sufficient capacity to meet the needs of existing residents. It was also felt that the area is currently lacking in facilities for the young / elderly population and there is poor public transport to these locations.
- **Services for older people:** These services were considered to be insufficient.
- **Nursery provision:** Considered to be insufficient at present.
- **Water supply:** The need to ensure sufficient water supplies to meet future demand including sewerage and drainage, and that existing residents should not be expected to pay for this.

- **Waste:** Waste collection services were identified as being inadequate leading to a rise in vermin and littering locally. There were queries as to whether there was sufficient land fill / waste disposal capacity to meet growing needs.
- **Gas, electricity and internet:** Concerns that residents should not have to pay to meet the expanded need for these utilities and that their supply (particularly electricity and internet) is already poor.
- **Open spaces and parks:** Vital to ensure that all the Borough's open spaces and parks were not only protected but improved.

Green Belt

7.12 The majority of responses expressed the strongly-held opinion that the Council should not amend Green Belt boundaries with many saying it should restate its commitment as set out the Core Strategy and other commitments made by the Council to celebrate green spaces. It was felt that the Council should instead work to improve Green Belt areas. In particular, concerns were raised that the approach being taken by the Council did not give sufficient weight to the Government's own statements in the recent Housing White Paper, suggesting that the Green Belt was sacrosanct. It was suggested that the Council could consider delaying amendments of Green Belt until later on in the Plan period and that there was no need to release land now.

7.13 Responses clearly focused on the impact of losing Green Belt on the three areas identified in the preferred option and these concerns will be addressed in more detail under the relevant question. However, there were major concerns that the loss of Green Belt at this time would lead to further erosion over time resulting in unacceptable levels of coalescence and the loss of geographically distinct communities, encroachment into the countryside and the unrestricted sprawl of large built up areas. Additional concerns included the loss of the Borough's "green lungs", wildlife and open spaces for recreation and dog walking, leading to the creation of a more urbanised environment, all of which were raised as priorities.

7.14 There was much criticism of the Green Belt Boundary Review undertaken by ARUP, suggesting, that it had been reverse engineered to identify the areas being put forward in the preferred option and that it was fundamentally biased and flawed.

7.15 There were also a small number of comments that varied from the above themes. Comments included suggesting that as 57% of the Borough is Green Belt, 10% could be used to provide additional housing or that given the ageing population there is no need to protect as much of the Green Belt.

7.16 Other comments stated that needs could / should be able to be met on brownfield sites, or that the Council should explore further Green Belt releases to meet its housing need in full.

Alternative options suggested

7.17 One of the most frequently raised points was that the Council should focus upon or only use brownfield sites and empty properties for development, particularly those near employment prospects, transport hubs and fast rail lines. The alternative to this was to build

a new town (preferably outside of the Green Belt) or to share the burden of housing requirement equally across the Borough's settlements and across Surrey authorities.

Housing Needs

7.18 Although there was some agreement that more smaller and affordable dwellings are required, many respondents felt that housing needs had been overestimated or do not exist and that other factors such as the impact of Brexit on both migration and economic activity and the expansion of Heathrow had not been taken into account. It was also suggested that the Council had failed to take into account constraints such as the Green Belt in their assessment of housing needs.

7.19 There was widespread concern that the housing need was taking into account migration from London (and other areas) and as such was not looking to meet purely the needs generated within Elmbridge. A common sentiment was that housing should not be built or provided for people from outside the area (or for Gypsies and Travellers), or that the number of new homes to be built should only increase with the explicit consent of existing residents. It was stated that the Council should maintain its current Core Strategy target as that is currently the only "tested" housing figures available. Comments also considered the idea of meeting housing needs an impossible task (or that it was not for the Council to do, or something that central Government should take charge of) and that in doing so the Council would destroy existing communities and their quality of life.

7.20 Concerns were also raised as to the degree of control the Council would have on who would be able to access either the market or affordable homes and whether priority could be given to local needs. The potential for increasing numbers of homes being bought by overseas investors was raised as a concern, especially given the fall in the value of sterling.

7.21 With regard to the type of housing being built there were a variety of concerns. The Council was criticised for allowing too many big houses to be built. A sizable number of people felt that there were too many larger properties being built and that more 1-3 bedroom properties should be built instead. It was also highlighted that many smaller properties are being extended to make them larger, further reducing the stock. Whilst others felt that there were already sufficient smaller properties and more were not needed, or that the need for larger properties for wealthy people should be taken into account, in keeping with the demographics of the Borough.

Affordable housing

7.22 A substantial number of respondents agreed that there was a real need for more affordable housing within the Borough to meet the needs of younger and older people, with the proviso that any new or existing affordable housing should stay that way. However, in contrast to these statements of support other respondents held an alternative view, stating that it was not important or it is a naïve ambition as the area is just too expensive. Many argued that the Council could not affect market forces or force developers to build affordable housing. There were also general concerns about the impact of affordable housing provision on house prices, that it would 'drag down' the area, that more low cost housing would make social problems worse and that it could have a negative impact on social cohesion. There were also some statements made that if people want to have affordable housing they should move to other areas of the country (e.g. Scotland, the Midlands and the North), that they

should only live where they can afford to and that people should not be handed a house in this expensive area 'on a plate'.

Health and Well Being

7.23 Many responses highlighted that health (both physical and mental) and overall well-being of Elmbridge residents should be seen as a key challenge for the Council. Issues linked to the need for retention of Green Belt included increasing asthma and obesity rates, and the mental health benefits of having open spaces within communities.

Loss of character

7.24 There was significant worry around loss of character, particularly in relation to the potential merging of settlements and communities. These mostly related to the three strategic areas, where many argued the importance of maintaining the separate character and identity of communities and that this should be a priority for the Council.

7.25 There were many calls for higher density in urban areas but again also concerns over loss of character if development continues to be directed to existing settlements, particularly those that had taken significant amounts already. Responses outlined the importance of retaining the low rise character of the area and avoiding urbanisation and infill development.

7.26 In addition to the 'locational' loss of character there were also concerns raised about the loss of smaller houses being replaced by single large dwellings, or 2+ larger dwellings being 'crammed' into one original plot and the loss of the historic environment. It was also stated that Elmbridge should insist on higher standards of design and be more vigilant in stopping low quality developments.

Pollution

7.27 There were major concerns around increased and unacceptable pollution levels, with the challenge of reducing pollution was put forward as a key priority. This was in relation not just to CO₂ but also NO₂ and other particulates from the impact of increased congestion. Both noise and light pollution were also raised as challenges to be considered. There were concerns that by building on the Green Belt the loss of trees and other plant life will remove a key mechanism for cleaning the Borough's air and threaten wildlife. Some respondents suggested that the Borough need to move towards low carbon energy generation and technology.

Environment

7.28 A greater emphasis of the environment was considered necessary with many respondents stating that economic considerations had been given too high a priority. The importance of maintaining green spaces, particularly those in the urban area, was a widespread concern. Responses frequently highlighted specific areas e.g. Stokes Field Nature Reserve, Ancient Woodlands or SSSIs. Greater protection was felt to be a key priority in order to promote healthy lifestyles, to support rare and protected flora and fauna and to counteract the congested nature of the Borough, given the proximity of the A3 and M25.

Retail / employment

7.29 A few comments were made in relation to the need to support improvements and expansion of retail / businesses in the Borough whereas others did not want any more floorspace as it would attract more people to the area and increase the requirement for housing. Some responses highlighted that they considered retail provision to be sufficient and no more was needed, partially due to the proximity of Guildford and Kingston. Concerns were raised that the proposals for new development meant that more people would have to travel further to retail centres. Another issue raised was the changing nature of employment due to greater working from home / automation / the advent automated vehicles.

Tourism

7.30 Comments on this issue were limited but in general considered that there is no reason for increasing accommodation to support tourism.

Other issues raised

7.31 A number of broader issues were also raised in this question. Many are expanded on in later summaries.

- That the consultation document does not adequately cover all of the issues facing the area or that the document is poorly written and set out with a lengthy and complex response form
- The Council has not given enough alternatives or a 'do nothing' option
- The Council has chosen Option 2 as it is the easy option or the Council is doing what developers want
- That the answer to none of the issues raised is to build more housing
- The plan timescale is too short term as 2035 is less than a generation away
- Some residents support the Council's evaluation and selection of Option 2
- That Central Government threats to intervene will not happen.
- Local Authorities should get together to resist the bullying from central government to build more houses. Also local Councillors should represent the views of their constituents regardless of Central Government policy.
- Concern about different parts of government not working well / properly together e.g. Central Government, EBC and SCC re schools, highways, healthcare, transport provision etc.
- Concern about the impact of developments in surrounding areas e.g. Wisley airfield and Kempton Park
- Concern about house prices going down as a result of developments
- The building industry won't pay to assist with any of the issues as it will eat into their profits
- The Council should stop developers building low density high profit housing
- Loss of community spirit / cohesion and the facilities that support them e.g. sports clubs
- The need for population control
- Keep council tax down / under control
- Concern about crime as a result of these options

Order of priority / which is the most / more important issues

7.32 All of the above issues were quoted as one of the most important issue(s) for the Council to address by various different respondents. Alternatively, others said all of the challenges stated by them were equally important.

8 Consultation Summaries: Meeting the key challenges

Is Option 2 the most appropriate option?

8.1 Based on the evidence collected and on the sustainability appraisal of the options set out by the Council, Option 2 is presented as the preferred option. This option balances the Government's directive to increase the levels of development, in particular housing development in the Borough, whilst recognising that there are constraints on the amount of developable land which will prevent the Council from meeting development needs in full.

8.2 As set out in the consultation document, the details of Option 2 are as follows:

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

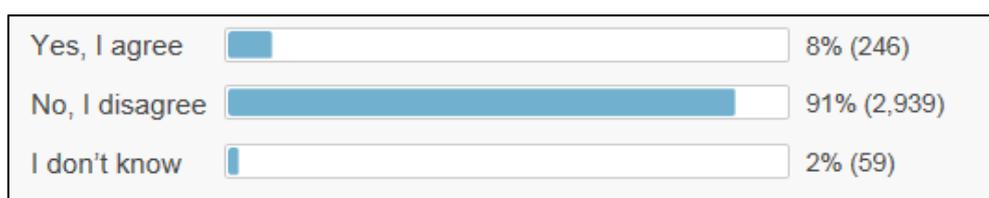
- Using the Duty to Co-operate to enquire as to whether other authorities have the potential to meet some of our need.

Consultation question

8.3 The consultation document asked whether, given the expected levels of demand for land from new development:

<p>Question 4. Do you agree that Option 2 is the most appropriate option? If not, why not, and what other option would you support and why?</p>
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Summary of responses



8.4 3,244 responses were received to Question 4 selecting one of the three options above. As set out above, the majority (91%) selected 'No'. Of these 3,244 responses, 3,067 continued to provide comment. Of these 3,067 provided further comment. In addition, 62 comments were received from individuals/organisations that did not select one of the three options. Where respondents provided a postal address or gave some form of commentary regarding where they reside, it can be ascertained that in the region of 80% of respondents are from the Cobham² and Dittons³ areas.

8.5 Many of the responses followed one of the three standard templates that were circulation for submission to the Council. The following provides a summary of all the comments received.

Comments from those who responded 'Yes'

8.6 Of the 246 responses received answering 'yes'; they did agree that Option 2 is the most appropriate option, 153 provided further comment.

8.7 Comments received recognised that up until now the Council has been pursuing a strategy based upon urban capacity. It was stated that whilst this strategy worked previously, the planning system had changed e.g. the abolition of Regional Spatial Strategies, and so must the Council's plan-making approach reflecting other relevant circumstances. Points stated as other relevant circumstances included the Government's drive to increase the provision of new homes, increased house prices and affordability ratios, and the need to have a credible plan in place. The Council was strongly supported for seeking to address strategic matters such as Green Belt now, and not relegating these to a second-tier development plan document, such as a site allocations plan.

8.8 On the issues of increasing housing need and affordability, it was considered important that the Council seeks to address the housing needs of all groups in accordance with the NPPF. Specific reference was made to the need to address the housing needs of the ageing population, one of the biggest drivers of population growth in the Borough. With reference to the younger population, it was also stated that everyone, and not just a few, should be given the opportunity to own their own home.

8.9 Respondents considered Option 2 to be an effective compromise that balances the need for new homes whilst recognising that there are constraints on development within the Borough. It was considered that through Option 2, the responsibility for providing new homes would be shared throughout the Borough with development opportunities being sought in our towns and villages on brownfield sites and on weakly performing Green Belt in some of our less populated areas. It was felt that Option 2 ensures that the character of the area is

² Including Oxshott and Stoke D'Abernon

³ Including Thames Ditton; Long Ditton; Hinchley Wood and Weston Green

preserved both in terms of the densities of development but also continues to safeguard our open spaces within the settlement areas. Retaining the character of the Borough was considered to be particularly important to those residents from the northern areas of the Borough e.g. Walton, Hersham, Weybridge, Molesey where historically development has tended to take place.

8.10 Amending the boundaries of the Green Belt was frequently quoted as a 'last resort', with some respondents stating that this time had now come. It was considered that the rationale for looking to amend the boundary of the Green Belt had been clearly demonstrated and the need to do so was already well-documented. The acknowledgement that not all Green Belt land within the Borough continues to meet the five purposes as set out in the NPPF was welcomed. Specific reference was also frequently made to the proposed Drake Park scheme and the need to actively manage any future development, keeping it in balance with the existing features of the Borough.

8.11 The proposed loss of 3% of the Green Belt was considered by some as a small price to pay and that Options 1 and 3 would be far more harmful to residents and the environment. It was also recognised that opportunities of providing new infrastructure to support any large-scale developments where needed, was more likely to occur on-site / be delivered as part of Option 2.

8.12 Finally, it was considered that now was not the time to be 'NIMBYs' about development as the wider-Borough would be better protected and could also benefit from the proposed developments.

8.13 In some instances the expressions of support for Option 2 were caveated. The majority of which were suggested by local residents and / or amenity groups. Caveats put forward included:

- It being the least-worst option
- The figure of housing need still needs to be challenged
- General support for increasing the development in the urban areas, as long as it is in keeping with the existing character
- The overall integrity of the Green Belt still needs to be maintained
- Support the overall option, but not the sites selected
- That only small parts of the Green Belt should be released but only with community support
- Other Green Belt sites should also be considered – all those weakly performing and other areas also
- That any development should be small in scale and spread across the Borough
- That any development should be community (and not developer) led
- That infrastructure is and will be a major issues that needs resolving / providing alongside any new development
- The need to take account of environmental and health impacts
- The need to take account of surrounding developments e.g. Wisley, Kempton Park etc.

Comments from those who responded 'No'

8.14 2,939 responses received answering 'no'; they did not agree that Option 2 is the most appropriate option, 2,884 provided further comment. Many responses outlined site

specific reasons as to why they considered the development of Local Areas 14, 20 and 58 to be inappropriate. These responses have all been considered but to avoid duplication have been summarised under Question 6 (see page 44-53).

8.15 Many felt strongly about the disadvantages of Option 2 as well as not agreeing with or disbelieving the benefits as set out in the Strategic Options document. Many felt that there should be more options or more nuanced versions of Option 2 developed. Others argued that there was insufficient information on which to base a decision or that the document was contrived in order that respondents had to select Option 2. Respondents also felt that insufficient time had been allowed to read and consider all the evidence produced in order to make an informed response.

8.16 A further reason for not supporting Option 2 was felt to be that the strategic areas are not located in sustainable locations and that building affordable homes in these areas is unrealistic as they are distant from amenities and that it would only add to the area's existing problems. There were concerns that the Borough will end up being as urbanised as London and that the developments would be out of character with the existing area. The Green Belt and its loss was also a prominent concern raised by numerous residents, with many stating that it is sacrosanct and will be lost for ever once released for development.

8.17 A significant number of respondents argued that there were flaws and issues with the evidence base that meant that Option 2 was unsuitable. This included fundamental concerns around both the Green Belt Boundary Review (GBBR) and the Strategic Housing Market Assessment (SHMA). Full details of the points raised in regard to the evidence base documents are summarised on pages (Page 135-150). As an overview, the issues raised included the fact that the SHMA had not taken into account recent changes such as the vote for the UK to leave the EU or changes to stamp duty. In terms of the GBBR a common criticism was that it was subjective and flawed with the consultants used not being sufficiently independent. There was also further criticism that the formulation of Option 2 appeared to have relied solely on the work on the Green Belt, rather than a sustainability assessment.

8.18 There was more general criticism that the level of housing need identified was inappropriate as the environmental impact and impact on infrastructure provision / capacity of such a quantity of development would be too great. Conversely, it was suggested that Option 2 would leave too much of the housing need unmet, with criticism arising from the fact that the Consultation document did not specify how much housing the Council expected to be able to deliver if Option 2 was implemented. It was also noted that the Council had not addressed the availability of land within the strategic areas in detail within the Consultation document.

8.19 A number of comments suggested that an up-to-date Strategic Housing Land Availability Assessment (SHLAA) must be produced in order to inform the development of the Local Plan. Relating to this point, it was also expressed that insufficient evidence has been prepared to demonstrate that the Council cannot build solely on brownfield land to meet development needs. This was frequently combined with the concern that releasing some Green Belt at this point would merely be a 'slippery slope' to further releases in the future.

8.20 Another of the most frequently raised criticisms was that the consultation does not follow or is not aligned with the Government's Housing White Paper, which was published

towards the end of the consultation period on 7 February 2017. One of the key points being that the exceptional circumstances required to amend the Green Belt boundary had not been demonstrated. It was also frequently stated that to make any amendment to the Green Belt boundary required local support, something that the Council did not have.

8.21 Under Option 2, the exceptional circumstances suggested by the Council to amend the Green Belt boundary included the need to provide more affordable homes and a better housing mix. A more detailed summary of the comments made regarding these two points is set out in Question 5 (see page 36). However, in response to Question 4, a small number of respondents stated that the Council is responsible for the current imbalance in the housing stock in the Borough as it has permitted too many large dwellings and not forced developers to build smaller properties instead. Building on the Green Belt to 'fix' the Council's mistakes was not therefore considered to be the answer. There was also uncertainty as to what 'affordable' actually means and scepticism that housing would be affordable for those that need it in the Borough. There was concern that a large supply of affordable housing in the area could cause social problems.

8.22 Some respondents suggested that there is not adequate evidence that the Council has made efforts through the Duty to Cooperate to seek to meet the shortfall in provision through discussion with neighbouring authorities or cross boundary solutions. This was sometimes combined with comments that there has been no evidence of the Council taking account of proposed development in surrounding Boroughs such as Wisley Airport and Kempton Park.

8.23 Many also argued that infrastructure in the area is insufficient with specific concerns about traffic, schools places and a lack of GPs and doctors surgeries. Full summaries of the key issues raised in regards to infrastructure provision are set out under Questions 30, 31 and 32 on pages 121–133.

Comments on Other Options:

8.24 Question 4 asked respondents to put forward alternative proposals to Option 2 if they did not agree that it was the most appropriate way forward. This resulted in a number of suggestions as to the way in which the Council should progress. In addition, the Council also received a number of comments in support of the alternative two options set out in the Consultation document, Options 1 and 3. A summary of the comments made is set out below.

Suggested Alternative Approaches

8.25 It was frequently suggested that there should be a 'do nothing' option, to maintain the status quo. Many disagreed with all the options put forward. It was felt that the Council should stand up to Government and refuse to meet the full development needs of the area as has been done elsewhere by Councils such as Reigate and Banstead.

8.26 There were suggestions to accommodate further development or meet housing needs on previously developed land including making use of brownfield sites, public sector land, office areas, estate regeneration and bringing back into use empty properties and reconfiguring them. One view commonly expressed was that given the scale of the housing need, industrial and commercial developments should be scaled back in favour of residential

development. It was argued that the Council needs to consider whether Elmbridge is an appropriate location for commercial uses such as warehouses, offices and retail space.

8.27 It was also suggested that large houses should not be built, but low level flatted development should be constructed instead. Some respondents argued that this should be done first or instead of Green Belt development, whilst others suggested that this should apply to brownfield sites in the Green Belt as well. This theme was continued in more general terms by the suggestion that houses (including affordable ones) should be close to jobs, transport links and services.

8.28 A number of location specific suggestions were made including re-developing industrial estates in Hersham and Molesey, and the general development / intensification of development at Whiteley Village, the Painshill area, Silvermere golf club, land at Burwood Road around Banks Column and land south of the M25. There were also more general suggestions of Local Areas that could be built on instead of those proposed including Local Areas 1, 4, 21, 22, 23 and 27 and only part of Stokes Field / One Tree Hill (Parcel 58). Full details of alternative locations for development are set out under Question 8 on pages 60–64.

8.29 Alongside these area-specific suggestions a number of more general locations were also put forward. These included building along the Woking / Walton / Esher rail line or in Boroughs with better transport links such as Woking, Guildford and Kingston, building an entirely new village / town in a logistically better-positioned area as well as the idea of developing a new island in the Thames Estuary or reclaiming land from the sea as has been done in the Netherlands. It was proposed that housing need within the South East should be met further afield e.g. Manchester, Liverpool, Birmingham, Exeter, Plymouth, Newcastle and Leicester. This was alongside the proposal to relocate businesses so there would be no more demand for new housing.

8.30 Finally, a further approach put forward was for the current Local Areas (as set out in the GBBR) to be sub-divided and re-assessed to see if there may be other, smaller areas that may be suitable for development. It was proposed to retain the Green Belt areas but highlight smaller areas where, if applicants provided well considered and designed proposals which safeguard the surrounding environment, provided community open space and improved local infrastructure then development could be considered. If the resulting remainder of the Green Belt could not reasonably maintain its designation, it was proposed that it should be re-designated as Strategic Open Urban Land (SOUL).

Option 1

8.31 Some favoured Option 1 as they felt it had the benefit of locating people close to amenities and having less impact on traffic. It was argued that, following the emphasis on increasing densities that was evident in the Government's Housing White Paper, the loss of playing fields and allotments arising from the pursuance of Option 1 may not be inevitable as long as densities were increased and the housing need revised to a more realistic figure. It was also suggested that as the Council has not demonstrated that Option 1 would be unviable, the exceptional circumstances that would be necessary to justify an amendment to the Green Belt boundaries have not been demonstrated.

8.32 It was also suggested that a modified Option 1 would be a preferred approach. It was proposed that such a course of action would require even more emphasis on accommodating need within the urban area, increasing densities across all parts of the Borough. It was suggested that there should be less emphasis on matching the character of the area (particularly in terms of density), but greater emphasis on design. A minimum height of four storeys was proposed for housing developments within the urban area.

8.33 Conversely, Option 1 was criticised for representing an extreme approach. It was argued that the necessary density of approximately 300dph would be comparable to that of Central London, which would be entirely out of character and would render the required infrastructure improvements difficult to implement. It was also argued that Option 1 would result in the delivery of flatted developments, rather than housing suitable for occupation by families.

8.34 It was suggested that a comparable amount of information had not been provided for Options 1 and 3, making an informed response to the consultation impossible.

Option 3

8.35 A number of respondents noted that Option 3 would spread development more evenly across the Borough. A more equitable spread was argued to be a fairer approach. The Option was also favoured by some as it would meet housing needs in full.

8.36 However, it was again argued that Option 3 would represent an extreme course of action. Respondents suggested that this Option would not afford the health of the Green Belt, the sustainability of the sites and landscape quality enough weight. It was argued that the removal of other areas from the Green Belt would weaken it too much, leaving it susceptible to further erosion in future.

Comments from those who responded ‘Don’t know’

8.37 Of the 59 responses received answering ‘Don’t know’, 30 provided further comment. A number of these did so because they felt they lacked enough information or detail about the Options and evidence behind them to comment upon their suitability. Comments repeated concerns already made about the detrimental impact on infrastructure of building in the already over-developed South East.

Comments from those just providing further comment

8.38 In addition to the comments summarised above, the Council received 62 comments from respondents who did not select an option. Many of these repeated comments already summarised, including concerns around infrastructure, issues with the evidence base, the view that there are no exceptional circumstances for the release of Green Belt, that sufficient brownfield sites exist to meet need and the view that the Council should stand up to Government pressure for housing growth.

8.39 A number of statutory providers and Duty to Cooperate Bodies also provided comment on the Options. Mole Valley District Council (MVDC) noted that Option 2 impacts on the Council’s ability to meet housing need in full. As part of the same Housing Market Area, MVDC highlighted that there is a very real prospect that they will also be unable to meet their own needs in full. As the plan making process progresses they will also be exploring cross-boundary options under the Duty to Cooperate. Spelthorne Borough Council

responded to highlight that as the preferred option will not meet need in full, they would wish to be assured that full discussions have taken place with authorities within the Housing Market Area to help address this need. Spelthorne also provided comment on evidence base documents. These are summarised within section 13.

8.40 Surrey County Council (SCC) stated their support for the protection of the Green Belt. However, they noted the White Paper's proposal to make more land available for homes by maximising the contribution of surplus land already in public ownership. SCC has limited non Green Belt assets but is committed to liaising on potential opportunities. The Environment Agency commented that they would welcome a clear definition of absolute constraints as they may consider other issues to also be an absolute constraint on development, such as the sewerage network and environmental capacity.

8.41 Historic England highlighted that they would wish to ensure that any heritage assets and the wider historic environment are fully considered in the selection and allocation of strategic sites. The response did suggest that a combination of the Options set out might be appropriate, as long as it does not affect character adversely.

8.42 A number of representatives from the development industry also responded on the Options presented. There was agreement that Option 1 is not feasible as there are limited opportunities to significantly increase densities in this manner in the urban area. There was support for the release of Green Belt to meet emerging need and also support for meeting housing needs in full. There were also queries about how the need for employment land would be met. It was suggested that the Council will need to consider a range of strategic options to meet need: this included reviewing the density of unimplemented schemes. Imber Court was referenced specifically.

8.43 Finally, the relationship between Housing Market Areas in North Surrey and the need for a coordinated approach between authorities on OAN, generally covered under the Duty to Cooperate was commented on. It was stated that conversations with other authorities should be supported by a robust testing of available and suitable land in those authorities and examining whether other authorities can help meet some of Elmbridge's housing need.

Exceptional Circumstances

8.44 Options 2 and 3 both seek to amend the Green Belt boundary in Elmbridge. In accordance with current Government Policy (the National Planning Policy Framework (NPPF)), the Council has had to consider whether there are the exceptional circumstances that would enable this position to be taken forwards under either option. As set out in the consultation document, the issues that the Council considers should be recommended to a Planning Inspector as capable of amounting to exceptional circumstances are:

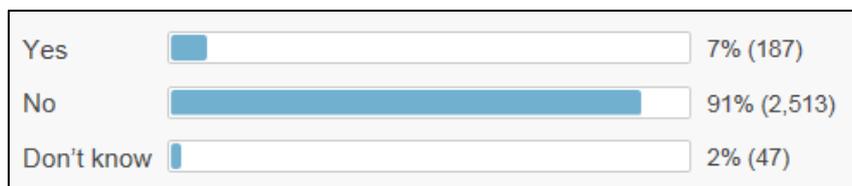
- One of the worst levels of affordability in the country coupled with an under supply of affordable homes;
- Need to deliver a better mix of new housing away from current delivery focussed on houses of four or more bedrooms; and
- The land that is being kept open for the purpose of Green Belt is no longer meeting those purposes.

Consultation question

8.45 The consultation document asked whether, given the expected levels of demand for land from new development:

Question 5. Do you consider the suggested exceptional circumstances are sufficient to support the amendment of the Green Belt boundary?

Summary of responses



8.46 2,747 responses were received to this question selecting one of the three options above. The majority (91%) selecting 'no'. Of these 2,747 respondents, 2,575 continued to provide further comment. There were also 9 comments from individual/organisations who did not select one of the three options. Many of the responses followed one of the three standard templates that were circulated for submission to the Council. Where respondents provided a postal address or gave some form of commentary regarding where they live, it can be ascertained that in the region of 80% of those responding to this question are from the Cobham⁴ and Dittons⁵ areas.

Comments from those who responded 'Yes'

8.47 Of the 187 responses received answering that 'yes'; they do consider the suggested exception circumstances are sufficient to support amendment of the Green Belt Boundary, 144 respondents provided additional comments.

8.48 The general consensus was that issues of significant / high need for new homes, unprecedented problems with housing affordability and the lack of supply did constitute exceptional circumstances and, were more than sufficient to amend the Green Belt boundary. It was suggested that such issues were having a significantly negative impact on communities and that 'ordinary people' should be able to live in an area they grew up in.

8.49 Comments received suggested that Green Belt should be reviewed from time to time and that when designated 60 years ago, the demands, changes in uses of land and many other changes and demands that now exist, could not have been foreseen. It was suggested that the Council's preferred approach still maintains 97% of existing Green Belt which was considered to be a 'fair' compromise, maintaining the right balance between development and protecting our Green Belt. It was also stated that the approach gave Green Belt overall a higher / better level of protection in the future.

8.50 It was stated that the Council had done all the due diligence necessary to support the recommendation and that the analysis and approach used was supported by other Councils and followed elsewhere.

⁴ Including Oxshott and Stoke D'Abernon

⁵ Including Thames Ditton; Long Ditton; Hinchley Wood and Weston Green

8.51 A number of respondents stated 'yes' but, that any release of Green Belt should only occur where the development is supported by the appropriate infrastructure and that only those areas intended for development should be removed i.e. playfields / allotments should remain in the Green Belt.

8.52 A number of respondents, including local residents, suggested that the Council should go further in its response and be more progressive. It was stated that all weakly performing Green Belt should be de-designated and that the Council should look at the sub-division of moderately and strongly performing Green Belt and further development opportunities should be explored and identified. It was suggested that other areas have the potential to expand in order to help the Council meet its identified housing needs.

8.53 Some respondents identified that Councils need to take into account the proposed changes to Government policy and its position in regards to exceptional circumstances, as set out in the Housing White Paper, published during the consultation and which will overlap with the Council's on-going preparation of the Local Plan.

Comments from those who responded 'No'

8.54 Of the 2,513 responses received answering that 'no', they do not consider the suggested exception circumstances sufficient to support amendment of the Green Belt Boundary, 2,407 respondents provided additional comments. Amongst these responses was the strongly expressed consensus that Green Belt boundaries should not be amended under any circumstance and thus the exceptional circumstances to do so would never exist. Others felt that Green Belt was being targeted as an 'easy-option' and that amending the boundary now would lead to further amendments in the future i.e. the thin end of the wedge. It was stated that the difficulty is that, over time, the interpretation of what constitutes exceptional circumstances can change hence no Government can categorically state that the Green Belt is safe from built development. Coupled with Local Plans needing to be reviewed every 5 years, it was felt that further Green Belt land will be released in the future and prior to the end of the Plan period of 2035.

8.55 The majority of the responses answering no to this question were from individuals / organisations from the Cobham and Dittons areas. Many of the responses also followed one of the three standard templates circulated and highlighted the same six key issues. These issues were:

- National Guidelines state that "unmet housing need is not a justification".
- The perception that the consultation material states that Green Belt boundaries should only be adjusted with the support of local people – something the Council does not have.
- The Council has not given due consideration to other options e.g. brownfield sites / urban intensification and working with other Councils.
- The negative knock on effects of amending the Green Belt boundary in terms of pressure on local services / congestion / destruction of the quality of life
- The Strategic Paper has only explored three parcels of so called 'weakly performing' Green Belt. The work should have been completed at a much lower level. Who is to say that the next levels of your identified weakly performing Green Belt Parcels are not more suitable and have more developable areas.

- The Government White Paper emphasises that councils need to have fully explored all other options before considering Green Belt land. Elmbridge Borough Council has not demonstrated this.

8.56 Some of the responses received expanded upon these six points listed above; the details of which are summarised below.

8.57 Many respondents commented that national policy and guidance states that unmet housing need is not a justification for amending Green Belt and, at a national level, plans to relax Green Belt restrictions had been shelved by Ministers because of concerns conveyed by MPs. It was stated that this now needed to be reflected in the Strategic Plan. In addition, the level of housing need identified in the Strategic Housing Market Assessment (SHMA) was questioned. It was felt that the figure of 9,480 new homes is incorrect as it was calculated pre-Brexit and many respondents also felt that it should not have taken into account London's overspill i.e. in-migration from London. It was stated that London's housing need was 'not the concern of Elmbridge tax-payers'.

8.58 In terms of giving due consideration to other options, the opinion was expressed that options such as higher densities in the urban areas and a more detailed and thorough search for brown-field sites should be undertaken. A strongly held view was that the level of housing need could be met on brown-field sites in the urban areas and that options of identifying open spaces and replacing them with residential developments should be explored. In meeting development needs in the urban areas, some responses made reference to the Council's current Local Plan (the Core Strategy) and its Land Availability Assessment (LAA) (September 2016). In terms of the Core Strategy it was quoted that the document states "evidence shows that there is sufficient potential within the urban area to meet the local housing requirement. The Green Belt boundary will remain unchanged". In referencing the LAA it was stated that as there was a 7.51 year housing land supply, considerably above the 5 year requirement set out in national planning policy, there was no need to consider Green Belt releases.

8.59 Under the consideration of other options, it was also commented upon by many that the Council had not worked with neighbouring authorities to see how housing needs could be addressed across Borough boundaries. Linked to this and the more detailed assessment of urban land, was a focus on the Government's Housing White Paper that was published during the consultation. A number of respondents picked up on this and stated that in accordance with the White Paper the Council must demonstrate that they have fully examined all other reasonable alternatives for meeting their identified housing requirement. It was also commented that if Green Belt was to be released this should be done on 'sustainability' factors and not on the strength of the Green Belt.

8.60 Focusing on the three issues the Council suggested could be considered as exceptional circumstances and the reaction received to these, it was suggested that these were not exceptional but were in fact the norm i.e. high house prices are not just a market condition faced by Elmbridge residents but by those living across Surrey, London and the wider South East. It was suggested that building in the region of 2,500 new homes over 20 years in the Green Belt would have no effect on reducing the average house price in the Borough or in improving overall affordability issues. It was felt that building new homes in the area and in particular next to some of the most expensive homes in the Borough would not provide more 'affordable' homes as the Council has little influence over the type of housing built on private land.

8.61 It was felt that providing 'so-called' affordable homes at 20% or below local average prices would do little to alleviate the real housing needs that exist in the Borough (i.e. social housing) and that this was becoming increasingly difficult to deliver given changes in Government funding and attitudes / policy towards this type of housing provision.

8.62 In seeking to balance the housing mix provided, it was considered that the Council and its existing policy (CS19 of the Core Strategy) had failed to have any affect on the delivery of smaller units and respondents queried therefore why a change of approach i.e. Green Belt amendments, would have any different result. It was considered that if there were such a need for smaller units, that this should be reflected in current developments being granted planning permission. It was acknowledged that some smaller units might be developed on larger sites however, it was felt that these would be 'luxury' flats and that no great numbers would be delivered to help alter the present imbalance. It was considered unrealistic to suggest that large number of smaller units would be built in areas between the low density areas of Stoke D'Abernon and Oxshott and in other areas close to Long Ditton or even north of Cobham and that increased densities risked the creation of 'ghetto-like' developments.

8.63 It was suggested that addressing these two issues (affordable housing and balancing the housing mix) was more likely to be met through Option 1.

8.64 On the relationship between housing needs and the Green Belt, it was suggested that the need for more affordable housing and a greater mix of housing types and sizes, is clearly linked to unmet housing needs and therefore could not be considered as exceptional i.e. it is just a type of unmet housing need. There was a general misunderstanding of the difference between 'exceptional circumstance' and 'very special circumstance' with many quoting the NPPF: "unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the very special circumstances justifying appropriate development on a site within the Green Belt".

8.65 On the last factor that the Council suggested could be considered as an exceptional circumstance (the land that is being kept open for the purposed of Green Belt is no longer meeting those purposes) the majority of respondents raised serious concerns as to the results of the Green Belt Boundary Review (GBBR). To avoid duplication these concerns have been set out in 13 of this Consultation Statement. However, in summary it was stated that the strength of Green Belt is subjective at best and that there were inconsistencies and bias in the categorisation; parcelling; scoring and presentation the various areas.

8.66 Other responses received stated that the Strategic Options Consultation had failed to show areas where residents and businesses do want Green Belt and other development to take place. The main example given was the land opposite Esher Rugby Club. It was also strongly stated that the plan making process should be stopped as the Council was believed to be in breach of its obligation to act properly and of its fiduciary obligations not to spend material resources and other costs on a process that is very unlikely not to succeed.

8.67 Whilst not fully agreeing to the exceptional circumstances proposed by the Council, a number of respondents did suggested amendments / additional factors. These included:

- Ensuring that the Borough has available larger sites for the established need of 5,780 new homes and is capable of accommodating a better mix of new housing without compromising the established character of the Borough's existing settlements.

- The availability (lack of) Green Belt land within the Borough that is no longer meeting its original purposes that can provide this need.
- There are other exceptional circumstances where the Green Belt boundary should be reviewed, including where its alignment does not reflect the form of built development on the ground and where development for certain purposes is appropriate.

8.68 It was also suggested that exceptional circumstances could be site specific.

Comments from those who responded ‘Don’t know’

8.69 Of the 47 responses received answering that they did not know whether the suggested exception circumstances were sufficient to support amendment of the Green Belt Boundary, 24 respondents provided additional comments. Some responses received were similar to those who did not consider that exceptional circumstances had been demonstrate e.g. more sites within the urban areas should be found. However, there was more of an acceptance that housing need including prices and affordability was a particular issue in the Borough.

8.70 Some of the more detailed responses stated that the issue of Green Belt releases needed to be considered as part of a wider strategic approach; not just within the Borough boundary. The suggestion of a strategy of forming “New Towns” outside of the M25 to meet additional housing need was made also made. This was considered as an alternative to increased sub-urban infill, allowing areas to become more densely developed.

8.71 A number of responses stated that further details would be required in terms of the scale of the releases / development proposed for them to decide whether the exceptional circumstances suggested were sufficient. Others stated that they agreed with the exceptional circumstances in support of Option 2 but not Option 3.

Comments from those who did not select an option

8.72 In addition to the comments summarised above, the Council received 9 comments from respondents who did not signal whether they agreed, disagreed or did not know whether the suggested exceptional circumstances were sufficient to amend the boundary of the Green Belt. Some of the responses reiterated the overall sentiments of those who did not agree and the generic six issues (bullet points on page 37) that were continuously repeated. A number stated that until the scale of the developments and types of developments were known in greater detail, this question was difficult to answer. Others agreed that the exceptional circumstances are sufficient or at least recognised the need for more housing in the area and the current housing needs issues. One response referenced the ‘Streets Apart’ report commissioned by Surrey County Council and Walton Charities that recognised high average ratio of house prices to incomes and that house prices in Elmbridge are 260% above the national average income.

The Key Strategic Areas

8.73 Under the Council's preferred option (Option 2) three Key Strategic Areas were identified where it was considered that the Green Belt designation could be removed. Each of these areas was 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. Subject to the demonstration of exceptional circumstances, an initial appraisal of the three areas showed 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.

8.74 The three Key Strategic Areas identified were:

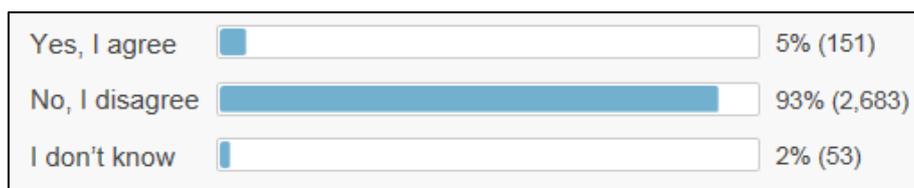
- Land north of Blundel Lane including Knowle Hill Park and Fairmile Park, Cobham (Local Area 14);
- Land south of the A3 including Chippings Farm and The Fairmile, Cobham (Local Area 20); and
- Land north of the A309 and east & west of Woodstock Lane North, Long Ditton (Local Area 58).

Consultation question

8.75 The consultation document asked whether, given the expected levels of demand for land from new development:

Question 6. Do you agree that, given the appropriate exceptional circumstances, these three Key Strategic Areas are appropriate for removal from the Green Belt? If not, why not?

Summary of responses



8.76 2,887 responses were received to this question selecting one of the three options above. The majority (93%) selecting 'no'. Alongside the 2,887 responses 2,750 individual comments were received, including 25 comments from individual/organisations who did not select one of the three options. Many of the responses followed one of the three standard templates that were circulated for submission to the Council. Where respondents provided a postal address or gave some form of commentary regarding where they reside, it can be ascertained that in the region of 80% of those responding to this question are from the Cobham and Dittons areas.

Comments from those who responded 'Yes'

8.77 Of the 151 responses received answering that 'yes'; they considered the removal of the three Key Strategic Areas from the Green Belt as appropriate, 126 respondents provided additional comments. From the additional comments received a number of general sentiments can be pulled-out. These have been summarised below. Nevertheless, it should be noted that some of the comments received did not correspond with the respondents stating that they agree with the removal of the three Key Strategic Areas from the Green Belt. The 151 respondents registered as supporting this approach is therefore likely to be a slight overestimation. Where it is considered that an error has taken place and the respondent has incorrectly selected 'yes', the comments made have been considered and reported under those respondents stating that they disagree with the removal of the three Key Strategic Areas from the Green Belt.

8.78 The general sentiment expressed by those agreeing with the proposed approach is that subject to the demonstration of appropriate exceptional circumstances, the removal of these Local Areas would not seriously impact on / be a loss to the Green Belt. It was stated that as the proposed three areas are adjacent to strongly or moderately performing Green Belt areas and, assuming that the protection of those areas remains, the overall impact within that geography is limited. It was further stated that the rationale used to identify the areas was appropriate; that they were suitable for larger scale development in order to provide more smaller and affordable homes and; that such benefits would outweigh the harm to the openness of the Green Belt. A number of respondents also stated that this approach was more favourable than the continuous delivery of significant levels of new development in areas that are already densely developed / in one single location however, it was suggested that those areas used by the public e.g. allotments & nature reserves, must be retained alongside the overall character.

8.79 In reference to the Council's overall approach, it was suggested that without the identification of the Key Strategic Areas, the Council would not have a credible Local Plan to submit to the Government and would not be able to maintain control over future development. A number of respondents also stated that they agreed with the categorisation of other particular Local Areas as set out in the Green Belt Boundary Review.

8.80 Focusing on the individual Key Strategic Areas, the following comments were received in regard to why their removal from the Green Belt was considered to be appropriate:

Parcel 14 – Land north of Blundel Lane including Knowle Hill Park and Fairmile Park, Cobham

- The analysis of the Green Belt Boundary Review is supported and the area is indeed considered to be performing weakly against the purposes of Green Belt.
- The area already has planning permission for new homes and would be an opportunity to provide more.
- The Local Area has good transport links both to the roads and rail networks.

Parcel 20 – Land south of the A3 including Chippings Farm and The Fairmile, Cobham

- If released, a defined boundary would be set using the alignment of the new A3 and this is readily recognisable and would be permanent.
- Part of the site is previously developed.
- Positioned on the edge of Cobham and close to the town centre and well related to existing community and social facilities, this is a sustainable location for development.
- The conclusions of the Green Belt Boundary Review are supported in particular that the opening of the A3 has brought about a fundamental change in the character and role of the land.
- The Local Area has good transport links both to the roads and rail networks.
- The Sustainability Appraisal of the Local Plan clearly shows Option 2 as the more sustainable option taking account of all economic, environmental and social indicators / objectives.

Parcel 58 - Land north of the A309 and east & west of Woodstock Lane North, Long Ditton

- It's release through the emerging Local Plan will secure economic, social and environmental benefits in the Borough in line with paragraph 7 of the NPPF.
- The analysis of the Green Belt Boundary Review is supported and the area is indeed considered to be performing weakly against the purposes of Green Belt.
- The area contains no absolute constraints that would limit development opportunities.
- The Local Area has good transport links both to the roads and rail networks.

8.81 Comments were also received stating that other areas across the Borough should also be considered for development, including the remaining 10 weakly performing Green Belt Local Areas identified in the ARUP report.

Comments from those who responded 'No'

8.82 Of the 2,683 responses received answering that 'no'; they did not consider the removal of the three Key Strategic Areas from the Green Belt as appropriate, 2,570 respondents provided additional comments.

8.83 Amongst these responses was the general consensus that Green Belt boundaries should not be amended under any circumstance, that the exceptional circumstances / justification to do so had not been demonstrated / would never exist and that Green Belt is not suitable for development. An alternative to this that was suggested was that there should be a local referendum or a formal vote in Parliament to allow building on the Green Belt. The robustness and consistency of the Green Belt Boundary Review was again questioned and the belief that Green Belt was being targeted as a 'quick and easy-option' was expressed, along with accusations that the Council / developers were only doing it for their own greed or being short sighted in the approach taken. The point that amending the boundary now would lead to further amendments in the future i.e. the thin end of the wedge or setting a precedent, was expressed alongside the reiteration that brownfield sites should be used first, that there are other more appropriate sites within the Green Belt that could be developed or that alternative options should be further explored.

8.84 Some comments also suggested alternative approaches such as assessing and using other Green Belt (particularly weakly performing) areas which are closer to higher order urban areas as they may be more sustainable. It was suggested that may include areas of major sources of employment and transport such as Esher, Hersham, Walton-on-Thames, Weybridge and Woking. It was also put forward by some respondents that only area to be developed in each of the Key Strategic Areas should be removed from the Green Belt, and the remaining parts of the parcels should stay in the Green Belt.

8.85 There were also a number of other general concerns / comments which included there should be a 2 stage process first assessing all land then then looking at all areas in conjunction with the Land Availability Assessment to see what land may be available. The Council should use a settlement hierarchy to determine areas that may be suitable and available for development and undertake a sustainability assessment of them to see which ones are the most suitable. Additional concerns related to the potential housing required and that only affordable housing should be built.

8.86 Further concerns related to the Green Belt, with one respondent suggesting that 150m strips should be left as Green Belt along all surrounding roads if any areas were to be developed, with others stating that Green Belt removal should only take place with local support. The location of the sites being remote from employment or transport links was also raised, along with the assertion that the approach of assessing Green Belt areas by Local Area was not a suitable method as Green Belt should not be removed from an entire parcel as this could not be supported and would be counterproductive. Finally, the point made by the Government that unmet housing need is not a justification for remove Green Belt was also reiterated.

8.87 Focusing on the individual Key Strategic Areas, the following comments were received in regard to why their removal from the Green Belt was not considered to be appropriate. To avoid duplication, comments relating the Green Belt Boundary Review have been included in the summary of comments on the evidence base document which can be found on page 135. This also applies to concerns about infrastructure which are summarised under Question 30, 31 and 32 on page 121-133.

Parcel 14 – Land north of Blundel Lane including Knowle Hill Park and Fairmile Park, Cobham

8.88 Green Belt

- The analysis of the Green Belt Boundary Review is not supported and the area is not considered to be performing weakly against the purposes of Green Belt (see page 135 for further comments relating to the Review).
- The Green Belt must be planted with more trees to mitigate the rising pollution levels.

8.89 Character

- Development would damage the feel of the area, lead to over development and create a crowded space.
- Area is currently low density so higher density would be out of keeping with the existing area
- Affordable housing would have to be delivered in the form of flats which would be better suited to urban centres close to transport hubs.

8.90 Infrastructure & Access

- Local infrastructure is poor and at capacity. This includes the road network, school places, public transport, GP Surgeries and local hospitals.
- Substandard road access and roads not suitable for widening.
- Trains and the stations are full and parking at train stations is insufficient.
- Cobham should not be seen as desirable for London commuters given that there are only 2 trains per hour to Waterloo operating an unreliable service and high ticket prices.
- It is not a sustainable area to develop due to inadequate access to public transport.
- Proximity to public transport critical for development of this scale.
- Sewerage and drainage systems are at capacity.
- There is insufficient waste disposal and the area is already used for fly tipping.
- Until infrastructure is considered, it is not possible to make a rational or logical decision regarding the suitability of these areas for development.

- The rights of way across the site should not be affected.
- There is a high pressure gas pipeline running under the site

8.91 Flooding

- There are many springs and wells between Polyapes and Blundel Lane which if built on could lead to flooding issues, particular concern is the area at the bottom of Knowle Hill Park.
- The area is hilly and a flood plain and would surely be a flood risk if built on.
- Flooding already occurs in Water Lane, the lower section of Fairmile Lane, Stoke Road - this would further heighten the water tables and increase flooding.
- There are flood plains along Blundel Lane.
- Householders in the area have problems getting Home Insurance due to flood risk.

8.92 Site sustainability

An assessment of the areas' sustainability was undertaken by various planning agents and these concluded that it was relatively unsustainable, scoring poorly for a number of different criteria including distances to schools, shops, healthcare facilities, railway stations, employment areas and recreation facilities. It did however score more highly for its proximity to an A road and being located next to the existing urban area. There was also concern about the small area of land within it that would be available for development being unable to supply a large amount of housing that would be enough to justify a new school and other facilities, as well as the small access road to the site. Additional concerns about this area also included the number of environmental and other absolute constraints on the site, and perceived stronger links to the wider landscape.

8.93 Noise & Air Quality

- The Green Belt must be planted with more trees to mitigate the effects of rising pollution levels.
- Development would be too close to main roads and could affect the health of those people who would live there. Air quality near main roads in Elmbridge already exceeds legal limits.
- Currently, the parcel provides a 'lung' to combat pollution.
- Air quality is already bad as Elmbridge is situated between two major airports.
- EU taking action against UK due to dangerously high levels of Nitrogen Dioxide.

8.94 Trees & Woodland

- Ancient Woodland needs to be protected and could not ever be replaced.
- Provides good woodlands as well as Ancient Woodland.
- Trees and grassland is part of our eco-system and are biodiversity havens.
- The Green Belt must be planted with more trees to meet the rising pollution levels.

8.95 Biodiversity

- Trees and grassland is part of our eco-system and are biodiversity havens.
- Loss of wildlife in general which is protected under UK / EU legislation.

- The area hosts protected English Bluebells, bats, owls, buzzards, adders, deer, owls, toads and Great Crested Newts.
- Ancient woodland needs to be surrounded by buffer zones and wildlife corridors

8.96 Recreation

- Loss of area for recreational uses e.g. dog walking, walking etc.
- Loss of scout facility / scout facility surrounded by houses causing child protection issues.
- Lack of facilities for young people in the area.
- There is no other accessible green space in the surrounding area.

8.97 Other Considerations

- Any development would negatively impact on the quality of life and health of existing residents who do not support the proposals.
- There has been no consultation with local residents.
- The two areas in Cobham are too close together.
- Impact on existing property prices.
- Negative impact on community cohesion.
- Presence of war memorials, WWII bunkers, mine shafts and brickworks making the ground unsuitable for development.
- Former landfill sites within the area.
- None of the new properties would be affordable due to high prices in the area.
- Large parts of this parcel are not available for development, e.g. owners have said no or village green etc.
- There is a covenant restricting development on part of Knowle Park.
- Questions with regard to why the Section 52 legal agreement on this area was removed.
- Development is not near local jobs and places of employment.
- Absolute constraints have not been recognised in the scoring.
- There has been no consideration on the feasibility of developing on this area.
- Stoke D'Abernon is mentioned in the Domesday Book, is the oldest parish in the area, has a Grade I church that may be the oldest in Surrey, has a world-renowned music school, home to one of the top Premier League football club.
- Already severe problems with the foul water drainage system which is overloaded and would require major upgrade.
- It is a historic area with Littleheath on the Diggers Trail.
- The topography of the site makes it unsuitable for development.
- The area available would not enable the supply of a significant number of homes.
- There are issues with land ownership and assembly due to a large number of landowners in this parcel which may make its delivery problematic.
- Having 2 of the 3 areas for development in Cobham is unfair

Parcel 20 – Land south of the A3 including Chippings Farm and The Fairmile, Cobham

8.98 Green Belt

- The analysis of the Green Belt Boundary Review is not supported and the area is not considered to be performing weakly against the purposes of Green Belt.
- The Green Belt must be planted with more trees to meet the rising pollution levels

8.99 Character

- Development would damage the feel of the area, lead to over development and create a crowded space.
- This would result in ribbon development which would contravene the Ribbon Development Act (1935) which is still in force.
- Too little has already been done to protect the character of the area.
- Affordable housing would have to be delivered in the form of flats which would be better suited to urban centres close to transport hubs.
- Development up to the road edge should not be permitted.

8.100 Infrastructure & Access

- Local infrastructure is poor and at capacity. This includes the road network, school places, public transport, GP Surgeries and local hospitals.
- Trains and the stations are full and parking at train stations is insufficient.
- Cobham should not be seen as desirable for London commuters given that there are only 2 trains per hour to Waterloo with an unreliable service and high ticket prices.
- Proximity to public transport critical for development of this scale.
- There is a lack of cycling provision.
- It is not a sustainable area to develop due to inadequate access to public transport
- Substandard road access
- Sewerage and drainage systems are at capacity
- A new school of 1,200 students will open at the top of Fairmile Road in the Summer. With this new school in place, the area will not be able to cope.
- Until infrastructure is considered, it is not possible to make a rational or logical decision regarding the suitability of these areas for development.

8.101 Site sustainability

An assessment of the areas' sustainability was undertaken by various planning agents and these concluded that it was relatively unsustainable, scoring poorly for a number of different criteria including distances to secondary schools, shops, railway stations, employment areas and recreation facilities. It did however score more highly for its proximity to a primary school and healthcare facilities as well as its location on an A road and adjacent to an existing urban area. There was also concern about the area of land in the centre of the site that might be suitable for development being unable to supply a large enough amount of housing to justify a new school and other facilities, as well as the access road to the site and the noise impacts of the A3.

8.102 Flooding

- Flood risk has not been covered in the consultation.
- Flood risk will be made worse.
- The Old Common spends much of the winter underwater and is frequently flooded.

8.103 Noise & Air Quality

- The Green Belt must be planted with more trees to mitigate the rising pollution levels.
- Development would be too close to main roads and could affect the health of those people who would live there. Air quality near main roads in Elmbridge already exceeds legal limits.
- Currently provides a 'lung' to combat pollution particularly in regard to the often congested A3.
- Provides separation from the disfigurement of the A3.
- EU taking action against UK against dangerously high levels of Nitrogen Dioxide.

8.104 Trees & Woodland

- The Green Belt must be planted with more trees to meet the rising pollution levels.
- Trees and grassland is part of our eco-system and are biodiversity havens.

8.105 Biodiversity

- SSSI, SNCI, LNR and BOA and common land must be protected.
- Connections between biodiverse areas need to be protected.
- Trees and grassland is part of our eco-system and are biodiversity havens.
- Loss of wildlife in general which is protected under UK/EU legislation.
- The area hosts protected English Bluebells, bats, owls, buzzards, newts, adders, deer, owls and the Greater Crested Newts.
- Rare birds, 6 types of reptile and insects such as the silver studded blue butterfly *Plebejus argus* on the SSSI.
- Presence of snakes that must be protected on the common land and SSSI

8.106 Recreation

- Used by the community for sport.
- The allotments could all be under threat and lost in future if the Green Belt status is removed.

8.107 Other Considerations

- Any development would negatively impact on the quality of life and health of existing residents who do not support the proposals
- Development on such a large scale would damage local community cohesion.
- There is some capacity but not for as many houses as is proposed, One Tree Hill / Stokes Field should specifically be excluded if some of the area is to be developed.
- Impact on existing property prices.
- People who pay the largest taxes in country will move.
- The land is private / the rugby club has a long lease on the land.

- The two areas in Cobham are too close together
- There has been no consultation with local residents
- None of the new properties would be affordable due to high prices in the area.
- Development is not near local jobs and places of employment.
- Loss of employment from existing facilities within the area.
- Having 2 of the 3 areas for development in Cobham is unfair and disproportionate

Parcel 58 - Land north of the A309 and east & west of Woodstock Lane North, Long Ditton

8.108 Green Belt

- The analysis of the Green Belt Boundary Review is not supported and the area is not considered to be performing weakly against the purposes of Green Belt.
- The Green Belt must be planted with more trees to mitigate the rising pollution levels.
- Access of the Green Belt should be increased.
- The Government has said there is no need to build on the Green Belt.

8.109 Character

- This is the gateway into / on the front line between Surrey and London.
- Physical and psychological barrier to the urban sprawl of South West London.
- Development would be out of character with the area and its existing homes.
- Development would damage the feel of the area and lead to over development and create a crowded space.
- Too little has already been done to protect the character of the area.
- The area has already taken lots of development recently e.g. Hinchley Park
- Loss of green spaces - the housing requirement should be shared across the Borough and not just spread across a few areas that already have limited green spaces available. This area (Hinchley Wood / Long Ditton) has the least green spaces.
- This is an area of countryside from where you can see views across the wider area.
- Development would result in dramatically increasing traffic and traffic congestion in the Southborough Estate, which will alter the whole ambience of this conservation area.
- Development would turn the area into a slum in the long term.
- Building on area 58 would double the size of Hinchley Wood.
- Would not retain current settlement patterns/significant open spaces that characterise and provide benefit to the area as identified within the consultation document.
- Village feel and community spirit would be lost.
- The setting of St Mary's Church, a Grade II Listed Building, would be compromised.

8.110 Infrastructure & Access

- Local infrastructure is poor and at capacity. This includes the road network, school places, public transport, GP Surgeries, local hospitals and sewerage and drainage systems.
- School places are insufficient at both a primary and secondary level and Kisimul School requires tranquil surroundings.
- Trains and stations are already full at peak times particularly heading to Waterloo from Surbiton.

- Parking, especially at train stations is insufficient.
- Doctors and hospital appointments are difficult to obtain.
- There is substandard road access and an increase in road congestion.
- Traffic is already a danger to children from Hinchley Wood, Long Ditton Infants and Junior Schools.
- The Council should investigate infrastructure particularly road capacity.
- Current drainage provision is insufficient.
- Until infrastructure is considered, it is not possible to make a rational logical decision regarding the suitability of these areas for development.
- The area is not big enough to be able to support the required infrastructure.
- The majority of the impacts from the development would be felt in London e.g. Surbiton station and Kingston.
- No evidence of funding available to provide additional infrastructure.
- No additional infrastructure was built to support the Hinchley Park development.
- Possibility that Epsom Hospital may close, others are at capacity.
- Promised infrastructure for St James' estate was not delivered.
- Housing White Paper – high-density development should happen on sites well-served by public transport – not applicable to Area 58.
- Building a new primary school will not solve problems with secondary provision.
- Unlikely a new school will be built on land proposed for housing.
- Mental health issues will result if recreational spaces removed creating further demands on social and mental health services.
- Questions with regard to whether discussions have taken place with TFL to assess additional impact, especially on bus services.

8.111 Site sustainability

An assessment of the areas' sustainability was undertaken by various planning agents and concluded that it was relatively unsustainable, scoring poorly for a number of different criteria including distances to schools, shops, railway stations, employment areas and recreation facilities. It did however score more highly for its proximity to healthcare facilities, an A road and being located next to the existing urban area. There was also concern about the large number of different land ownerships and existing facilities that have not given an indication that they are willing to relocate, meaning that there are questions as to how much housing could be delivered on site, and therefore if any supporting infrastructure would be justifiable alongside them. There was also concern about access onto the A3, the number of environmental and other absolute constraints on the site, and perceived stronger links to the wider landscape.

8.112 Flooding

- Local gardens and roads are getting flooded in heavy rain and there is nowhere for the water to drain. Water flows down Southwood Gardens when there are storms and gardens get pools of water. More homes will increase these flooding issues and this could cause damage to properties.
- Building along A309 would increase risk to all surrounding downhill areas since the Green Belt acts as a natural soakaway.
- In 1960s two lakes in the former Manor House grounds drained to create Church Meadow and this resulted in severe flooding.

- Predominantly London Clay soil, which does not drain well.
- Would contradict national flooding policy.
- If One Tree Hill did get developed then it would create a man-made flood plain and water could cascade into Hill Rise.
- Hinchley Wood Primary School frequently floods.

8.113 Noise & Air Quality

- The Green Belt must be planted with more trees to mitigate rising pollution levels. Loss of trees will make air quality worse.
- Development would be too close to main roads and could affect the health of those people who would live there. Air quality near main roads in Elmbridge already exceeds legal limits.
- Noise disturbance during and after construction.
- Prevents air and noise pollution from the main road (A3) to the residents beyond
- Provides a 'lung' to combat pollution.
- Health will suffer due to air pollution.
- Existing and future roads will run close to schools e.g. Hinchley Wood, so the children will suffer the effects of increased vehicle movements.

8.114 Trees & Woodland

- The Green Belt must be planted with more trees to mitigate the rising pollution levels.
- Trees and grassland is part of our eco-system and are biodiversity havens.

8.115 Biodiversity

- Trees and grassland is part of our eco-system and are biodiversity havens.
- Development would impact and destroy the nature reserve which should be protected.
- Loss of wildlife if developed.
- Biodiversity corridors need to be maintained and habitat fragmentation needs to be avoided.
- This is an important area where future generations can learn about local wildlife and the protection of nature.
- Presence of a nature reserve on this site means that any development would be detrimental to the habitat and could cause long-lasting damage.
- Access to the nature reserve should be improved.
- Questions whether an Environmental Impact Assessment has been undertaken.
- Includes Stokes Field, LNR and SNCI – Stokes Field has wildflower meadows and a network of ponds and drainage ditches and line of ancient oak trees – building on this area would result in fragmentation of rural habitat.
- Home to badgers, bats and deer.

8.116 Recreation

- This is the only open space within the area and provides valuable walking, dog walking, relaxation and recreation space for the community.
- The sports and other facilities (e.g. allotments, garden centre and cemetery) must not be lost including informal uses such as tobogganing in the winter.

- Future residents will impact directly on recreational use and walks in Stokes Hill.
- The area is used by all ages.
- All of the sporting facilities e.g. the cricket club, provide extremely important programmes for younger people including the local school which uses it for field trips.
- Hockey club extremely successful and must be protected.
- Community and leisure facilities would be negatively affected e.g. Buddhist centre
- Expanded and improved facilities should be provided instead
- Sports club should be given 99 year leases. The Council has previously confirmed that it would not sell the area that is proposed for removal from the Green Belt and this will seem a false promise
- Area used for school nature studies and the Rangers.
- Without protection of Green Belt recreational uses (even if not developed this time) will likely come under pressure for future development.
- Views from One Tree Hill would be lost and this area should be enhanced rather than developed.
- Sporting heritage of the area could be lost.
- Residents of Long Ditton would have to drive or take public transport to next nearest natural woodland at Telegraph Hill, Claygate
- Although it is accepted that the Nature Reserve is to be protected, it will be less enjoyable when surrounded by houses.
- Not true to say the land is underused.
- Council tax payers have a right to expect something for their money i.e. recreational spaces.
- Area of allotments in Hinchley Wood has already been lost.
- Access to an area like this easier than accessing footpaths over agricultural land in the Green Belt.
- Elmbridge Borough Council arranges healthy walks on One Tree Hill as part of its Healthy Living campaign.

8.117 Other Considerations

- Any development would negatively impact on the quality of life and health of existing residents who do not support the proposals.
- Impact on existing property prices.
- Unfairness in providing affordable housing when others have paid high prices to live in the area.
- There is some capacity but not for as many houses as is proposed.
- The areas assessed need to be redefined as they include land unsuitable for development e.g. Stokes Field.
- There has been no consultation with local residents.
- Development would deny local residents their local rights to access the land.
- None or very few of the new properties would be affordable due to high prices in the area.
- Development would result in the loss of local jobs and places of employment.
- No evidence of consideration of cross border impacts, joint working or involvement of other stakeholders.
- Parcel 58 has already lost a third of its size due to council ownership.
- It is not agreed that Long Ditton is part of Greater London.

- If houses must be built in Long Ditton, the only reasonable space would be close to Squires Garden Centre – any other space would be ecologically disastrous.
- Chance of affordable housing being provided is reduced as the value of land within threatened areas will already have increased, making the cost of building and the cost of housing even higher.
- Cannot have a nature reserve surrounded by dense housing.
- Ex-council houses in Long Ditton selling for £500k. Questions asked about how to ensure affordable houses remain affordable, who they will be for and what is considered affordable.
- The Shinnyo-En site, in the Old Manor House is an historic building with the first trials for the hovercraft taking place in these grounds.
- Building on or around this would also result in the loss of the spiritual centre.
- There are issues with land ownership and assembly due to a large number of landowners in this parcel which may makes its delivery problematic.

Comments from those who responded ‘Don’t know’

8.118 Of the 53 people that responded ‘don’t know’, 29 continued to provide further comments. A number of respondents felt that they did not understand the question and needed further information around the alternatives on which to base a judgement or did not know all the areas well enough to comment. A number agreed with some of the areas but not others. It was also suggested that further explanation is needed of which plots within the strategic areas could be developed.

8.119 It was felt that alternative options, such as brownfield sites, had not been explored sufficiently. It was also suggested that there had been insufficient explanation as to why other options are not possible, for example releasing small parts of a number of areas. There were queries around the amount of cross boundary work that had been carried out to identify options. Respondents requested a clearer summary of the Green Belt Boundary Review (GBBR) findings weighed up against all the other evidence base findings. There was a feeling that scoring and categorisation is inconsistent within the GBBR.

8.120 There were specific concerns around the proximity of Local Areas 58 and 20 to the A3 and the resulting impact on air quality, with a feeling that homes and schools should not be sited near major roads. There was specific concern about infrastructure issues for Local Area 58, particularly train capacity, schools and health provision. There was a feeling that enough development has been seen in that area in recent years. Healthcare was mentioned specifically with the view that the area is too far from medical facilities.

8.121 Road improvements were felt to be vital to accompany any development on Local Area 20. Protection of designated environmental sites within both Local Areas 14 and 20 were argued to be essential, with buffer zones and wildlife corridors requested. It was argued that the presence of ancient woodland, flood plain and the presence of Greater Crested Newts should be recognised as absolute constraints for Local Area 14. There were queries around the funding of infrastructure improvements, with scepticism that developers will fund the required infrastructure and will provide the affordable housing promised. There were requests for low cost housing to be well built.

8.122 Although opposed to release of Green Belt, there was some feeling that other areas of the Borough have already seen significant development impact and the areas suggested

do redress what is considered to be a focus on the Walton/Hersham/Weybridge areas in recent years.

8.123 Sports England responded in relation to Local Area 58, which contains significant sports facilities, setting out their objection to any new residential development that does not protect existing sports facilities.

Comments from those who did not select an option

8.124 25 people did not select an option but provided comments. These included some comments from residents that considered these sites to be of adequate scale to assist in meeting Government targets. They were considered to be infill areas offering something of a compromise to Government pressure for development. There were specific concerns around infrastructure, pollution levels, flood risk and loss of Green Belt impacting on quality of life. It was again argued that Green Belt should be preserved for future generations and that once lost it is irreplaceable. It was suggested that the amount of housing achievable across the three areas would not be significant enough to risk questioning and breaching the concept of Green Belt. It was argued again that the Council should stand up to Government requests for new housing. Concerns around lack of exceptional circumstances, lack of investigation of brownfield sites, lack of cross Borough engagement and the integrity of the Green Belt Review were all repeated. Increased urbanisation of the Borough's built up areas was requested, particularly around stations. It was also felt essential that the Council control the delivery of new housing until promised elements of infrastructure are delivered.

8.125 There were requests that One Tree Hill in Local Area 58 be considered as an extension to Stokes Field nature reserve. It was felt that this particular area protects Elmbridge from Greater London sprawl and gives a strong sense of rural character. It was argued that loss of Green Belt in this location would have a disproportionate impact on residents, given that the area is felt to already be densely populated. It is felt that this particular area of Green Belt is well used and the organisations present such as the Buddhist centre and Kisimul School have selected this location for its tranquillity.

8.126 There was some acceptance that areas within Local Area 58 could be suitable for development of the smaller properties needed, on the proviso that developers create additional amenities in the area. It was felt that the biggest problem linked to housing growth in this area would be transport and congestion issues. Access to the A3 is felt to be a particular issue. Concern over congestion, with the resulting air pollution, was repeated in relation to the both Local Areas 14 and 20.

8.127 Specific objections to the inclusion of Local Area 14 were repeated, including the scoring within the GBBR, removal of the Section 52 agreement, presence of flood plain, infrastructure impact and presence of protected habitats. Objections to the inclusion of Local Area 52 were also repeated, including scoring within the GBBR, presence of SSSI, the site's role in separating Esher and Cobham, the creation of ribbon development and infrastructure impact. Additionally there was opposition to developing the scout camp at Polyapes and any mention of developing car parks.

8.128 There were also responses from Duty to Cooperate partners. Surrey County Council highlighted the importance of considering each site against the impact on health and social care, including issues such as air quality and pollution, highway and community safety, access to open space, design standards around accessibility, energy efficiency, insulation

and amenity and accessibility to housing and services for all groups in the community. The Greater London Authority noted that the Royal Borough of Kingston had objected to the inclusion of Local Area 58.

8.129 Historic England provided specific comment on each of the three Strategic Areas. Local Area 14 has no designated heritage assets within the site but appears to be composed of mature parkland and a historic landscape (Knowle Hill Park), possibly with underlying archaeology, which requires further assessment. Local Area 20 contains a listed pair of cottages and the setting of these historic buildings should be considered in the allocation of the site for development. The Fairmile is likely to be of historic interest though not formally designated and there may be remnants of an older landscape associated with it that should be assessed. Local Area 58 contains the Long Ditton conservation area and a number of listed monuments associated with St Mary's Church (grade II), and the potential effects of any development on these and their settings would need to be considered. Some archaeological interest is likely to be present in the churchyard and grounds related to the Manor House. Southborough conservation area in the neighbouring Borough of Kingston-upon-Thames may be affected by development in terms of its setting and views and out of the conservation area.

8.130 The Environment Agency also provided specific comment on each area. The southern edge of Local Area 14 is associated with fluvial flood risk and is within Flood Zone 2 (medium risk of flooding) from the Fairmile Ditch, which is a designated Main River. They set out that flooding has been experienced by residents along Blundel Lane on a number of occasions in the past, and it is understood that this flooding may not be solely associated with the Fairmile Ditch. Local drainage problems are also likely to be present. Any development proposal for Local Area 14 should ensure that flood risk is fully considered; any proposal should look to offer a betterment over the existing condition and look to reduce the overall flood risk in the area. They set out that development in this area has the real possibility to seek an integrated solution to flood risk from any source, and this opportunity should be taken. Adequate consideration should be given to the provision and management of the surface water drainage from any development on this site, with the use of sustainable drainage systems where appropriate. This area is also located over a Secondary A Aquifer and, therefore, issues regarding contamination of controlled waters should be considered in any development. In addition, a Historic Landfill (Littleheath Lane) is located in the north of the site.

8.131 Local Area 20 is located over a Principal Aquifer in the south west corner, and a Secondary A Aquifer over the rest of the site. In addition, the EA noted the presence of a Historic Landfill (Norwood Farm) less than 100m to the north of the area boundary.

8.132 Local Area 58 contains an area designated as Flood Zone 2 and 3 in the eastern corner of this area, alongside the Surbiton Stream, designated a Main River. In addition, a small area of Principal Aquifer is located in the western side of the area.

8.133 Natural England also provided specific comment on the Strategic Areas. These noted that Local Area 14 contains designated Ancient Woodland and the Local Plan should contain appropriate policies to ensure their protection. This area also contains a section of Registered Common Land which must be considered in terms of national policy. Similarly Local Area 20 includes Registered Common Land as well as SSSI. Natural England advised that SSSI and its designated features must be given appropriate protection from development.

8.134 Representatives from the development industry highlighted that these three Strategic Areas will be unable to meet residual housing need in full. There was also some surprise that a consultation was carried out without an indication of which sites are available for development within the areas. It was argued that the Council should instead seek to identify and select sites which better meet the criteria at footnote 11 of the NPPF in that they are a suitable location for development and are achievable. It was argued that there has been no consideration of how access to the strategic road network can be achieved or how new development would impact the setting of environmental or heritage assets. For example, in Local Area 14 it was suggested that it is difficult to understand how development could be delivered without a disjointed approach to identifying land parcels, with the presence of additional features such as public footpaths that have not been identified. It was suggested that there could also be land assembly issues for Local Area 58.

Availability of the three Key Strategic Areas

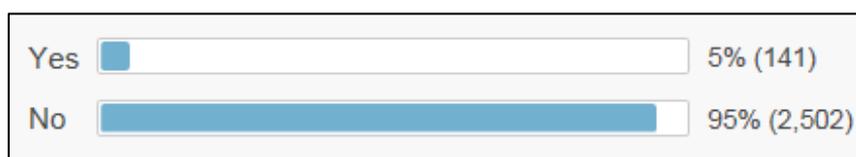
8.135 Under the Council's preferred option (Option 2) three Key Strategic Areas have been identified where it is considered that the Green Belt designation could be removed. Each of these areas has been judged to be weakly performing against the purposes of Green Belt and is either unaffected or only partially affected by 'absolute constraints' which limit development opportunities. Subject to the demonstration of exceptional circumstances, an initial appraisal of the 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.

Consultation question

8.136 The consultation document asked whether, given the expected levels of demand for land from new development:

7. Do you know any sites within any of the three key strategic areas that could be considered for future development?

Summary of responses



8.137 Of the 141 responses received answering that 'yes'; they do know of a site that could be considered for future development, 128 respondents provided additional comments. The comments received were however, diverse and not necessarily focused on the question. Of the additional comments, a number stated why these areas should not be developed whilst others listed alternative areas across the Borough and in neighbouring authorities which they considered more appropriate for development. Both of these points were covered elsewhere in the consultation document (Questions 6 & 8) and therefore the comments received have been considered as part of these two questions.

8.138 Focusing on the three Key Strategic Areas, some respondents stated that subject to the appropriate infrastructure being provided, they saw merit in developing at least parts of the three areas. This was also subject to ensuring that those areas covered by absolute

constraints and used by other leisure facilities for example, should not be developed. The majority of comments received related to Parcel 58 stating that if part had to be developed this should be restricted to the areas running directly north of the A309 (e.g. Rose Hill Nurseries and Ditton Hill Farm).

8.139 Of the 2,502 responses received answering that 'no'; they did not know of any site that could be considered for future development, 2,065 respondents provided additional comments. Again the comments received were diverse and not necessarily focused on the question. The majority reiterated their responses to Questions 6 & 8 of the consultation document stating why the three Key Strategic Areas were not considered appropriate for development and suggesting alternative land for development both within the Borough and in neighbouring local authorities' areas. These comments have all been read and summarised as part of the analysis of responses to Questions 6 & 8.

8.140 Two common threads amongst the 2,065 additional comments received were that it is for the Council to undertake a robust investigation of the land available for development and that this should have been undertaken prior to the commencement of the consultation. It was also stated that this was not an appropriate question to ask the public. A number of respondents reiterated comments that the Council should be presenting alternative, more appropriate options. Other than maximising brownfield sites, no explanation was given as to what 'more appropriate options' would be.

8.141 Fifteen respondents did not answer whether they knew of any land available or not but provided comments. This included a number of landowners / developers confirming the availability of their land for future development. Millgate Homes confirmed that the area of land within their ownership that is located within Parcel 14 was not available for development. Other comments repeated reasons why Green Belt and the individual Key Strategic Areas should not be developed and suggested alternative options / locations.

Alternative areas of land for potential development

8.142 The Preferred Spatial Strategy (Option 2) identified three key strategic sites within the Green Belt where the designation could be removed. Each of these areas was judged to be weakly performing against the purposes of the Green Belt and is either unaffected or 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.

- 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);
- Land north of the A309 and east & west of Woodstock Lane North, Long Ditton (Local Area 58)

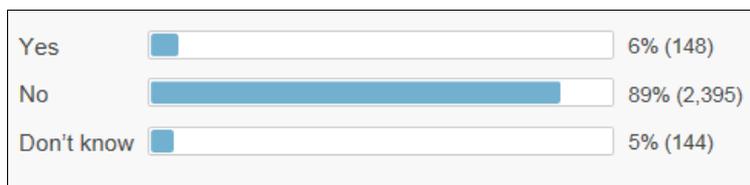
8.143 Questions 6 and 7 sought views on the potential release of these three sites, whilst question 8 focused on whether any other areas of land within the Green Belt should be considered for release.

Consultation question

8.144 The consultation document asked, given the expected levels of demand for land from new development do you:

Question 8. Consider that other areas of land should be removed from the Green Belt including those that are moderately or strongly performing?

Summary of responses



8.145 2,687 responses were received to this question selecting one of the three options above. As set out above, the majority (89%) selected 'yes'. Alongside the 2,687 responses, 2,367 individual comments were received, including 28 comments from individual/organisations who did not select one of the three options. The following provides a summary of the comments received.

8.146 A number of respondents provided comments that did not relate directly to the question, for example, they simply commented that no new housing should be built, particularly within the Green Belt or within Parcels 14, 20 and 58, and that the Council's priority should be addressing the current issues with infrastructure before seeking to provide more new homes. Some felt that the process for identifying Green Belt land is flawed and that there should be more emphasis on use by local community. The majority felt that housing need was not an exceptional circumstance to justify the release of Green Belt. Many of these issues are addressed fully within Questions 1-7.

Comments from those who responded 'Yes'

8.147 Of the 148 responses received answering 'Yes'; do they consider that other areas of land should be removed from the Green Belt including those that are moderately or strongly performing, 141 provided additional comments. The majority of these suggested alternative sites within the Green Belt including a range of specific sites and more general suggestions to re-assess Local Areas and/or consider sub-divisions. Suggestions by residents/individuals were mainly of alternative areas away from where they lived or outside of the Borough. A summary of alternative proposals is featured on page 60-64.

Comments from those who responded 'No'

8.148 Of the 2,395 responses received answering 'No'; do they consider that other areas of land should be removed from the Green Belt including those that are moderately or strongly performing, 2,120 provided additional comments.

8.149 The vast majority of respondents to this question simply commented that Green Belt should continue to be protected and should not be released to meet development needs. Comments highlighted the importance of the Green Belt in Elmbridge in helping to prevent urban sprawl and the spread of London, particularly areas within the M25, to stop towns from merging and encroachment into the countryside. Comments referred to the Green Belt as

being sacrosanct and that any loss would be detrimental to the character of the Borough, impacting on habitats, flood risk, availability of greenspace, health and consequently existing resident's quality of life. A significant number of respondents were concerned that any release of Green Belt now would be the 'thin end of the wedge' and would lead to further loss in the future. Many felt that the release of Green Belt was against Government policy.

8.150 Some respondents commented that moderately or strongly performing Green Belt should be avoided at all costs but considered that weakly performing Green Belt could be utilised. A few respondents accepted that Green Belt release was necessary if sufficient sites could not be found within the urban areas with some suggesting moderately performing areas should be looked at or site selected based on infrastructure, sustainability e.g. closer to Walton-on-Thames. A number were in favour of a more balanced release of Green Belt across the borough. There were also a significant number of respondents who felt that releasing one large site from the Green Belt for a new town/village would be a better way of meeting housing need. A list of alternative sites/suggestions is provided within on page 60-64.

8.151 Many felt that the Council were taking the 'easy way out' and had not fully explored other options. A significant proportion felt that urban regeneration and the development of brownfield sites should be the focus and that more work needed to be done to identify sites in these areas. There was significant criticism that the Council has not exercised its responsibilities and undertaken a full and complete assessment of brownfield land available for regeneration including high-rise development in town centres, increasing the density of development across the Borough and targeting empty properties. Respondents felt strongly that this would help to avoid or alleviate Green Belt release. Many felt a sense of frustration that the Council had allowed so many large homes on sites that could have delivered smaller, more affordable homes. A list of sites/suggestions within the urban areas is provided on page 60-64.

8.152 A significant proportion of respondents commented that more cross boundary cooperation was required in order to look for other ways of meeting housing need within the wider area. Some suggested directing new homes to other areas of the country e.g. the midlands, the north, outside London and the South East.

8.153 Some comments were made on the methodology and approach of the Green Belt boundary Review and these are dealt with under the 'Evidence Base' summary.

Comments from those who responded 'Don't know'

8.154 Of the 144 responses received answering 'Don't know'; if they consider that other areas of land should be removed from the Green Belt including those that are moderately or strongly performing, 78 provided additional comments.

8.155 There was a mixed response to this with comments similar to both those respondents answering 'yes' and those respondents answering 'no'.

8.156 A number of respondents commented that they did not have sufficient information to answer the question. Others simply said that they would prefer other areas of land either within or outside the Borough to be released or that the development of brownfield sites is preferred.

8.157 A number of alternative sites/suggestions were made for the release of Green Belt and/or brownfield land and these are summarised on page 60-64.

Comments from those who did not select an option

8.158 In addition to the comments summarised above, the Council received 28 comments from respondents who did not select an option. A number of responses were similar to those who responded 'yes' and included alternative sites put forward by individuals/developers/agents (See list on page 60-64). Other responses covered similar ground to those who responded 'no' commenting that brownfield land within the urban areas is preferable.

Note: This includes any suggestions also made under Question 7.

Green Belt sites promoted by developers/agents

- Land south of Hare Lane, Claygate (The Crown Estate)
- Land east of Blundel Lane, Oxshott (The Crown Estate)
- Land at Horrington Farm, Claygate (The Crown Estate)
- Five areas of land at Slough Farm and Beazleys Farm, Claygate (Mike Gilbert Planning on behalf of Trustees of The Sophie Irvin Will Trust and The Virginia Margaret Litchfield Settlement 1988) (labelled by EBC as: Site 1, Rythe Road, Claygate, Site 2, Oaken Lane, Claygate, Site 3, Oaken Lane, Claygate, Site 4, Telegraph Lane, Claygate and Site 5, Claygate Lane, Hinchley Wood)
- Southern End of St George's Hill Estate, Rodona Road, Weybridge (Indigo Planning on behalf of the Julien Family Trust)
- Land east of Weylands House, Molesey Road and south of Field Common Lane, Walton-on-Thames (the proposed development known as Drake Park, Walton) (Bonnar Allen Ltd)
- The Broom, Painshill, Cobham (Richard Anstis on behalf of Andrew and Robert Macateer)
- Whiteley Village, Hersham (Whiteley Village Trust)
- Imber Court – Metropolitan Sports Club, Ember Lane, East Molesey (Metropolitan Police)
- Land at Rydens Road, Walton (OPS Architecture on behalf of Willowcroft Homes)
- Hersham Golf Club, Assher Road, Hersham (Claudel Venture Holdings Ltd on behalf of Hersham Golf Club)
- Wimbledon Greyhound Welfare, Turners Lane, Hersham (Richard Rees of Rees Greyhound Racing)
- Heathside, Hinchley Wood (Strutt and Parker on behalf of Mr and Mrs Hickman)
- Weyland Treatment Works, Hersham (Iceni on behalf of Bridge Court Holdings)
- Moore Place Golf Course, Esher (Montague Evans on behalf of Moore Place Holdings Ltd)
- Burwood Road, Hersham (Ashill Group)
- Land to rear of Claygate House, Littleworth Road, Claygate (Woolf Bond Planning on behalf of Claygate House Investments Ltd and MJS Investments Ltd)
- Esher Rugby Club, Molesey Road, Walton (Barton Willmore on behalf of Esher Rugby/Taylor Wimpey)

- 3 sites adjoining reservoirs - Site A: QEII (North East Corner), Walton Road, Walton; Site B: QEII (South Corner), Molesey Road, Walton; Site C: QEII (North West Corner) (Thames Water)
- Brooklands College, Weybridge (Brooklands College)
- Painshill Farm, Portsmouth Road, Cobham (Iceni on behalf of Cinnamon Care Capital)
- Cobham Saw Mill, Downside Road, Cobham (Bewley Homes plc)
- Corbie Wood, Seven Hills Road, Walton (Mr Hurlock and Mrs Burke)
- Land at Blackhills, Esher (Blackhills Residents Association)
- Manor Farm, Woodlands Lane, Cobham (Mr Wilson)
- Land around Brooklands within the former Brooklands Circuit, extending from the Brooklands Community Park in the south to Brooklands Hotel and Mercedes Benz World to the north (Q+A Planning on behalf of Next plc)
- Part of Local Area 75A for proposed new Heathside School (Education Funding Agency)
- Squires Garden Centres in Hersham, Long Ditton and Stoke D'Abernon – 3 sites to consider removal from the Green Belt for expansion of facilities and employment (Squires Garden Centres)
- Danes Hill School, Leatherhead Road, Oxshott (Charles Clutterbuck on behalf of Danes Hills School)

Other sites within the Green Belt

- Creating a new village on the eastern half of Area 1. The Parcel should have received poor marks in the Arup report as it is weakly performing.
- 6 sites instead of 3 e.g. Parcel 22 (North part – near Brooklands) 'Moderately performing'; Parcel 47 (East Side – West of Esher) 'Moderately performing'; Parcel 70 and 74 (Molesey) 'Weakly and Moderately performing'; Parcels 36, 37, 51 and 53 'Weakly performing'
- North of parcel 20
- Parcels 11, 12, 20, 21, 22, 23, 29, 31, 32, 54, 62.
- Parcel 114 near Hersham which includes some brownfield land and where the local infrastructure is good.
- Areas surrounding Walton (Local Areas) 71, 75 and 27
- Parcels 11 or 4 near Cobham as they are large areas next to an existing town and close to transport corridors
- More granular scrutiny / garden village in Parcels 4, 11, 13, 21, 22 and 23 might reveal sub-areas that could be declassified with very little impact overall.
- Moderately performing Green Belt Parcels: Parcel 23 - this is a vast area with very little constrained land. It is in effect a totally separate area and if developed would not impact existing residents to any great degree. It's really strategic and would see the council's housing needs met for possibly 50 years (at over 400ha it's far larger than the 170ha, or so, that are currently under consideration); Parcel 27 - the Elmbridge section of 27 is separated from Kingston by constrained land. Whilst it has quite a lot of constrained land, if developable it would not cause much coalescence between Oxshott and Claygate (and residents could cycle to Claygate for commuting).
- Smaller areas of Green Belt e.g. area between Esher, Cobham and Oxshott
- Parcel 23 as it is close to the A3
- Land near Parcel 31 by Claygate Station

- Parcel 36 and 37 should be released along with other weakly performing areas to support small scale housing development
- Small part of Parcel 37 - grassland facing Queen's Road shielded with many trees where pre-fab homes were built in 1940s and demolished in 1960-1970s. Between main entrance to Burwood Park and Seven Hills Road roundabout.
- Area 47 - houses already exist along this stretch of road and case for merging of towns (Hersham and Esher) therefore doesn't exist here. The river also separates Hersham and Esher.
- Parcel 62 - large site at Farm Road, Douglas Road, Arran Way area in Esher (primary school has been built on edge)
- Part of Parcel 75A – area where a Secondary School is needed (Heathside)
- Wisley Common
- Wisley, Fair Oaks and Redhill airfields
- Surbiton station and surrounding area
- Areas south of Chessington or north of Ockham
- New town at Malden Rushett
- Adjoining Wisley Airfield
- New Town between Guildford and M25
- Areas near M25/A3 junction – Addlestone and Chertsey (houses will be more affordable if near to main arterial road)
- M25 – Downside services
- Land between Blundel Lane and M25
- Land north of A3 at Cobham / between Cobham and Esher
- Areas between Burhill Golf Course and north of A3
- Areas directly around the Cobham A3 roundabout – Painshill Park, Silvermere Golf Club or the old San Domenico site
- The Crown / Queens Estate - Compulsory purchase some of the large houses on the Queens Estate for affordable housing
- Land east of Weylands House, Molesey Road and south of Field Common Lane, Walton-on-Thames (the proposed development known as Drake Park, Walton)
- Esher Station adjacent to golf course and Sandown Racecourse
- Sandown Park Racecourse
- Silvermere Golf Club
- Old Burhill Golf Course
- Thames Ditton & Esher Golf Club
- Golf course to the north of the A244 Esher Road / Hersham bypass
- land to the rear of Longmead or Thames Ditton
- Area around Woodstock Lane East to Hook Road
- Land behind the new estate on A309
- Areas near Long Ditton e.g. Surbiton Golf Club, Woodstock Lane
- Oaken Lane, Claygate generally including the rugby league pitch
- Areas south of Claygate
- Telegraph Hill, Claygate
- Areas north of Claygate, south of Telegraph Hill
- Land South West of Claygate Station
- Littleworth Common, Esher
- Loseberry Farm area between Esher and Claygate
- Small area near the Ewell Road

- Allow some development in areas of strongly performing Green Belt – Copsem Lane (one side of Road)
- Land between Tilt Road and River Mole
- Painshill Park and Claremont Gardens
- Site to south of Knowle Hill close to Stoke D'Abernon Station
- Expand Downside
- Desborough Island
- Molesey Heath
- Areas around Brooklands, Weybridge
- Area between Lower Green, Esher and Walton – this Parcel is larger and has already supported new primary school. Previously development land exists in this area.
- Green Belt areas around Walton
- The Hersham – West Molesey axis and land to the north of Walton between Hurst Road and the River Thames
- Between Molesey and Fieldcommon
- Ex-quarry areas and poor agricultural land – along Molesey Road between Molesey and Walton/Hersham
- General demolition site in area 59a
- Willow Tree Farm in Hersham Area 21
- Along the River Mole around Hersham
- Area between West Molesey and Field Common and between Field Common and Hersham Industrial Estate

Unspecified general areas within the Green Belt

- Small infill development rather than large scale
- Larger sites adjoining motorways (A3/M3) and major A roads
- Further down the A3 where population density is lower
- Smaller areas of weakly performing parcels
- Larger areas of moderately performing Green Belt
- Areas where standalone communities can be developed
- Not adjoining existing communities
- A balanced release of Green Belt across the Borough
- Location of new development should be based on sustainability and infrastructure
- Previously developed land in Green Belt
- Other weakly performing areas
- Where the Green Belt boundary does not reflect the actual extent of built development on the ground
- Areas around transport hubs and schools
- In neighbouring areas such as Mole Valley (e.g. west of The Oxshott Road (B2430), close to the Tesco store and west of the Quinnell forge); Guildford (Wisley); Spelthorne (Kempton); Royal Borough of Kingston upon Thames (Chessington, Hook and Tolworth)
- Areas beyond London and the South East
- Areas of Green Belt that are contaminated
- Only areas that could support new or extended communities are corridors between Surbiton in East, Hampton in North and Woking in the West.

- Walton has taken more housebuilding in recent years than Hinchley Wood, Long Ditton and Cobham so housebuilding should be spread more evenly to those areas

Sites within the urban areas

- Around Esher Town Centre
- Relocate Heathrow and build a new town there instead
- Walton / Weybridge rather than Cobham as there are more jobs in the area
- High rise buildings along the River Thames approaching Walton.
- Hinchley Wood Station
- Increased density around light industrial areas
- Use of unoccupied dwellings / car parks and Council owned garages
- High-rise, infill with balanced release of Green Belt across the Borough
- Reclassifying the industrial areas in West Molesey and Hersham.
- Urban land, particularly car parks, those close to existing amenities
- Building at higher densities within low density character areas e.g. St Georges Hill and the Bird Hill Estate
- BT Exchange, Portsmouth Road,
- Hampton Court Station
- Walton on Thames station car park, Walton on Thames
- GlaxoSmithKline, Weybridge
- Walton Court, Walton on Thames
- Dairy Crest, Claygate
- Former Molesey Sewage Works
- Cobham Recreation Ground
- Reserve site, Queens Road
- Part of the Lynwood Recreation Ground and allotment site
- In and around the Chelsea Training Ground
- Jewson, Station Approach, Hinchley Wood
- Old Tiffinians Sports Ground
- Allotments along the A309 Weston Green / Thames Ditton area

9 Consultation Summaries: Housing

Size of new homes and limiting provision of 4+ bedroom homes

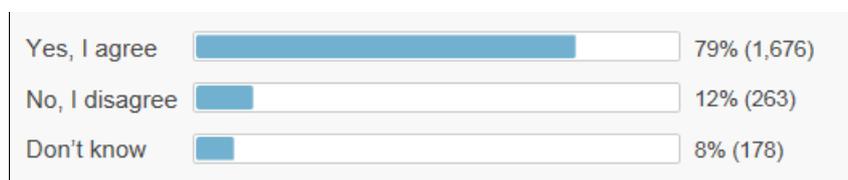
9.1 In taking forward the Local Plan and planning for new homes, the Council has to consider what type and size of new homes should be provided. As set out in the consultation document, Elmbridge is one of the least affordable parts of the country to live. Some of this is due to the high cost of housing but it is also due to the type and size 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 (1-3 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.

Consultation question

9.2 The consultation document asked whether, based on your knowledge of the housing market in Elmbridge:

Question 9. Do you agree that we should seek to provide more of a balance in terms of the size of new homes being built?

Summary of responses



9.3 2,117 responses were received to this question selecting one of the three options above. As set out above, the majority (79%) selected 'yes'. From these 2,117 respondents, 1,719 provided further comment. In addition 18 comments were received from individual/organisations who did not select one of the three options. Many of the responses followed one of the three standard templates that were circulated for submission to the Council. The majority felt that there should be more of a balance and the following provides a summary of the comments received.

9.4 A number of respondents provided comments that did not relate directly to the question, for example, they simply commented that no new housing should be built, particularly within the Green Belt or within Parcels 14, 20 and 58, and that the Council's priority should be addressing the current issues with infrastructure before seeking to provide more new homes. Some respondents mentioned that the Council should concentrate on the restoration of existing homes and empty properties rather than the provision of new homes.

9.5 In addition, a significant number were more generic and covered issues also addressed in other questions such as location, density and the need to work more closely

with other Boroughs to deliver new homes before releasing Green Belt land within Elmbridge.

Comments from those who responded 'Yes'

9.6 Of the 1,676 responses received answering 'yes'; they did agree that we should seek to provide more of a balance in terms of the size of new homes being built, 1,447 provided additional comments.

9.7 As reflected in the overall responses, many respondents saw the importance of delivering a balance in terms of the size of homes to meet need and reflect local demographics. Some commented that this would help to create a mixture of social groups that will integrate more easily with the existing population. It was considered that the provision of smaller homes in particular would help to provide opportunities for younger people, families, singles and those wishing to downsize but not yet seeking specialist older people's accommodation, to access the local housing market. These homes should be more affordable and meet the needs of the local community. Concerns were raised that if something is not done to address the imbalance in size of properties there will be no 'ordinary' people in the Borough and it will become an enclave for the 'super-rich'.

9.8 The types of new homes suggested included high density tower blocks; combined home and workshop units; smaller but quality 2, 3 and 4 bedroom homes; cottage style housing or mews developments; 2 bedroom houses with a studio in the basement; high quality 3 bedroom homes with basement parking and shared open space; bungalows and low rise apartments with outside space. It was also felt that the provision of more older people's accommodation and care homes would help to free up under-occupied family housing. A number of respondents also commented that people's expectations on the size of homes needed to be managed e.g. a 4 bedroom house for a couple with 1 child is a luxury.

9.9 The majority of respondents felt strongly that the Council had permitted too many large, luxury homes (4+ bedrooms) on sites that could accommodate a number of smaller more modestly sized homes and that this has led to the current imbalance in the housing stock. They felt strongly that this should not justify the release of Green Belt land.

9.10 In terms of the location and density of new homes, the majority of respondents that agreed with this question felt that new homes should be located in existing urban areas on brownfield sites and not within the Green Belt. Some mentioned that as smaller homes would have smaller gardens this made it more important to protect the Green Belt. Many considered that by providing smaller homes, more development could be accommodated within the urban areas thereby relieving pressure on the Green Belt.

9.11 There was a significant amount of support for building smaller, more affordable homes at higher densities in appropriate locations within the urban areas such as close to stations, town centres and employment opportunities e.g. Weybridge and Esher were suggested locations as well as Stoke D'Abernon station car park, the A3/rail corridors and conversion of redundant retail/industrial units. It was felt that developing in these locations will in turn support the local economy. The majority of respondents felt that the Council needed to undertake further work to identify such land and work more closely with developers to bring sites forward. Some examples of higher density town centre developments provided were Woking, Guildford and Kingston. Within Elmbridge, Brabant

House (Portland Place) was mentioned as a good example of a development of smaller units (14 x 1 bedroom flats). A few respondents did suggest locating developments of smaller homes within new villages.

9.12 There were differing views on the spread of small homes across the Borough with some respondents commenting that a balance should be sought across the settlement areas rather than just within the 3 strategic sites and that such large scale provision of smaller and/or affordable housing would not be sustainable in smaller communities e.g. Cobham/Oxshott. Others felt that future provision of small homes should take account of the existing imbalance in housing stock in some areas and therefore should be located in areas like Weybridge, Esher and Oxshott where the type of housing is predominantly large and unaffordable. However, many also felt strongly that smaller homes should be focussed towards areas where they already exist to ensure that local character remains intact. Some expressed strong views that higher end luxury housing should not be located close to smaller more modest homes. Many felt that the balance should reflect what the local areas, communities and infrastructure could sustain without affecting the quality of life or living conditions of existing residents. Further information on these impacts was requested.

9.13 A significant number of respondents raised concerns as to whether smaller homes would be genuinely affordable and meet the needs of the community.

9.14 In terms of actually delivering a balance of new homes, a number of respondents suggested that the Council should consider introducing incentives/policies/penalties to ensure that all urban sites deliver smaller homes. Some also felt that extensions should be restricted on existing smaller properties to ensure that they are retained as small homes. Some felt that if land is released from the Green Belt, the size and type of housing should not be developer-led whilst others commented that the market should dictate this. Other suggestions to deliver a balance of new homes across the borough were: options for housing cooperatives and self builds; allocation of land to housing associations or developers who agree to build at least 75% as smaller, affordable homes; more building by housing associations, the Council and not for profit organisations; consider reducing S106 and infrastructure payments to provide smaller and more genuinely affordable homes; support the development of a Build to Rent sector to provide homes for people who cannot afford or do not want to buy.

Comments from those who responded 'No'

9.15 Of the 263 responses received answering 'no'; they did not agree that we should seek to provide more of a balance in terms of the size of new homes being built, 212 provided additional comments.

9.16 Of those comments that directly related to the balance of new homes to be provided, a large proportion felt that the Council should not be intervening in the housing market to direct the type and size of homes built and that this should be left to market forces. Respondents felt strongly that this should not be based on forecasts or local/central government policy but should be based on actual market demand/signals and had concerns that policies to limit certain types of development would not be effective. Many considered that developers would not build 4+ bedroom homes if there were no demand for them.

9.17 A significant number of respondents commented that there was already a mix of housing within the Borough including flats and smaller homes and did not feel that this is an

issue that needs addressing. Others considered that any attempt to diversify the housing stock would not be appropriate and any attempt to do so would be unsuccessful given the extremes of types of housing that exist. Some felt strongly that the Borough should remain a 'premium area'.

9.18 The majority of respondents were very concerned that the provision of new smaller and affordable homes would impact the quality of life of existing residents, fundamentally altering the character of the area and feel of the community. Many expressed the view that large, detached low density homes were part of the character of the area and that this type of development (4+ bedroom homes) should continue and reflect what is currently in the community.

9.19 A number commented that if people needed smaller, more affordable homes then they should seek to live elsewhere to find homes that meet their need e.g. surrounding boroughs or London. They also queried whether the Council could fund development elsewhere in the country where land is cheaper e.g. the Midlands or further North or West.

9.20 Many were unconvinced that smaller homes would be attractive to younger people both in terms of their affordability and their location in an area which is largely populated with families.

9.21 In terms of the provision of additional smaller, more affordable homes, some raised concerns that the resultant high density development would risk the agglomeration of areas within Elmbridge into high density commuter areas such as Kingston. A few respondents raised concerns that smaller homes would just be extended in due course. Others felt strongly that such new homes were unlikely to be affordable and meet local need thus attracting more affluent families and pushing house prices up further.

Comments from those who responded 'Don't know'

9.22 Of the 178 responses received answering 'don't know'; whether they agree that we should seek to provide more of a balance in terms of the size of new homes being built, 60 provided additional comments.

9.23 The majority of respondents answering 'Don't Know' commented that they did not have sufficient information or knowledge to make an informed response or that the question was unclear. Other comments covered similar ground to those answering 'Yes' or 'No' as set out above.

Comments from those who did not select an option

9.24 18 respondents did not select an option but provided a comment. Of these, a number supported the delivery of smaller homes within urban areas commenting that increased density at these locations will allow provision of smaller more affordable homes. Others felt that each site should be assessed on its merits and the type, size and tenure should be a bespoke solution taking account of its location and scale. A few respondents commented that the housing mix should be dependent on the local provision of services, transport and employment opportunities.

9.25 One respondent raised concern as to how the Council could control the development of sites to ensure that smaller more affordable housing is delivered and another considered

that more expensive areas should be retained as such as this is what attracts people to live there.

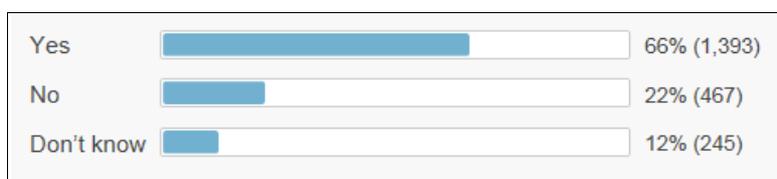
Limiting the provision of 4+ bedroom homes

Consultation question

9.26 The consultation document asked whether based on your knowledge of the housing market in Elmbridge:

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

Summary of responses



9.27 2,105 responses were received to this question selecting one of the three options above. As set out above, the majority (66%) selected 'no'. Of these 2,105 respondents, 1,251 continued to provide comment. In addition 11 comments were received from individuals or organisations that did not select one of the three options. Many of the responses followed one of the three standard templates that were circulated for submission to the Council. The following provides a summary of the comments received, many of which were similar to those provided for Question 9.

9.28 A number of respondents provided comments that did not relate directly to the question, for example, they simply commented that no new housing should be built, particularly within the Green Belt or within Parcels 14, 20 and 58, and that the Council's priority should be addressing the current issues with infrastructure before seeking to provide more new homes.

Comments from those who responded 'Yes'

9.29 Of the 1,393 responses received answering 'yes'; they did agree that we should limit the future provision of 4+ bedroom homes, 818 provided additional comments.

9.30 Most respondents acknowledged that there is a need for a more diverse housing stock within the borough to meet the local need and to help foster mixed, sustainable communities. The majority felt strongly that there are too many large 4+ bedroom homes and that smaller, more affordable (1, 2 and 3 bedroom) homes are required to provide opportunities for young families to access the housing market, for elderly residents to downsize and for the growing number of single person households. A significant number of respondents commented that there needs to be a reduction in 'luxury' high cost 'mega mansions' and a greater focus on the delivery of more 'ordinary' lower cost homes to meet the needs of those on average incomes. There was a general sense of frustration that the Council had permitted such developments in the past. It was considered that given the housing shortage this was inappropriate and a waste of valuable land within the urban area which in turn has now put pressure on the Borough's Green Belt. Many felt that whilst there

may be a demand for these types of homes there is no real 'need' and developers only build them to make significant levels of profit. Respondents felt strongly that this type of development needs to be controlled and smaller, more modestly sized homes built in their place.

9.31 A few respondents expressed a preference for a more measured approach and considered that scope for 4+ bedroom homes should be provided alongside the provision of smaller homes particularly in areas where they already exist e.g. Crown Estate, Oxshott.

9.32 A number of respondents raised concerns as to how the proposed mix of dwelling sizes would be achieved. Suggestions included restricting extensions on smaller properties, providing incentives to developers to build smaller homes, introducing maximum floorspace guidelines (sqm) or the building of Council housing.

9.33 In providing smaller homes many felt that smaller, high density homes should be delivered only in appropriate locations, predominantly within the major urban areas in the Borough where this type of development already exists e.g. Walton. A few respondents commented that development should be spread throughout the Borough or focussed towards areas which are currently dominated by larger homes e.g. Cobham, Esher to achieve a better balance.

9.34 Many felt strongly that the need to redress the balance and provide smaller homes should not justify the release of Green Belt land. In fact, it was considered by many that the provision of smaller homes should indeed relieve pressure on the Green Belt by using land more efficiently in urban areas.

Comments from those who responded 'No'

9.35 Of the 467 responses received answering 'no'; they did not agree that we should limit the future provision of 4+ bedroom homes, 358 provided additional comments.

9.36 A significant number of respondents who felt that 4+ bedroom homes should not be limited commented that the Borough should remain an upmarket, exclusive area with large numbers of 4+ bedroom homes. They felt strongly that this was the reason people had chosen to live in the area. They were of the view that an increase in high density, smaller homes would ruin the character of the area. A number commented that those who could not afford to live in the Borough or sought smaller properties should live elsewhere e.g. Surbiton, London. Some raised concerns regarding the potential 'fit' of occupants of smaller homes into the area and consequent effects on community cohesion.

9.37 A number of respondents felt that there was already a mix of homes within the Borough and that this should continue in order to avoid the creation of ghettos. They also expressed a preference for 4+ bedroom properties to form a part of this mix with limits only being placed on larger 5+ bedroom homes. It was generally felt that 4 bedroom homes in particular were a necessity not a luxury. The need for more modest 4 bedroom homes rather than large luxury mansions however was acknowledged.

9.38 The majority of respondents felt strongly that market forces (supply and demand) should dictate the mix of homes being delivered and that it was not the place of the Council to intervene. There was a strong belief that developers will only build what will sell and that past over-delivery indicates that there is significant demand for this type of property in the

area. A significant number of respondents commented that it would be better to encourage /incentivise the provision of smaller units rather than limit the provision of larger ones.

9.39 Some respondents felt that the decision on the mix of new homes should be tailored to each street, road or area in order that it is in character with existing forms of development.

Comments from those who responded ‘Don’t know’

9.40 Of the 245 responses received answering ‘don’t know’; whether we should limit the future provision of 4+ bedroom homes, 75 provided additional comments.

9.41 Most of the respondents answering ‘Don’t Know’ provided comments similar to those answering ‘No’. For example, that it should be left for the market to decide, that there is a demand for 4+ bedroom homes in the local area, that it is a family area and 4 bedroom homes are a necessity not a luxury for many modern families or that an appropriate mix should be determined on a settlement by settlement basis. Many also queried whether there was an over-delivery of 4+ bedroom homes and felt that if this is the case such properties would be lying empty.

9.42 Some also provided comments similar to those answering ‘Yes’. For example, that the redevelopment of larger properties should be controlled and perhaps 2-3 new smaller homes could be accommodated instead of one larger one. Others simply commented that they did not have enough information to form an opinion.

Comments from those who did not select an option

9.43 In addition to the comments summarised above, the Council received 11 comments from respondents who did not select an option. These covered a range of issues including, the failure of the Council to deliver smaller homes in the past, the need to assess each site individually and the need to respond to market demand in the long term. It was also queried whether there was an over-delivery of 4+ bedroom homes and felt that, if this is the case, such properties would be lying empty.

Densities

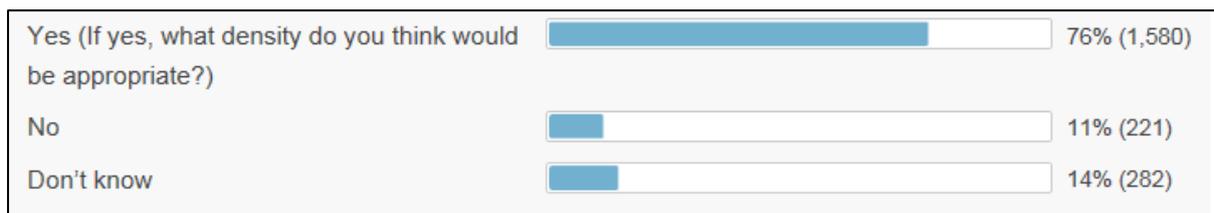
9.44 The current Local Character, Density and Design policy set out in the Core Strategy (CS17) seeks a minimum density in our suburban areas of 30dph and 40dph in our town centres. However, the Government has suggested that the most sustainable locations, such as those with good access to public transport and around train stations could be the location for higher density developments. Questions 11, 12a and 12b are presented in order to find out views on the potential of delivering higher density developments in appropriate locations and where this does not impact negatively on local character.

Consultation question

9.45 The consultation document asked whether, given the need for both market and affordable housing:

<p>Question 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?</p>

Summary of responses



9.46 2,083 responses were received to this question selecting one of the three options above. The majority (76%) selected 'yes'. Of these respondents, 1,823 continued to provide further comment. In addition 15 comments were received from individual or organisations that did not select one of the three options. Many of the responses submitted followed standard templates that were circulated for submission to the Council. The following summarises the content of these standard and individual comments.

Comments from those who responded 'Yes'

9.47 Of the 1,580 responses received answering 'yes'; they did agree that we should seek to increase minimum densities at sustainable locations in the urban areas, 1390 provided additional comments. Although answering 'yes', it must be stressed that a large majority said that this question was impossible to answer due to their lack of knowledge in this area of planning policy. Many submitted a standard response stating that density depended on many factors and so a definitive answer is subjective and others called for further consultation on the matter.

9.48 Of those commenting on density figures suggestions varied from 40 dwellings per hectare right up to 300. Most felt that high density development should be focused in sustainable locations such as town centres in the borough, with many quoting the Heart in Walton as a good example. There were some respondents who felt that this should be applied across the urban area in the borough, but this viewpoint was in the minority. There were others that were not supportive of high density development close to the Borough's train stations as these are often located in the Green Belt and are low density in character. People generally supported 40dph and felt this was in line with national policy. Some even suggested well designed high density development could improve the urban area.

9.49 A standard response by many respondents was that creative design should be used to maximise the opportunity with these developments. Many suggested mixed development schemes above town centre car parks and retail units. There were suggestions of underground car parks and 3 to 4 storey flatted developments. Respondents provided a variety of ideas for the accommodation of housing, however many others said that density must be assessed on a case by case basis and applying targets was not appropriate.

9.50 People suggested the benefits of building at a high density in the urban area included the reduction in reliance on the car, using an already established infrastructure network and the protection of green spaces and the Green Belt. Respondents felt higher density development could provide the social housing the Borough needs as well as private sheltered accommodation for the elderly. There was a mix of opinions regarding the height of development with some respondents saying that they were not keen on high rises. In contrast, some respondents supported building up and encouraged high rise development.

Other suggested types of high density dwellings included flatted development not more than 4 storeys high as well as 3 storey terraced housing.

9.51 Despite this support, concerns were raised around the impacts of higher density development on the existing infrastructure system including train capacity, job markets, roads, services and schools. Many stated that they only supported high density developments in the urban area if the infrastructure is in place to support it. Respondents highlighted that high density development would lead to an increase in car ownership and a need for additional parking spaces and many suggested improvements needed to public transport accessibility and frequency across the Borough.

9.52 There was a general concern expressed regarding overcrowding as a result of high density development as well as issues with community cohesion. Many respondents supported high density development provided it does not impact on the character of the area. Security considerations in relation to high density development were felt to be important.

9.53 Two sites were specifically suggested as suitable for investigation with regard to accommodating high density residential development. These were BMW garage Cobham and Claygate House. Often respondents felt unclear whether the Council had pursued the duty to cooperate to see whether neighbouring authorities have capacity to deliver the Borough's housing need.

Comments from those who responded 'No'

9.54 Of the 221 responses answering 'no' to minimum densities at sustainable locations in the urban areas, 148 provided additional comment. Respondents commented that higher densities will put greater strain on services and infrastructure. Some felt densities are too high already and unsustainable in terms of traffic, parking and local services. There were contrasting views relating to train stations. Some felt that areas around train stations are already developed and congested while others felt densities could be increased at train station locations. Suggestions included flats next to Hersham railway station as appropriate.

9.55 Similar to the 'yes' comments, there were concerns expressed with regards to the character of the area and many felt strongly that high density development would have a detrimental impact on the character of the area. Respondents were opposed to cramming housing in and areas becoming too heavily populated. Some felt strongly that it would be impossible not to affect character and that Elmbridge's suburban attractiveness would be lost with the Borough becoming more like a London Borough.

9.56 Many respondents provided comments with regard to potential social impacts, with a feeling that high density developments would result in a hostile environment. Respondents were concerned about potentially cramped accommodation and a lack of garden space and public green space. People expressed concerns about the quality of life for those living in a high density area. Increased congestion and parking pressures were frequently highlighted.

9.57 Similar to comments received for 'yes' answers, respondents felt that density should be considered on a case by case basis. Respondents were against over development and high rise buildings and felt that this would impact detrimentally on infrastructure, character and sustainability of the Borough.

Comments from those who responded ‘Don’t know’

9.58 Of the 282 respondents answering ‘Don’t know’, 97 provided further comment. Many commented that they had trouble visualising density, which made it difficult to answer the question. Comments were made with regard to the social impacts of supporting high density developments such as community tensions, overcrowding and pressure on infrastructure. There were concerns expressed about over-development and the introduction of high rise development significantly changing the Borough’s character and affecting the quality of people’s lives.

9.59 Some respondents said that they were not supportive of a blanket approach to applying density targets. There were concerns about the type of high density housing proposed. However, many stated strongly that high density development was preferable to developing Green Belt land. Suggestions were diverse, including support for Victorian style terraces as a higher density alternative and the minority view that developing Green Belt is preferable to high density development throughout the Borough.

Comments from those who did not select an option

9.60 In addition to the comments summarised above, the Council received 15 comments from respondents who did not signal whether they agreed, disagreed or did not know whether the Council should seek to increase minimum densities at sustainable locations in the urban areas. The standard response that density depends of many factors and local aspects was submitted as well as the response that creative design should be used to maximise the opportunity within these developments and that sufficient infrastructure should be in place. Respondents again said that they did not know enough about densities to answer the question but suggested three or four storey buildings containing one to two bedroom flats alongside semi-detached houses in or near to town centres so people are close to services and transport. They also asked for parking provisions to be factored in to take account of increased car ownership.

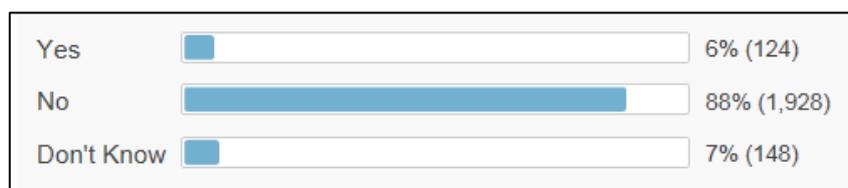
Consultation question

9.61 The consultation document asked whether, given the need for both market and affordable housing:

Question 12(a) 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?

Summary of responses



9.62 2,200 responses were received to this question selecting one of the three options above. The majority (88%) selecting 'no'. Of the 2,200 respondents, 1,869 provided further comment. In addition 14 comments were received from individuals or organisations that did not select one of the three options. Most of the answers to this question repeated the general objection to Option 2. There was opposition to the wording of the question, as many respondents felt that it pre-supposed support for the Council's proposed approach.

Comments from those who responded 'Yes'

9.63 Of the 124 respondents answering 'yes', 87 provided further comment. Respondents supported the delivery of housing at higher densities subject to the sites being located close to amenities and infrastructure. Some noted that higher density developments would be more likely to deliver infrastructure improvements and would result in lower development costs for affordable housing, which could result in lower prices. Comments suggested that land released from the Green Belt should be used for its full potential, and that high density developments located within the three strategic areas would be most likely to help meet the Council's housing need.

9.64 Some answers suggested that they would prefer a balance of higher and lower densities across the three key strategic areas. A range of possible density targets was suggested, ranging from around 40 dwellings per hectare (dph) up to numbers within the range of 60 to 80dph, whilst higher densities were felt to be too much. A number of comments argued that density should be considered purely on a site-by-site basis, and that a strict numbered target would be arbitrary. A range of views about building height were received, with suggestions ranging from a cap at a maximum of 3 storeys to no height limitations in order to use less of the land released from the Green Belt. There were preferences for low-rise development in order to safeguard the quality of life of future occupiers.

9.65 Many respondents supported the principle of high density developments, but were opposed to the development of the three strategic areas. Alternative proposals included development of existing car parks, a disused BT Exchange and British Rail land near Oxshott station. Land at Claygate House was also proposed as a potential development site. A number of respondents requested that density should be increased within the existing urban areas, while others suggested that high densities within entirely new development areas would be preferable.

9.66 Conversely, some respondents supported the principle of high density developments within the three strategic areas, but qualified their support subject to specific conditions. These included a landscape and character assessment, transport improvements, the provision of only 2 and 3 bedroomed homes, energy efficiency, suitable amenity space for prospective residents, protection for existing cemeteries and that developments should incorporate sufficient trees. Other requirements included assurance that Option 2 would not

impact on local character, travel infrastructure, property prices, quality of life for existing residents, as well as the protection of privacy and controls on noise pollution. Some respondents were supportive of higher densities but only on the basis that brownfield and other suitable sites had been fully explored and discounted.

9.67 Specific types of development were proposed. These include a 'Garden Village', which would incorporate woodland screening from major highways, and a 'Garden Square', which would incorporate a central green area in which biodiversity could flourish. It was also suggested that High Street properties could be re-purposed for residential use.

Comments from those who responded 'No'

9.68 Of the 1,928 answering 'No', 1726 provided further comment. Most respondents simply repeated their overall opposition to the Council's preferred option. There were a range of conflicting views ranging from opinions that if development on these areas was absolutely necessary, it should be at as high a density as possible to fully utilise the strategic areas through to views that densities on the strategic areas should be at as low a density as possible to preserve some openness. Many stated that they would be in support if satisfactory infrastructure improvements were implemented prior to the development of housing in the strategic areas. A number of comments stated that design, infrastructure and the impact on the existing community are of far greater concern than the density of a development.

9.69 Many responses objected to higher density development on the basis that it will increase pressure on infrastructure, whilst others argued that it would not be possible to develop at high densities at all without negatively affecting the character of the area. It was argued that the two strategic areas in the south of the Borough are too far from the centre of Cobham and its associated services for high density development to be desirable. It was also stated that there is very low potential for employment in the immediately surrounding areas and that housing should be developed in less expensive areas with affordable transport links.

9.70 The effect of high density development on the character of the area was a key concern. Respondents argued that 'overcrowding' would make a development unattractive and would reduce the attractiveness of the Borough overall. Many stated their opposition to high rise developments in the key strategic areas. It was noted that it is unusual to situate high density developments outside of town centres, and that it would be preferred to increase the density of existing developments, particularly in town and village centres, rather than building new developments. It was argued that high density housing would damage the outlook of existing residents close to the three strategic areas. It was suggested that additional housing should be located in areas that currently have very low density development. Responses also expressed concern for the amenity of future occupiers of high density housing, stating that such a development would not provide an adequate or comfortable living environment.

9.71 Responses suggested that it would not be economically viable to develop on the key strategic areas, and that the absolute constraints present (particularly wildlife) as well as the topography of these sites will prevent high density development. The risk of flooding on these areas was noted, as well as the risk posed by clay mines on Parcel 14. Comments were also concerned with the protection of allotments, sports and recreation grounds in existence on the three strategic areas.

9.72 Respondents commented that a sustainability study per parcel and transport analysis has not been carried out, and that air quality would be affected to the detriment of public health. A number of respondents argued that high density development would be more suitably located in Walton-on-Thames, while others suggested that opportunities for development should be found more equitably across the entire Borough. It was proposed that development on Parcels 21, 22 and 23 and at existing train station car parks would be preferable.

9.73 Many of the answers centred on the respondents' view of affordable housing. It was stated that it would be economically unviable to build such housing in such an expensive Borough, and that it would not be desirable in the three strategic areas. It was also argued that there is no need for additional housing, affordable or otherwise, in these areas. Some queried what affordable housing is and it was repeatedly stated that such housing would not remain affordable once sold on. It was requested that the Council should themselves develop and maintain affordable housing.

9.74 A range of proposed densities was included in responses to this question. It was argued that development could be at a higher density than currently characterises these areas, as long as it did not exceed 40dph. It was suggested that the two strategic areas in Cobham should be developed at a density no greater than 30dph due to their 'rural' setting, whilst others stated that density should be lower than 10dph. A number commented that higher densities would be dependent on design of the development. It was argued that high-density housing could be appropriate on parts of Parcel 58 close to the A309 and the boundary with Kingston-upon-Thames. Many respondents suggested that they were not opposed to high density housing as long as it was located within the urban area. Some respondents preferred a mixed approach, stating that some building at higher densities could be incorporated as part of a wider development. A number of respondents stated that density could only be considered on a site-specific basis.

Comments from those who responded 'Don't know'

9.75 Of the 148 answering 'Don't know', 56 provided further comment. Concerns regarding transport and infrastructure were raised in response to this question. The point was made that higher density developments would make infrastructure improvements more likely, but that it would meet with opposition from local residents who have historically been able to enjoy the open spaces. Others stated that the density of a development would depend on the financial contribution of the Council to the maintenance of new and existing infrastructure.

9.76 It was argued that it would be better to increase the densities of proposed developments rather than lose more of the Green Belt, and that high density developments could be supported if no other sites can be found. Conversely, it was stated that high density developments were supported as long as they were located outside of land that is currently designated as Green Belt. It was argued that the construction of Affordable Housing on the three strategic areas would not be economically viable.

9.77 It was argued that the desirable density of a development depends on its design, and that it is a site-specific issue. It was also stated that it would not be possible to build high density housing that did not conflict with the prevailing character of the area. Maisonettes were proposed as a possible mode of housing to be incorporated into future development.

9.78 Other respondents noted that they had not considered the question as part of their overall response to the questionnaire, or that they did not feel able to answer. Some stated that it was for the Council to decide on the densities that would maximise housing delivery whilst maintaining the character of the area.

Comments from those who did not select an option

9.79 Respondents stated that the local infrastructure is not sufficient to support additional housing. Concerns regarding parking provision and the retention of protected trees were also raised. One developer argued that higher density developments would be best placed within the urban area and at greater densities than have previously been granted permission (with particular reference to Imber Court).

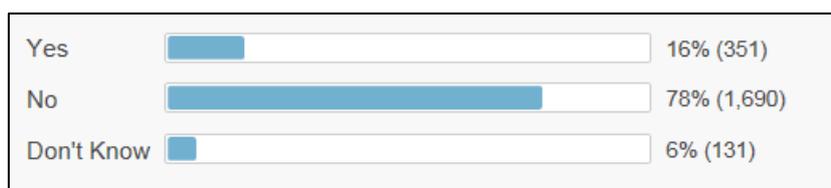
Consultation question

9.80 The consultation document asked whether, given the need for both market and affordable housing:

Question 12(b) 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:

b. support lower density developments that maintain the open character of an area and reflects the surrounding character?

Summary of responses



9.81 2,172 responses were received to this question selecting one of the three options above. Of these, 1812 provided further comment. In addition 22 comments were received from individuals or organisations that did not select one of the three options. The vast majority of the responses answered 'No' and simply re-stated their opposition to Option 2. Many also argued that the question was not neutral and pre-supposed support for Option 2.

Comments from those who responded 'Yes'

9.82 Of the 351 answering 'Yes', 199 provided further comment. Many comments supported the lower density option subject to a number of caveats, including infrastructure improvements, proximity to public transport networks, retention of woodland, playing fields and cemeteries, and the provision of affordable housing. It was argued that the Local Plan's priority should be sufficient affordable housing, even if this meant that densities would have

to be higher. It was also argued that more Green Belt land could be released to allow the Council to meet their housing need from low density developments.

9.83 Responses to this question were concerned about reflecting both the character of the surrounding area and the open character of the land that is presently Green Belt. Supporters of low density developments argued that they would reduce the impact on the existing community, infrastructure and local services, as well as retaining some of the open feel of the strategic areas. It was also suggested that the lower density approach would help to preserve air quality, amenity and biodiversity, particularly if areas of accessible habitat could be incorporated into the development sites. Comments included requests that most of the three strategic areas, if released, should remain open green space or that low density developments could provide more opportunities for community land trusts, co-operative homes and self-build homes.

9.84 Respondents argued that development should be confined to the edges of the nearest relevant settlement area, rather than isolated within the centre of the three strategic areas. Conversely, it was also argued that entirely new development areas should be created, with lower densities on their outer edges or that developments should be low density unless high density development is already present adjacent to the strategic areas. Many commented that they would prefer smaller development sites spread across Elmbridge rather than large developments on the three strategic areas. It was felt that high density developments should be located only within the urban area, and that such developments in Elmbridge would result in the borough's convergence with London.

9.85 A number of responses expressed support in principle for the idea of low density developments, but expressed concerns that these would be unable to meet the housing need. Many felt that sites suitable for higher density developments could be found elsewhere, whilst others accepted that with the Plan's focus on providing smaller homes it is likely that densities will be high. Other responses suggested that a mix of higher and lower densities would be most appropriate.

9.86 There was caution that lower density developments should not mean larger houses, whilst others stated that they would prefer larger houses to be built. It was suggested that low-rise flatted developments and townhouses could be acceptable.

9.87 Minority views included that that developments should leave sufficiently land available for future demand to be met or that these areas are better suited for industrial expansion than housing.

Comments from those who responded to 'No'

9.88 Of the 1,690 answering 'No', 1557 provided further comment. The 'No' figure is high as many objected to the phrasing of the question which they felt pre-supposed support for this option or they wanted to restate their objection to Option2.

9.89 It was argued that there is already too much low density housing in Elmbridge, and that such housing is not what is in demand close to the three strategic areas. The request for lower density developments to be spread throughout the entire Borough was repeated. A number of respondents noted that low density developments could not maintain the character of the area when that area had previously had no housing. It was argued that maintaining the character of the area should be a higher priority than delivering housing, and that densities should be appropriate to the adjacent areas. Conversely, it was argued that

some of the character of the area would need to be sacrificed in order for a sufficient number of homes to be built.

9.90 A number opposed to lower density developments suggested that the Council would be unable to fully meet the housing need identified in the consultation document. It was also argued that if the strategic areas were released from the Green Belt, it would be wasteful not to optimise their full potential. It was highlighted that to meet the housing need at lower densities; much more land would need to be released from the Green Belt.

9.91 Again, a range of views on the type of housing required was expressed, with some respondents arguing that larger 4 bedroomed homes should be built in order to preserve the character of the area. Others expressed their preference for small flatted developments and houses. There were a range of comments on density ranging from requests for high densities in town centres through to the need for the Council to maintain and strictly enforce current dph targets. A number of comments argued that the overall design of a development was far more important than its density.

9.92 It was argued that small developments of low density would not contribute significant funds to the improvement of services and access. It was also stated that it could not be guaranteed that additional houses would not be built on low density development sites in future.

Comments from those who responded ‘Don’t know’

9.93 Of the 131 respondents answering ‘Don’t know’, 55 provided further comment. Many respondents stated that they did not have sufficient knowledge to answer this question, or that they did not consider this particular issue as part of their response. Some answers stated that it should be up to the Council alone to consider and decide on the appropriate densities, in some cases on a site-specific basis. Others argued that desirable densities are dependent on the overall number and type of the homes planned.

9.94 It was argued that it would be best to pursue higher densities coupled with green spaces in order to use a smaller area of the Green Belt, and also that it would be preferable to provide higher densities in new developments rather than increasing the density in existing residential areas. It was stated that low density developments would better reflect the existing character around the key strategic areas, and that if development was shielded from view from surrounding roads, it could be acceptable.

Comments from those who did not select an option.

9.95 Specific points raised here included that Parcel 58 has been described by the Council as ‘countryside’ in other corporate documents. A mix of high and low density developments was commonly requested. A number of responses stated that low density developments could be suitable as long as they did not negatively impact on local character, infrastructure, property prices and quality of life for the existing community.

Affordable housing

9.96 Following Government changes in June 2016; the Council’s current affordable housing policy is now in conflict with national guidance. The consequence being that the Council would not be able to continue to collect affordable housing contributions on small sites (<10 units) as the Government consider that small sites are being disproportionately burdened by certain planning obligations.

9.97 Between 2011 and 2016, the Council’s policy on affordable housing, CS21 of the Core Strategy, delivered 373 affordable homes through on-site delivery and supported off-site delivery from financial contributions totalling £6.89m. During this period, 50% of all new homes built were on sites of less than 10 units and 91% of current applications providing an increase in new homes are on sites of 10 units or less. Elmbridge is the most expensive place to live in the south-east region and 4th expensive in the country. The borough has a significant need for affordable housing and on the vast majority of sites <10 units delivery of affordable housing contributions has not been an issue.

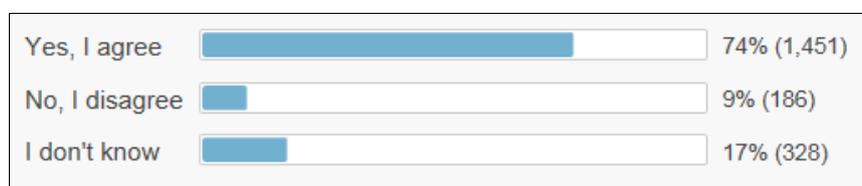
9.98 The Council has therefore taken the decision to continue to consider Policy CS21 on a case by case basis for relevant applications. This approach considers whether local circumstances in regard to affordable housing and the nature of development sites in the Borough are sufficient to warrant the requirement of affordable housing contributions, or whether greater weight should be attached to Government guidance.

Consultation question

9.99 The consultation document asked whether, given the need for affordable housing in Elmbridge and the nature of development sites coming forward do you:

Question 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?

Summary of responses



9.100 1,965 responses were received to this question selecting one of the three options above. As set out above, the majority (74%) selected ‘yes’. Within the 1,965 responses, 1,402 individual comments were received, including 18 comments from individuals / organisations who did not select one of the three options. Many of the responses followed one of the three standard templates that were circulated for submission to the Council. The following provides a summary of the comments received.

9.101 A number of respondents provided comments that did not relate directly to the question, for example, they simply commented that no new housing should be built, particularly within the Green Belt or within Parcels 14, 20 and 58, and that the Council’s priority should be addressing the current issues with infrastructure before seeking to provide more new homes. In addition, some comments related to the principal of affordable housing and how this is delivered. For example, that it should be available for rent only, could it be secured through a tax or a proportion of sale profits returned to the local authority. A few respondents felt that more information was required and/or modelling to enable them to make an informed response.

Comments from those who responded 'Yes'

9.102 Of the 1,451 responses received answering 'yes'; they did agree with our approach to continue to apply Policy CS21, 1,148 provided additional comments (79%).

9.103 The majority of respondents agree that Policy CS21 should continue to be applied on a case by case basis and that a blanket approach is not appropriate. Most recognised the significant need for affordable housing in the Borough and felt that its delivery was key to developing a fair and balanced community. A number of comments referred to the need to be more forceful with developers when considering viability to ensure that affordable housing is provided. One respondent went as far to say that planning permission should not be granted if affordable housing cannot be provided.

9.104 However, respondents also acknowledged that each area is different and the approach to the delivery of affordable housing should take account of this. For example, it may not be appropriate or viable in all areas or on all sites. Some felt strongly that preserving the character of the area and quality of life of existing residents should be a priority. In terms of the location of affordable housing a number commented that it would be better located in small pockets on all sites to avoid the creation of ghettos. However, others felt that the need for affordable housing was so high in the Borough the strategic sites should be used solely for the delivery of affordable/social housing. Some considered it essential that any new affordable housing be located close to public transport connections and local employment.

9.105 For many it was important that affordable housing was available for local people and not for those moving into the Borough from elsewhere.

9.106 A significant number of respondents were concerned as to whether any affordable housing built would be genuinely affordable for those who need it locally given the cost of living in the Borough. One comment referred to the frustration with Right to Buy legislation that effectively means affordable homes are continuously lost to the market.

Comments from those who responded 'No'

9.107 Of the 186 responses received answering 'no'; they do not agree with our approach to continue to apply Policy CS21, 127 provided additional comments. A significant proportion of comments were not directly related to the question (see above).

9.108 A number commented that affordable housing should be provided on all sites. It is assumed that this means regardless of local circumstances or viability. There was a sense of frustration that developers had not provided affordable housing in the past and that this is now the reason Green Belt release is being considered.

9.109 However, a significant proportion of respondents felt that it was not appropriate to develop affordable housing in Elmbridge. Many felt strongly that the desirability of Borough as a place to live is partly due to the homogenous character of some areas e.g. Cobham and Stoke D'Abernon and that the provision of affordable housing here would substantially change the socio-economic nature of the area. Some felt that mixing market and affordable housing will impact on community cohesion.

9.110 Some felt that affordable housing should only be developed in certain areas e.g. close to public transport and employment, within the urban area or where appropriate having

regards to the existing housing stock. A small number of respondents considered it appropriate to collect financial contributions in order to provide affordable housing elsewhere. Some, however, felt that due to the lack of available land this strategy was flawed.

9.111 A large proportion of respondents were concerned that the provision of affordable housing in Elmbridge was not workable due to high house prices and the cost of living

9.112 Some felt that developers should not have to provide affordable housing and that this places too greater burden on development costs.

Comments from those who responded 'Don't know'

9.113 Of the 328 responses received answering 'don't know'; whether they agree with our approach to continue to apply Policy CS21, 109 provided additional comments.

9.114 The majority commented that they did not have sufficient information or knowledge to make an informed response or that the question was unclear.

9.115 Other comments covered a range of issues similar to those answering 'Yes' or 'No' as set out above.

Comments from those who did not select an option

9.116 In addition to the comments summarised above, the Council received 18 comments from respondents who did not select an option. A number commented that a blanket approach to the delivery of affordable housing was not appropriate and that each site should be treated on its merits taking account of its location etc. and subject to viability. Other issues raised were, the potential for employers to provide accommodation for employees, clarity on the level of contributions required by developers, concerns that past policies have not been successful in delivering affordable housing on-site, removal of Right to Buy, the need to locate affordable housing close to employment and transport links within the urban areas and spread provision throughout the Borough. One respondent felt that affordable housing should only be required on developments of 10 or more homes.

Gypsies, Travellers and Travelling Showpeople

9.117 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, the Council are required to assess the housing needs of Travellers within the Borough and provide appropriate accommodation.

9.118 In August 2015, the Government amended the national planning policy for traveller sites (PPTS). They made a change to the definition of a Traveller which would mean that those Travellers who have given up travelling permanently, for whatever reason, no longer fall within the definition for planning purposes.

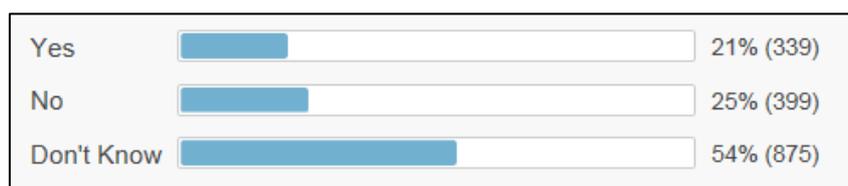
9.119 The implication for Traveller households who do not travel and do not meet the planning definition under PPTS is that their needs form part of the wider housing need of the area as identified through the SHMA process. Therefore the provision of pitches and plots for non-travelling Travellers would have to be balanced against our ability to provide other types of accommodation such as affordable housing and homes for older people.

Consultation question

9.120 The consultation document asked:

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?

Summary of responses



9.121 1,613 responses were received to this question selecting one of the three options above. Of these 1,613 responses, 665 individual comments were received including 26 comments from individuals/organisations who did not select one of the three options.

9.122 A high proportion (54%) of respondents signalled that they did not know whether there are any other aspects of Government policy that Elmbridge should consider with regard to meeting the accommodation needs of non-travelling Travellers. This question was technical in nature and many of the respondents openly stated that they did not have the knowledge to respond to the question. This lack of understanding becomes apparent when studying the answers as respondents that said yes and no provided similar comments. All of the comments provided for each answer (Yes, No, Don't Know and No answer) all contain the same issues. Hence the summary is not analysed by answer but instead grouped into key issue. These are set out below. Comments relating to individual experiences, the impact of recent encampments and potential costs to the Council are noted but not necessarily discussed below if not relevant to the question.

The definition of a 'Non Travelling Traveller'

9.123 Most respondents commented that they could not understand the term 'non-travelling Traveller' stating that it was an oxymoron and a contradiction in terms. A proportion of respondents referred to the accommodation needs of both Travellers and non-travellers within their responses.

Accommodation needs of the 'Non Travelling Traveller'

9.124 Largely, respondents stated that non-travelling Travellers should be treated the same as members of the settled community as they have given up the tradition of travelling and use the services and infrastructure in the local area. Respondents stated that they should live in 'regular' housing, be subject to the same planning laws and be treated exactly the same as every resident in Elmbridge. Some suggested that non-travelling Travellers should live in affordable housing, which the Council should provide.

9.125 Some respondents accepted that there is a need to meet the accommodation needs of non-travelling Travellers and this would help prevent unauthorised encampments. While others clearly stated that no additional provision should be sought for non-travelling

Travellers. Overall, there were many general statements that the Council should not provide any more accommodation for Travellers in the Borough whether they travel or not.

Site provision

9.126 Some respondents recognised that there is a demand for Traveller accommodation but stated that finding suitable sites would be difficult. A large amount of respondents provided a standard response to improve existing sites and facilities before looking for new sites. Some stated that existing sites should be expanded before seeking new sites.

9.127 A proportion of respondents said that pitches and plots should be accessible and integrated with the community. However, many other respondents stated that Travellers should be located further away from the settled community and did not support integration.

9.128 There were various suggestions with regard to where accommodation should be provided. Respondents suggested outside the South East, central London and across the wider UK. There were many comments submitted that said that Elmbridge was not suitable for providing Traveller accommodation due to the high price of land. Some suggested that the areas that were less likely to be developed were more suitable. Unused caravan parks were also suggested. Many responses stated that there were enough sites already and that no more should be provided.

9.129 A significant amount of comments stated that no Green Belt land should be used to provide housing to any population, whether settled, non-travelling or travelling. This applies to Parcel 14 and 20. One respondent stated a concern about uprooting the existing community of non-travelling Travellers in the Borough.

Infrastructure

9.130 Many respondents mentioned infrastructure provisions and felt that this community would put extra strain on infrastructure. Some added that extra funding should be provided for specialist education and that the availability of school places needs to be considered. Concerns were also raised about lack of job opportunities.

Questioning the evidence base

9.131 There were a number of submitted responses that stated that not enough information on this subject was provided. Some quoted the figures from the evidence but stated that there was no indication from evidence presented that significant provision was needed. Some felt more research was required and others asked where the figures came from.

Consultation Question

9.132 Respondents also provided feedback about the question itself stating that it was too broad and the topic was too large to be fully considered. Many did not understand the topic area. There were a number of respondents that asked for greater consultation with the community regarding provision of accommodation for Travellers as well as consulting directly with non-travelling Travellers. Many respondents questioned the actual site allocations and where the accommodation will be located in the Borough.

Neighbouring Authorities

9.133 There were two responses from neighbouring Local Authorities Mole Valley District Council and Reigate and Banstead Borough Council. After reading the 2017 GTAA, Mole Valley DC commented on the lack of responses which indicates uncertainty from the travelling community but understood that this is likely to be due to the change in planning definition. Mole Valley concluded that the GTAA provides a pragmatic assessment of needs based on the evidence available.

9.134 Reigate and Banstead Borough Council is investigating whether they have capacity to meet their own needs and have not completed work to examine whether there is any scope to meet our needs. The authority recommend EBC carry out a Traveller 'call for sites' and establish whether EBC can meet their own need and any additional need from other neighbouring authorities.

Specific Housing Needs

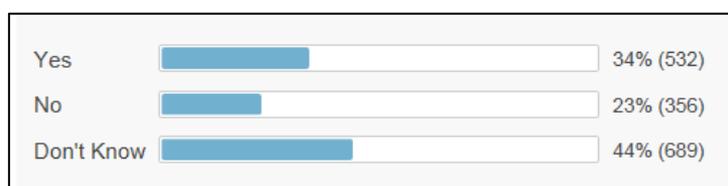
9.135 The principal development pressure across London and the South East is for housing. Elmbridge's location, the availability of good services and high quality environment mean that this pressure is reflected locally. In seeking to meet housing needs, we must ensure that we are providing the right type, size and tenure of housing that our existing and future populations require. A key focus of the consultation paper was therefore how the Council seeks to provide more affordable housing, smaller homes (one to three bedrooms), and specialist accommodation.

Consultation question

9.136 The consultation document asked:

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?

Summary of responses



9.137 1,577 responses were received to this question selecting one of the three options above. There was not a clear majority with a high proportion of the respondents selecting 'don't know' to this question. 34% thought that there were other specific housing needs that need to be addressed as part of the new local plan and 23% selecting 'no' they did not believe this to be the case. 679 individual comments were received in total including 21 comments from those not selecting an option. The following text summaries those comments received.

Comments from those who responded 'Yes'

9.138 Respondents to this question frequently cited the need to address the requirements of the elderly, particularly ensuring the provision of affordable residential care. Most respondents felt that homes for older residents should be located close to public transport and shops and amenities, but other comments suggested that self-contained 'retirement villages' could be considered to meet the specific needs of older residents. Almost all respondents stressed that residential care for the elderly must be affordable and built to serviceable, but not luxury standards.

9.139 Other respondents stressed the need for increased provision of smaller homes to enable older residents to live independently and release larger homes for family occupation. Not allowing the conversion of bungalows to larger homes was often mentioned, along with actively building more bungalows, annexes and low-rise flatted developments. Smaller homes were also suggested to meet the needs of younger single people, as well as a scheme whereby younger people are offered a place to live in exchange for caring for older residents.

9.140 The need for affordable housing was a popular response, coupled with the desire for starter homes to serve the needs of first time buyers. Some respondents requested that the balance between affordable and market homes on each development should be re-considered, with the requirement for a greater proportion of affordable homes, in some cases off-site. It was argued that affordable units should be located in close proximity to employment opportunities.

9.141 Social rented housing was commonly mentioned in the responses to this question. Respondents wanted more social housing, and of a higher quality. Some answers suggested that the Council should explore public/private partnerships to re-develop existing sites to achieve high densities. A number of answers stated that this housing should remain permanently rentable and should not be sold. There was also a standardised response that requested that existing residents of Elmbridge should have priority over newcomers to the area. It was suggested on a number of occasions that Walton Court could be utilised for rented accommodation.

9.142 Residents expressed concern for key workers living in the area, often arguing that more housing should be available for this particular group at affordable prices. A local loan scheme to help public sector workers to buy a first property was proposed, as well as financial help for those who do not meet criteria for social housing but are unable to afford local market rent. It was also suggested that professions that are needed in the area are given priority and assistance with housing.

9.143 A number of respondents suggested that housing to serve students at local universities is required in the area. Some also mentioned the possibility of 'halls of residence'-style housing for young professionals, as well as houses in multiple occupation (HMOs) to serve this group.

9.144 Some residents addressed the needs of vulnerable people in their answers, suggesting a permanent emergency shelter for the homeless and sheltered accommodation for people with disabilities or mental health needs. It was strongly felt that this type of accommodation should be close to amenities.

9.145 The need for more self-build and custom-build plots was mentioned in answers to this question, as well as an increase in the number of mid-sized homes (3 and 4 bedrooms) to serve the needs of families.

Comments from those who responded ‘No’

9.146 Again, respondents who answered ‘no’ to this question cited the needs of the ageing population, with bungalows frequently mentioned. The needs of key workers were also included, as well as support expressed for affordable housing. Answers also proposed the building of smaller properties to meet the needs of both young families and downsizers.

9.147 Others argued that there is already a good mix of housing in Elmbridge, with additional housing neither needed nor desired by existing residents. Some answers stated that all housing needs were either currently being addressed, or were considered in the consultation document.

9.148 Residents stated that additional needs should be addressed with neighbouring Boroughs, and that there should be less focus on housing in the Local Plan.

Comments from those who responded ‘Don’t know’

9.149 Many of the respondents openly stated that they did not have the knowledge to respond to the question. Responses cited the elderly, disabled, single people and first-time buyers as groups with specific housing needs. Comments often focused on providing smaller homes for people to downsize into, thereby releasing larger homes for family occupation. Affordable homes and Council-run, low-fee residential care homes were also included, as well as sheltered accommodation and social housing.

Comments from those who did not select an option

9.150 Respondents in this group covered the needs of older people, students and first time buyers, as well as supporting affordable housing and self-build accommodation. Respondents suggested that enough housing is already being built elsewhere, and that both bungalows and gardens should be protected from re-development.

10 Consultation Summaries: Economy

Strategic Employment Land

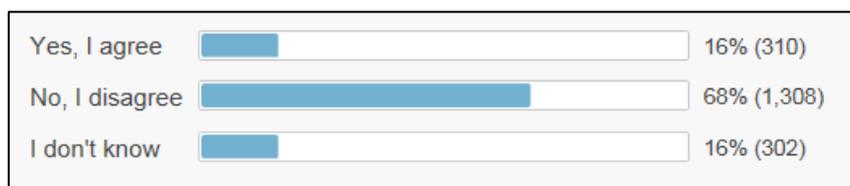
10.1 The Council want to ensure that Elmbridge continues not only to be a great place to live but also an area attractive to businesses and workers. To do this the Council needs to balance the need for housing with the need to support and grow our economy. Elmbridge's current policies seek to ensure 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. The Council feels 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.

Consultation Question

10.2 The consultation document asked:

Question 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?

Summary of responses



10.3 1,920 responses were received to this question selecting one of the three options above. The majority (68%) selecting 'no'. Of the 1,920 responses received, 1428 individual comments were received, including 13 comments from individual/ organisations who did not select one of the three options. Many of the respondents followed a standardised response (which was submitted by those who agreed, disagreed, didn't know and didn't select one of the answer options).The following summaries all the comments received.

Comments from those who responded 'Yes'

10.4 The standard response stated that 'Mixed residential/retail/small business developments are very viable and effective. Mixed residential/retail/small business developments are the norm in many other countries in Europe and have proven successful. Mixed residential/retail/small business developments are likely to draw the required talent/labour resources to the strategic employment areas in the Borough and do so in a more affordable manner'. This was coupled with numerous responses being in favour of a

flexible (often case-by-case) approach that could respond to changing market conditions, particularly where premises may have been vacant for a long period of time.

10.5 Protection of Strategic Employment Land sites was deemed important by some people as they felt it is important to protect the local economy and to retain its best strategic employment areas as it helps reduce commuting times and pressure on infrastructure such as roads and public transport. Some felt that the plan should provide a framework for resisting 'employment land' being too easily converted into residential use whereas another suggestion was to keep residential and commercial units separate including not allowing residential units above commercial ones. One respondent stated that the Council should seek to bring iconic new employers into key office and factory sites to act as development hubs, particularly in higher skills and technology industries.

10.6 There were various views on how and when employment land reviews should be undertaken including that this should be done regularly in the future and with a view to increasing the number of areas protected. It was also considered by some that the needs and requirements of small businesses should have a greater emphasis as well as the free-market always being allowed to provide some input.

10.7 Some responses stated that if there are brownfield sites etc., that are not being utilised then they could be redeveloped for housing in the Borough, and this should be done before Green Belt is considered for residential development.

Comments from those who responded 'No'

10.8 The standardised response of 'Mixed developments are increasingly viable and effective putting less strain on transport networks due to proximity of housing to places of employment. Mixed residential/retail/small business developments are the norm in many other countries in Europe and have proven successful. Mixed residential/retail/small business developments are likely to draw the required talent/labour resources to the strategic employment areas in the Borough and do so in a more affordable manner' (or those of a very similar nature) was given by the vast majority of respondents who disagreed with the question. This response appears closely linked to numerous statements about the changing working patterns over the Plan period and how this has the potential to change the demand for employment floorspace. These related to the need to boost the services sector as opposed to manufacturing and warehousing as well as the need to not divide working and living due to increased self-employment, flexible working, working from home and automation. Another example given was the way in which retail and traditional B-class employment uses interact is blurring, with the increase use of the Internet and click and collect facilities.

10.9 Some respondents stated that it should be down to a case-by-case basis or whether the current sites / SELs are viable and if they are not they could be suitable for housing to avoid areas being empty in the long term (with some thinking this should require local support). Other respondents thought that businesses 'should flourish wherever the need is to do this' or that as it's a free market, if businesses cannot afford property they should move to a cheaper area and that housing should be given the best locations as 'offices and factories etc., can go anywhere'.

10.10 There were also people who thought that employment areas should be re-developed for housing as the Green Belt, SSSIs and the historic environment are more important to

preserve, even if this resulted in fewer jobs in the area, or out of a desire to reduce the number of people attracted to Elmbridge.

10.11 There were also suggestions that the Council should take an active approach including buying sites from failed businesses and use compulsory purchasing powers where necessary to aggregate such sites into strategic areas for housing and infrastructure provision.

10.12 The Council was advised by another response to review policies that protect existing employment sites (i.e. CS23 and DM11) as well as having concerns raised about the evidence base as it was felt that the employment study elements have yet to be completed and so it is premature to make this conclusion that this land use should be protected over other uses.

Comments from those who responded ‘Don’t know’

10.13 There was a wider variety of views given by those that selected ‘Don’t know’ in response to question 16. One of the most frequent was the standardised (or others which were of very similar content) ‘Mixed residential/retail/small business developments are very viable and effective. Mixed residential/retail/small business developments are the norm in many other countries in Europe and have proven successful. Mixed residential/retail/small business developments are likely to draw the required talent/labour resources to the strategic employment areas in the Borough and do so in a more affordable manner.’

10.14 There were also a number of other views given including that housing would be a better use of some of this land, particularly if there was an oversupply of employment floorspace or buildings were empty for a long period of time. Also that developments should be considered on a case by case basis and that a big picture needs to be considered, not picking away at apparently convenient parcels of land that landlords wish to sell.

10.15 Alternative proposals / ideas also included the idea that hospitals, large shopping centres, business / industrial areas and maybe even universities could be located away from towns and villages to alleviate local traffic and pollution problems. Another idea was that there may be some locations where facilities, such as low-level multi-story car parks would be advisable. Finally, some deemed that market forces should dictate, rather than others influencing what development takes place.

Comments from those who did not select an option.

10.16 A number of statutory consultation bodies did not specifically respond to the questionnaire but gave their answers separately. This included the Greater London Authority which said that ‘it may be useful to explore relevant economic linkages with London to understand and plan for the role of Elmbridge in the shared market area for industry and logistics provision’. Spelthorne Borough Council stated that ‘initial consideration should be given to the various impacts of the possible expansion of Heathrow Airport, such as increases in employment. This could potentially reduce the amount of employment land required in the Borough and subsequently free up space for other uses.’

10.17 One respondent stated that the proposed amendments to the NPPF may require local planning authorities to ‘...adopt a policy with a clear limit on the length of time (such as three years) that commercial or employment land should be protected if unused and there is not significant and compelling evidence of market interest of it coming forward within a two-

year timeframe' (Paragraph 38). It was suggested that the Council should 'revise the existing policy to provide flexibility to enable the redevelopment of employment sites that have been vacant for a significant period of time and where marketing evidence has clearly demonstrated that there is no demand for the floorspace. The revised policy could for example require evidence regarding the period of vacancy, as well as evidence that the site has been thoroughly marketed'.

10.18 In a similar vein to responses to both agreeing and disagreeing with the question above, the standardised response (or responses of a very similar nature) that 'Mixed residential/retail/small business developments are very viable and effective. Mixed residential/retail/small business developments are the norm in many other countries in Europe and have proven successful. Mixed residential/retail/small business developments are likely to draw the required talent/labour resources to the strategic employment areas in the Borough and do so in a more affordable manner.' was also given by a respondent who did not utilise any of the response buttons. Finally, there was also a response that stated 'some 'strategic employment areas' which are third rate and run down and should therefore be developed for housing, if only in part', again showing support for the re-development of underperforming areas.

Site specific responses

10.19 There were a number of site specific responses in relation to this question. The first of these came from GlaxoSmithKline (GSK) which requests that the GSK Weybridge site is included as a site with potential for residential development within the emerging Local Plan and the SEL designation is removed.

10.20 Bridge Court Holdings Ltd stated that Weylands Treatment Works is an established employment site providing a range of B1, B2 and B8 uses for waste, storage, building companies and warehouses. They went on to say that the redevelopment of this site would allow it to function properly and more effectively, for a full range of business uses, and to assist in delivering the additional employment floorspace within the Borough. Alongside their comments on the Weylands Treatment Works site, Bridge Court Holdings Ltd also supported the retention of the Brooklands Industrial Estate as Strategic Employment Land, noting however, that this is a high end industrial park and it is not considered suitable to accommodate all types of employment, and that the quality of the area could be undermined if it was required to accommodate all forms of employment use.

10.21 More general comments were also made in relation to derelict sites in West Molesey that may be unlikely to become offices / warehouses, and that they could be re-developed for housing instead. Further comments were also made about the fact that a number of employment sites are located near train stations with Hershams train station being a prime example. The respondent stated that the 'ridiculous use of land for industry, rugby club and poor development around this area should be seriously considered'.

Consultation question

10.22 The consultation document asked:

<p>Question 17. If not, what degree of flexibility do you consider would be appropriate with regard to alternative uses in such areas?</p>

Comments from those who were in favour of more flexibility

10.23 The most common view received (and in a similar vein to numerous responses to Question 16) was that there should be complete flexibility and open mindedness and that local employee accommodation should be offered to reduce travel needs and the resulting congestion and pollution. Another very popular response was that decisions should be made on a case by case basis.

10.24 There were various statements in support for changing employment areas to various different uses, particularly housing (again, in a similar way to response to Question 16), especially if it avoided areas being empty in the long term. It was also stated that the concept of 'business parks' ought to give way to more flexible concepts for the use of urban and semi-urban space, mixing residential, leisure and retail wherever possible, including going higher rise. The conversion of employment land to residential should take place even if it affected economic performance / the number of jobs in the area according to some respondents, some of which felt that this should take place to protect Green Belt. This flexibility however, should only be in one direction according to some responses, with residential being able to be introduced into employment areas, but not the other way around.

10.25 It was also suggested that free market rules / business ethics and adaptability / supply and demand for different uses should drive the decisions as opposed to planning / policy as the market could / should dictate what is supplied and where.

Comments from those against flexibility

10.26 There were a number of statements against having flexibility in the Strategic Employment Areas. Some proposed a very small degree of flexibility only when it is deemed that the land is no longer suitable for business, whereas other felt that no flexibility should be given because as soon as you 'open the door' then a precedent has been set which will result in a mixed living environment with appropriate social issues (though there was no further details given as to what these issues may be). There was also concern that property developers would soon be using ex office / industrial land to build more large houses. It was also felt that the Council should protect the most strategic sites in the Borough (a point also made under Question 16) such as Brooklands Business Park and should encourage redevelopment of other 'existing employment' sites for high density housing with a mix of 1, 2 and 3 bedroom dwellings.

10.27 Other views that were against flexibility stated that a 'big picture' needs to be considered, not picking away at apparently convenient parcels of land that landlords wish to sell and it not being acceptable to evict businesses so that you can redevelop the office. It was also suggested that where retail parks exist, they should be supported with improved traffic flow measures; enable redevelopment & upgrade / additions and not reclassify them for partial use as residential.

Other comments

10.28 There were various other statements made that did not specially refer to the level of flexibility that should be used in relation to Strategic Employment Land. This included a suggested hierarchy of types of employment that should be allowed, focusing on offices before warehousing before factories, and other that are felt to be of more 'community value' such as garden centres should be protected over warehouses.

10.29 An alternative methodology for assessing Strategic Employment Land was put forward based upon the Green Belt Performance indicators as a guideline. It was also felt that local infrastructure should be taken into account when assessing these areas. Another method for decision making was suggested via the use of referenda on each project. In terms of changing areas, there should be pressure (with no specification as to how this should be done) on landowners to come up with 'lateral thinking solutions' and the Council should then support these proposals at planning stages

10.30 Finally it was suggested that the current projections may be unnecessarily high in view of "Brexit" consequences (though no specifics were given as to which / what type of projections this comment related to).

Re-development at Brooklands including other barriers that could prevent further development

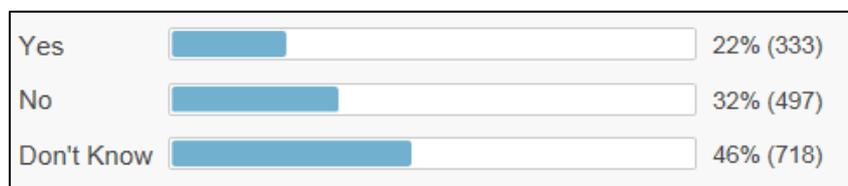
10.31 Brooklands offers a mixture of employment uses with high quality offices as well as large format warehousing and distribution centres. However, like our other employment areas it is tightly bound by residential areas but additionally constrained by the Green Belt running between The Heights and Brooklands Industrial Estate; a Scheduled Ancient Monument (the former Brooklands Race Track); and an area of Suitable Alternative Natural Greenspace (SANG). The Council's approach is 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. Any exploration into amendments at Brooklands would 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.

Consultation question

10.32 The consultation document asked:

Question 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?

Summary of responses



10.33 1,548 responses were received to this question selecting one of the three options above. The majority of respondents did not know whether there were any exceptional circumstances that would support the amendment of the Green belt boundary at Brooklands to support further development of employment. Of the 1,548 responses, 698 comments were received, including 9 comments from individual/organisations who did not select one of the three options. The following text provides a summary of these comments.

Comments from those who responded 'Yes'

10.34 There were numerous statements of support for development at Brooklands. This included that the area should become a residential and business hub, that flexibility and open mindedness should be the way forward, that it is currently underutilised, that a specific Supplementary Planning Document should be drawn up to guide any development and that it should be extended north of the railway line to the east of New Haw (through this area lies within Woking Borough). There was also support for a mixed-use development of the area including residential alongside retail and employment areas, and a statement from a specific company as to their space requirements in the area.

10.35 In addition to these responses there were more reserved levels of support for development in the area including that it should only be for employment-related uses (and not housing); that the historic environment must be preserved; that if development had to take place then it should be here; and that only part of the Green Belt in the area should be used, but not all of it.

10.36 There was also support for the existence of exceptional circumstances stating that without such expansion the Borough would be unable to continue to provide the large scale employment space that it needs, and that is needed to support London and the wider South East region.

10.37 One of the main / most frequently raised points was that if there was to be more development in this area, that changes that would help reduce congestion / improve infrastructure would be needed as it is not currently suitable, and that this should be provided before any additional development takes place. One specific view was to offer employees accommodation on site.

Comments from those who responded 'No'

10.38 The responses from respondents who answered 'No' to Question 18, often focused around the Green Belt, citing a lack of exceptional circumstances and local support for changes to the boundary; that the area is already Green Belt and should stay that way and is non-negotiable; that once a little is given, more would be taken; and that the Council has taken the 'easy' way out by looking at Green Belt land. Other comments stated that the existing land should be intensified rather than using Green Belt.

10.39 There were other non-Green Belt reasons given including an increase in pollution; that the former Brooklands racetrack is a scheduled ancient monument and that the accessible green space is used for events and should also be enjoyed by workers, students and visitors. There were also numerous statements where it was cited that there was plenty of unused office and factory space in and around Elmbridge, that it is already highly developed (or fine as it is) and that there are no employment issues in the area.

10.40 In a similar vein to the responses to 'yes', there were concerns raised about traffic congestion and the road network in the area, even if improvements were made. Alongside this there was concern that more employment would increase housing demand in the Borough.

10.41 Specific issues were also raised in relation to flooding in the area (through no specific reasons for this were given in the responses) and that the Museum is trying to preserve

flying at Brooklands as prescribed by the planning permission for Mercedes-Benz World and further encroachment on the Green Belt could make this more difficult.

10.42 A community park created by removing the tarmac / concrete and creating walkways, planting 5,000 trees with a sculpture to commemorate the site's heritage was suggested, as well as looking at Hersham as an alternative to developing in the Brooklands area.

Comments from those who responded 'Don't know'

10.43 Nearly half of respondents stated that they lacked the required knowledge / information to give an answer and that it was the responsibility of Elmbridge Borough Council to fully evaluate other options and subsequently provide details.

10.44 There were similar responses to 'no' in relation to the Green Belt, again stating it was an 'easy' way out and there are no circumstances to support Green Belt boundary amendments and that any loss of Green Belt land must be replaced by an equal amount of adjacent land. Similarly, the issue of traffic was again cited as a reason not to develop the area further.

10.45 There were also statements in support of development in the area, claiming that Brooklands already has good infrastructure (and is underutilised) in key areas and could probably sustain more affordable housing, provided the employment opportunities and educational and medical facilities can sustain an expanded population with the preservation of recreational amenities also being important. Some caveats were given such as the need for it to be a mixed-use area and that the historic environment should be preserved.

Comments from those who did not select an option

10.46 For those who did not select one of the answers, the responses were supportive of development in the area stating it would allow the expansion of the industrial estate to deliver significant development to meet the Borough's objectively assessed housing and employment needs, that brownfield development here would be preferable to Green Belt development and that there is (or there is the space for) the required infrastructure to support further development.

Consultation Question

10.47 The consultation document asked:

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

Barriers suggested:

10.48 One of the most common constraints mentioned was the traffic issues (as raised under Question 18), lack of public transport and general lack of infrastructure in the area (e.g. schools, doctors etc.) as well as a lack of affordable housing. Other common barriers given were the historic value of the area, nearby listed buildings and the scheduled monument (racetrack) and associated museum (again, as similarly cited for Question 18).

10.49 Various environmental concerns were also raised including flood risk as large areas are in Flood Zones 2 and 3 (which was also mentioned under Question 18). Alongside

flooding issues the increase in noise, chemical, air and water pollution in addition to historic land contamination was also a frequently mentioned concern / constraint on the area. In addition to the issues on the land around Brooklands, the fact that the stretch of the River Wey is failing to meet the Water Framework Directive 'good ecological status' and the potential conflict with Surry Wildlife Trust's ambitions to improve the stretch of the River Wey that runs through the area was also cited as an additional barrier to developing the area further. The final environmental concern raised was the proximity of Brooklands Park, a designated Suitable Alternative Natural Greenspace.

10.50 In a similar vein to Question 18, Green Belt was also given as a good enough a reason / barrier to development (in addition to opposition from residents to development in the area, the impact upon the community and the amendment of Green Belt boundaries in of itself), as was the need to prevent towns in the immediate vicinity merging into one large built-up area.

10.51 A number of miscellaneous constraints were given including the cost of land in the area, the overpopulation of the Borough as it currently stands, that the Council should be looking at Brownfield land, that the area is already developed enough and that the parkland, planting and the open space should be maintained.

No problems / other comments

10.52 Many people said that there were no problems or that they were not aware of any issues that would prevent further development in the Brooklands area, or that they did not feel they were able to comment without further information / did not know the area well enough to comment.

10.53 There were also miscellaneous comments including a suggestion to amend the Brooklands race track scheduling as it occupies a substantial area of land that could be utilised. Another M25 junction between Byfleet and West Byfleet and the need for a by-pass road were also suggested to help alleviate congestion in the area. Other comments stated that some of Brooklands is ideal for conversion to starter homes and social housing, or is prime for housing / re-development due to the close proximity of the large TESCO and M&S supermarkets.

Sandown Park Racecourse

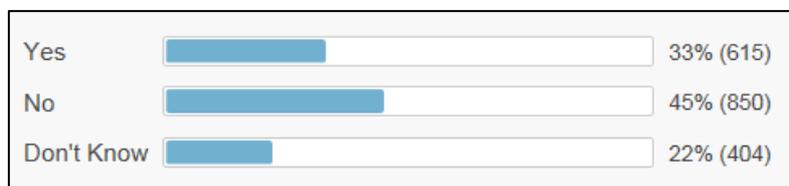
10.54 One of the main attractions in the Borough is Sandown Park Racecourse which is not only a sporting venue but also a major conference and exhibition centre. The racecourse also supports over 100 permanent jobs and over 4000 temporary staff supporting race fixtures and events. However, the racecourse, 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. 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.

Consultation question

10.55 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 the consultation document asked whether the Council should:

Question 20. Encourage the redevelopment of Sandown Racecourse to provide improved and extended conference and hotel facilities?

Summary of responses



10.56 1,869 responses were received to this question selecting one of the three options above. The majority (48%) said 'no'. Within the 1,869 responses, 1,066 individual comments were received, including 10 comments from individuals/organisations who did not select one of the three options. The following summarises those comments received.

Comments from those who responded 'Yes'

10.57 There were numerous statements in support of re-developing Sandown Racecourse. One of the main points put forward was that new / upgraded facilities will help secure the long term future of the site, preventing it from being redeveloped for other uses. In addition, improved hotel and conference facilities would help address the current lack of this type of venue the Borough currently has.

10.58 There was also more muted support, some with various caveats such as CPRE stating that Sandown Park should be subject to a comprehensive study in the light of final Government guidance and a Brief being developed that would guide any future development. Other points raised were that the open aspect of the site is retained and that the size of any re-development should be limited. There was also only support for the re-development of the site if it is not Green Belt, and only if no housing development takes place in the area, as respondents felt that only one or the other could be accommodated in the area.

10.59 One of the most frequently raised points was that development should only take place if traffic issues / congestion can be addressed, including improving parking onsite and also to other nearby tourist attractions.

10.60 Aside from traffic concerns, additional reservations about the re-development included that it should not affect horse racing and other sporting / entertainment activities as well as no street trees, Green Belt, gardens, allotments, parks or green spaces being lost. The location of where this should not take place was also specified by some responses including that it should only happen on the Portsmouth Road side. It was stated that the redevelopment should only take place if it provides employment opportunities for local people, and has the support of local residents.

Comments from those who responded 'No'

10.61 There were numerous reasons given as to why Sandown Park should not be re-developed and this included that there are enough events / facilities on site (or that it was under used and thus did not justify the extra development) and the wider area already, that

traffic / pollution is bad and it would only get worse as well as local infrastructure / road access not being able to cope with improved facilities.

10.62 As noted above there was also support for re-developing Sandown Park for residential, leisure or mixed uses instead, or that some facilities were more important than others to keep or improve. There was also concern that not enough detailed information has been provided on the proposed "extended conference and hotel facilities" to be able to support the concept.

10.63 It was also stated by some respondents that Sandown Park is a private enterprise, and its development should have nothing to do with Elmbridge Borough Council, that it would naturally develop so there is no need to encourage re-development or that it was not a strategic matter for consideration in the Local Plan. Finally, there was also a statement that whilst it is important to create tourism it should not be at the cost of other established local businesses.

Comments from those who responded 'don't know'

10.64 Although a number of respondents indicated that they were not sure as to whether they did or did not support the potential redevelopment of Sandown Park, a number of familiar themes / comments were raised which were similar to those noted above. One of the most frequently raised was that the increase in traffic as a result of the re-development would be unacceptable and / or that the road infrastructure could not cope with an increased number of visitors, or that it would require significant upgrades.

10.65 Other opinions stated that there was no need for additional facilities or that re-development should only take place if it were essential to maintain the survival of the venue. Alongside this it was expressed that development could be suitable, provided it did not affect or damage the Green Belt, the existing facilities or stop the existing events from taking place.

10.66 Other respondents felt that they did not have sufficient information to make comments, and would like more information to be able to do so. Another view was that it should only take place with the agreement of Esher residents, or that it should be left for the site owners to decide what to do with their site.

10.67 There were also suggestions made in relation to alternative forms of development on the site to those proposed by the question, including the accommodation of housing / retail / small business. Finally for those who answered 'don't know' there was a suggestion that if residential development goes ahead at Kempton Park would there be scope for a good chunk of Elmbridge's housing shortfall being accepted as a quid pro quo, within the duty to co-operate.

Comments from those who did not select an option

10.68 There were a number of comments provided by those respondents that did not select one of the response options. Some of these covered topics that have been noted above including that traffic infrastructure would need to be upgraded to accommodate any increased visits due to enhanced facilities. There was also support for the re-development to meet the expectations of such venues now and in the future as well as a proposal to re-develop one of the golf courses for affordable housing. There were however some reservations about development of the area, including that it should only take place within the footprint of the racecourse, that the site is partially covered by Flood Zone 2 at its

northern end, and that it is located over Principal and Secondary Aquifers. Finally, the Jockey Club confirmed its commitment to working with the Council (through the Local Plan process) to 'foster the ongoing and successful future of Sandown Park'.

Retail provision in our town and village centres

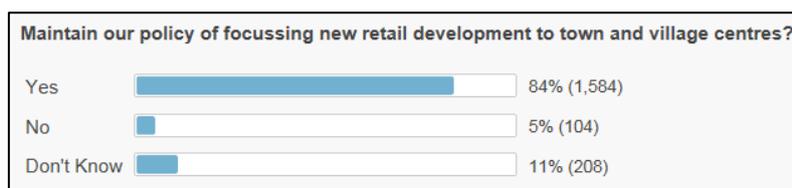
10.69 Our town centre uses policy set out in the Core Strategy (CS18), seeks to focus all new retail development in our town centres and to protect primary and secondary retail frontages from inappropriate changes of use. This is in line with the National Planning Policy Framework. However, there are many challenges when considering the delivery of retail development for the next 20 years. For example, 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 challenge to meet the levels of development required to retain market share when faced with competition from centres such as Kingston and Guildford. Not only that but people's shopping habits are changing and many retail centres are diversifying taking on more recreational and leisure uses to ensure footfall. The following questions (question 21a, 21b, 21c) seek views on how the Council meets the challenge of keeping towns and villages in Elmbridge vibrant, taking into account changing consumer habits.

Consultation question

10.70 The consultation document asked whether, given changing consumer habits should we:

Question 21a. Maintain our policy of focusing new retail development to town and village centres?

Summary of responses



10.71 1,896 responses were received to this question selecting one of the three options above. The majority (84%) selected 'yes' and agreed to maintain our policy of focussing new retail development to town and village centres. Of the 1,896 responses, 1,326 individual comments were received including 26 comments from individual/organisation who did not select one of the three options. Many of the responses followed one of the three standard templates that were circulated for submission to the Council. The following summaries those comments submitted.

Comments from those who responded 'Yes'

10.72 84% of respondents agreed that the Council should maintain our policy of focusing new retail development to town and village centres. They felt that maintaining the success of town and village centres is important to retain local character, strengthen local communities and support the local economy. Some stated that the Borough's town and village centres

help an aged population assess goods and services. It was expressed that changing consumer habits are strengthening town and village centres with smaller, more frequent top up of goods. Many commented on the environmental benefits stating that focusing retail in town and village centre would reduce car use, pollution and congestion.

10.73 A large proportion of people used a standard response stating that the Council should focus on mixed residential/retail and small businesses in the town and village centres. They felt that this would result in better job opportunities for local people and more sustainable work patterns. Many people discussed the lack of diversity in current centres and supported a better mix of retailers, including smaller and independent shops.

10.74 Although people said 'yes', many concerns were raised regarding existing problems. For example, many people felt the business rates and landlord rents were driving retailers out and this needs to be addressed in order to support the centres. Issues regarding existing and future car parking provision were also highlighted. In addition to this, some felt that more investment was needed to make the centres more attractive.

10.75 Many respondents stated that they were against out of town shopping centres. Some stated that occasional edge of centre and out of town could be acceptable provided it does not impact on the vitality of town and village centres.

10.76 Some people stated that new developments must have central hubs so local shopping needs can be met. There were some concerns from respondents' regarding the conversion of retail to residential; the impact of traffic and striking the right balance between what is needed and what is provided.

Comments from those who responded 'No'

10.77 5% of respondents said 'no', with many stating that this should not be the priority and that housing provision is the key issue. Some stated that GP services and schools were more important than retail development. There were comments suggesting that existing retail provision is adequate and that local people are well served.

10.78 However, in contrast, some stated that retail centres are in decline due to the dominance of online shopping. Respondents commented largely on issues facing existing town and village centres such as inadequate parking, high business rates and landlord rents, empty shops, overcrowded centres, increased traffic, homogenised retail offer and lack of accessibility.

10.79 Various solutions put forward were greater accessibility and provision of parking and that the Council should rejuvenate centres but not expand. Some felt a flexible approach is needed as some towns and village centres could not cope with large increases in retail development. It was suggested that local centres such as Oatlands should be supported. Respondents suggested existing shops should be occupied before any more are built. There was concern raised regarding the need for more retail if retail is not needed.

10.80 The standard response to focus on mixed residential/ retail and small businesses was also provided. Many of the respondents support out of town retail as this provides a different experience to town and village centres with greater parking facilities and greater access for those with a car.

10.81 NEXT plc highlighted various concerns to the consultation document's approach to retail provision to be focussed in the Borough's town and village centres. The retailer has a long term requirement for a site to locate a new combined home and fashion store of about 5,500-6,000 sqm gross (about 3,700-4,000 sqm net) in the Brooklands area. This store is designed for an out of town retail centre due to its larger home, garden and DIY products. It stated that it is essential that policy recognises this substantial retail requirement since it would demonstrate how the Council is considering market signals as advised in Planning Policy Guidance.

10.82 NEXT has raised particular concerns about the consultation question and policy approach. They say it bears little reference to the evidence base or NPPF obligations to meeting retail need in full. They raise concerns about the approach to neighbouring shopping centres Kingston and Guildford and present a number of problems relating to this approach such as expenditure leakage and sustainability issues.

10.83 NEXT also questioned some of the methods used for the Elmbridge Retail Assessment 2016. It commented that the Elmbridge Retail Assessment has under-represented the need for additional comparison retail floor space by testing a reduced market share scenario. It felt this lower figure should be deleted from policy. Next also set out a number of issues they have with the evidence base and this will be looked at in greater detail in a separate summary document.

10.84 NEXT encourages the Council to provide explicit support within the Local Plan to meet the company's retail requirement within the Brooklands area.

Comments from those who responded 'Don't know'

10.85 There were a number of contradictory responses received including converting shops to housing than on the other hand preserving declining High Streets. Some felt that there should be no increase in town and village development if this means more traffic. Others suggested focusing new development in town and village centres and not on green spaces and sites within the Green Belt. However, some respondents said that they did not want the Council to preclude edge of town centre and out of town development. Existing parking issues were also mentioned as an issue.

Comments from those who did not select an option

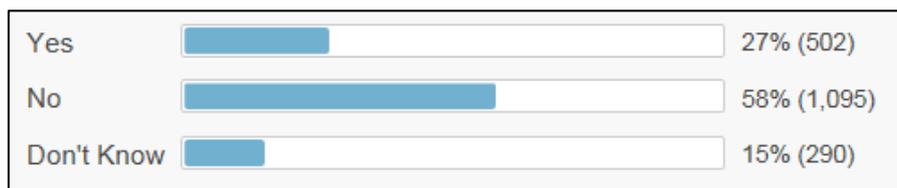
10.86 The standard response to focus on mixed residential/ retail and small businesses was also provided for those who did not provide an answer. Respondents stated that housing development was more important than retail as people can shop online. Expensive business rates were cited again. A number of respondents stated that facilities such as leisure centres for young people should be included. Other comments stated no retail development on racecourses or Green Belt. Major new development should include retail provision within them and the Council should consider further development at Brooklands.

Consultation question

The consultation document asked whether, given changing consumer habits should we:

<p>Question 21b. Continue to protect primary shopping areas from other uses as set out in the Current Core Strategy?</p>

Summary of responses



10.87 1,887 responses were received to this question selecting one of the three options above. The majority (58%) selecting 'no'. This question received some 1,238 comments including 16 who made a comment but did not select an option. The following summaries those comments received.

Comments from those who responded 'Yes'

10.88 27% of respondents said 'yes' to continue to protect primary shopping areas from other uses set out in the current Core Strategy. They wanted to maintain the character of the Borough's town and village centres and keep them as they are. They wanted to protect independent retailers and also introduce a range of affordable business rates to attract and retain them. Many felt that high street shopping should be encouraged and was vital for elderly people. It reduces the need to travel to other centres and cuts down on pollution. Some said these should be grown to meet the needs of more people.

10.89 Despite saying 'yes' to protecting primary shopping areas, many respondents commented that policy should be flexible, mixed with residential above and suggested various other uses in the primary frontage such as medical establishments and leisure venues. Diversity in the High Street was considered important and many people expressed their dislike of estate agents, charity shops and coffee shops.

10.90 Respondents did feel that this policy should be reviewed regularly to ensure its working and that there should be a different strategy for each town and village centre as they all function differently. Issues of relating to existing and future parking needs were also highlighted.

Comments from those who responded 'No'

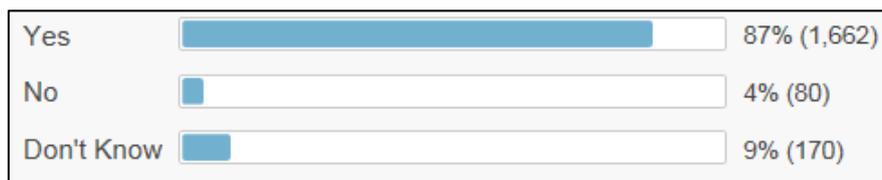
10.91 Over half (58%) of respondents felt that the Council should not continue to protect primary shopping areas from other uses as set out in the current Core Strategy. They believed that the High Street should contain a mix of uses including retail, housing and small businesses. Some said that they supported medical uses and many felt that retail and leisure should be located on the ground floor with residential above. A large proportion used a standard response which stated that there should be a focus on mixed developments and that this would provide local job opportunities.

Consultation Question

The consultation document asked whether, given changing consumer habits should we:

Question 21c. Consider allowing other important uses in primary high street shopping frontages such as doctor's surgeries, dentists and libraries?

Summary of responses



10.92 1,912 responses were received to this question selecting one of the three options above. The majority (87%) selected 'yes' we should consider allowing other important uses in primary high street shopping frontages such as doctor's surgeries, dentists and libraries. Alongside the 1,217 comments received, 15 comments were received for those who had not selected an option. The following text summaries all the comments received.

Comments from those who responded 'Yes'

10.93 87% of respondents to this question felt the Council should consider allowing other important uses in primary high street shopping frontages such as doctor's surgeries, dentists and libraries. Respondents largely commented that this would be beneficial, in terms of the accessibility and increasing convenience for local people. Respondents also stated that this would help to sustain the town and village centre adding to the vitality and preventing shops closing down and staying empty. Respondents said that it would encourage people to use the town and village centres creating linked trips and in turn greater use of shops. A high majority of respondents advocate a mixed use policy for town and village centres including housing and believe that this would allow people to access job opportunities. Respondents stated that there should be flexibility but that consideration needs to be on a case by case basis depending on the shopping centre. A number of people indicated that shops would have to be left vacant for a specific length of time before a change of use should be considered.

10.94 Although many people supported this, there were some reservations expressed in the respondents' comments. Respondents stated that parking facilities must be provided for day time use as well as evening use. Some were concerned that allowing other uses could increase traffic congestion around the centres. Some suggested that better public transport links must be provided to ensure people could get to these facilities more sustainably. As well as these issues, respondents also expressed concerns regarding business rates and the high cost of rents that exist in the High Street and suggested that these uses may not be able to afford these expensive locations. There were also fears that these uses could drive out retail businesses. Respondents asked for careful consideration to changes of uses and regular monitoring to ensure the future vitality and viability of centres. The character of the town and village centre was also mentioned as an important factor and not to be impacted upon by the suggested changes of use.

10.95 There were no different comments made from those 4% that disagreed or selected 'don't know'.

11 Consultation Summaries: Environment

Local Green Spaces

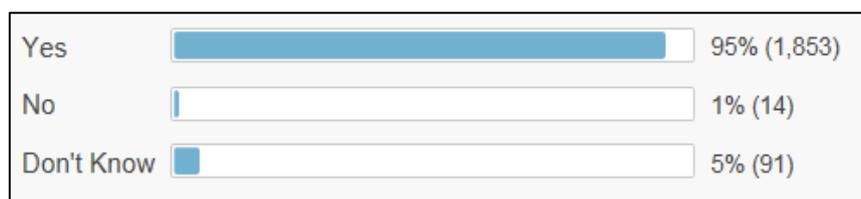
11.1 The NPPF sets out that we can establish what are known as Local Green Spaces (LGS) for areas that are demonstrably special to the local community. These LGS would then have the same level of protection as Green Belt. LGS can only be established through the preparation of a Local Plan and we will look to designate such spaces where appropriate to give greater protection to those open spaces that meet the criteria set out by Government.

Consultation question

11.2 The consultation document asked:

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?

Summary of responses



11.3 1,958 responses were received to this question selecting one of the three options above. The overwhelming majority (95%) selecting 'yes', they did agree that the Council should continue to give a high level of protection to all open spaces and designate those spaces that meet the criteria for Local Green Spaces. Within the 1,958 responses, 1,417 individual comments were received, including 14 comments from individual/organisations which did not select one of the three options. The following summarises the key points raised in the comments received.

Comments from those who responded 'Yes'

11.4 A number of different points and issues were raised by those agreeing that the Council should continue to give a high level of protection to all open spaces and to designate LGS where they meet the criteria. One of the most commonly given reasons was that green spaces provide the "green lungs" to counter the increasing urbanisation, pollution and merging of separate areas, and that creative design should be used to maximise the opportunity around these areas. There were also a wide variety of uses given for why open spaces are important including that they provide wildlife habitats, amenity spaces, places to exercise, relax, enjoy the outdoors, connect with nature and learn. In addition, they were also cited as having positive benefits in relation to towards good health and quality of life as well as being part of the character / identity of areas.

11.5 In addition to the uses that green spaces provide or enable, there were also concerns raised about what might happen to areas if they were not protected. These included that they were irreplaceable, and if they were developed then there would be additional pressure on infrastructure. It was also suggested that if one is developed, then another should be created to replace it.

11.6 There were a number of suggestions about how potential LGS should be assessed / looked after with additional consideration being given to an area's ability to reduce flood risk and pollution, as well as the benefit the area gave to motorists passing through the area. This was alongside a suggestion that all open spaces should be assessed under the LGS criteria, but that not all of them need to be protected. Another proposed way to protect green spaces was through the Council acquiring the desired areas through the utilisation of Community Infrastructure Levy (CIL) funds with a policy backing this in the Local Plan.

11.7 There were also other significant statements made, including that people do not really go to Green Belt areas as they are privately owned and access is therefore often restricted to them. On this basis, people might be open to some building on the Green Belt if special green spaces are retained. It was also suggested that the Council should recognise that different green spaces in the same neighbourhood may be valuable to the community in different ways.

11.8 The issue of alternative ways to protect green spaces was also raised including that it is particularly important to do so where legal agreements (e.g. s.52 and s.106) are in place. There were also comments indicating that some residents did not think that the LGS designation would not be sufficient, and that only Green Belt, Village Green and / or Common Land designations are strong enough to protect areas.

Comments from those who responded 'No'

11.9 The range of comments was not as broad as the responses to 'Yes', but did cover some different topics, particularly in relation to areas that could be potentially utilised. The main point raised was the need to assess the value of each green space to see if they could be released for alternative uses if their contribution was not great. Golf courses were mentioned as an 'inefficient use' of land that could help meet needs in the Borough and it was also suggested that playing fields could be relocated to moderately and strongly performing Green Belt, freeing up land in the urban area.

11.10 There were also comments stating that there would soon be no open spaces left eventually if the Council did not protect them, and that the Council should give a high level of protection to all of them, particularly wooded areas along main roads.

Comments from those who responded 'Don't know'

11.11 Many of the responses given by those who answered 'don't know' have been covered above, particularly the need to assess sites on a case-by-case basis, that green spaces provide the "Green Lungs" to counter increasing urbanisation and that land must be protected and villages preserved.

Comments from those who did not select an option

11.12 Many of the responses given by those who did not select one of the answer options have been covered above, particularly the need to assess sites on a case-by-case basis, that green spaces counter increasing urbanisation and that creative design should be used to maximise the opportunity around these areas. In addition there were also comments in support of the policy stating it was appropriate for the area as well as suggestions that attention should be given to the additional roles that LGS can perform e.g. as a flood plain and wildlife corridor.

Proposed LGS areas

11.13 There were a number of areas suggested to be designated as LGS, with the majority of the suggestions relating to areas that have already been assessed in the existing LGS evidence base report. This includes the open spaces within Burwood Park and Walton Charity owned land at Severn Drive (known in the LGS report as Severn Drive Green).

11.14 Alongside the suggestion for designation of a number of already assessed areas, support was expressed for the designation of a number of sites including Vauxmead (located in Hersham), the recreation ground opposite the Barley Mow pub (known in the LGS report as Hersham Recreation Ground – Area A), Land at Vaux Crescent (Hersham), Hersham Green, Hersham Golf Club and Hurst Meadow / Park, Molesey.

11.15 New areas for potential designation were also put forwarded and focused on three main areas. These were Areas 36 and 37 from the Green Belt Boundary Review report (land either side of Seven Hills Road), Weybridge. In the Long Ditton / Hinchley Wood area Stokes Field Nature Reserve and the surrounding community uses (which covers the cricket club, cemetery, hockey club and allotments) was put forward as one LGS whilst Stokes Field and One Tree Hill was separately suggested in this area. This would include designating Surbiton Hockey club as it has been previously suggested and is adjacent to these areas. Finally, Grove Way Recreation Ground, Weston Green was also put forward.

Biodiversity and the Thames Basin Heaths Special Protection Area

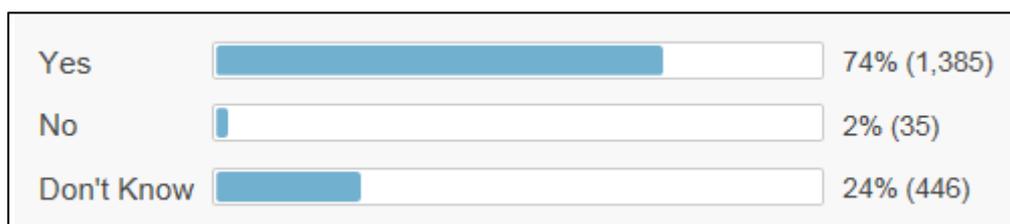
11.16 The Council must ensure that new development does not impact on the internationally designated Thames Basin Heaths Special Protection Area (SPA) which stretches across the three counties of Surrey, Hampshire and Berkshire. We are required to mitigate against the impact of all development within a 5km zone surrounding the SPA. To do this we require all new developments 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 sensitive habitats.

Consultation question

11.17 The consultation document asked do you:

<p>Question 23. Agree with our approach to biodiversity and mitigating the impact of new development on the Thames Basin Heaths habitat?</p>

Summary of responses



11.18 1,866 responses were received to this question selecting one of the three options above. Of these 337 provided further comment, including 14 comments from individuals/organisations who did not select one of the three options.

Comments from those who responded 'Yes'

11.19 226 respondents that were in agreement with the approach to mitigating the impact of development on the Thames Basin Heath continued to provide further comment. Many stressed the importance of the Thames Basin Heath habitat, both locally and nationally. The majority felt strongly that measures should be in place to protect biodiversity and areas of ecological value, specifically within the Thames Basin Heath SPA but also more widely. The approach adopted was felt to be a pragmatic approach.

11.20 More technical responses commented on the need for alternative areas to be of at least the same area and ongoing maintenance to also be funded through developer contributions. Others responded that the amount and location of SANGs is a matter for further consideration through the Local Plan process. However, it was suggested that the current procedures are over complex and widely misunderstood.

11.21 A number of respondents had a more measured view, supportive of the approach but in a balanced manner so that progress is not hampered. A number also felt that there were inconsistencies given that this level of protection could be given to particular areas, but not green belt.

Comments from those who responded 'No'

11.22 Of the 35 people answering 'no', 26 provided further comment. The majority argued that more should be done to consider environmental impact and environmental assessment of current policies should take place. A number of people argued that land north of Blundel Lane has particular ecological value, given the flora and fauna present. It was suggested that the potential impact of locating homes within the 5km zone should be considered as part of the Local Plan process. It was also suggested that this approach is unknown by most residents and more could be done to promote and encourage visitors to the SANGs. Two responses suggested that the requirement for SANG should be relaxed to enable greater provision of homes.

Comments from those who responded 'Don't know'

11.23 71 of the respondents answering "don't know" to this question provided further comment. The bulk of these commented that they felt unable to understand or assess the benefit of the approach to mitigating the impact of new development on the Thames Basin Heath. A number agreed broadly with the premise of maintaining biodiversity, with some commenting that the Borough Council does not go far enough and that the buffer zone could

be extended. Respondents were also confused as to why this level of protection could be given to Thames Basin Heath areas but it did not extend to other areas of ecological importance.

11.24 There was one more technical response which suggested that the impact on the SPA within the 5km zone should be carefully considered, with the scope for greater flexibility around C2 uses. This could provide the opportunity for the policy to be considered against the specific circumstances of sites and in particular the mobility of residents and likelihood of accessing the SPA.

Comments from those who did not select an option

11.25 14 respondents did not select an option but provided a comment. Over half of these highlighted the need to make protection of the environment a priority. There was some support for work that the Council has carried out in recent years to improve accessibility in areas such as Littleheath Common.

11.26 Natural England responded and reiterated that the use of SANGs is a strategic solution approach for this SPA which has been agreed across Local Planning Authority areas in order to mitigate recreational impacts of development in close proximity to the designated site. The response continues to set out that the Local Plan should be screened under Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) at an early stage. It may be necessary to outline avoidance and/or mitigation measures at the plan level. The Local Plan should also set criteria based policies to ensure the protection of designated biodiversity and geological sites.

11.27 Natural England made specific comment on the three strategic areas in relation to biodiversity. These included the need for appropriate protection from development in relation to designated sites such as SSSIs and habitats such as ancient woodland and veteran trees.

11.28 Natural England continued to highlight that the Local Plan should be underpinned by up to date environmental evidence, including an assessment of existing and potential components of ecological networks. This will require working with Local Nature Partnerships as recommended in the NPPF to inform the Sustainability Appraisal, the development constraints of sites and to ensure the mitigation hierarchy is followed. Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species as well as identifying targets for other habitats and species of local importance. Where identified, the Local Plan should also reference Nature Improvement Areas and consider specifying appropriate types of development within them. The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. There should also be consideration of geodiversity conservation.

11.29 Natural England also set out that the Local Plan should consider climate change adaption and should recognise the role of the natural environment to deliver measures to reduce the effects of climate change. They continue that factors which may lead to exacerbate climate change should be avoided. Their final point requests giving appropriate weight to the roles performed by the soils within the Borough and they highlight that the Local Plan should safeguard the long term capability of the best and most versatile agricultural land in line with NPPF paragraph 112.

11.30 The Environment Agency responded with support for the broad approach to biodiversity set out in the document, including the retention and updating of Policy CS15 - Biodiversity. Suggestions included extending the principals of Policy CS12 – The River Thames Corridor and its tributaries, to all designated main rivers in the Borough. They highlighted that watercourses are an important environmental asset and an undeveloped 8 metre buffer zone on both sides of a watercourse should be provided.

Heritage and Historic Environment

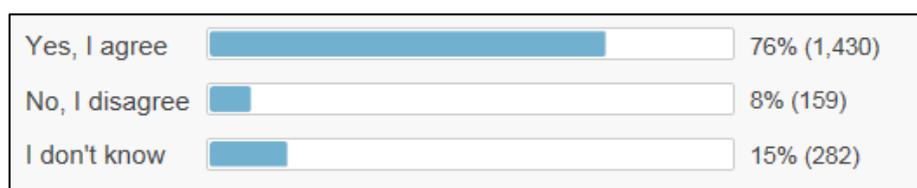
11.31 The Council has adopted a positive strategy for the conservation and enjoyment of its historic environment through both the Development Management Plan and the Heritage Strategy. These resist the loss of heritage assets whilst recognising that there is potential to allow some redevelopment especially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

Consultation question

11.32 The consultation document asked:

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

Summary of responses



11.33 1,871 responses were received to this question selecting one of the three options above. The majority (76%) selecting 'yes' they do agree that our strategic and pro-active approach to supporting our heritage assets is appropriate. Of the 1,871 responses 529 individual comments were received including 15 comments from individual/organisations who did not select one of the three options. The comments received across the options including those that did not select an option all contain similar comments. Therefore in order to prevent repetition the following text will summarise the key points raised for all answers.

The importance of heritage assets

11.34 Many respondents reiterated the importance of the Borough's heritage assets and the need to protect, preserve and enhance them for current and future generations to enjoy. There were several comments that stated that heritage assets were irreplaceable and must be protected at all costs. 51 people who said 'yes' used a standard response commenting that heritage is 'absolutely key' to the identity of the area. A further 109 people who said 'no' used the same standard response and this was also submitted for those who didn't know. There was support expressed for the consultation text that stated heritage should be regarded as an asset and not a constraint. It was felt that a strategic and pro-active approach was very important in light of increasing pressure to modernise and extend older buildings. Additionally, it was felt that protecting heritage is more important in light of increased development and urbanisation.

11.35 Other benefits were pointed out in the responses and a large majority talked about how heritage assets help to protect the character of the area. Respondents said that heritage assets give people a sense of belonging and community as well as opportunity for the future. Others discussed heritage's importance to tourism and boosting the local economy. Some commented on the social benefits of heritage with one respondent describing it as social infrastructure. Many commented that heritage helps increase the quality of life for people.

Concerns raised and other approaches suggested

11.36 There was a concern that the protection of heritage must not compromise the asset and that the asset must not be exposed and therefore eroded by redevelopment. Some suggested protecting heritage on a case by case basis as preserving historic buildings too strictly could prevent improvements and regeneration. A view was submitted that said the Council should not protect to the point that progress is strangled and another said not to be 'too heavy handed'.

11.37 There were a handful of respondents suggesting that the Council should preserve heritage assets in a sustainable way. Several respondents called for preservation as well as conservation and that heritage assets should be incorporated into new designs to give a new lease of life. However, another respondent said that preserving older buildings is not always the right thing to do and that there was a need for new innovative, high quality eco-friendly designed buildings.

11.38 Several people felt that educating people about the Borough's heritage was important and one suggested local schools could help with this. One respondent felt there should be greater publicity and suggested an interactive webpage which would help educate local people and encourage tourism. An additional person suggested better use of local listing. However, there was another response that questioned the use of local listing and suggested it should be stronger or not used at all.

11.39 There was a suggestion received that stated all new development should be subject to legal covenants which would prevent any extensions or additional developments. Each new property should make an annual contribution towards the heritage asset's and environments upkeep, linked to inflation and continued in perpetuity. Another respondent stated that heritage should be maintained but improvements should be strictly controlled and largely self-funding.

11.40 A number of people expressed concerns regarding the access to heritage assets. Comments included that access and transport links need to be addressed to ensure equal benefit from heritage assets. There was not support for a blanket support for heritage assets particularly those with no public access. Another view received was that road improvements can impact on the integrity of heritage sites.

Council's approach to protecting heritage assets

11.41 There were some respondents who felt the Council's strategic and pro-active approach to supporting heritage assets has been appropriate and successful. However, there were others that said the Council is not proactive and does not protect heritage assets enough calling for stronger protection. Some people commented that the Council has not listened to the community and granted permissions for schemes that they do not support.

The preferred option and site specific comments

11.42 A large majority of responses felt that the Borough's Green Belt and green spaces are part of the area's heritage and were concerned with its potential loss. There were a number of standard responses stating that the Council's preferred option risks the Council's approach to preserving heritage and even were set to destroy it. There were many other responses pointing out historic features on parcel 58, 14 and 20. There were various comments received about the historical importance of Stoke D'Abernon and one person felt the ancient woodland in parcel 14 was being threatened.

11.43 Some comments received talked about the continued protection of certain sites such as the Jolly Boatman site at Hampton Court. However, there were a handful of representations that suggested Walton Court the exception and could be suitable for redevelopment. The recent planning permission at Holly Parade was also cited as a bad decision by the Council and an example of a lack of protection.

11.44 The redevelopment of Painshill Park as a potential solution to meeting the housing need was suggested. In contrast, others said there should be limited development near to heritage sites.

Comments from those who responded 'Don't know'

11.45 Many of the 40 respondents that said they did not know repeated the comments discussed above but there were 15 respondents stating that they did not have enough knowledge to answer the question. Some did not understand the term heritage asset and one respondent felt that this should be explained. Many respondents stated that they were not qualified to answer the question and others said that they did not understand the Council's approach to supporting heritage assets. One respondent said that they believed a strategic, flexible and engaged approach was required and they could not judge if this is what the Council is doing.

Consultation Question

11.46 The Consultation document asked:

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

11.47 127 comments were received for this question but very few respondents suggest an alternative approach for the Council to support heritage assets. Many respondents had no comments to make and one explicitly stated that they had no recommendations to make on any possible alternative approaches. There were many short statements such as the call to change policy in order to support heritage assets but no more information provided to explain how the Council should do this.

11.48 Many respondents reiterated the importance of the Borough's heritage assets and the need to protect, preserve and enhance them for future generations to enjoy. It was felt that heritage assets are part of our unique identity and need to be maintained in an appropriate surrounding environment. There were a handful of comments that said the Council does not protect heritage assets enough and call for stronger protection. It was said that the Council does not listen to community and heritage groups and that the Council

should consult local heritage groups. There was also a suggestion that the Council should support the work of specialists in the running of their own heritage assets in the Borough rather than taking the lead. It was said that the Council should beware of piecemeal restrictions but the respondent did not explain exactly what they meant by this.

11.49 The same suggestion that new development should be subject to legal covenants which would prevent any extensions or an additional development was submitted again for this question. They felt that each new property should make an annual contribution towards the heritage asset's and environments upkeep, linked to inflation and continued in perpetuity. In contrast, comment was received that stated an emphasis on sustainability should be the priority and assets should only be maintained where it can be done in a sustainable manner. If it has an excessive demand on resources then it should be considered very carefully.

11.50 There were a few respondents citing local buildings and current development sites including comments regarding exceptions to the protection of all heritage assets. Walton Court was an example of a building that could be redeveloped. The site of the Jolly Boatman was also mentioned and suggested for designation as strategic open land to protect the setting of Hampton Court Palace. There was a generic comment that the Council should consider listing and preserving houses and buildings of character.

11.51 Many respondents did not directly answer this question. Instead they provided comments relating to the strategic options and the preferred option to amend green belt boundaries. These comments relate to protecting the Green Belt, protecting identity and character and limiting housebuilding. There was a call to use brownfield sites only and to stop all new development. Views included that the Council needs to make sure developers and builders do not overwhelm the aims of the residents. Many stated that the preferred option was in direct conflict with the Council's previous commitment to protect heritage.

Design and Character

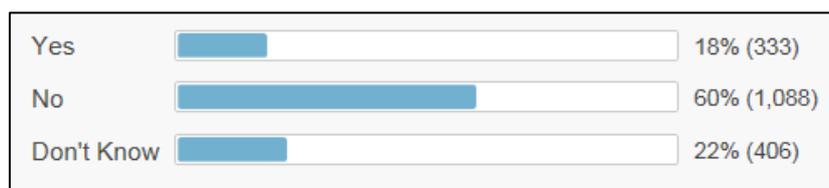
11.52 The current policy on Local Character, Density and Design (CS17) in the Core Strategy sets out the key principles to guide the form and design of all new development in the Borough. The Development Management DPD includes a policy on Design and Amenity (DM2) which seeks to ensure all new development achieves high quality design. A design and character SPD identifies character areas across the Borough and provides detailed design guidance. These documents are used to ensure all new development is based on an understanding of its local environment, that it enhances local character, takes full account of detailed design guidance and demonstrates environmental awareness.

Consultation question

11.53 The consultation document asked:

<p>Question 26. Do you agree that the Council's current approach to considering design and character is appropriate?</p>

Summary of responses



11.54 1,827 responses were received to this question selecting one of the three options above. The majority of respondents (60%) selected 'no' they did not agree that the Council's approach to considering design and character is appropriate. Of the 1,827 responses, 619 individual comments were received, including 7 comments from individual/organisations who did not select one of the three options. The following summaries the key points raised in the comments submitted.

Comments from those who responded 'Yes'

11.55 18% of respondents agreed that the Council's current approach to considering design is appropriate. Although there was positive feedback with regard to the Council's policy on design and character and how it has been applied, some respondents stated that the Council were not being strict enough. Praise was received with regard to the Council's current design SPD but respondents felt it was not being applied in practice. Some stated that the Inspectorate often over ruled planning decisions. Despite saying yes, several responses disagreed and suggested the Council look at Cobham and Walton High Streets as examples. This comment seems to imply that the design of development in Cobham and Walton High Street has not been successful but this was not explicitly said and the statement is left open to interpretation.

11.56 Many respondents provided a standard response stating that they wanted more creative and innovative design. Similarly, other comments requested flexibility, innovation, diversity and variety in the design of new development. There was a call for design that improves and enhances an area rather than design that just maintains character. Design that encompasses sustainability and appropriate landscaping was also deemed important. There was a suggestion that the scale of development should be more important than character alone.

11.57 However, there were those that stated they wanted new development to be in character with the existing area. They wanted a higher standard of design to be implemented with high quality materials. Many respondents reiterated their opposition to building on the Green Belt as this would have a detrimental impact on the character of the area.

11.58 Some stated that Conservation Area Advisory Committees have been very effective and others suggested greater input from community groups and local people. Other comments included incorporating the provision of parking spaces in design and the prioritisation of brownfield sites.

Comments from those who responded 'No'

11.59 Similar comments were received for those who answered 'no'. The standard response regarding creative design was also submitted. There was a call for more creative design solutions and mixed developments that provide employment as well as housing. Many respondents felt that the Council were not innovative enough and do not actively

encourage high quality design standards and creativity. A lack of ambition to look at good town centre mixed use developments to provide more realistic options for housing for local people was cited. Another felt there should be less focus on character stating that one person's view of character is another person's unnecessary restriction. In addition to this, there was a view that the current design and character approach will not allow the Council to tackle the housing shortage. The suggestion to build up not down and a call for flexibility rather than one solution fits all was also submitted.

11.60 In stark contrast with the calls for more innovative, creative and high density development, many respondents wanted to continue to preserve the character of the area. Again the reference for the Council to look at Cobham and Walton High Street was cited and appeared to be sarcastic in tone perhaps suggesting that these High Streets contain developments that are not considered good examples of high quality designed spaces. However, no other text has been submitted to explain this statement. There were other respondents that stated recently allowed developments were not in keeping with the area and hence the Council approach to design and character was not appropriate in practice. Many respondents felt that the Council had not listened to local people views and they felt ignored. It was stated that the Council's implementation of the design and character policy fails to meet the community aspirations and one said that it fails to excite and empower local communities.

11.61 Many respondents said that they had felt the Council's approach to design and character was good but the proposals in the consultation document goes against this. Others stated that the Council was too relaxed and that new development was not in keeping with character of the area. A large proportion of responses stated that the intention to build on Green Belt parcels would impact detrimentally on the character of the area

11.62 There were many responses that provided alternative approaches. This included the idea that large development sites should make provision for a certain number of self-build projects (subject to time limits and adequate budgets to ensure build out) which would provide unique properties on site. Respondents felt that commercial development close to open spaces should be considered. Additionally, the use of green belt sites for market gardens to provide food for the population was suggested. The comments received also included the call to prioritise brownfield sites. Many respondents felt that the Council should consult more with heritage groups. Quality of materials used was also mentioned as an important factor in preserving character.

Comments from those who responded 'Don't know'

11.63 Over 25 respondents said that they were not sure what the Council's current approach to design and character was and whether this is being applied consistently. Many of these respondents complained that they did not have the knowledge and were not qualified to answer this question. Some said that there was too much information to take in while others said the consultation document did not contain enough information on design and character. There was a call for some specific examples.

11.64 There were a number of respondents calling for more innovative design solutions. Many felt that policy was focussing too much on retaining the status quo and not being adventurous enough. They felt that this approach would improve the design of the built environment and in turn the character of the area. A call for creativity and the use of guidelines not rules was also expressed. However, in contrast with this opinion others felt

that design must reflect what is current within the community and must blend with harmoniously with the existing built environment. Development sites in Kingston were cited as bad examples of a design approach being adopted. Another mentioned various developments and streets in Elmbridge that they considered unsympathetic in design.

11.65 Many reiterated the importance of a design and character policy. However, some felt that if Option 1 were adopted the Council's current approach to design would have to be reconsidered. The view that retaining historical assets and planning aesthetically pleasing design could be successfully achieved alongside higher density housing within urban areas was highlighted.

Comments from those who did not select an option

11.66 Similar comments to the above were received from respondents who did not select an option. There were those who felt that the Council must preserve local character, historic facades and that style of development must be considered alongside planning consideration such as sizes, sightlines and separation distances. Recent developments were cited as being of a poor design and therefore the Council had not been concerned with maintaining appropriate design and character. There was a general call for no more 'carbuncles' or 'weird' applications of indifferent quality. However, there was support for innovative design as long as it was sympathetic to the surrounding area.

Additional comments received under Question 33

11.67 Many respondents stated that the Council should not 'ruin' or fundamentally change an area. Instead they should maintain the current character of the area. There was a call to avoid urbanisation and a need for space between London Boroughs and Elmbridge / Surrey. One respondent called for the the Birds Hill estate to be a Conservation Area. Comments also included the need to resist ad hoc extensions to existing houses which increase their size. There was also a need to ensure that new buildings are not above 3 floors in height.

Consultation question

11.68 The consultation document asked:

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

Comments Received.

11.69 The comments received for this question resulted in two common standpoints. One view was that the Council needs to protect the character of the Borough and raise design standards, ensuring that these are adhered to. The other viewpoint was that the Council should stop insisting on conservative / mediocre development that is considered 'in character' and should look to adopt more creative and innovative design to accommodate higher density development within the urban area and on brownfield sites which is environmentally sustainable. The following text explains these differing perspectives further.

11.70 Many respondents referenced recent planning applications and felt that the Council was not applying or enforcing its design and character policy. They felt that local residents' opinions are not being listened to and applications were being permitted for a variety of different reasons including economic motives and developer/ development pressure. To

address this, many felt that local heritage groups should be consulted on design and could provide the expertise needed. As stated above, there were many respondents who felt that the Council must protect and retain the Borough's design and character. Various suggestions included using local materials and keeping in line with the style and height of existing development within the street scene. Some stated that design policy must be adhered to and applied consistently, with some respondents calling for an even stronger design and character policy.

11.71 Despite this, there was an awareness of the housing challenge and the need to deliver high density development. Respondents felt that more attention must be paid to design in order to accommodate this successfully. Again a standard response called for creative design to be used to maximize opportunities for urban development and a call for mixed residential and commercial schemes. There were many references to looking abroad for inspiration, drawing upon the best architecture in the world and even allowing young architects to come up with innovative ideas. This view is in contrast to those suggesting a traditional Surrey vernacular to be enforced.

11.72 However, for many people there was a general criticism expressed of the current design of development in the Borough with reference to both mansions and dull mediocre design. Comments suggested that many people want a greater diversity of architecture and design creativity and that insisting on keeping within 'character' is not necessarily helping achieve well designed development. Some suggested that development suitable for modern day living particularly design incorporating environmentally friendly and sustainable design may not be attractive but is what is needed. Many respondents felt design should be looked at on a case by case basis and some highlighted the need to consider different design solutions for specific development types, such as older people accommodation.

Flooding

11.73 The Council's Strategic Flood Risk Assessment 2015 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 on flood risk are addressed.

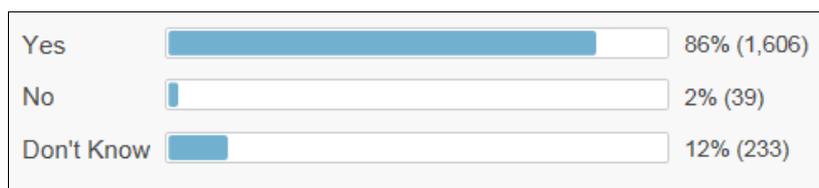
11.74 At present, the Council can manage this by requiring all development that is, or could be, affected by flooding to provide a detailed Flood Risk Assessment outlining the impact of a development on flood risk and what is being done to address these impacts. Whilst this has been effective we recognise 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 planning applications and reducing the financial burdens on householder applications.

Consultation question

11.75 The consultation document asked:

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?

Summary of responses



11.76 1,878 responses were received to this question selecting one of the three options above. As set out above, the majority (86%) selected 'yes'. Of the 1,878 responses, 1,247 individual comments were received, including 20 comments from individuals / organisations who did not select one of the three options. Many of the responses followed one of the three standard templates that were circulated for submission to the Council. The following provides a summary of the comments received.

11.77 A significant number of respondents provided comments that were not directly related to the question. For example, that any form of development increases the risk of flooding through the loss of greenspace, trees and gardens, that the strategic areas identified (Parcels 58, 14, and 20) were subject to different forms of flooding and that development of these would exacerbate existing issues.

Comments from those who responded 'Yes'

11.78 Of the 1,607 responses received answering 'yes', they agree we should 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, 1,167 provided additional comments.

11.79 The majority agreed that it was important to address the risk of flooding and ensure that it is kept to a minimum given the Borough's location, past flooding events e.g. 1968, and the future impact of climate change. A significant number of respondents commented that any plan of this complexity cannot be considered in isolation and hence they fundamentally disagree with an approach that just singles out housing. It was considered important that other uses should also be considered as well as different scales of development.

11.80 The impact of cumulative development on flood risk was acknowledged with a range of local examples provided i.e. infill / back land development along Manor Road, AstroTurf on Danes Hills School, subterranean development in Meadway, Esher. Concern was also raised in relation to the impact of permitted development e.g. extensions and driveways and the importance of addressing other sources of flooding e.g. surface water. This was a particular concern in Cobham and Thames Ditton and a number commented that better incorporation of Sustainable drainage systems (SuDS) including appropriate use of soakaways and water attenuation measures which are more suited to the areas sub-soil were important.

11.81 A significant proportion of respondents made specific comments relating to flooding in their community e.g. that Rectory Lane, Long Ditton is known locally as 'Watery Lane' due to the presence of underground streams and the regular closure of parts of Cobham due to flooding. Many felt strongly that development should not be permitted at all within areas at risk of flooding as this would only exacerbate existing problems. Some felt there should be greater restrictions on particular types of development. The impact of new development on flood risk for existing properties and associated insurance issues was also mentioned.

11.82 A number of respondents felt that flooding issues had not been adequately addressed in the past, with Flood Risk Assessments being too basic and expert advice lacking, particularly since the Environment Agency have taken a step back in commenting on smaller and lower risk applications. One respondent felt that there was a need for greater awareness amongst residents, that the Environment Agency were too laid back/complacent and that flooding issues in general needed to be taken more seriously. Some respondents also commented that flooding issues should be addressed on a wider than Borough basis, working with the Environment Agency, and considering implications both up and downstream including any impact on adjoining properties. It was felt that generally a range of simple measures could be included to reduce flood risk for small scale development e.g. elevated floor levels.

Comments from those who responded 'No'

11.83 Of the 39 responses received answering 'no', people agreed that we should 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, 25 provided additional comments.

11.84 Comments ranged significantly. Some had a perception that flood risk in the Borough is relatively low with some commenting that the current policy requirements are adequate or possibly overly burdensome on homeowners. Others, however, felt that current and proposed policies did not go far enough and that greater controls should exist on all forms of development in flood risk areas. Some went as far to say that development should not be permitted. Concern was raised regarding the need to better manage permitted development in these areas e.g. driveways and extensions. One respondent felt that any new policy requirements should be coordinated with other areas and the Environment Agency.

11.85 A number of respondents commented that the Council should focus on addressing flood risk for large scale development.

Comments received from those who responded 'Don't know'

11.86 Of the 233 responses received answering 'don't know'; whether they agree we should 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, 35 provided additional comments.

11.87 The majority of respondents answering 'don't know' commented that they did not have sufficient information or knowledge about our current approach or the issue in question to make an informed response. Some had no opinion.

11.88 Some commented that flood risk should be considered in all proposals and not just small scale householder development. Others felt that addressing flood risk was not a priority or that a blanket ban on development in flood risk areas should be put in place in the absence of detailed, specialist advice.

Comments from those who did not select an option

11.89 20 respondents did not select an option but provided a comment. Of these, a significant number of comments followed one of the standard responses made by respondents who selected 'yes'.

11.90 The Environment Agency requested further information on what would constitute small development and whether it would be covered by their Flood Risk Standing Advice. The Agency would be happy to work with the Council in developing policies.

11.91 Spelthorne Borough Council commented that they would like to be assured that a consistent and holistic approach to addressing flood risk is adopted in the wider Thames catchment area and that policies should be included on how the plan will support the implementation of the River Thames Scheme.

12 Consultation Summaries: Infrastructure

Sustainable transport and travel patterns

The current Core Strategy sets out policies that look to:

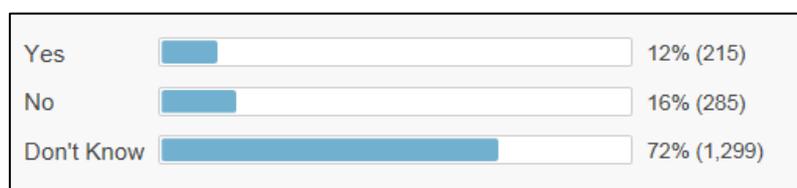
- Direct development to the most sustainable locations close to public transport and existing services;
- Require major developments to prepare transport assessments and travel plans;
- Apply maximum parking standards, including the consideration of zero parking for town centre developments where appropriate;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

Consultation question

12.1 The consultation document asked do you:

Question 29. 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?

Summary of responses



12.2 1,799 responses were received to this question selecting one of the three options above. 629 respondents provided further comment, including 12 comments from individuals/organisations who did not select one of the three options.

Comments from those who responded 'Yes'

12.3 Of the 215 respondents stating that existing policies to deliver more sustainable travel patterns are still appropriate, 96 responses provided further comment. A common theme was that policies should go further, with many stating that traffic and travel options and the resulting pollution impact are the biggest problems for the area. Suggestions included a comprehensive strategy for the integration of rail and bus services and improved cycling provision. To help mitigate the impact of any house building, improved public transport was felt to be the only option. Addressing the impact of the school run was also considered to be a key issue.

12.4 A number of people did question the impact of the policies to date. There was a feeling that zero parking provision in town centre locations is unrealistic. Just because a site is near a transport hub, doesn't mean that the car will not be used. This is particularly an issue given that people feel that level of public transport provision in the Borough is poor.

12.5 Comments received suggested that the selection of the three strategic areas is contrary to the Borough Council's policies given their location and level of public transport provision. The selection of high density sites near transport hubs were suggested instead.

Comments from those who responded 'No'

12.6 Of the 285 respondents stating that existing policies to deliver more sustainable travel patterns are no longer appropriate, 231 responses provided additional comments. These expanded on all of the comments made above with a significant proportion of people stating that existing policies haven't worked due to the poor levels of bus and rail provision, high cost of public transport, an unrealistic approach to the need for adequate parking provision both in town centre and related to development and policies not being properly implemented. Many felt that reducing provision for cars does not reduce their number, but rather a holistic approach to transport planning is needed.

12.7 Amongst these responses were requests for much more proactive planning to address transport issues, including lobbying of Government to support required traffic improvements. Many made the comment that it is beyond the control of Elmbridge Borough Council and firm evidence of joint working with other bodies is required. The extension of the London travel card zone into Elmbridge was suggested. A number of responses questioned the ability of Surrey County Council to fully assess the impact of development plans in highway terms.

12.8 Specific comments were received about the impact of the opening of the Cobham Free School at Munro House on the Portsmouth Road, which it was felt has not been taken into account. Many also commented on the inability of roads around the three strategic sites to cope with additional traffic that would be created with development and the impossibility of mitigating the impact.

Comments from those who responded 'Don't know'

12.9 Of the 1299 responses received stating that they did not know whether the existing policies were sufficient, 290 made further comment. Public transport is seen as an important means to encourage sustainable travel, but a history of bus cuts and rail overcrowding mean that there is little faith improvements could be made. The comment was again made that the strategic sites suggested were in conflict with the existing policies.

12.10 A significant proportion (nearly three quarters) of respondents stated that they were unfamiliar with existing policies and therefore did not understand the question. However, the traffic impact on the opening of the Cobham Free School Secondary Department on Portsmouth Road was highlighted as a key concern. The impact of school traffic within the area is seen as significant. Many also voiced their concern that limited consideration has been made in relation to traffic issues in advance of the consultation exercise.

Comments from those who did not select an option

12.11 12 respondents did not select an option but provided a comment. Again these picked up points already raised such as the impact of the Cobham Free School secondary department in Cobham, disagreement with zero parking in town centres, lack of information on that traffic impact of proposals and the poor level of bus provision in the Borough. The Cobham Chatterbus was highlighted as a positive development for the area.

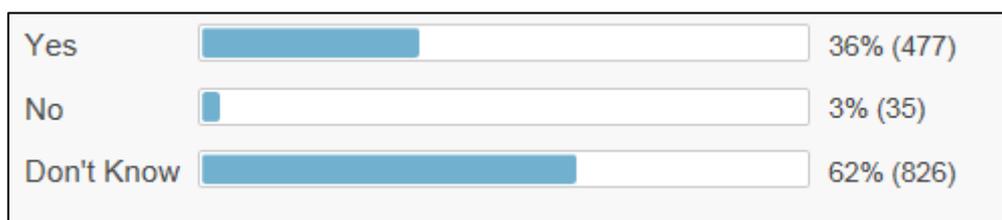
12.12 It was argued that consideration of new access roads must be part of the decision making process in terms of site selection. It was queried whether the strategic areas are particularly sustainable areas. Others commented that even developing alongside existing transport infrastructure will bring huge impacts to those areas, in turn impacting on their sustainability if improvements are not made. It was suggested that the provision and promotion of sustainable transport in Surrey generally and Elmbridge specifically has a poor track record.

12.13 Surrey County Council responded that new development should encourage more sustainable travel patterns, including modal shift away from the use of private vehicles. They were supportive of existing policies to protect and improve infrastructure such as footpaths and bridleways and the requirement for major development to prepare travel plans.

12.14 On the theme of sustainable transport and travel patterns the consultation document continued to ask:

Question 30. Are there other approaches we should consider?

Summary of responses



12.15 548 respondents provided further comment, with similar comments made by those answering 'yes', 'no' and 'don't know'. Of these responses, 150 provided comments through a standardised response form, citing the importance of out of town parking for school traffic, shuttle buses as in Kingston, cycle routes and cycle hire as in London.

12.16 Many comments were received on bus provision in the area, citing poor bus services, cost of rail travel, lack of stair free access and car parking fees at stations are discouraging use of public transport. Many commented on dangerous levels of congestion at Surbiton station. Flexible community mini bus type services were suggested, with the Chatterbus provided as a positive example. Any improvements had to be combined with efforts to get people to switch to public transport. Many advocated being more forward thinking in approach, by utilising new technology and planning for increases in electric car use. There were comments that people need to be incentivised not to drive. A number of respondents queried whether park and ride had been considered.

12.17 Provision for cycling was a common theme, this included suggestions for shared pavement space for pedestrians and cyclists. Protected cycle paths were favoured, although there was criticism of schemes such the Kingston Portsmouth Road scheme, which people felt to be over-engineered. Fear of theft of cycles was quoted as a major deterrent, with secure cycle parking facilities suggested. There was a general plea for safer walking and cycling routes.

12.18 School traffic is felt to be a significant cause of congestion, with an increase in school buses suggested as a method to reduce this. Traffic management, pedestrian safety and

improved pavements around schools were felt to be required. There were also comments relating to improved phasing of traffic lights and increased planting to absorb air pollution.

12.19 The consensus was that a holistic approach is needed to address traffic issues, with both short and long term priorities. Sustainability and environmental impact were considered to be priorities. Many felt that development should be focused around transport hubs, with the development of a new town alongside the required infrastructure suggested. It was felt that two areas were taking a disproportionate impact. Thorough assessment of transport impacts were requested, with all transport studies to be carried out at peak time. A number of responses also referenced Crossrail 2 and the potential for wider infrastructure improvements linked to these proposals.

Infrastructure Delivery

12.20 The consultation document highlighted that infrastructure improvements will be required to support any increase in development. The document also explained that the Council will continue to seek developer contributions from developers to help deliver new infrastructure to support growth.

Consultation question

The consultation document asked:

Question 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?

Summary of responses:

12.21 A common starting point for comments received was that infrastructure requirements should be a primary consideration in site identification. 1,902 respondents provided comment to this question, with 840 (44%) using a standardised response form which highlighted a number of key concerns in relation to infrastructure provision. These responses were mainly received from the Cobham area⁶ and raised issues specific to the area, but a proportion were also received from the Dittons⁷, highlighting the common infrastructure concerns across the three strategic areas.

12.22 These responses suggested that current infrastructure is not fit for purpose and that it would be less complex and expensive to address infrastructure needs for one large, better positioned site, rather than three individual areas. It was suggested by residents of Cobham and Oxshott that options near fast, established transport links should instead be considered, namely proximity to the Woking/Esher rail line rather than the slow Guildford/Cobham rail line. The primary infrastructure concerns highlighted in the standardised responses were as follows:

- School provision
- GP provision
- Green areas to ensure quality of life for residents

⁶ Including Oxshott and Stoke D'Abernon

⁷ Including Thames Ditton, Long Ditton, Hinchley Wood and Weston Green

- Alternative road patterns to ease existing and future traffic congestion, including improvement of rail road bridges, roundabouts and traffic lights
- Parking at or near transportation links, including stations
- Improved bus services

A number of these response forms also raised the following concerns:

- Importance of a pathway along Blundel Lane over the railway bridge in Stoke D'Abernon
- Improved river flows/dams
- Need for cycle lanes
- Park and ride facilities
- Need for fixing of potholes

Comments on Area 58

12.23 Over 225 responses were specific to Local Area 58 in Long Ditton. They again raised the inadequacy of current infrastructure provision and stressed that for any building to even be contemplated it is essential to plan for additional school places, GP provision, accessible open space, public transport, highways schemes to address congestion and a sufficiency of parking. It was stressed that infrastructure must be in place before development takes place. There was also a lack of faith that promised infrastructure improvements to support housing developments will get delivered, with the St James Estate given as an example. Again, many felt that infrastructure capacity should determine site selection.

12.24 School provision at all stages was a key concern, but particularly in relation to access to secondary school places as Hinchley Wood Secondary is already oversubscribed, with children living 1km away unable to secure a place. This in turn creates additional congestion as these children need to travel elsewhere in the Borough to school. A number felt that school place issues are exacerbated by a lack of provision for Claygate children. Hinchley Wood Secondary School responded specifically with concerns about the impact on the school of the increased demand for secondary places. The school stressed the high levels of oversubscription, which would be increased with any growth at existing primary schools or new primary schools locally. The school highlighted that no discussions have taken place with them around how the additional demand would be addressed. Given the growing crisis in terms of school funding and teaching recruitment, the school stressed that any development must be accompanied by sufficient financial support for publicly funded educational infrastructure. This would be crucial in ensuring no negative impact on the outcomes for students. The school would require involvement in a strategy for dealing with additional demand for secondary school places in the East of the Borough. A number of respondents felt that there isn't space to continually expand schools and establish new ones.

12.25 Many respondents expanded on the traffic and transport issues locally. Rail capacity locally was raised, along with the issue of car parking provision at stations. The physical capacity of Surbiton station and difficulties of accessing and exiting the station were also felt to be an important infrastructure priority to be addressed. Respondents felt that the area has a limited bus service, which would restrict the ability for public transport to assist in addressing the resulting traffic increase. It was highlighted that further bus cuts are being considered.

12.26 A number of routes were referenced as key areas for concern. These included Manor Road North and Claygate Lane (particularly during the school run), Windmill Lane and the A309 and addressing speeding on Ditton Hill. Access to the A3 was also commented on, with the need for remodelling of the Hook interchange suggested as a strategic requirement for the area. Suggestions involved creating a slip road from the A3 Hook roundabout allowing traffic to join the southbound A3 carriageway and when heading northbound on the A3, creating an exit at the hook roundabout so traffic can exit before Tolworth. The need for remodelling of the Scilly Isles was also raised. It was argued that access to any major development on the site of this Area should be provided solely from the A309 as the minor road network is unsuitable for serving a large new development.

12.27 Pedestrian access was also raised, with a lack of pavements referenced and improved pedestrian crossings on busy routes requested. The state of the roads, in terms of repair, was also felt to contribute to traffic issues locally. It was suggested that there is a difference in the state of repair of Surrey and TFL roads, with Surrey's characterised by disrepair.

12.28 The relationship with the London Borough of Kingston was also queried, with the feeling that infrastructure impacts should be considered jointly not in isolation, given their plans for housing growth. Comments were also made that infrastructure impacts would have a knock on impact on Surbiton and Kingston. General comments were made about the ability to fund necessary improvements.

12.29 Less frequent responses related to the impact on utilities such as water supply and sewerage and also areas such as high speed broadband. The importance of addressing flooding issues, air pollution and provision of shops to cater for an increased population were also raised. Suggestions made included noise reducing barriers along the A3. Drainage systems are felt to be inadequate, resulting in fluvial flooding by St Mary's Church, at the bottom of Rectory lane, at the Long Ditton Cricket Club and the graveyard. In addition to local GP provision, concerns were also raised about the ability of Kingston Hospital to cope with an increased population. It was argued that time taken to get to hospital can be considerable and that there are reported plans to cut the number of major hospitals in south west London from five to four.

Comments on Areas 14 and 20

12.30 Almost 200 additional responses were received specific to Local Areas 14 and 20 in Cobham. They again raised the inadequacy of current infrastructure provision and stressed that infrastructure should be a primary consideration, with an infrastructure plan in place. Responses set out that it is essential to plan for additional school places, GP provision, accessible open space, public transport, highway schemes to address congestion and a sufficiency of parking. The lack of state secondary education provision was specifically referenced by a number of respondents.

12.31 A commonly held view was that it is not possible to mitigate the impact of the additional traffic that would be generated, with the roads in the area incapable of accommodating the resulting traffic and no highways schemes feasible to address the issues. A number of roads were referenced as key areas for concern. These included the Portsmouth Road, Cobham High Street, A245 roundabout, Fairmile Lane, Steels Lane, Knipp Hill, Blundel Lane and Water Lane. It was also highlighted that Oxshott and Cobham roads function as an alternative to the M25 when that route is congested. Access to and

from the A3 was also raised as problematic. The need for noise screening from the M25 and A3 was also mentioned. It was queried whether the potential for development at Wisley and the resulting traffic impact, had been fully considered.

12.32 Specific highways improvements suggested included improvements to the Fairmile Lane/Portsmouth Road T-junction, improvements to the A245 and Portsmouth Road roundabout, improvements to the Water Lane and Fairmile Lane junction, widening of Blundel Lane and improvements to the Fairmile Lane and A245 junction.

Detailed comments were provided on issues relating to Portsmouth Road, with proximity of the site to the junction with Fairmile Lane, the access to the American Community School and the planned Cobham Free School at Munro House felt to mean that additional traffic could not be accommodated. There were suggestions that the full impact of the traffic to the Free School had yet to be considered. A number of people did raise the fact that school traffic is a significant issue in the Cobham area, particularly private school traffic.

12.33 In addition to the constrained access over the railway bridge on Blundel Lane, the difficult access from Blundel Lane onto Stoke Road was highlighted as a key concern. It was suggested that past studies on both the Portsmouth Road and Blundel Lane have not identified schemes to address existing issues.

12.34 Parking was an issue raised for Cobham, with respondents commenting that a significant amount has been lost from the town centre and that there are issues at station car parks locally, where provision would need to be increased. It was also suggested that the two strategic areas would require residents to have access to a car, given the lack of transport and distance to a station.

12.35 Bus services were felt to be completely lacking in the area and expensive and rail services already busy, but also infrequent and not operating late enough for an area being considered for further development. A number of people felt that pavements are lacking in the area, making journeys for pedestrians dangerous.

12.36 Further comments were received on the need for improved road drainage, cycle paths, higher quality street repairs, additional community facilities and additional policing. Pollution concerns were also raised, with the suggestion that levels in Cobham and Stoke D'Abernon are at unacceptable levels. There was also a feeling that the incidence of respiratory problems have increased with the opening of the M25 Motorway Service area.

General comments on infrastructure requirements to support new development

12.37 Over 600 individual responses commented on infrastructure requirements general to all 3 areas. Again these stressed that infrastructure should be a primary consideration to inform site selection, particularly given the pressure on current services. A number of respondents felt that development spread across the Borough should be an option to investigate. Alternatively many felt that a new town outside of the Borough should be pursued. Whilst a number felt that in terms of addressing infrastructure need, focusing on urban areas with better transport links and proximity to rail stations would be the best option. Planning for increased school provision was a key concern, with a number of people suggesting that the Borough is at the stage of requiring new schools rather than further expansion of the existing. Access to schools was also commented on, with sufficient provision for drop offs and improved traffic management required around schools.

12.38 Again delivery of additional health provision including hospital space, highway schemes to address congestion, accessible green space, road maintenance, improved public transport and sufficient parking provision (both in relation to development and at key facilities) and consideration of wider services such as social services were all felt to be vital. Many questioned whether required improvements and additions were even feasible, given lack of space, finance and resulting impact on air pollution.

12.39 Specific requirements included separate cycle paths, ensuring a sufficiency of parking provision for new properties, improved pedestrian crossing facilities on busy roads, improved flood prevention measures and improved road maintenance. The extension of oyster travel zones was also requested.

12.40 A number commented on the constrained nature of the Borough making improvements difficult. They felt this was particularly challenging for highway schemes, given the constraints of the A3 and rivers.

12.41 Many stressed that infrastructure must be in place before development takes place. Respondents were keen to see costed infrastructure programmes alongside potential site identification. The issue of funding was raised, with respondents sceptical that funding for the required improvements could be secured. A number of respondents felt that coordination with statutory bodies such as the County Council and transport bodies had been lacking, particularly given that the delivery of strategic infrastructure is beyond the control of the Borough Council. This point was further expanded on by questioning whether the combined infrastructure requirements for potential housing developments beyond the Borough boundary had been adequately considered. This included proposals such as Wisley, Kempton Park and Tolworth schemes.

12.42 A number of responses quoted the Surrey Infrastructure Study 2016 which highlights an infrastructure funding gap of £3.2 billion to 2030. Comments set out that this huge funding gap represents a minimum scenario as these are based on population forecasts constrained by planned housing sites as opposed to ONS population forecasts.

Comments from infrastructure providers and Duty to Cooperate partners

12.43 Responses were also received from statutory infrastructure providers. Thames Water Property Services Ltd commented that it is easier to provide infrastructure for a small number of large sites rather than a large number of small sites. They stressed the need for adequate water and sewerage infrastructure to be delivered prior to development and requested a strengthening of the policy requirements in the new Local Plan to ensure that developers are required to demonstrate that there is adequate capacity both on and off site to serve the development and that it would not lead to problems for existing users. When there are capacity constraints the developer should set out how the infrastructure improvements will be completed prior to occupation of the development and engage with statutory providers at the earliest opportunity.

12.44 The Environment Agency responded to highlight the need for a Water Cycle Study (WCS) to form part of the evidence base to inform the Local Plan of the most appropriate location for development to occur to avoid Water Framework Directive compliance issues and/or capacity issues in the wastewater infrastructure network.

12.45 The study will need to assess both the environmental capacity (water quality needed to protect aquatic and wildlife environment) and infrastructure capacity (ability of the

wastewater system to collect, transfer and treat wastewater from home and business) in relation to the impact of the growth being proposed. Natural England also responded to set out that the plan must consider the strategic impacts on water quality and resources as set out in the NPPF.

12.46 Natural England commented on a number of areas, firstly highlighting that the Local Plan should include policies to ensure protection and enhancement of public rights of way and National Trails. They continued that the Local Plan should seek to provide new access opportunities where possible. Comments also referred to the need to make provision for an appropriate quantity and quality of green space to meet identified local needs. They also encouraged the provision of green infrastructure to be included within a specific policy in the Local Plan. The response highlighted that evidence of a strategic approach can be underpinned by a Green Infrastructure Strategy.

12.47 Natural England also provided further comment on air pollution, setting out that they expect the Local Plan to address the impacts of air quality on the natural environment. It should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSIs. Natural England advised that key considerations for the Local Plan and Habitats Regulations Assessment are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation. They consider that designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification.

12.48 The Education Funding Agency responded to highlight the impact on education facilities that significant growth within the Borough would have. They committed to joint working on the development of the Infrastructure Delivery Plan in relation to Education as the Local Plan progresses. The response stressed that the need to provide for secondary places is already known and proactive joint working is already underway in relation to the proposed Heathside Walton on Thames School as there is a pressing need for additional secondary places in the north of the Borough. The response continued to suggest that the new Local Plan requires specific reference to the relevant national policies relating to school provision and the EFA highlighted approaches taken by other authorities in planning for additional school provision.

12.49 Responses were also received from Duty to Cooperate partners, both Surrey boroughs and the Greater London Authority. Both Reigate and Banstead and Mole Valley Council stressed the need for full assessment of the infrastructure requirements of new development as the Council progressed towards the identification of sites. This is of particular concern to Mole Valley District Council, given the proximity of the two Cobham Strategic Areas to their authority boundary. Assessment of strategic highways issues will need to include consideration of cross boundary impacts.

12.50 The Greater London Authority and Transport for London responded to highlight the additional capacity and connectivity that the Borough will benefit from through Crossrail 2, which in turn could assist in delivering higher levels of growth in appropriate locations. Transport for London would support an approach that aims to maximise the benefits from planned rail investment by focusing new development and increasing densities in locations that are highly accessible to rail stations that will benefit from investment, such as the planned Crossrail stations of Thames Ditton and Hampton Court. They suggested that any

large-scale growth proposed on sites without direct rail access would need to be carefully planned and supported by bus and cycle routes to the nearest station.

12.51 The response continued to highlight the importance of a transport assessment that will take into account the effects of cross boundary travel within London. Given the location of local area 58 in Long Ditton adjacent to the London boundary, TFL stressed the need for assessment of the transport impacts on all modes of transport to be carried out with input from TFL and Kingston Council. TFL would want to ensure that any site proposals seek to minimise the impacts on the A3 or A243 road corridors within London, including the Hook Road roundabout. Impacts within London would need to be mitigated and funding identified to deliver any required transport improvements.

12.52 TFL is working closely with Kingston Council on their growth proposals, including looking at options for the A3 junction with the A243 Hook Road and A309 Kingston Bypass. TFL committed to cross boundary discussions in relation to policies, proposals and site allocations. TFL are also keen to work with Elmbridge to explore options to improve bus services in the areas covered by TFL supported where large scale development is proposed. Funding would be a key issue, with the expectation that developers provide funding towards service enhancements.

12.53 TFL supports a restraint based approach to car parking within London Boroughs and parking policies in Elmbridge should be designed to encourage sustainable travel options and minimise car trips across the London boundary. TFL would support a continuation of maximum car parking standards, including the consideration of zero car parking for town centre developments where appropriate.

12.54 NHS Property Services responded to set out that the Council should ensure they work with NHS commissioners and providers to ensure that adequate healthcare infrastructure is provided to support new residential development. The response stressed that healthcare facilities are essential infrastructure and where new facilities are required, they should be delivered alongside additional housing to mitigate the impact of population growth on existing infrastructure. The response continued to argue that the NHS requires flexibility in its estate with restrictive policies, especially those requiring substantial periods of marketing, potentially delaying required investment in services and facilities. There are already separate testing and approval processes used by NHS commissioners to identify unsuitable healthcare facilities. NHS Property Services argued in order to support the wider transformation of NHS services and the health estate it is important that surplus and vacant NHS services are not strategically constrained by local planning policies, specifically restrictive policies or periods of marketing.

Smaller scale infrastructure requirements

12.55 The consultation document highlighted that infrastructure improvements will be required to support any increase in development. The document also explained that the Council will continue to seek developer contributions from developers to help deliver new infrastructure to support growth.

Consultation question

The consultation document asked:

Question 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?

Responses:

12.56 969 respondents provided comments on this question. Of these 140 took the form of a standardised response stating that there were too many necessary improvements to mention in this cumbersome form.

12.57 A large number of respondents felt that there were no small scale improvements that could make development acceptable given the current scale of pressure on existing roads, schools and health provision at both GP and hospital level. The feeling was that the impact can't be mitigated and many questioned the ability to raise finance to fund infrastructure improvements. It was felt essential to have details of an infrastructure plan alongside development options. It was argued that the Council has an obligation to take into account the quality of life of its residents, both current and future. A number of respondents felt that insufficient regard is given to the cumulative impact on infrastructure when assessing planning applications.

12.58 Many comments related to traffic and transport issues, with a feeling that greater analysis of transport impacts is required and a fundamental review of road junctions is needed. It was stressed that road improvements would be required in advance of any development, but many felt that given the constrained nature of the Borough it would be impossible to make the required improvements to the highway network. Improved cross boundary consideration of impacts and potential mitigation measures was also requested.

12.59 Comments repeated and built on responses to Question 31, with routes and potential schemes already highlighted again being referenced as key areas for concern. In addition there was specific mention of a desire for restrictions of heavy lorries on residential roads and the A244 through Oxshott being used as a cut through to the M25/A3. A number of people queried whether access from the A3 could be improved by investigations into the opening up of Redhill Road or providing access by the Cobham Hilton. A number of responses also suggested the need for additional safe pedestrian crossing points or speed restrictions, with improved road safety around schools felt to be essential. Specific safety improvements suggested included a pedestrian crossing at junction of Ewell Road and Rushett Road, cycle lane on Manor Road and Claygate Lane to reduce school traffic and an additional zebra crossing on Manor Road and Claygate Lane. There were also requests for other areas of the Borough such as pedestrian crossing facilities at Hersham station.

12.60 Specific improvements such as a roundabout on Stoke Road were frequently mentioned, although many commented that a comprehensive road improvement scheme is required. In addition there were suggestions such as cycle lanes (dual use pedestrian/cyclist) on the stretch of A244 between Esher and Leatherhead and the need for a roundabout at junction of Copsem lane and Sandy Lane. Smaller scale highways improvements suggested included improvements in crossings, speed limits and traffic calming on roads used as cut throughs, more cycle storage, extensions to Chatterbus and improved public transport.

12.61 There were again comments relating to the impact of school traffic, with measures such as additional school buses suggested. The impact of private school traffic was felt to

be significant. There were specific comments received about the access issues to the American Community School and the need for this to be addressed. A few comments did suggest that new secondary schools would assist by altering catchment areas, meaning that children in areas such as Cobham would not have to travel so far. A number of people did comment on what they considered the unsuitability of some current school sites within residential areas, given transport issues. Claygate was mentioned specifically as needing more accessible school places.

12.62 There were requests for realism in relation to parking provision, in relation to specific developments and also station and town centre parking. Many respondents also commented on the need for increased spending on long term road resurfacing. Improvements to public transport were considered to be essential to provide a feasible alternative to car travel, with well-maintained footpaths and cycle routes also referenced.

12.63 A number of people also commented on the building process, with the comment that it needs to be more sympathetic to existing residents. This included improved traffic management and repair of roads, footpaths and verges damaged while development takes place.

12.64 In addition there were requests for improvements to playing fields and parks, more leisure facilities, sewer improvements, improved street lighting, more pre-schools, extensions to GP surgeries, additional school places and smaller scale capital investment in schools and community facilities. There were also area specific comments such as requests for a pedestrian bridge across the Mole from Hersham, improved signage from Weybridge town centre to the rail station and improvements to Baker Street in Weybridge. It was suggested that Long Ditton needs a walk in centre to take pressure off Kingston hospital.

12.65 A number of comments were received on wider environmental issues. This included numerous comments on the need for accessible open space to remain. Increased tree planting was also requested as were improvements to the drainage systems.

12.66 A number of respondents felt that developers should pay more to address the impacts created through new development. Statutory bodies such as the County Council and Education Funding Agency (EFA) also stressed that contributions made by developers should be sufficient to contribute to infrastructure required to address the impact of development such as increased demand for school places and highway improvements. In this vein, the EFA committed to informing an updated Infrastructure Delivery Plan and review of the CIL charges.

12.67 The EFA and County Council committed to joint collaborative working to support the development of future Local Plan proposals. The County Council highlighted that modelling of the impact on school places will require detail on the number and location of units to inform the forecasting. As well as pupil yield from new housing, the County Council take the latent capacity in existing schools at the time of new development being delivered into account. Surrey County Council also commented that detailed transport modelling will be required once preferred development options are confirmed.

12.68 Highways England provided further comment on highways issues. At this stage their specific concerns related to the impact on the M25 and A3 up to the junction with the A309, explicitly how the cumulative effect of development proposals have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN), in this case the M25 and A3 junctions within and adjacent to the Borough boundaries. They set out that the

Borough will need to provide detail of the impact on the SRN and the proposals to mitigate the impact to an acceptable level. There was recognition that there is a need for close working in relation to the ongoing A3 junction 10 consultation process. Highways England was supportive of Surrey County Council's work to update the SINTRAM forecasting model and methodology providing a more collaborative approach to Local Plans within the Surrey County Council area.

13 Other issues including evidence base documents and duty to cooperate

Any other issues

13.1 Question 33 of the consultation response form gave space for respondents to make any other comments. As a result, there were comments made on a very wide range of topics and subjects. Where these related to topics previously covered in the consultation document, they have been included in those summaries. Outlined below is a summary of the remaining comments. For ease of reference, the comments received from our duty to cooperate partners have also been summarised in this section.

The Consultation Process

13.2 There were many critical comments received with regard to the consultation. Many respondents stated that the consultation period was too short and poorly timed. They objected to the fact that it had started just before Christmas where people were busy and did not have time to consider the information. As well as this, respondents felt that there was not enough publicity about the consultation and many people were unaware that it was even happening. In particular, Kingston residents felt they should have been notified due to the location of Local Area 58 on the borders of the London Borough.

13.3 In terms of the consultation document itself, respondents stated that the language used in the document was too complex and difficult to understand. They stated that it should be written in plain English and without the use of technical jargon. Many respondents felt that the document was written in favour of Option 2. There were many comments received stating that there was a lack of information on how many homes would be delivered by removing Green Belt status. Many respondents said that the consultation paper was not clear on what type of housing was needed and where and also how infrastructure would be provided to mitigate increased growth / development. One respondent stated that the maps within the document were poor and unclear.

13.4 Respondents also felt the response form was too lengthy, complicated and complex. They said that this had been done on purpose to put people off replying. Another respondent said that the time it had taken to fill out was unacceptable and many stated the amount of days it took to complete. Several respondents said it was not user friendly and inaccessible to many. Many felt the questions included were odd and ill-phased making it difficult to respond and unfair. Others stated it was overwhelming, contained repetition and had an examination like format that put people off completing.

13.5 There were many comments received about the lack of a simple question asking which option they supported: Option 1, 2 or 3. They also suggested more options should have been studied and presented. Generally, respondents felt the Council was just going through the motions and had already made up its mind about the plan and were not open to any challenge from local residents. Many stated that the questions were biased and manipulative and pushing people towards Option 2.

13.6 There were a few responses commenting on administration issues with the online consultation form. Particularly, the fact that the software had no 'submit' button and that the answers needed saving each time. One respondent was disappointed with the 4pm deadline set.

13.7 A number of respondents commented about the consultation drop in events that were held across the Borough. Comments included a lack of information at Hinchley Wood School and no MP being present. There was also complaint that people could not get their questions answered at the events because Council representatives were overwhelmed with the volume of people attending. One respondent felt that the disabled and elderly had not been taken into consideration.

13.8 Respondents felt there should be an easier way to get local communities views. They felt the Council and community should be working together and there should be better communication and transparency.

Housing White Paper

13.9 The Council was criticised for not taking into account the Government's Housing White Paper: 'fixing the broken housing market' (February 2017), even though this was published during the consultation and as such the Council had no forewarning as to its content.

13.10 Subsequent to its publication, a number of comments were received stating that the Council now needs to review its approach in light of the Government's proposal to introduce a standard mythology for calculating objectively assessed need and proposed amendments outline the circumstances under which local authorities can make amendments to Green Belt boundaries.

Financial Implications

13.11 A few comments raised made the (perceived) point that the Borough Council had insufficient finances to fund new schools, social care and infrastructure provision, and thus no additional homes should be built when it cannot support its existing and future habitants.

Green Belt Boundary Review (GBBR)

13.12 In seeking to meet the development needs of the Borough, the Council is required by Government to consider all options available. In accordance with national policy and subject to the demonstration of exceptional circumstances, this includes the potential to amend the boundary of the Green Belt.

13.13 As part of the evidence base review the Council commissioned Ove ARUP ('ARUP') to undertake an assessment of the Green Belt within Elmbridge Borough. The objective of the Review was to assess how 'parcels' (Local Areas) of Green Belt, as defined by defensible boundaries, were functioning against the purpose of the Green Belt as set out in the NPPF.

13.14 Alongside other evidence base documents prepared, the GBBR informed the preparation of the Strategic Options Consultation document and was published at the start of the 10-week consultation.

13.15 As with the SHMA, the Council received a number of comments relating to the GBBR. Again, two distinct factions formed in terms of the response to the findings. Firstly, there were comments from those who agreed with the findings of the Review. Such responses were divided between landowners and / or their representatives who agreed with certain Local Areas being identified as weakly performing and / or being identified for potential release from the Green Belt. A number of our residents and local amenity groups / organisations also agreed with the findings particularly where this related to certain Local Areas being identified as strongly performing Green Belt. For example, this sentiment was expressed by residents from the Walton-on-Thames and Hersham areas agreeing with the conclusion that Local Area 59a (Drake Park and its environs) was strongly performing Green Belt.

13.16 Secondly, in contrast to the above a significant number of comments were made that disagreed with the findings of the GBBR. Once more these were divided between landowners and / or their representatives who disagreed that certain Local Areas / their sites had been identified as strongly performing and residents and local amenity groups / organisations that strongly objected to certain Local Areas being identified as weakly performing. This was particularly true of the Local Areas considered to be weakly performing and identified in the Strategic Options Consultation document as Key Strategic Areas for potential development. In addition, a number of landowners and / or their representatives also sought to challenge the assessment in regards to the Key Strategic Areas in favour of their land / sites.

13.17 In summarising the comments a number of sub-sections have been set out below. These include:

- general comments regarding the Review that focus on the overall methodology employed including the definitions used and what are considered to be omissions from the process.
- comments made in regard to the three Key Strategic Areas.
- comments made in regard to other Local Areas identified as weakly performing.
- comments promoting alternative sites for development.

General Comments

13.18 A high proportion of comments made in response to the consultation made reference to the GBBR stating that it was a flawed and subjective process, and thus it had little weight, was incorrect and (some) suggested that a more scientific method should have been used - though without providing any details of what form this should take. The majority of these stemmed from one of the standard response forms that was circulated amongst local residents and community groups for submission to the Council.

13.19 In regards to the three Key Strategic Areas, alternative scorings against the purposes were submitted by a number of respondents. Demonstrating the subjective nature of the process, these also varied in terms of the assessments and the overall performance and individual scoring attributed to each purpose.

13.20 More detailed responses questioning the robustness of the Review and in particular, the methodology employed raised the following issues:

Assessing the 'performance' of Green Belt

13.21 Comments were received querying why it was considered appropriate to assess and subsequently define Local Areas of Green Belt (because many consider the Green Belt to be sacrosanct, and thus questioned the point of undertaking the GBBR at all). The need to classify areas of Green Belt as weakly, moderately or strongly performing was also queried. It was considered that Local Areas where either performing / functioning as Green Belt or not and that a 'sliding-scale' was inappropriate. It was stated that this standard approach adopted by ARUP and used by many other local authorities was not supported by national planning policy as there is no reference to weakly, moderately or strongly performing Green Belt in it. Others stated that Green Belt did not need to 'perform'; it merely had to exist to fulfil its purpose, alongside other statements to this or similar effect.

13.22 Building on this point it was stated that even Local Areas considered to be weakly performing were, to an extent, still fulfilling the purposes of Green Belt and therefore should not be considered further for development. Comparison was made to other local authorities' Green Belt Studies where some areas were identified as not fulfilling any Green Belt purposes. It was stated that no such areas had been identified in Elmbridge Borough and therefore no amendments to the boundary were justified.

13.23 Other comments received stated that any assessment of Green Belt based solely on its contribution to its function, will find that sites adjacent to existing settlements will score highest in checking the unrestricted sprawl of a built-up area. It was stated that it was axiomatic that these areas are also likely to be the most sustainable for development, being close to existing services and facilities. On the basis of the methodology employed it was suggested that the logical conclusion was that the more remote an area was from settlements the less value it would have.

13.24 Some responses queried why the overall summary was based on the best of the three scores i.e. some areas rated moderately / strongly performing based solely on the score for Purpose 3, despite the acknowledgement that all Green Belt purposes should have equal weight.

13.25 There were also concerns raised that only 3 (or sometimes incorrectly stated, 2 purposes) out of the 5 purposes of Green Belt listed in the NPPF were used when assessing Local Areas, when all of them should have been used. An example of this was the fact that many residents stated that Stoke D'Abernon (being listed in the Domesday Book) was a historic settlement, and thus the criterion relating to preserving the setting of historic settlements should also have been utilised, or that the Green Belt does help with urban regeneration in Elmbridge, so that criterion should have been used as part of the scoring methodology.

Landscape quality, history and use of Green Belt

13.26 Objections to the GBBR were raised as no account was taken of landscape quality and the use / potential uses of the Green Belt which together, shape how the Green Belt is subjectively experienced, how it functions and how overall, it contributes towards quality of life. Reference was made to paragraph 81 of the NPPF and the obligation that Councils have to plan positively to enhance the Green Belt with opportunities to provide access, outdoor sport and recreation and to retain and enhance landscapes, visual amenities and biodiversity. It was stated that these points should have formed part of the assessment of

Green Belt and that had these aspects been factored in, most of the Green Belt Local Areas identified as 'weakly performing' would be excluded from further consideration for development.

13.27 It was also commented that the Council has not set out the historical reasons for the Local Areas being designated as Green Belt and what has changed since then to justify the change in status of the land from Green Belt to land being capable of providing new homes.

Defining Local Areas

13.28 Comments received stated that the GBBR was undertaken on the basis of an extreme interpretation of the NPPF and what is considered to be a defined and permanent boundary. In selecting to define boundaries using major existing and permanent man-made and natural features, it was stated that this over influenced the definition of Local Areas and also became a dubious factor in assessing performance. Furthermore, it was expressed that the over emphasises of major roads and railway lines had undervalued the durability of some long established boundaries and that the use of minor features to sub-divide large areas was applied inconsistently. In addition, some respondents felt that roads (including dual carriageways) and railway lines were not barriers between areas of Green Belt and thus should not be used to separate Green Belt areas into Local Areas.

13.29 Adding to the issue of sub-division, it was felt that the huge disparity of size of defined local areas led to a biased assessments and had allowed opportunities to be missed that might arise if smaller Local Areas were defined. It was felt by many that all of the areas should be broken down into smaller / more equally sized areas and that this would make the assessment of the Local Areas fairer.

13.30 A view was also expressed that the consultants' assessment of Local Areas had been incorrect as these were based on ward boundaries (following the electoral review) and not the settlement boundaries as set out in the Core Strategy. It was considered that the Council had provided the consultants with incorrect information which formed the basis of many Local Areas in the Weybridge / Hersham areas as being assessed as weakly performing.

Purpose 1 – checking the sprawl of large built up areas

13.31 In regard to Purpose 1, some responses pointed to a need to reconsider the definition of sprawl. Reference was made to the definition of 'sprawl' as set out in the Collins Dictionary - 'the part of a city that has not been planned and spreads out untidily over a large area'. As such, it is stated that 'sprawl' is a somewhat derogatory term and a complete anachronism when any major development is to be provided for and controlled by positively prepared development plans.

13.32 Other comments received stated that by widening the definition of sprawl to apply not just to the Greater London built-up area but to other built-up areas had diluted the importance of this aspect in Area A as part of the Strategic Assessment. It was also considered that as the purpose emphasised 'checking' sprawl the Review determined that any effective contribution of an area depended on it being on the frontier i.e. having a boundary on to the built up area. This resulted in a 'gating switch' whereby these criteria must be met (a 'PASS' given) before any scoring was subsequently applied. Furthermore, this approach was not considered appropriate as it was applied regardless of the size or shape of the Local Area and so evaded the question of how much of the Local Area this

point actually applied to. It was also considered by others to not be suitable as it did not appear to be carried forward as part of the final scoring of a Local Area, which they felt it should be.

13.33 The interpretations of other terminology used in the assessment of Purpose 1 were also deemed incorrect. It was considered that the lack of explanation in the NPPF and planning guidance as to how 'built-up areas' is interpreted has not necessarily led to a consistent categorisation or to a categorisation that accords with natural observations. For example, it is suggested that the continuous built up area of Surbiton / Esher / Fairmile is just as much as a large built up area as Walton-on-Thames, Weybridge and Hersham. Underpinning this suggestion is the statement that this part of the country is effectively a continuous built up area within which there are all of the usual land uses including areas of open space, some of which are designated Green Belt.

13.34 Other inconsistencies that have been suggested is that if Chertsey and Addlestone (located in Runnymede Borough) are categorised separately as large built up areas, then Fairmile must also be. Cobham and Oxshott were also considered to have been omitted from the list of large built-up areas. It was stated that both these areas should be included particularly as Bookham and Fetcham (in Mole Valley District) have been included, within neither of these areas being any larger than Cobham or Oxshott.

13.35 In regard to the detailed assessment, it was considered by some respondents that too much emphasis had been placed on whether there is a durable or permanent 'barrier' existing somewhere. As with previous comments relating to defining Local Areas, it was accepted that guidance indicates that Locals can be delineated by certain barriers, but it was felt that just because such a physical barrier exists somewhere then the whole Local Area (that owes its existence to that barrier) should then, by Arup's 6 own criteria (on Table 4.2), be downgraded to the lowest scores (1 or 1+). It was considered that the artificial Local Area of Green Belt, however large or small, which has been created by the presence of a road or railway, should not be just dismissed as not having value in preventing sprawl into open land or serving as a barrier at the edge of a large built up area. It was concluded that this assumption completely downgrades a Local Area's intrinsic value in preventing sprawl and condemns large important Green Belt areas that are "on the front line" to little or no importance under Purpose 1.

13.36 It was also expressed that the scoring judgements dominated on whether there is the existence or not of boundaries based on durable features was again an overzealous and interpretation and misapplication of national policy and guidance.

Purpose 2 – to prevent neighbouring towns from merging

13.37 The assessment of gaps forming the basis for maintaining the existing settlement patterns within the Borough and preventing settlements from merging was both supported and opposed. Those supporting the approach agreed with the scoring criteria and the definitions set out in Table 4.4.

13.38 However, other respondents felt that the perception of separation of neighbouring towns and any distinct character and identity should not be determined by the distance between them, but must in part be a product of the particular character and role of the intervening area. It was suggested that by focusing solely on gaps between settlements which often meant a collection of communities, ignored the importance of separation between individual villages within such conurbations.

13.39 As with the interpretation of large built-up areas, it was also suggested that in the absence of what a 'town' is considered to be in national policy and guidance that this had led to an inconsistent application. It is stated that by virtue of its size and the facilities and services present, Fieldcommon cannot be properly regarded as a town.

13.40 Building on the statement that that this part of the country is effectively a continuous built up area within which there are all of the usual land uses including areas of open space, some of which are designated Green Belt, it was felt that this meant the separate towns are therefore also relatively difficult to distinguish. Added to this was the belief that areas of open space are part of the general mix rather than performing a significant role in creating separate identifies for separate towns.

Purpose 3 – to assist in safeguarding the countryside from encroachment

13.41 Comments of support and opposition were received in terms of the approach taken to assessing the extent to which a Local Area assisted in safeguarding the countryside from encroachment. On one hand it was accepted that this purpose should be scored with regard to the types of uses either rural or urban and also an assessment of the percentage of built for existing.

13.42 However, other responses suggested that it was incorrect to assess the built-form of a Local Area and to consider the extent to which the 'openness' and 'rural' qualities of Green Belt area have been maintained. It was felt that this approach failed to consider the effectiveness of the Local Area as a barrier that continues to prevent encroachment. It was also suggested that the assessment of 'semi-urban character' should not include publically accessed green space, green corridors, country parks or local nature reserves. Such features were considered to be more rural in nature.

13.43 Comments were also made that suggested that this element of the review showed bias against the potential release of smaller areas. For example, the percentage of built form discriminated against man-made structures including community assets which favoured the larger Local Areas.

13.44 Focusing on the scoring, it was suggested that the percentages of built-form contained in Table 4.5 (to score 5 less than 3% built form, to score 4 less than 5% and to score 3 less than 10%) are too strict. Amendments were suggested that to score 4 the % of built form should be increased to "less than 10%" and to score 3 the % of built form should be "less than 15%". Consequently the % to score 2 should be increased to "less than 18%"

The use of consultants

13.45 A few comments were received questioning the independence of ARUP. Their own website was referenced in that it states they are international engineers. Concern was also raised that they tended to be work on behalf of private companies including developers. It was suggested that this caused a conflict of interest and that their subjective nature was tainted. A few comments also stated that as ARUP were not a local company to the area then they had limited knowledge of Green Belt in Elmbridge, of 'local issues' and how the Green Belt was / is used by the various communities.

13.46 It was suggested that in order to achieve a consensus of how Local Areas function in terms of the purpose of the Green Belt, local residents and other amenity groups should form part of a review panel, and that the GBBR should be subject to 'independent audit

verification', but without any detail as to who should carry this out, or how a suitable body would be selected to do this. There was also stated suspicion that the Review had been 'fixed' or set out to meet pre-drawn conclusions.

13.47 Comments also suggested that too much weight had been given to ARUP's report both in terms of identifying the Key Strategic Area and Option 2, and that other considerations such as sustainability should also have been included in the assessment of areas and the approach taken to the Local Plan.

Comments made in regards to Local Area 14

General Comments:

13.48 The vast majority of comments received strongly disagreed with the overall assessment of Local Area 14 as 'weakly performing'. It was considered by the majority of residents and other local amenity groups to be highly / strongly performing Green Belt.

13.49 It was stated that any development of the site would impact on the fundamental aim of Green Belt, to protect openness and to maintain permanence of the Green Belt. The point was also made that many times in the past 20-30 years there has been severe pressure by developers and /or landowners to put forward parts of this area as suitable for development usually at the Local Plan process (first in 1992). It was stated that these pressures were strongly resisted by the Council on Green Belt grounds and that without continual resistance, areas facing Blundel Lane would very soon be developed with very likely low density housing.

Purpose 1 - checking the sprawl of large built up areas

13.50 Linking back to the responses made as to the definitions used within the Review, it was again stated that both Cobham and Oxshott should be classified as separate large built up areas. Supporting this opinion was the statement that when travelling east along Blundel Lane one is leaving a substantial urban area and the open area is preventing further development along the road into Oxshott and its village core. If the definition were amended, the Local Area would then 'Pass' the first criteria of Purpose 1 and, would continue to be assessed against the second element of Purpose 1.

13.51 Other comments received relating to Purpose 1 stated that Local Area 14 has strong links to Local Area 10, and that presence of the railway line and Blundel Lane should not mean it is weakly performing in comparison to Local Area 10. It was also stated that the development of the Local Area would result in urban sprawl and the spread of settlements away from the services provide in the designated centres.

Purpose 2 – to prevent neighbouring towns from merging

13.52 The GBBR states that the Local Area meets Purpose 2 weakly as it is "nearly fully enclosed within the settlement footprint of Cobham... playing a less than essential role in preventing coalescence with Leatherhead and Fetcham".

13.53 Criticism of the Review was received in regard to this assessment stating that the consultants clearly do not know the area and that their assessment must have been largely viewed from a map. It was stated that on the ground the situation is entirely different and that the Local Area is not enclosed within the footprint of Cobham. The Local Area is considered to be a distinct entity in its own right stretching from the north along Fairmile Lane with open

views south to and beyond the office complex and to the south stretching from the edges of Stoke D'Abernon along the road east to the outskirts of Oxshott village.

13.54 Related to the above point are the significant number responses that stated that Cobham, Stoke D'Abernon and Oxshott are distinct communities. Reference to the Council's own Flood Risk Assessment recognising them as separate entities was also made along with references to their distinct 'cultures', identities and histories. As such, removal of the Local Area from the Green Belt would almost certainly lead to the merging of Oxshott with Stoke D'Abernon and Cobham, and because of this, the Local Area was performing strongly in keeping these settlements separate. The fact that the GBBR referred to Cobham and Oxshott as one settlement / area was stated as evidence of the inaccuracy of the report and that this showed that it should not be given significant weight or be used by the Council as part of its evidence base.

13.55 It was felt that the description that fits this area under Table 4.4 of the assessment criteria is "a wider gap between non Green belt settlements ... where the overall openness and the scale of the gap is important to prevent merging" or "an essential gap between non Green belt settlements where development would significantly reduce the perceived or actual distances between them."

Purpose 3 – to assist in safeguarding the countryside from encroachment

13.56 A number of comments, some including photographs, were received stating that the area is largely rural and notwithstanding the office complex / residential redevelopment at Knowle Park, has limited built form. A number of responses queried the scoring attributed with reference to Table 4.5 of the Review stating that the Local Area should score a 4 or 5 under this purpose (the range of built form suggested on the Local Area ranged from 2.5 to a little over 5%).

13.57 Other points made included the criticism that the countryside was assessed as highly fragmented. It was commented that there are in fact large open areas of land with mostly non-intrusive boundaries. The comment on "*managed status*" was only considered to be partly true in regards to Knowle Park but that it still presents an attractive open park-scape fully appropriate in the Green Belt.

13.58 Finally, the description of Local Area 14 as "semi-urban" was also considered to be highly subjective and untrue. Responses stated that it was semi-rural or just rural and that the nature of the area, and its uses incidentally represent considerable obstacles to the delivery of housing.

Comments made in regards to Local Area 20

General Comments:

13.59 The vast majority of comments received strongly disagreed with the overall assessment of Local Area 20 as 'weakly performing'. It was considered by the majority of residents and other local amenity groups to be highly / strongly performing Green Belt.

13.60 Some comments did however accepted that this site is likely to be available based on the history of the site and its ownership. It was also accepted that this site provides little

benefit to the purpose of the Green Belt, due to its location between the A3 Esher By-Pass and existing residential development at Cobham.

Purpose 1 - checking the sprawl of large built up areas

13.61 Linking back to the responses made as to the definitions used within the Review, it was again stated that both Cobham and Oxshott should be classified as large built up areas. If the definition were amended, the Local Area would then 'Pass' the first criteria of Purpose 1. In regard to how the Local Area would then be assessed it was stated that the area is viewed as a very largely open area stretching away north from the main road and that the A3 cannot be seen as it is constructed in a cutting. It was generally felt that too much emphasis and importance had been placed on the A3 as a barrier to preventing urban sprawl, with some respondents stating that roads do not separate areas of Green Belt from others.

13.62 Comments continued that Local Area 20 is essentially part of a largely open corridor that runs on one or both sides of the road all the way from north Cobham including Cobham Rugby Sports fields north to Esher Commons finally ceasing only after Claremont Gardens. The Local Area was therefore considered to be a vital component of this green corridor and for this purpose alone should be retained as Green Belt. It was also stated that the Local Area should be valued for its own sake and therefore has importance in preventing outward sprawl from the urban development which is already contained by the Portsmouth Road.

13.63 Other comments received stated that the development of the Local Area would result in urban sprawl and the spread of settlements away from the services provide in the designated centres. Respondees also stated that as Local Area 20 formed part of Strategic Area B, what is said about the Strategic Area must have some bearing.

Purpose 2 – to prevent neighbouring towns from merging

13.64 A mixture of comments were received in regard to the role the Local Area plays in preventing towns / settlements from merging. A number of comments stated that the Local Area did not play an important role with some respondents agreeing that its contribution is limited in terms of the overall gap between Cobham and Hersham. Others felt however, that the Local Area prevents the merging of Cobham and Esher (along the Portsmouth Road (A307)) and Hersham. It was stated that the development of the Local Area Development would contravene the Ribbon Development Act (1935) which is still in force.

Purpose 3 – to assist in safeguarding the countryside from encroachment

13.65 The statement that the Local Area is "*heavily influenced by urban developments*" and other uses was disputed by those responding to the consultation. It was stated that uses that are directly adjacent, and therefore outside of the Local Area such as residential dwellings to the west and east do not reduce the openness and that this was commonplace along the borders of any Local Area and the settlement areas.

13.66 The statement that 'the parcel is tightly bounded by the A307 to the south and the A3 to the north, both of which detract audibly and visually from the sense of rurality', was also a point of contention. Comments stated that this was only true up until a point, and that on the ground the conclusions drawn may be different from a desk-top / map based assessment. It was also stated that the Local Area forms part of a wide expanse of open countryside to the north and that as the A307 presents a strong and defensible boundary already, this should continue to contain the built up area of Fairmile.

13.67 Some comments received agreed that the hotel buildings are non-rural; however, the other non-open uses in the Local Area including the farm buildings of Chippings Farm are rural uses and are acceptable forms of development in the Green Belt. It was therefore felt that there was less than 15% built form within the area. Some responses stated that the built form was only 4.6%.

Comments made in regard to Local Area 58

General comments:

13.68 A number of comments received agreed with the Strategic Assessment and the identification of Local Area 58 forming part of the wider swathe of Green Belt around London forming what was referred to in the Review as Strategic Area A. The identification of Strategic Area A performing “very strongly” against the first two purposes of Green Belt was supported.

13.69 However, the vast majority of comments received strongly disagreed with the overall assessment of Local Area 58 as ‘weakly performing’. It was considered by the majority of residents and other local amenity groups to be highly / strongly performing Green Belt. It was stated that any development of the site would impact on the fundamental aim of Green Belt, to protect openness and to maintain permanence of the Green Belt.

13.70 Concern was raised that any development of Local Area 58 will lead before long to pressure to develop adjoining Green Belt sites. In particular, it was felt that there will inevitably be pressure to develop parts of the north of Local Area 34, both east and west of Woodstock Lane South. Also mentioned was that Area 58 is very similar to Area 34 and yet the scoring differs and that Arbrook Common was described as deserted most of the time in comparison to Parcel 58.

Purpose 1 - checking the sprawl of large built up areas

13.71 A significant number of comments strongly opposed the assessment of Local Area 58 in regards to Purpose 1. It was stated that the position of the area immediately adjacent to the urban area of Long Ditton, Thames Ditton and parts of the Borough of Kingston Upon Thames means that it plays a vital role in checking the unrestricted sprawl of large built up areas, in this case South West London. The area was stated as forming the immediate “*front line*” in preventing London’s sprawl continuing further south. Such emphasis on the A309 checking any further urban sprawl was believed to be much exaggerated and the reasoning flawed. It was felt that if the area to the north of the main road was removed from the Green Belt and built on there would be considerable pressure to develop for housing areas immediately to the south of the road.

13.72 It was also strongly stated that Long Ditton was not ‘enclosed’ within the large built up area of Greater London (it is not possible to be so on three sides out of four) or that Long Ditton formed part of the Greater London built up area. Rather, Long Ditton was its own separate area from Greater London with its own community and marked change in urban character between Surbiton and Long Ditton. It was felt that the development of the area would create significant urban sprawl with the area becoming one large urban landscape with no open space separating Long Ditton from Hinchley Wood, London and areas such as Surbiton, Chessington & Hook. It is felt by many respondents that the whole Local Area

performs a vital part of the 'green lung' entry into this part of Elmbridge from London and that it provides a rural gateway / transition between London and Surrey.

13.73 On the basis of the above it was felt that Local Area 58 should be given a higher score (strongly performing) and be offered a higher protection.

Purpose 2 – to prevent neighbouring towns from merging

13.74 A significant number of respondents also disagreed with the assessment of Local Area 58 in regards to Purpose 2. It was felt that the statement that the area 'makes only a very limited contribution to the overall gap between Long Ditton and other areas' was incorrect. Comments received stated that the assessment of the role that the Local Area plays in providing a gap between settlements was incorrect in focusing on Long Ditton and Claygate. Rather the importance of the Local Area in providing a gap between settlements should have been considered in the context of the area to the east and west – the gap between Long Ditton and Hinchley Wood, and again, also between Long Ditton and Chessington / Hook / Surbiton / London in general.

13.75 The general gap was considered by respondents to be 'essential' in its role of maintaining existing settlement patterns, and that removal of this Local Area from the Green Belt and subsequent development would severely compromise these settlements.

13.76 On the basis of the above it was felt that Local Area 58 should be given a high level of protection.

Purpose 3 – to assist in safeguarding the countryside from encroachment

13.77 Comments received in regards to Purpose 3 queried whether it was correct to base the assessment on the level of built-form that had occurred previously as a result of previous encroachments and which reflected the sensitive, fragmented nature / configuration of the area.

13.78 It was stated that the built-form was erroneous and that there were in fact very few so called 'built developments' within the 67 hectares of land. Rather than being seen as 'semi-urban', the Local Area is considered by respondents to be 'semi-rural'. Comments received also stated that the built form was generally located / confined to the edges of the Local Area and that as the area is countryside, any development in it would be encroachment of the countryside in of itself.

13.79 Continuing on scoring aspect and the built form assessment, a number of comments were also received that stated that by ARUP's own assessment, the built form percentage of 7.5% would score a 3 as it contains less than 10% built form. The point was made that other areas e.g. Local Area 62, has a higher percentage built-form but was still deemed to be more rural.

Other Weakly Performing Local Areas

Local Areas 36 and 37:

13.80 Some respondents said that they could see why the Local Areas were not strongly performing in Green Belt terms for example, they did not provide a significant gap between settlements. Two differing views then emerged. Some stated that this area should be looked at for additional residential development as it could accommodate additional housing and

was close to existing settlements, and that parts of the area previously had dwellings on. Other respondents stated that regardless of the area performing weakly, it should not be built upon. It was felt that the narrow strip would provide only a small amount of houses, with poor access onto a busy main road.

13.81 Some respondents disagreed with the assessment that the two Local Areas were weakly performing as they provided a clear boundary between Burwood Park / Hersham and Weybridge. It was also stated that there are large amounts of wildlife in the areas and that the land is well used by local residents for walking, dog walking and recreation. It was suggested as an area that should be designated as a Local Green Space.

13.82 Other responses stated that it should not be considered a weakly performing area as it provided a clear boundary between Burwood Park / Hersham and Weybridge. In contrast, a small number of responses said this area should be looked at for additional residential development as it was a weakly performing area of Green Belt that could accommodate additional housing and was close to existing settlements, and parts of it had had dwellings on it in the past.

Local Area 70:

13.83 This Local Area received a number of comments stating that it should not be developed due to the variety of wildlife it hosts, as well as its function as a flood plain / soakaway. There was also concern about the loss of recreational uses within the area, including the park in the south western corner (which was suggested as an area that could potentially be designated as a Local Green Space) along with the facilities at Imber Court.

13.84 Others stated that as it was a weakly performing Local Area it should be considered as an alternative location for development to the three Key Strategic Areas.

Suggested 'sub-divisions' of Local Areas

13.85 In addition to the general comments received regarding the GBBR methodology, a number of responses also raised site specific comments. The majority of these were made by landowners and/or their representatives promoting land for future development. As part of their submissions alternative assessment and / or 'scoring' against the GBBR criteria was suggested. This was on the basis that if the Local Area was sub-divided, the overall assessment of the promoted site would be weak in comparison to the remaining, wider Local Area / Green Belt.

13.86 Those responses suggesting alternative assessment scoring related to the following areas / sites / areas:

- Land south of Burwood Road, Hersham
- Proposed Drake Park development, Walton-on-Thames
- Land adjacent to Rydens Road, Walton-on-Thames
- Land at Claygate House, Claygate
- Land south of Hare Lane, Claygate
- Land at Horringdon Farm, Claygate
- Land east of Blundel Lane, Cobham
- Esher Rugby Club, Walton-on-Thames
- South End of St. George's Hill Estate, Rodona Road, Weybridge

- Moore Place Golf Course, Portsmouth Road, Esher
- Wimbledon Greyhound Welfare Centre, Turners Lane, Hersham

13.87 The alternative assessments and / or scorings included detailed assessment against each Green Belt purpose as set out in the NPPF. In support of the alternative assessments and in promotion of the sites, a large amount of additional information was also submitted. As a minimum the majority of alternative assessments were accompanied by a Site Appraisal, these tended to include information relating to:

- landscape assessments and / or visual baseline conditions;
- policy assessments;
- sustainability assessment / appraisal;
- flood risk overview;
- preliminary transport appraisals / strategy
- development options; and
- constraints analysis.

13.88 The details of the alternatives assessments and the additional documentation submitted has not been summarised as part of this Summary of Consultation Responses document. The information is however, available to view via the Council's Consultation Portal.

The Kingston & North East Surrey Strategic Housing Market Assessment

13.89 When planning for new residential development, local authorities are required to understand their Objectively Assessed Housing Need (OAHN). As set out in the NPPF and Planning Practice Guidance (PPG) this is to be understood by preparing a Strategic Housing Market Assessment (SHMA) for the Housing Market Area (HMA).

13.90 To inform the preparation of a new Local Plan, a SHMA was produced for the Kingston and North-East Surrey HMA. Published in June 2016 this was prepared for Elmbridge Borough Council alongside the Royal Borough of Kingston-upon-Thames; Epsom & Ewell Borough Council; and Mole Valley District Council.

13.91 In response to the Strategic Options Consultation two distinct factions formed in terms of their response to the findings of the SHMA. Firstly, there were comments from those who considered that the OAHN for Elmbridge Borough had been (significantly) overestimated. Such comments were generally received from our residents, particularly those from the Cobham and Dittons areas, as well as from local amenity groups and organisations.

13.92 In distinct contrast comments were also received from those who considered that the SHMA significantly underestimated the true level of the need for new homes in the Borough. Comments suggesting that need had been underestimated tended to be from landowners and / or their representatives promoting the need for additional developments in the Green Belt.

13.93 The only commonality between the two sides was in reference to the publication of the Government's Housing White Paper: fixing the broken housing market and other, wider-

externalities that it was considered needed to be taken into account as they could impact on the number of new homes required within the Borough.

13.94 In regard to the Housing White Paper, which was published during the Strategic Options Consultation, the consensus was that the continued preparation of the Local Plan would be premature in advance of the Government's planned intention to introduce a standard methodology for calculating OAHN. Reference to prematurity was however for differing reasons: some believing the standard methodology would see the OAHN figure reduced, whilst others considered it would significantly increase.

13.95 Externalities which could impact on the number of new homes required within the Borough were referenced as the review of the London Plan, plans for Cross Rail and the third runway at Heathrow, Brexit, and other proposed developments in neighbouring authorities. It was generally suggested that until the implications of these issues were known, formulating a Local Plan on the current SHMA and OAHN figure was flawed.

13.96 Under the two contrasting viewpoints (the OAHN figure being an overestimate or underestimate), a summary of the issues relating to the SHMA have been outlined below. A section at the end has also been included which records a number of general observations made.

Comments received suggesting that the OAHN figure is an overestimate

13.97 A number of responses queried why the OAHN figure was significantly higher than the current housing requirement as set out in the Council's Core Strategy (2011). It was also queried why this differed so significantly from the projected figures set out in the now revoked South East Plan and also in comparison to Surrey County Council's recent forecasts in their document "Understanding Surrey's Growth Requirements".

13.98 In terms of the methodology employed in the SHMA, it was queried as to why Elmbridge should be planning for the overspill of London. Evidence from the SHMA was quoted in that Elmbridge's birth rate has plateaued and that 40% of Elmbridge's population growth has been down to in-migration from other places. It was suggested that without in-migration from London in particular, the target could be 50 - 60% of the OAHN figured identified in the SHMA.

13.99 On the issue of in-migration and net internal immigration, the concern of over-delivery being a circular and self-fulfilling prophecy was made i.e. build and they will come. It was also stated that the decision to leave the EU will have consequences for the economy of London and the south-east which may currently be unpredictable but are unlikely to be positive. It was suggested that given that the Government seems to be committed to controlling immigration, which is indirectly a driver for some of the perceived increased housing needs in the region, then it would seem appropriate to be more cautious about the accuracy of the projections. Other respondees suggested that future need may now be lower as a result of Britain being due to leave the European Union and the anticipated drop in immigration from the bloc as a result of increased immigration control or decreased economic activity in the UK attracting fewer migrants.

13.100 Continuing the focus on London, it was also stated that many of the homes built in London were for overseas investors to 'buy to leave'. It was suggested that this issue should be addressed first prior to any additional homes being built in Elmbridge to meet the Capitals 'overspill'.

13.101 Other concerns relating to the use of population projections to calculate the need for new homes were also raised. This included that they provide an indication as to what future population structures might be if trends were to continue, they are not forecasts based on any specific facts, calculations and certainty, and they were perceived by some to largely be speculation. The point that they take no account of policy was also a key concern.

13.102 Assessing the need for new homes over a longer timeframe was also seen as an issue. Linked to the use of trends, it was stated that to continue to project based on short-term trends (the previous 5 years) that reflect the circumstances of the time only increases the level of uncertainty over forward projections. It was stated that over the last five years there have been a range of factors or anomalous events that would have influenced the projected trends. An example given was the strength of the UK economy since 2010 relative to the EURO monetary area. It was also stated that the accelerated population growth that occurred between 2011 and 2014 would have continued.

13.103 A number of comments also appeared to suggest that the Council should challenge the findings of the SHMA and the housing number that had been 'handed down' from Government.

Underestimated Objectively Assessed Housing Need

13.104 Some comments received suggested that the assessment of the Borough's OAHN, as set out in the Kingston & North-East Surrey SHMA, is a significant underestimate of the true level of need for new homes in the Borough up to 2035. It is stated that this has occurred as a result of the methodology used which, is considered to be fundamentally flawed in every step of the process. As a result it is believed that that the SHMA has not been undertaken in accordance with the NPPF and Planning Practice Guidance (PPG) and, must be reviewed.

13.105 As set out in the responses to the Consultation, those points considered to be the SHMA's significant shortcomings can be summarised as follows:

- 1. Demographic projections** – it is considered that the SHMA does not properly reflect the impact of demographic projections for London on the three Surrey authorities. It is considered that the SHMA fails to recognise that the impact will be an increase above the official projections and that this could increase the demographic-led housing need within the Surrey authorities to c. 1,600 dpa.
- 2. Household formation** – the SHMA does not make any adjustment to household formation rates and presents no evidence to justify why this is appropriate. Evidence would support an adjustment in line with the PPG, which could increase housing need by around 5%.
- 3. Market signals** – the conclusion that no uplift is requirement is fundamentally flawed and do not reflect the PPG. There is no basis within the PPG for 'waiting' to make any uplift at a time when the situation becomes a degree worse than the national average. It is considered that there is justification for adopting an uplift figure in the region of 25% - that being the minimum scale that could reasonably be expected to improve affordability.
- 4. Jobs-based need** – the figures underpinning the assessment, particularly for London Borough of Kingston and Mole Valley, are considered to be conservative in the context of the latest Experian forecasts. In addition, it is considered that a key failure is the assumption that to rather than explore an increase in housing need to address

labour supply shortfalls, the assumption is made that additional commuting in the future will provide the workers required to support economic growth.

5. **Affordable Housing** – the SHMA seeks to down-play the overall level of need.
6. **Affordable Housing Delivery** – the SHMA fails to compare the affordable housing need to the likely future rate of delivery. If considered then an increase in the overall housing requirement would be required whereby this could meet affordable housing need.

13.106 On the basis of the above points, it is stated that the SHMA does not represent a robust, reasonable or PPG compliant assessment for the HMA. It is considered that the true OAHN for Elmbridge Borough is nearer the region of 700 – 800 dwellings per annum / 14,000 – 16,000 dwellings over the Plan period.

Other general comments:

13.107 It was noted that underpinning the SHMA are the 2012-based household and population projections but that these have been updated with the 2014-based projections published in May 2016. In light of this and the publication of the Housing White Paper, it was again suggested that the SHMA be reviewed in the near future in order for it to remain accurate.

Elmbridge Retail Assessment (ERA) 2016

13.108 Next PLC has employed Q & A Planning Ltd to respond to the Strategic Options Consultation. The following outlines the issues raised with regard to the Elmbridge Retail Assessment 2016.

Background

13.109 Next has a long term ambition for a site to locate a new combined home and fashion store of about 5,000 to 6,000sqm gross (about 3,700 to 4,000sqm net) in the Brooklands area. This store would be designed solely for an out of town centre shopping experience due to its larger home, garden and DIY products which require a showroom style presentation of goods.

13.110 Next wants the Council to recognise this substantial retail need since it would demonstrate how the Council is considering market signals as advised in the PPG. It also states that facilitating such a store through policy would also meet a large amount of the Borough's retail need in the comparison goods sector, as set out in the ERA 2016.

13.111 In its representation, various concerns about the evidence base have been raised. Although it is stated that the quantitative methodology adopted within the ERA is sound, NEXT questions its robustness and is unconvinced about a number of key methodological assumptions and inputs. The following outlines its key concerns.

Testing a reduced housing market scenario

13.112 The ERA finds that there is a need of between 14,100 and 19,700sqm of net comparison floorspace by 2035. Next feels that the ERA has under-represented the need for additional comparison retail floorspace by testing a reduced housing market share scenario. It says the Council has an obligation under paragraph 23 of the NPPF to assess its need for retail floorspace 'in full' and that this should not be 'compromised by limited site availability'.

Next opposes adopting a reduced market scenario for the following reasons:

- It would have sustainability implications forcing consumers to shop outside the Borough increasing the need to travel.
- It dampens the short term needs and suggests to the Council that there is no pressure to meet its needs locally.
- Invites defeat.
- Where market share decreases – expenditure leakage increases.
- Sustainability of consumer behaviour in the retail sector reduces.
- Impact on the Borough's local economy, business rates and income as well as employment opportunities.

13.113 Next feels that the lower figure of 14,100sqm net comparison floorspace which is described as a minimum in the ERA is misleading. It feels the minimum should be 17,800 sqm net floorspace. In addition, it is considered that a strict maximum should not be set since this would put an artificial cap on Elmbridge's ability to maintain its market share and ensure shopping patterns are sustainable. Next feels that the higher figure should be seen as a guide.

Sub-regional context

13.114 The ERA highlights the future proposals planned for the sub regional shopping centres of neighbouring Kingston, Guildford and Woking, which will have an impact on shopping patterns in the Borough. Next is critical of this assumption and the Council's acceptance that these centres will attract more trade from Elmbridge residents. It feels this would be at the expense of destinations in Elmbridge and say this will lead to people travelling further distances to shop creating inevitable sustainability draw backs.

13.115 Next states that the ERA has not reviewed the evidence base or policy position of these neighbouring shopping centres. It feels this is surprising as the same consultants prepared them. Next says that if the exercise had been undertaken, it would be apparent that none of these centres are actively promoting a policy position or using evidence that advocates an increasing market share in the comparison good sector for those areas.

13.116 The investments in these centres are not predicted on increasing market share of comparison expenditure. Therefore by considering a reduced market share, it is suggested that Elmbridge will be left with an excess need that will not be met through policy. This situation is contrary to the NPPF. Additionally, Next states that there is no evidence through the duty to co-operate that Elmbridge have agreed to export this need to a neighbouring authority.

Brooklands

13.117 The ERA is inconsistent with its advice regarding Brooklands. In paragraph 10.35 (in context of recommendations on Weybridge) it states that 'future expansion of Brooklands which would diversify the retail offer or broaden the range of uses, should be resisted in order to protect the vitality and viability of Weybridge district centre'. The statement appears to contradict with paragraph 10.57 where the ERA simply says 'further development at Brooklands should be tested against the requirements of the NPPF and local planning policies'.

Next opposes the first statement at 10.35 due to the following:

- It prejudices any ability to put forward an application under the necessary development management tests expected to be included in policy (namely the sequential test and retail impact).
- Diversifying the retail offer or broadening the range of uses does not automatically mean that there will be increased competition with Weybridge or other centres.
- The level of competition depends on the nature of the proposals put forward.
- It contradicts paragraph 10.57 as detailed above.

13.118 There is no preclusion of out of town retail floorspace within the NPPF. Next feels it is supported subject to satisfying the sequential test and demonstrating that there will be no likelihood of a significant adverse impact on the town centre (paragraphs 23-26)

Quantitative Need Calculations

13.119 Next makes the point that the omission of inflow expenditure in the quantitative need calculations in the comparison sector has likely downplayed the need to some degree, particularly in light of the significant employment floorspace at Brooklands.

Qualitative Needs

13.120 Next states that there is limited explanation in the ERA as to what qualitative needs are in the Borough and how this is expected to be met. There is factual analysis of existing centres, however Next feels that nowhere does the study address the fundamental point on whether retail floorspace in the Borough is currently providing, or will provide in the future, adequate consumer choice taking into account market trends at section 3. Next feels that if it had done so, it would have identified the clear opportunity to improve retail choice at Brooklands that complements the existing network of town and village centres.

Duty to cooperate partners

Neighbouring and other authorities

Organisation	Key points
Mole Valley District Council (MVDC)	<ul style="list-style-type: none"> • There is a prospect that MVDC will be unable to meet their own Objectively Assessed Need in full and would also be exploring cross-boundary options under the Duty to Cooperate. • Given the proximity of Local Areas 14 and 20 to the MVDC boundary the Council anticipate seeing further evidence on strategic highways issues, including consideration of cross boundary impacts. • Concluded that the 2017 Gypsy and Traveller Accommodation Assessment provides a pragmatic assessment of needs based on the evidence available. There was comment on the lack of responses but understanding that this may be due to changes in the planning definition.
Royal Borough of Kingston upon Thames	<ul style="list-style-type: none"> • Strong objection to the inclusion of Local Area 58, specifically the inclusion of the portion of the parcel that falls within Kingston. Kingston has not identified this as an area within its boundary suitable for removal from the Green Belt. Requested that this area of land outside of Elmbridge control is not included in any further consultation or documentation and that the error of

	<p>inclusion is acknowledged.</p> <ul style="list-style-type: none"> • Development with Local Area 58 will impact on infrastructure in Kingston Borough and there is a need for cross boundary working to ensure that impacts are mitigated by adequate infrastructure provision through S106 and CIL receipts, including in Kingston. • Local Area 58 is close to areas which already have significant traffic issues, i.e. the A3 and Tolworth Roundabout. Kingston is looking to work closely with Elmbridge and Transport for London to find strategic, cross-boundary solutions to the traffic and environmental issues arising from the A3. • Queries around how big the potential unmet need is under Option 2 and also why there is no option to meet housing need in full within the Borough.
Runnymede Borough Council (RBC)	<ul style="list-style-type: none"> • Potential to explore the opportunity for amendments to the Green Belt boundary at Brooklands to deliver further opportunities for employment uses at this site. Given the close functional economic links between the Boroughs RBC are keen to engage further in this respect.
Epsom and Ewell Borough Council (EEBC)	<ul style="list-style-type: none"> • EEBC shares in the challenge of responding to significant Objectively Assessed Housing Need. The initial outcome of evidence gathering informing a partial review of the spatial strategy suggests that there is unlikely to be any scope to accommodate a shortfall from neighbouring authorities. • Commitment to joint working on the strategic issue of infrastructure provision.
Joint response from Woking, Guildford and Waverley Borough Councils	<ul style="list-style-type: none"> • Joint concern over the issue of unmet housing need within the Strategic Options. There is an expectation that every opportunity is taken to meet this unmet need within the Housing Market (HMA) Area of Kingston and North Surrey. There is already unmet need within the West Surrey HMA arising from Woking and should any surplus arise in the West Surrey authorities it would contribute to the shortfall within this HMA.
Reigate & Banstead Borough Council (RBBC)	<ul style="list-style-type: none"> • No available capacity to meet any of EBC's unmet need for housing. RBBC is committed to engaging actively with surrounding authorities to understand the extent to which they may be able to accommodate some of RBBC's unmet needs. • Emphasises the importance of early review of infrastructure and highlights the importance of full testing of infrastructure requirements in conjunction with site allocations. • Safeguarding of land should be considered as the EBC Local Plan progresses. • RBBC is investigating whether they have capacity to meet their own Gypsy and Traveller pitch need and have not completed work to examine whether there is scope to meet the need of others. • Recommendation that EBC carry out a Traveller 'call for sites'.
London Borough of Richmond upon Thames	<ul style="list-style-type: none"> • Given that the Borough is similarly highly constrained, the Council is not in a position to meet any additional housing need.

	<ul style="list-style-type: none"> • Supportive of 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 is a similar approach to that in LB Richmond upon Thames. • Share a similar approach to protecting employment areas. • Supportive of the approach to retain and update the Policy CS12 on the River Thames Corridor and its tributaries.
Surrey County Council	<ul style="list-style-type: none"> • Stated their support for the protection of the Green Belt. However, they noted the White Paper's proposal to make more land available for homes by maximising the contribution of surplus land already in public ownership. SCC has limited non Green Belt assets but committed to liaising on potential opportunities. • Highlighted the importance of considering each site against the impact on health and social care, including issues such as air quality and pollution, highway and community safety, access to open space, design standards around accessibility, energy efficiency, insulation and amenity and accessibility to housing and services for all groups in the community. Felt it would be appropriate to include 'health, wellbeing and community safety' in the section in the Venn diagram where key environmental and social challenges overlap. • Support for considering heritage as an asset rather than a constraint. • Through development more sustainable travel patterns should be encouraged, including modal shift. • Policies should encourage electric vehicle charging facilities within new development. • Stressed that contributions made by developers should be sufficient to contribute to the infrastructure required to address the impact of development such as increased demand for school places and highway improvements. • Commitment to joint collaborative working to support the development of future Local Plan proposals. The response highlighted that modelling of the impact on school places will require detail on the number and location of units to inform the forecasting. As well as pupil yield from new housing, the County Council take the latent capacity in existing schools at the time of new development being delivered into account. Surrey County Council also commented that detailed transport modelling will be required once preferred development options are confirmed. • As the plan progresses the impact on the road network of cross boundary development such as the Heathrow expansion, Crossrail 2 and potential strategic housing sites in neighbouring authorities will need to be considered.
GLA Greater London Authority and Transport for London	<ul style="list-style-type: none"> • Noted the Royal Borough of Kingston's objection to the inclusion of Local Area 58. • Felt it may be useful to explore relevant economic linkages with London to understand and plan for the role of Elmbridge in the shared market area for industry and logistics provision. • Consideration of longer term historic migration trends is

	<p>welcomed but regrets that it could not be extended to other parts of the housing market shared with London.</p> <ul style="list-style-type: none"> • The GLA and Transport for London (TFL) responded to highlight the additional capacity and connectivity that the Borough will benefit from through Crossrail 2, which in turn could assist in delivering higher levels of growth in appropriate locations. TFL would support an approach that aims to maximise the benefits from planned rail investment by focusing new development and increasing densities in locations that are highly accessible to rail stations that will benefit from investment, such as the planned Crossrail stations of Thames Ditton and Hampton Court. • TFL suggested that any large-scale growth proposed on sites without direct rail access would need to be carefully planned and supported by bus and cycle routes to the nearest station. • Highlighted the importance of a transport assessment that will take into account the effects of cross boundary travel within London. Given the location of local area 58 adjacent to the London boundary, TFL stressed the need for assessment of the transport impacts on all modes of transport to be carried out with input from TFL and Kingston Council. • TFL would want to ensure that any site proposals seek to minimise the impacts on the A3 or A243 road corridors within London, including the Hook Road roundabout. Impacts within London would need to be mitigated and funding identified to deliver any required transport improvements. • TFL is working closely with Kingston Council on their growth proposals, including looking at options for the A3 junction with the A243 Hook Road and A309 Kingston Bypass. TFL committed to cross boundary discussions in relation to policies, proposals and site allocations. TFL are also keen to work with Elmbridge to explore options to improve bus services in the areas covered by TFL supported where large scale development is proposed. Funding would be a key issue, with the expectation that developers provide funding towards service enhancements. • Support for a restraint based approach to car parking within London Boroughs and stated that parking policies in Elmbridge should be designed to encourage sustainable travel options and minimise car trips across the London boundary. TFL would support a continuation of maximum car parking standards, including the consideration of zero car parking for town centre developments where appropriate.
Wokingham Borough Council	<ul style="list-style-type: none"> • Encourages the Council and other authorities within the housing market area to review options for meeting housing need in full. It was highlighted that Wokingham does not fall within the HMA and that the SHMA does not identify any strong links between the respective housing market areas.

Infrastructure Providers

<p>NHS Property Services</p>	<ul style="list-style-type: none"> • The Council should work with NHS commissioners and providers to ensure that adequate healthcare infrastructure is provided to support new residential development. The response stressed that healthcare facilities are essential infrastructure and where new facilities are required, they should be delivered alongside additional housing to mitigate the impact of population growth on existing infrastructure. • Argues that the NHS requires flexibility in its estate with restrictive policies, especially those requiring substantial periods of marketing, potentially delaying required investment in services and facilities. There are already separate testing and approval processes used by NHS commissioners to identify unsuitable healthcare facilities. In order to support the wider transformation of NHS services and the health estate, it is important that surplus and vacant NHS services are not strategically constrained by local planning policies, specifically restrictive policies or periods of marketing.
<p>Education Funding Agency (EFA)</p>	<ul style="list-style-type: none"> • Highlighted the impact on education facilities that significant growth within the Borough would have. • Commitment to joint working on the development of the Infrastructure Delivery Plan in relation to Education as the Local Plan progresses. • Stressed that the need to provide for secondary places is already known and proactive joint working is already underway in relation to the proposed Heathside Walton on Thames School as there is a pressing need for additional secondary places in the north of the Borough. • Suggestion that the new Local Plan requires specific reference to the relevant national policies relating to school provision and the EFA highlighted approaches taken by other authorities in planning for additional school provision. • Initial work concerning a potential site for Heathside Walton-on-Thames suggests that identifying a site outside of current Green Belt designations will be very challenging. The EFA will continue working with the Council to undertake an assessment of suitable sites and preparation of necessary evidence to develop options to amend Green Belt boundaries to accommodate the school through the Local Plan process. • Without the new Heathside Walton secondary school, the Borough will face a significant shortfall in secondary places within the northern part of the Borough during the Local Plan period. The need for the new school arises from existing and known development and not from future housing numbers. • The EFA supports Option 2 of the Local Plan that proposes amending Green Belt boundaries when certain criteria are met. This should include the need to provide for key infrastructure when it can be demonstrated that there are no other suitable sites available. Educational need would form part of the exceptional circumstances that would allow Green Belt boundaries to be amended.

	<ul style="list-style-type: none"> • It is proposed that part of Local Area 75A should be considered as land suitable for removal from the Green Belt as the Local Plan progresses. It covers the area where secondary educational need is most critical and therefore will include the most likely location for the proposed Heathside Walton school. • Supportive of the principle of safeguarding land for the provision of new schools. • There is a need to ensure that education contributions made by developers are sufficient to cover the increase in demand for school places that are likely to be generated by major developments in the Borough. The EFA supports the Council's approach to ensure developer contributions address the impacts arising from growth. • Welcome the Council's proposed review of their CIL charges to ensure necessary resources will be available to support the required infrastructure provision arising from the anticipated levels of growth.
Civil Aviation Authority	<ul style="list-style-type: none"> • The Borough is outside of the 'physical' 15km safeguarding zone and there are therefore no comments to make from an aerodrome safeguarding perspective. • Should any proposals for wind turbines come forward we would ask that we be notified as soon as possible, as wind turbines have the potential to impact on radar utilised by the airport.
Highways England	<ul style="list-style-type: none"> • At this stage specific concerns related to the impact on the M25 and A3 up to the junction with the A309, explicitly how the cumulative effect of development proposals have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN), in this case the M25 and A3 junctions within and adjacent to the Borough boundaries. • The Borough will need to provide detail of the impact on the SRN and the proposals to mitigate the impact to an acceptable level. • Recognition that there is a need for close working in relation to the ongoing A3 junction 10 consultation process. • Support for Surrey County Council's work to update the SINTRAM forecasting model and methodology providing a more collaborative approach to Local Plans within the Surrey County Council area.
Thames Water Property Services Ltd	<ul style="list-style-type: none"> • Broadly supportive of the approach set out under Option 2. Submission of three Green Belt sites for consideration that are now surplus to operational requirements. • It is easier to provide infrastructure for a small number of large sites rather than a large number of small sites. • Stressed the need for adequate water and sewerage infrastructure to be delivered prior to development and requested a strengthening of the policy requirements in the new Local Plan to ensure that developers are required to demonstrate that there is adequate capacity both on and off site to serve the development and that it would not lead to problems for existing users. When there are capacity constraints the developer should set out how the infrastructure improvements will be completed prior to

	occupation of the development and engage with statutory providers at the earliest opportunity.
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Environmental and Heritage organisations

<p>Historic England (South East Region)</p>	<ul style="list-style-type: none"> • Local Area 14 has no designated heritage assets within the site but appears to be composed of mature parkland and a historic landscape (Knowle Hill Park), possibly with underlying archaeology, which requires further assessment. • Local Area 20 contains a listed pair of cottages and the setting of these historic buildings should be considered in the allocation of the site for development. The Fairmile is likely to be of historic interest though not formally designated and there may be remnants of an older landscape associated with it that should be assessed. • Local Area 58 contains the Long Ditton conservation area and a number of listed monuments associated with St Mary's Church (grade II), and the potential effects of any development on these and their settings would need to be considered. Some archaeological interest is likely to be present in the churchyard and grounds related to the Manor House. Southborough conservation area in the neighbouring Borough of Kingston-upon-Thames may be affected by development in terms of its setting and views and out of the conservation area. • The strategic options plan might need to consider the inter-relationship of the objectives for the historic environment with the following issues of local importance – building a strong competitive economy, ensuring the vitality of town centres and villages, promoting sustainable transport, delivering a wide choice of high quality homes, requiring good design. • The Plan needs to assess whether it should identify any areas where certain types of development might need to be limited or would be inappropriate due to the impact on the historic environment • In formulating strategic site proposals it is advisable and often necessary to consider the following: <ul style="list-style-type: none"> - how the historic environment can assist the delivery of the economic, social and environmental objectives of the plan, - how the delivery of the strategic options will address particular issues identified during the development of the evidence base, including heritage at risk and the reuse of buildings, - the location, design and use of future development and how it can contribute to local identity and distinctiveness, the interrelationship between conservation of heritage assets and green infrastructure, landscape, regeneration, economic development, transport works, infrastructure planning, tourism, social and cultural assets, town centres and climate change mitigation/ adaptation, - the means by which new development in and around designated heritage assets might enhance or better
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	<ul style="list-style-type: none"> - reveal their character and significance - the means by which new development in Conservation Areas and within the setting of heritage assets might enhance or better reveal their significance - how the archaeology of the plan area might be managed - whether master plans or design briefs need to be prepared for the strategic sites where major change is proposed.
Surrey Wildlife Trust	<ul style="list-style-type: none"> • Suggested that the purpose of protecting and enhancing the natural environment might be further articulated via the importance of investing in the natural capital this represents. • The constraint analysis omits a number of spatial designations. NPPF section 17 requires planning policy to consider biodiversity conservation at a landscape-scale, recognising the hierarchy of international, national and locally designated sites of biodiversity importance as components of local ecological networks. • The presence of local wildlife sites (Sites of Nature Conservation Importance in Surrey) and Biodiversity Opportunity Areas might usefully have been included in the analysis. • Broad agreement that the preferred Option 2 is the most practicable for the direction of the Local Plan, subject to 'absolute constraints' being widened to reflect concerns above. • Urge that the purpose of Green Belt in 'safeguarding the countryside from encroachment' is afforded adequate consideration when evaluating relative weakness of the designation across Elmbridge • Do not support the removal of Local Area 20 from the Green Belt to facilitate developing the major part of this area. This area is of substantial importance for biodiversity conservation, including the Old Common Site of Nature Conservation Importance/LNR; and the field west of Old Common SNCI. Most of the Area is within a Biodiversity Opportunity Area centred on the Esher Commons SSSI, where the need to maintain and strengthen connectivity between the constituent biodiversity sites is of utmost priority. Extensive development of the land between the SNCI and SSSI would appear to be wholly inconsistent with this aim. • Supportive of limiting delivery of homes with 4+ bedrooms in order to meet genuine housing need with the least impact on the natural environment. • Supportive of designation of those spaces that meet criteria for Local Green Spaces • Welcome commitment to continuing to support biodiversity conservation and maintaining an effective and multi-functional network of Green Infrastructure as outlined in the Thames Basin Heath policies. • Vital to consider safeguarding important biodiversity. This especially relates to maintenance of connectivity throughout and beyond any developed areas, enhancement of public access to natural open space in

	<p>combination with wildlife corridors</p> <ul style="list-style-type: none"> • Highlighted Local Area 14 has populations of several Priority Species for conservation within the vicinity, which would require adequate consideration under any proposed development scenario. These include the protected Great Crested Newt Triturus Cristatus, Adder Vipera Berus, Grass snake Natrix Natrix and Slow-worm Anguis Fragilis, as well as several declining bird species. • Local Area 58 referenced in relation to declining wildlife, present both within and in proximity of the Stokes Field Local Nature Reserve (LNR). Perhaps the most important species resident here is the Brown Hairstreak Butterfly Thecla betulae.
<p>The Environment Agency (EA)</p>	<ul style="list-style-type: none"> • Welcome the recognition of flood plains and SSSIs as 'absolute constraints', however would welcome a full definition of absolute constraints as the EA may consider other topics to also be an absolute constraint on development, such as sewerage network and environmental capacity. • Recommend that consideration of potential contamination issues and possible impacts of development on brownfield sites should be addressed as a challenge in developing the plan. • Given the number of large historic landfills and older industrial parks it is suggested that the Council should have a specific brownfield site policy with an evidence base that reflects on potential contamination issues and possible impacts and controlled waters and habitats. A forward looking policy and relevant strategy for developers to engage early with relevant parties is recommended. • Infrastructure makes no reference to the impact of development on water quality. This is a concern as there may be deterioration in Water Framework Directive (WFD) status of the receiving water bodies. • Proposed growth may be constrained by infrastructure capacity and environmental capacity. Inadequate consideration of this could result in the Local Plan being found unsound by an Inspector. • The southern edge of Local Area 14 is associated with fluvial flood risk and is within Flood Zone 2 (medium risk of flooding) from the Fairmile Ditch, which is a designated Main River. Flooding has been experienced by residents along Blundel Lane on a number of occasions in the past, and it is understood that this flooding may not be solely associated with the Fairmile Ditch. Local drainage problems are also likely to be present. Any development proposal for Local Area 14 should ensure that flood risk is fully considered, any proposal should look to offer a betterment over the existing condition and look to reduce the overall flood risk in the area. Development in this area has the real possibility to seek an integrated solution to flood risk from any source, and this opportunity should be taken. Adequate consideration should be given to the provision and management of the surface water drainage from any development on this site, with the use of sustainable drainage systems where appropriate. This area is also

	<p>located over a Secondary A Aquifer and, therefore, issues regarding contamination of controlled waters should be considered in any development. In addition, a Historic Landfill (Littleheath Lane) is located in the north of the site.</p> <ul style="list-style-type: none"> • Local Area 20 is located over a Principal Aquifer in the south west corner, and a Secondary A Aquifer over the rest of the site. In addition, the EA noted the presence of a Historic Landfill (Norwood Farm) less than 100m to the north of the area boundary. • Local Area 58 contains an area designated as Flood Zone 2 and 3 in the eastern corner of this area, alongside the Surbiton Stream, designated a Main River. In addition, a small area of Principal Aquifer is located in the western side of the area. • Vital to ensure that groundwater is considered in all secondary and principal aquifer bodies in order to ensure that controlled waters are safeguarded for public supply and also to enable the use of surface waters for important habitat and recreational activities. • Flood risk, contaminated land and groundwater protection should all be considered a key constraint to development at Brooklands. WFD is also an issue. The stretch of the River Wey flowing through Brooklands is failing to meet the WFD objective of ‘good ecological status’. The Wey Landscape Partnership, led by the Surry Wildlife Trust, has ambitions to improve this stretch of the River. The Wey Catchment Restoration strategy sets out river restoration ambitions and making reference to this strategy in the local plan will help identify where environmental betterment can be achieved through development. There is also opportunity to make use of sustainable drainage systems to ensure that run off from the site does not impact the River Wey. • Highlighted that an area of Flood Zone 2 is present along the northern boundary of Sandown Racecourse, and the site is located over Principal and Secondary A Aquifers. Any proposed development in this location will need to recognize these environmental constraints. • Would welcome the continued protection of open spaces and would recommend when considering the status of these locations that attention is given to the additional roles that Local Green Spaces can provide; for instance, flood plain, wildlife habitat and corridors as a vital part of green and blue infrastructure. • Recommend that the principals of policy CS12 are extended to all designated Main Rivers in the Borough, such as the River Rythe and recommend that designated Main Rivers are specifically mentioned within Policy CS12. • Welcome the identification of river and canal banks, and the wider river and canal corridor, as an important part of Green Infrastructure. Watercourses are an important environmental asset and an undeveloped 8 metre buffer zone on both sides of a watercourse should be provided to promote green infrastructure, water quality and biodiversity. • Welcome the consideration of flood risk throughout the document and the commitment to ensuring the areas at highest flood risk are protected from inappropriate
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	<p>development.</p> <ul style="list-style-type: none"> • Welcome the updating of policy CS26 Flooding including a policy on small scale developments and their cumulative impact. An updated policy will need to include reference to the updated climate change allowances from February 2016. • Recommend that any flood risk and other relevant policies, such as environmental policy, reflects this River Thames Scheme (RTS) partnership and the need to safeguard land to deliver the RTS. • Desire to work with the Council to discuss policy requirements around addressing the impact of cumulative small scale development • Highlighted the need for a Water Cycle Study (WCS) to form part of the evidence base to inform the Local Plan of the most appropriate location for development to occur to avoid Water Framework Directive compliance issues and/or capacity issues in the wastewater infrastructure network. The study will need to assess both the environmental capacity (water quality needed to protect aquatic and wildlife environment) and infrastructure capacity (ability of the wastewater system to collect, transfer and treat wastewater from home and business) in relation to the impact of the growth being proposed. • Commitment to support the Council in producing a sound, robust and effective Local Plan. • Permitting developments, even on some Green Belt land, where the historic contaminant burden can be alleviated to some degree and where costs are met by the development is an important aspect to consider. This can ensure land requiring remediation is addressed proactively via the planning system. • Suggests that the 2016 Flood Risk SPD should be referenced. • Request that the Infrastructure Delivery Plan takes account of sewerage network capacity and WCS.
Natural England	<ul style="list-style-type: none"> • Noted that Local Area 14 contains designated Ancient Woodland and the Local Plan should contain appropriate policies to ensure their protection. This area also contains a section of Registered Common Land which must be considered in terms of national policy. Similarly Local Area 20 includes Registered Common Land as well as SSSI. Advised that SSSI and its designated features must be given appropriate protection from development. • A strategic approach for green infrastructure should support a similar approach for ecological networks. This can be underpinned by a Green Infrastructure Strategy. Encourage the provision of green infrastructure to be included within a specific policy in the Local Plan or integrated into relevant other policies. • The use of SANGs is a strategic solution approach for this SPA which has been agreed across Local Planning Authority areas in order to mitigate recreational impacts of development in close proximity to the designated site. The Local Plan should be screened under Regulation 102 of the Conservation of Habitats and Species Regulations 2010

(as amended) at an early stage. It may be necessary to outline avoidance and/or mitigation measures at the plan level. The Local Plan should also set criteria based policies to ensure the protection of designated biodiversity and geological sites.

- Comment on the three strategic areas in relation to biodiversity. These included the need for appropriate protection from development in relation to designated sites such as SSSIs and habitats such as ancient woodland and veteran trees.
- The Local Plan should be underpinned by up to date environmental evidence, including an assessment of existing and potential components of ecological networks. This will require working with Local Nature Partnerships as recommended in the NPPF to inform the Sustainability Appraisal, the development constraints of sites and to ensure the mitigation hierarchy is followed. Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species as well as identifying targets for other habitats and species of local importance. Where identified, the Local Plan should also reference Nature Improvement Areas and consider specifying appropriate types of development within them. The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. There should also be consideration of geodiversity conservation.
- The Local Plan should consider climate change adaption and should recognise the role of the natural environment to deliver measures to reduce the effects of climate change and that factors which may lead to exacerbate climate change should be avoided. Requested giving appropriate weight to the roles performed by the soils within the Borough and they highlight that the Local Plan should safeguard the long term capability of the best and most versatile agricultural land in line with NPPF paragraph 112.
- The Local Plan must comply with the NPPF in relation to water quality and resources and flood risk management.
- The Local Plan should be based on an up to date evidence base on the water environment and be informed by the relevant River Basin Management Plans.
- The Local Plan should contain policies which protect habitats from water related impacts and where appropriate seek enhancement. Priority for enhancements should be focused on N2K sites, SSSIs and local sites which contribute to a wider ecological network.
- The Local Plan should consider climate change adaption and recognise the role of the natural environment to deliver measures to reduce the effects of climate change.
- The Local Plan should address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the

	<p>plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable. Key consideration should be given to proposals likely to generate additional nitrogen emissions as a result of increased traffic generation. The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites, and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required.</p>
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14 Next Steps

14.1 As explained at the start of this document, the Government's proposals to change national planning policy in areas could affect the approach taken by the Council in preparing its new Local Plan. In particular, the proposed changes to assessing housing needs and the introduction of tests as to when there are exceptional circumstances to amend Green Belt will require the Council to prepare additional studies. Therefore, the Council must await the details of the proposed consultations as featured in the Housing White Paper before moving forward.

14.2 The additional studies required will impact on the timetable for the preparation of the Local Plan. For example, the Government's standardised methodology for assessing housing need should be published for consultation in Summer 2017. It is proposed to be adopted into national policy by April 2018. The new definition of what constitutes exceptional circumstances for amending the Green Belt is also not expected until Summer 2017. Until this methodology and new definition are known, the Council will not be able to assess whether these proposed changes will have an impact on our current assessments. Once this information is known, the Council will be able to respond in more detail to the key issues raised through the Strategic Options Consultation.

14.3 Consequently, the Council will not be consulting on the next stage of its Local Plan as set out in its Local Development Scheme (LDS) (September 2016). It is estimated that a minimum of 6 months will be required to prepare the required evidence base. As such, consultation on a more detailed Preferred Approach Local Plan is unlikely until early 2018.

14.4 A revised LDS will be published in due course, once the Government has provided a clearer timetable as to the implementation of the proposed changes set out in the Housing White Paper

15 Appendices

Borough Development

Planning for Elmbridge's Future Together



We have all seen headlines like these in the last year. The Government wants to tackle the lack of housing in England and as part of its housing strategy it is requiring Councils around England to meet the housing needs of their areas.

In response, Elmbridge Borough Council has agreed a timetable of preparation for a 'Local Plan' – the Council's planning strategy. This will replace the existing plan, the 'Core Strategy', as it was adopted before the Government introduced its new approach to development in England.

As part of the work to bring our planning strategy up-to-date with the Government's aims, we have been assessing the housing need in the Borough and as many residents would expect, the assessments show a very high level of housing need within the area. Increasing birth rates, an ageing population and more people moving from London are all adding to our current population. However, what is also clear is that this need is for smaller, more affordable accommodation.

The Local Plan will set out how we might increase the delivery not only of more new homes but also the right new homes. Homes that meet the needs of our population – homes that are smaller and more affordable. However, the Government also requires us to consider some difficult decisions, such as whether we should amend the Green Belt boundary or look to increase the density of development in our towns and villages.

The timetable sets out our intention to submit the Local Plan to the Government for examination early in 2018. Before then we will consult with residents and local businesses on the options and approaches we think will allow us to increase the level of development whilst also maintaining the character of the area and improving infrastructure.

For more information, please visit elmbridge.gov.uk/planning.

A Beacon of Sport for Elmbridge

As residents may be aware, the Council has started to create the Elmbridge Sports Hub – a modern, first class leisure facility housing football and athletics next to the Xcel Leisure Complex on Waterside Drive, Walton-on-Thames.

Creating a beacon of sport for the Borough, the Sports Hub is due to open in September 2017, with remediation work continuing on site until January 2017. The remediation work is required to 'clean-up' the land as it was previously used as a landfill site.

Facilities at the Sports Hub will include two full size 3G pitches (artificial turf), grass junior football pitches, a full eight lane athletics track to UK Athletics standard, as well as covered spectator seating for over 500 people. There will also be a children's play area and a dog walking strip, creating an outdoor community facility in keeping with Elmbridge's unique and green character on this reclaimed landfill site.

There is no doubt that the facilities being built at the Sports Hub will have lasting benefits for the Borough as residents of all ages will have the opportunity to become involved in football and athletics at the highest level. Whether playing football, competing in track and field events, supporting, volunteering or coaching, there will be countless opportunities for all of Elmbridge to get involved with the Sports Hub.

Sporting organisations, including Sport England, the Ryman Football League, UK Athletics and Surrey County FA, are very supportive of the Sports Hub. Surrey County FA has said:

"The Sports Hub in Walton-on-Thames will not only provide children and young people with the opportunity to develop their sporting skills but it will also encourage them to reap the benefits of a healthy, active lifestyle... a good result for Elmbridge and Surrey."

For more information on the Sports Hub and to read the regular updates, please go to elmbridge.gov.uk.



Appendix 2: A copy of the Response form

Shaping Elmbridge A New Local Plan



Elmbridge Local Plan: Strategic Options Consultation Response Form

Please use this form to respond to the Strategic Options Consultation.

Alternatively, you can view the Strategic Options Consultation document and complete this response form online at consult.elmbridge.gov.uk/consult.ti/lpsoc/consultationHome

Hard copies of the consultation document are also available to view at the Civic Centre and Borough Libraries.

This response form is divided into two parts.

Part One includes questions on the key challenges facing Elmbridge and the Council's Preferred Option. We would strongly encourage you to complete all of **part one**. There are 8 questions in total.

Part Two contains questions on key issues that need to be considered and addressed as part of the future Local Plan. Listed below, we would also like to hear your views on:

- Housing (questions 9-15)
- The economy and retail (questions 16-21)
- The natural and built environment (questions 22-28)
- Transport and infrastructure such as highways, schools and healthcare (questions 29-32)

We cannot accept anonymous comments. Therefore please complete the table overleaf with your contact information and return this with your response. 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.

If you print this form and use any additional sheets please mark these clearly confirming which part of the document you are responding to.

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.

Your Information

Please complete the appropriate sections below with your contact information and return this with your comments.

Personal Details*	Agent's Details (if applicable)	
*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.		
Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

Completed questionnaires must be returned by 4pm on Friday 24 February 2017

Please send completed questionnaires to: Planning Policy, Planning Services
Elmbridge Borough Council
Civic Centre, High Street
Esher, Surrey, KT10 9SD

Alternatively, save / scan and e-mail to: planningpolicy@elmbridge.gov.uk

PART ONE

The key challenges facing Elmbridge

Please read Section 2 of the Consultation Document that sets out the key challenges for Elmbridge

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 the challenges set out in section 2 of the consultation document are the key challenges facing Elmbridge?

Yes, I agree

No, I disagree

I don't know

Please explain your answer:

2. Do you consider there are other challenges that we should be addressing?

Yes

No

Don't know

Please explain your answer:

3. Do you consider any particular challenge or challenges that are more important than the others?

Yes

No

Don't know

Please explain your answer:

Our Preferred Option

To answer these questions, please read Section 3 of the Consultation Document

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

4. Agree that Option 2 is the most appropriate option?

Yes, I agree

No, I disagree

I don't know

If you disagree, please explain why and what other option would you support and why?

Please insert your comments here

- 5. Do you consider the suggested exceptional circumstances are sufficient to support the amendment of the Green Belt boundary?**

Yes
No
Don't know

Please explain your answer:

- 6. Agree that, given the appropriate exceptional circumstances, these three key strategic areas are appropriate for removal from the Green Belt?**

Yes, I agree
No, I disagree
I don't know

Please explain your answer:

- 7. Do you know of any sites within any of the three key strategic areas that could be considered for future development?**

Yes
No

Please explain your answer:

- 8. Do you consider that other areas of land should be removed from the Green Belt including those that are moderately or strongly performing?**

Yes
No
Don't know

Please explain your answer:

PART TWO – KEY ISSUES

Housing Size and Type

To answer these questions, please read Section 4 of the Consultation Document
--

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?**

- Yes, I agree
- No, I disagree
- I don't know

Please explain your answer:

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

- Yes
- No
- Don't know

Please explain your answer:

Housing Densities

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?

- Yes **If yes, what density do you think would be appropriate?**
- No
- Don't know

Please explain your answer:

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?

- Yes
- No
- Don't know

Please explain you answer:

b. support lower density developments that maintain the open character of an area and reflects the surrounding character

- Yes
- No

Don't know

Please explain your answer:

Affordable Housing

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?**

Yes, I agree

No, I disagree

I don't know

Please explain your answer:

Gypsies, Travellers and Travelling Showpeople

- 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?**

Yes

No

Don't know

Please explain you answer:

Housing Needs

- 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?**

Yes

No

Don't know

Please explain your answer:

The Economy: Offices, warehousing and industry

- 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?**

- Yes, I agree
- No, I disagree
- I don't know

Please explain your answer:

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

Please insert your comments here:

Brooklands

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?

- Yes
- No
- Don't know

Please explain your answer:

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

Please insert your comments here:

Sandown Park Racecourse

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?**

- Yes
- No
- Don't know

Please explain your answer:

Retail provision in our town and village centres

21. Given changing consumer habits should we:

- **Maintain our policy of focussing new retail development to town and village centres?**

- Yes
- No
- Don't know

Please explain your answer:

- **Continue to protect primary shopping areas from other uses as set out in the current Core Strategy?**

- Yes
- No
- Don't know

Please explain your answer:

- **Consider allowing other important uses in primary high street shopping frontages such as doctor's surgeries, dentists and libraries?**

- Yes
- No
- Don't know

Please explain your answer:

The Natural and Built Environment

Open Space

- 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?**

- Yes
- No
- Don't know

Please explain your answer:

Biodiversity and the Thames Basin Heaths Special Protection Area

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

- Yes
- No
- Don't know

Please explain your answer:

Heritage and Historic environment

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

- Yes, I agree
No, I disagree
I don't know

Please explain your answer:

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

Please insert your comments here:

Design and Character

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

- Yes
No
Don't know

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

Please insert your comments here:

Flooding

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?

- Yes
No
Don't know

Please explain your answer:

Sustainable transport and travel patterns

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?

- Yes
No
Don't know

Please explain your answer:

30. Are there other approaches we should consider?

- Yes
No
Don't know

Please explain your answer:

Infrastructure Delivery

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?

Please insert your comments here:

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?

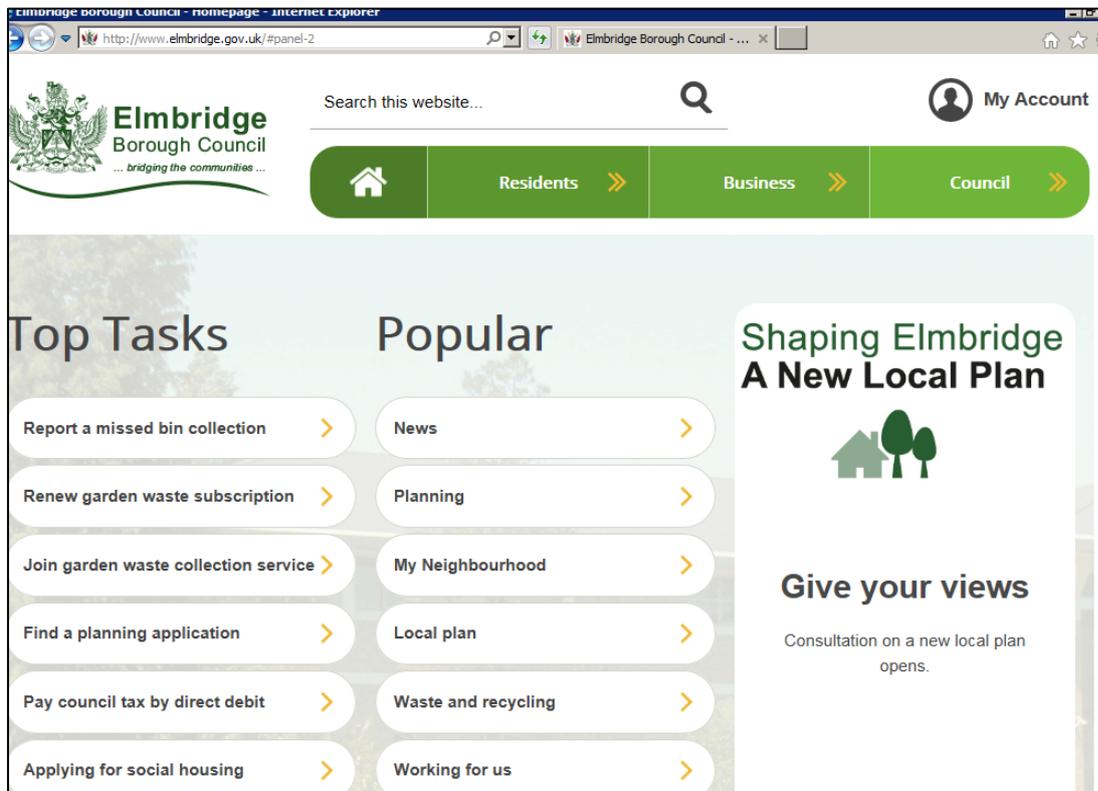
Please insert your comments here:

Any other issues?

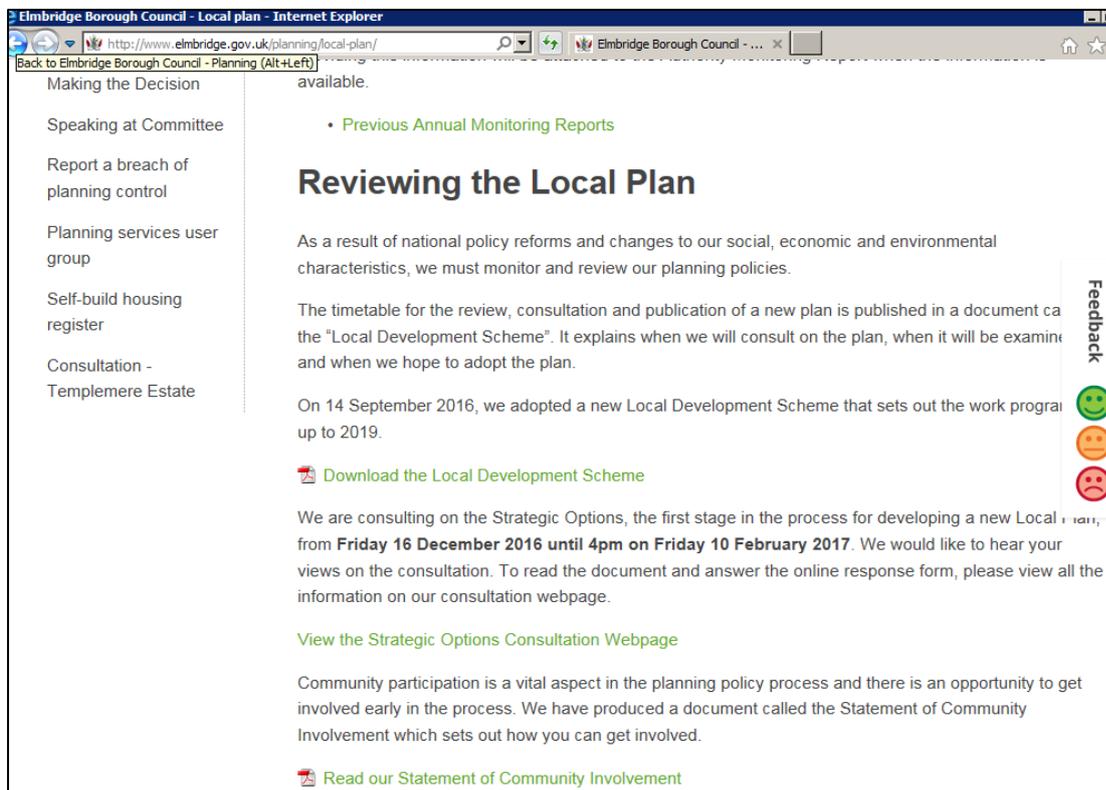
We recognise that there may be other issues or options we have not considered that you would like to raise. If there are we would like to hear these and consider them as part for this consultation. Please use this page to write anything else you would like us to consider.

Appendix 3: Consultation webpage and links

Elmbridge Borough Council's Homepage- Link on scrolling pane



Link from the 'Our Local Plan' webpage



Consultation Webpage

The screenshot shows a web browser window with the URL <http://consult.elmbridge.gov.uk/consult/t/psoc/consultationHome>. The page features the Elmbridge Borough Council logo and a search bar. A navigation menu includes 'Residents', 'Business', and 'Council'. The breadcrumb trail is 'Home » Planning » Our local plan » Strategic Options Consultation'. The main heading is 'Strategic Options Consultation'. A sidebar on the left lists navigation options like 'My Consultations', 'My Profile', and 'Consultation Home'. The main content area is titled 'Shaping Elmbridge A New Local Plan' and includes an icon of a house and trees. The text explains the consultation's purpose and provides links to frequently asked questions, consultation documents, and evidence base documents. A table lists consultation sessions with dates, times, and venues. The page also mentions an exhibition at the Civic Centre and provides contact information for submitting views.

Elmbridge Borough Council

My Consultations
My Profile
Log out
Help
All Consultations

Consultation Home

- Manage
 - Setup
 - Settings
 - Homepage
 - Documents
 - Web Pages
 - People
 - Participants
 - Invite
 - Responses
 - Questionnaire Responses
 - Comments
 - Moderate
 - Tags
 - Communication
 - Mail Merge
 - Letter Log
 - Send Email
 - Reports
 - Recycle Bin
 - Delete Consultation

Shaping Elmbridge A New Local Plan

What is this consultation about?

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

In particular, it sets out the Council's preferred option for a new spatial strategy. We are also seeking comments on a range of issues which will help inform the contents of a new Local Plan.

- Frequently Asked Questions**
 - [Read the Strategic Options consultation document](#)
 - [Browse evidence base documents](#)

Where can I find out more information?

A hard copy version of the document is available to inspect at the [Civic Centre](#), the Boroughs [local libraries](#) and at the drop in sessions. These are being held:

Date	Time	Venue
Tuesday 10 January	7-9pm	Lecture Hall, 1st Floor Weybridge Library
Wednesday 11 January	7-9pm	Cobham Community Centre
Thursday 19 January	7-9pm	Hinchley Wood Secondary School
Monday 23 January	7-9pm	Cecil Hepworth Playhouse (Walton)
Thursday 26 January	7-9pm	Civic Centre, High Street, Esher
Saturday 4 February	10- 2pm	Civic Centre, High Street, Esher

An exhibition will be permanently displayed throughout January and up until 10 February 2017 in the Civic Centre Reception, High Street, Esher.

Let us know your views

We would like to know your views on the strategic options and encourage you to use the online response form after reading the [consultation document](#). Unless you are already registered, you will need to register on our consultation portal but you can opt out of receiving any further correspondence if you do not want further contact.

If you would prefer not to use the online consultation portal you can print out the [response form](#) and e-mail it to us at planningpolicy@elmbridge.gov.uk or post back to us at Planning Policy, Planning Services, Elmbridge Borough Council Civic Centre High Street Esher KT10 9SD

- Recycle Bin
- Delete Consultation
- 📁 Site Admin
 - Reports
 - Mail Merge
 - Letter Log
 - Stakeholders
 - New Consultation

If you would prefer not to use the online consultation portal you can print out the [response form](#) and e-mail it to us at planningpolicy@elmbridge.gov.uk or post back to us at Planning Policy, Planning Services, Elmbridge Borough Council, Civic Centre, High Street, Esher, KT10 9SD.

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 are unable to accept anonymous comments and your name and comments will be published after the consultation finishes.

Copies of the consultation document cost £8.00. If you would like to purchase a copy of the consultation document, please contact us at planningpolicy@elmbridge.gov.uk

What happens next?

Following this consultation, we will consider 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 Summer 2017.

You may now respond to this consultation

[🔗 Customise this text](#)

Consultation Documents

[Strategic Options Consultation: Online Response Form](#)

Please let us know your views on the consultation document by completing this online response form.
12 Dec 2016 09:05

[Strategic Options Consultation Document](#)

Before completing the response form please read this consultation document as it explains the key challenges, strategic options, preferred option and issues that need to be considered as part of the development of a new Local Plan.

Before completing the response form please read this consultation document as it explains the key challenges, strategic options, preferred option and issues that need to be considered as part of the development of a new Local Plan.

08 Dec 2016 09:33, 3.3 MB

[Consultation Response Form for e-mailing or posting](#)

This form allows you to fill out, scan in and e-mail or print off, fill out and post back to us.
19 Dec 2016 12:23, 115 KB

[Statement of Representations Procedure](#)

Explains the procedure for commenting on the Local Plan Strategic Options consultation
08 Dec 2016 09:25, 156 KB

[Frequently Asked Questions \(FAQs\)](#)

These FAQs include information about the Local Plan, the content of the Strategic Options Consultation document and how to get involved.
08 Dec 2016 13:41, 393 KB

[Sustainability Appraisal Scoping Report and Initial Assessment](#)

This report sets out the scope for the SA and provides an initial assessment of the spatial strategy options.
08 Dec 2016 13:26, 1.8 MB

[Habitats Regulations Assessment and Initial Screening Report](#)

This document assesses the three Strategic Options and whether these options alone or in combination are likely to have a significant effect on a European site.
08 Dec 2016 13:39, 770 KB

[Equality Impact Assessment: Screening Form](#)

12 Dec 2016 13:44, 472 KB

[Poster](#)

The Strategic Options Consultation Poster.
08 Dec 2016 13:43, 1.3 MB

[Back](#)

[Add, remove or reorder documents](#)

Respond to this Consultation

You can respond to this consultation using any one of the options presented below.

- ▶ [Respond by making comments on the consultation document](#)
- ▶ [Respond by filling in the online questionnaire](#)

[Change the ways people can respond](#)

Consultation Links

- ▶ [I am no longer interested in this consultation](#)

Consultation Summary

Name	Strategic Options Consultation
Description	This consultation is to seek views on the Strategic Options for meeting development needs as part of the preparation of a new Local Plan to replace the Core Strategy. In particular, it sets out the Council's preferred option for a new spatial strategy. We are also seeking comments on a range of issues which will help inform the contents of a new Local Plan.
Dates	From 16 Dec 2016 at 09:00 to 10 Feb 2017 at 16:00 .
Status	Open

[Modify the name, description, dates or status](#)

Link to consultation page on News webpages

The screenshot shows the Elmbridge Borough Council website. The header includes the council logo, a search bar, and navigation links for Residents, Business, and Council. The main content area is titled 'News' and features several news items. The first item is 'Routine Maintenance' with a sub-headline 'There will be intermittent breaks in online services on Saturday 17 December - apologies for any inconvenience.' The second item is 'Give your views' with a sub-headline 'Consultation on a new local plan opens.' The third item is 'Public consultation' with a sub-headline 'New conservation area proposed for Templemere in Weybridge'. The fourth item is 'Flowerbed competition'. On the right side, there is a 'Media enquiries' box with contact information: Email us, 01372 474 387, and Communications at Civic Centre, High Street, Esher, Surrey, KT10 9SD.

Introductory text on Elmbridge Borough Council Homepage

Local Plan

News

Lights, camera, action!

enewsletter

Free gym pass for Xcel

Looking to improve your business?

Proposed Heathrow expansion

Elmbridge Gambling Policy Review

Community Infrastructure Levy (CIL)

Beware of rogue waste collectors

New Royston Pike Lecture Series

Support the Weybridge singing group

Cobham Link to celebrate 5th birthday

16 December

From Friday 16 December Elmbridge residents are being asked to [give their views on a new Local Plan for the Borough](#). The Local Plan will determine the planning strategy for Elmbridge for the next 20 years and is being prepared in response to the Government's requirement for Councils to address the housing need in England. Elmbridge Borough Council is putting forward three options to address the need for more affordable and social housing in Borough and it wants to hear from residents on the proposals.

There will be public exhibitions at the following venues in January and February when residents will have the chance to find out more about the proposals.

- Tuesday 10 January 7-9pm Weybridge Library Lecture Hall (1st floor)
- Wednesday 11 January 7-9pm Cobham Community Centre
- Thursday 19 January 7-9pm Hinchley Wood Secondary School
- Monday 23 January 7-9pm Cecil Hepworth Playhouse (Walton)
- Thursday 26 January 7-9pm Civic Centre, High Street, Esher
- Saturday 4 February 10-2pm Civic Centre, High Street, Esher

Councillor Stuart Selleck, Leader of Elmbridge Borough Council is encouraging residents to take part in the consultation for the Local Plan;

"As Elmbridge residents we want to hear your views on the planning strategy for the Borough. None of us want the Government making decisions for us, so I would urge all residents to participate in this consultation. Come along to a drop-in session, read the details on the Council website or at your local library or pop in to the Civic Centre in Esher High Street to view the exhibition. It is important to note that no decisions have yet been made."

Feedback



Appendix 4: Consultation E-mail and Letter Content



Elmbridge
Borough Council

... bridging the communities ...

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

contact: Planning Policy
telephone: 01372 474474
e-mail: planningpolicy@elmbridge.gov.uk
your ref: SO/2016
date: 16 December 2016

Dear

Shaping Elmbridge: A New Local Plan - Strategic Options Consultation

Elmbridge Borough Council is preparing a new Local Plan. The **Strategic Options Consultation** is the first stage in the process and sets out the key development challenges facing the Borough, including the Council's preferred option for addressing these. It also presents questions on a range of issues that will need to be considered as part of the development of a new Local Plan.

How can I get involved?

If you would like to comment, the consultation starts at **9am on 16 December 2016 and ends at 4pm on 10 February 2017**. You can read the document online at consult.elmbridge.gov.uk or alternatively hard copies are available for inspection at:

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

Date	Time	Venue
Tuesday 10 January	7-9pm	Lecture Hall, 1 st Floor Weybridge Library
Wednesday 11 January	7-9pm	Cobham Community Centre
Thursday 19 January	7-9pm	Hinchley Wood Secondary School
Monday 23 January	7-9pm	Cecil Hepworth Playhouse (Walton)
Thursday 26 January	7-9pm	Civic Centre, High Street, Esher
Saturday 4 February	10-2pm	Civic Centre, High Street, Esher

An exhibition will also be permanently displayed throughout January and up until 10 February 2017 in the Civic Centre Reception, Esher.

How can I comment?

All comments must be made in writing and received by **4pm on Friday 10 February 2017**.
Comments can be submitted either:

- through the Council's website at **consult.elmbridge.gov.uk**
- by email to planningpolicy@elmbridge.gov.uk
- by post to Planning Policy, Planning Services, Elmbridge Borough Council, Civic Centre, Esher, KT10 9SD.

Following this consultation, we will consider 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 the Summer of 2017.

If you have any further queries please contact our Planning Policy team on 01372 474474

Yours sincerely



Mark Behrendt
Planning Policy Manager

Why have I received this letter?

Your name and details are currently on our planning database. If you no longer wish to be consulted, or receive any communications from us in regard to the preparation of the Local Plan, please let us know by either writing to us at the above address or email us at planningpolicy@elmbridge.gov.uk and we will remove you from our database.

Please let us know your e-mail address

In order to reduce costs, we would like to contact you in future via e-mail. Please let us know your e-mail address by e-mailing us at planningpolicy@elmbridge.gov.uk and we shall update your details on the database.

Appendix 5: List of Consultees invited

Amenity Group/Club	Architects cont'd
Hersham Bowling Club	Robert Bailie Architects RIBA
Barbara Currie Yoga	Roger Bennett
Brooklands Museum Trust Ltd	Sassi Chamberlain Architects
Claygate Allotment Holders Association	Souhile Faris
Claygate Martial Arts Centre	Springwheel Associates
Claygate Women's Institute	Taylor Associates
Elmbridge Arts Council	Tim Wardle
Hersham Scout Group	West Waddy ADP
Lower Farm Stables	CAAC/Heritage/Conservation
MBC	Ancient Monuments Society
Old Pauline Sports Clubs	Brooklands Museum
Playhouse Users' Committee	Cobham Conservation & Heritage Trust
Ray Road Allotment Association	Downside CAAC
Soroptimists International of Elmbridge	East Molesey Conservation Area Advisory Committee
The Campaign for Real Ale	Esher CAAC
The Caravan Club	History Society
The Cecil Hepworth Playhouse, WOT	Society for the Protection of Ancient Buildings
The Lawn Tennis Association	Stoke D'Abernon CAAC
The Theatres Trust	The Gardens Trust
Walton & District Allotment & Garden Society	Walton CAAC
Walton-on-Thames Bowling Club	West End CAAC
Architects	Weybridge CAAC
ADM Architecture	Care/Support
Anyards Designers & Surveyors Ltd	Elmbridge Crossroads - Caring for Carers
Brian Prideaux Chartered Architects	New Approaches to Cancer
Building Plans	Surrey Care Association
By Design Architects	The Princess Alice Hospice
Construction Computing Services	Voluntary Action Elmbridge
Coventry Design	Walton Blind Society
Crane & Associates Ltd	Weybridge Stroke Group
David Sayer & Associates	Central Government
Dean Design Architectural Services	Health & Safety Executive
Glenavon House	Department for Culture Media and Sport
GMK Associates	Department of Transport
Home Design Services	Dept for Environment, Food and Rural Affairs
Knight Norman Partnership	Education Funding Agency
Lewandowski Willcox	Forestry Commission
MAA Architects	Health & Safety Executive
Mary Hackett & Associates	Homes and Communities Agency
Mitchell Evans Partnership	Marine Management Organisation
Omega Partnership Ltd	Sport England
OSP Architecture	Chamber of Commerce
Paul Hunt Associates	Surrey Chamber of Commerce
Pereira-Walshe Partnership	Elmbridge Business Network, Elmbridge Chamber of Commerce
Peter Whicheloe Architecture Ltd	Cobham Chamber of Commerce and Savills
PRC Planning	Claygate Chamber of Commerce (Catling & Co.)

Community Safety	Tony Popham
Crime Reduction Advisor- Surrey Police	Karen Randolph
Elmbridge Community Safety Partnership	Ivan Regan
North Area Office	Stuart Selleck
Office of the Police and Crime Commissioner for Surrey	Mary Sheldon
Surrey and Sussex Police	Tannia Shipley
Surrey Criminal Justice Board	Janet Turner
Surrey Fire & Rescue Service	James Vickers
Surrey Neighbourhood Watch	Graham Woolgar
Sussex & Surrey Police	Councillors – Surrey
Sussex & Surrey Police	Mike Bennison
Councillors – Elmbridge	Margaret Hicks
Ruby Ahmed	Peter Hickman
David Archer	Rachael Lake
Mike Axton	Mary Lewis
Mike Bennison	Ernest Mallett
Tricia Bland	Stuart Selleck
Lewis Brown	County Councils
James Browne	Hampshire County Council
Andrew Burley	Surrey County Council
Oliver Chappell	Developer/Builder/Landowner
Barry Cheyne	AMEC Environment & Infrastructure UK Limited
Alex Coomes	Andrew Dossett
Christine Cross	Antler Homes Southern plc
Kim Cross	Ashill Developments
Glenn P Dearlove	Barratt Southern Counties
Ian Donaldson	Bell Cornwell LLP
Victor Eldridge	Bellway Homes South East
Christine Elmer	Berkeley Group
Barry Fairbank	Berkshire Homes Ltd.
Simon Foale	Bewley Homes Plc
Michael Freeman	Bloor Homes
Roy Green	Burhill Homes
Nigel Haig-Brown	Burhill Kennels Consortium
Peter Harman	Cala Homes South Ltd
Peter Heaney	Chartridge Developments plc
Anne Hill-Purcell	Defence Estates
Neil Houston	Denton Homes Ltd
Malcolm Howard	Federation of Master Builders
Shweta Kapadia	GMS Estates Limited
Andrew Kelly	Goldcrest Homes
Alan Kopitko	Heritage Period Properties
Rachael Lake	Ian Allan Group Ltd
Ruth Lyon	Isallo Properties Ltd.
Mary Marshall	JPS Ltd
Dorothy Mitchell	Kingston Homes Ltd
Andy Muddyman	Laing Homes Ltd South West Thames
Tim Oliver	Lambert Smith Hampton
Alan Palmer	Latchmere Properties Ltd

Developer/Builder/Landowner cont'd	Environment cont'd
Levanter Properties Ltd & Waitrose	River Mole Catchment Partnership
Lightwood Property	River Thames Alliance
Linden Homes Development Ltd	River Thames Society
Lochailort Investments Ltd	Royal Society for Protection of Birds
Martin Grant	South East Waterways: Canal and River Trust
Martin Wapshott	Surrey Countryside Access Forum
McCarthy & Stone Retirement Lifestyles Ltd.	Surrey Nature Partnership
Michael Shanly Group	Surrey/National Playing Fields Association
Molefield Green Ltd	Thames Landscape Strategy
Molesey Industrial Estate: OYO Developments Ltd	Thames Renewables
Nationcrest plc	The National Trust
Next Generation Homes	Wey Landscape Partnership
Octagon Developments Limited	Estate Agents
Paddy Sweetram	Hawes and Co
Peer Group PLC	Aldous Craig Estates
Property Investment Holdings Ltd	Aston Mead
Reside Developments	Barons Estate Agents
Rushmon Homes	Bonsor Penningtons
Seaward Properties	Boyce Thornton Estate Agents Ltd
Shanly Homes Ltd	Brooke-Taylor Commercial
St Andrew's Properties Ltd	C H K Esher
Surrey County Council	Castle Wildish
Taylor Wimpey Homes	Catling & Co
Thakeham Homes	Curchods Estate Agents
Try Homes	DJF Residential Lettings Ltd
Wates Homes	Gascoigne Billinghamurst
Weber Shandwick Ltd	Gascoigne Pees Lettings and Countrywide Lettings
Wm Morrisons Supermarkets Plc	Hamptons International
Disability Group	Hawes & Co
Elmbridge MENCAP	Helas Wolf
Queen Elizabeth's Foundation for Disabled	HJC Real Estate
Environment	Huggins Edwards & Sharp
Assoc of Riparian Owners of River Mole	Jacksons Letting Agents
Berkshire Local Nature Partnership	Jackson-Stops & Staff
Centre for Ecology and Hydrology	John D Wood & Co
CPRE (Surrey Office)	Jones Lang Lasalle Ltd
Design Council	Knight Frank
Elmbridge Environmental Forum	Martin Flashman & Co
Environmental Transport Association	Preston Bennett Planning
Fields in Trust	Rawlinson & Webber
Friends of the Earth	Roy James Fancy Town & Country Homes
Hampshire and Isle of Wight Local Nature Partnership	Savills
London Local Nature Partnership	Smiths Gore (Crown Estate Managing Agent)
Lower Mole Countryside Project	Strutt & Parker
National Farmers' Union	The American Agency
NW Surrey RSPB Local Group	Trenchard Arlidge
Open Spaces Society	Ethnic Groups
Painshill Park Trust	Dean Kefford

Ethnic Groups cont'd	Local Business con'td
Friends, Families and Travellers	Eurotech Computer Services Ltd
Irish Traveller Movement in Britain (ITMB)	Federation of Small Businesses
National Federation of Gypsy Liaison Groups	FSB
Showmen's Guild of Great Britain	Galleria
Traveller Law Reform Project	Garsons
Health/hospital/GP	Golden Curry
Capelfield Surgery	Guy Salmon Jaguar Ltd
Department of Health	Heathrow Airport Ltd
Fort House Surgery	Hersham Place Technology Park
Meads Dental Practice	High Street Esher
Mole Valley DCMHT, Surrey Oaklands NHS Trust	Hinchley Wood Traders Assoc
NHS North West Surrey CCG	Jason Coats Ltd
NHS South East Coast	Jedco Product Designers Ltd
NW Surrey Clinical Commissioning Group	Jewson
South East Coast Ambulance Service	Jones Day
Surrey and Sussex NHS Healthcare	La Voiture
Surrey Care Trust	Lidl UK GmbH
Surrey Downs Clinical Commissioning Group	Mattias Billing Dental Office
Housing Association	McDonalds
A2 Housing Group	Meggitt Bird LLP
Crown Simmons Housing	Mott Macdonald
Elmbridge Housing Trust	Origin Brand Consultants
National Housing Federation South East	Osborne and Collins Ltd
Orchard (Weybridge)Housing Association Ltd	Pizza Express
Paragon Community Housing Group	Post Office Property Holdings
Paragon Community Housing Group (inc. Elmbridge Housing Trust and Richmond upon Thames Churches Housing Trust)	Queens Road Business Guild
Richmond Upon Thames Churches Housing Trust	Rhodes Foods Limited
Rosemary Simmons Memorial Housing Association	Rodd Properties Ltd
Southern Housing Group	Rose Nursery
Thames Valley Housing Association	Safino Limited
Transform Housing and Support	Sainsbury's Supermarkets Ltd
Local Business	Seven Hills Garden Centre
A W Law and Esher Business Guild	Stewart Ross Associates
Asda Stores Ltd	Stewart Ross Associates
Automotive Calibration Ltd	The Cookie Man
Barwell Court Estate	The Weybridge Office
Beveric Cleaners	Thro' the Looking Glass/Bluebell Lingerie/D & D Photography
Buds & Blooms	Top Flight Loft Conversions Ltd
CNBS	Tops Pizza & Chella Cafe
D2 Printing Ltd	Village Mowers Ltd
Digital Video Systems Ltd	Villager Laundry & Dry Cleaners
DJ Squires & Co. Garden Centres	Visioncare
Domino 4 Ltd	Waitrose Ltd
Enterprise M3	Wakelin Associates Architects
Esher Retail Group	Walchry Motors

Local Business cont'd	Media
Walton Business Group	Virgin Media Business Limited
Walton Plating Ltd	Older People
Walton Retail Guild	Age UK Surrey
Williamson Partnership	Day Centre Social Committee
Local Government	Whiteley Homes Trust
Basingstoke and Deane Borough Council	Parish Council
Buckinghamshire County Council	Claygate Parish Council
Chichester District Council	East Horsley Parish Council
Crawley Borough Council	East Horsley Parish Council
Ealing Borough Council	Effingham Parish Council
East Hampshire District Council	Ockham Parish Council
Elmbridge Borough Council	Walton on Thames PCC
Harrow Council	Planning Consultant/Agent
Hart District Council	Alliance Environmental Planning Ltd
Hillingdon Council	Andy Smith
Horsham District Council	Barton Willmore
Lambeth Council	Base Planning and Design Ltd
London Borough of Barnet	BNP Paribas
London Borough of Brent	Boyer Planning
London Borough of Bromley	Carter Planning Limited
London Borough of Croydon	Catriona Riddell Associates
London Borough of Hammersmith & Fulham	CgMs Consulting
London Borough of Hounslow	Chris Thomas Ltd
London Borough of Merton	Christian Leigh
London Borough of Sutton	Colliers CRE
Mid Sussex District Council	Cushman & Wakefield
New Forest District Council	Dalton Warner Davis
Royal Borough of Kensington & Chelsea	Davis Planning
Royal Borough of Windsor and Maidenhead	Deloitte Real Estate
Runnymede Borough Council	Derek Horne & Associates
Rushmoor Borough Council	DMH Planning
Sevenoaks District Council	DP9
Slough Borough Council	DPDS Consulting Group
South Bucks District Council	Drivers Jonas
South Downs National Park Authority	Entec UK Ltd
South London Partnership	ESA Planning
Surrey County Council	Firstplan
Surrey Heath Borough Council	FTB
Tandridge District Council	G L Hearn
Test Valley Borough Council	Genesis TP
Three Rivers District Council	Gregory Gray Associates
Wandsworth Council	Harper Planning Consultants
Wealden District Council	Henry Adams Planning Ltd
West London Alliance	Howard Hutton & Associates
Westminster City Council	Huggins Edwards & Sharp
Winchester Borough Council	Hurst Warne & Partners LLP
Woking Borough Council	Indigo Planning Limited
Wycombe District Council	Jones Lang Lasalle

Planning Consultant/Agent con'td	Political Parties cont'd
Kirkwells Town Planning Consultants	Esher & Walton Conservative Association
Maven Plan Ltd	Esher and Walton Conservative Association
Montagu Evans	Oatlands Conservative Association
Murdoch Planning	Socialist Labour Party
Nathaniel Lichfield and Partners	Weybridge Liberal Democrats
Paul Dickenson & Associates	Public Transport
Peacock & Smith	First County Group
Peter Brett Associates LLP	London Buses Network Operations
Peter Collins Associates	Network Rail
Phillips Planning Services Ltd	Office of Rail Regulation
Plainview Planning	South West Trains
Planning Potential Ltd.	Sustrans South East
Planning Works Ltd	Transport for London
Portaplanning	Religious Group
Pro Vision Planning & Design	All Saints Catholic Church
PRP Planning	Christ Church Esher
Rapleys LLP	Church Commissioners
rg+p Ltd.	Church of the Holy Name, Esher
Ronald Perrin	Elmbridge Multi-Faith Forum
RPS CgMs	Guildford Diocesan Board of Finance
Savills (UK) Ltd	Hersham Baptist Church
SGT- International	Holy Trinity Church
Spitfire Properties LLP	Kingston Liberal Synagogue
STAR Planning and Development	Molesey Community Church Trust
Telereal Trillium	Our Lady of Lourdes R.C. Church
Terence O'Rourke	St Andrew's Church
Tetlow King Planning Ltd	St Barnabas Church
The Bell Cornwell Partnership	St James' Parish Church
The JTS Partnership	St Mary's Church East Molesey
The Planning Bureau Ltd	St Mary's Parish Church
The Planning Inspectorate	St Peter's Church
Turley Associates	Walton Baptist Church
Urban Matrix Ltd	Weybridge Methodist Church
Urbanicity	YMCA London South West
Vail Williams LLP	Residents
White Young Green Planning	890 Residents
Woolf Bond Planning	Residents Association/Group
WYG Planning and Environment	Ashley Park Residents Association
Political Parties	Black Hills Residents Association
Cobham Garden and Horticultural Association and Esher & Walton Constituency Labour Party	Broom Way Cul de Sac Residents Association
Cobham, Downside, Oxshott & Stoke D'Abernon :Labour Party	Burwood Park Residents Ltd
East Molesey Conservatives	Claremont Park Residents Association

Residents' Association/Group cont'd	School/College/University cont'd
Cobham & Downside Residents' Association	Burhill Community Infants School
Danes Court Estate (Oxshott) Residents Association	Burwood Pre-school
Ditton Reach Residents Association (DRRA)	Cardinal Newman RC Primary School
Downside Village and Plough Corner	Chandlers Field School
Envisage	Claremont Fan Court School (Senior)
Esher Residents Association	Claygate Primary School
Fairmile Avenue Residents Association	Cranmere Primary School
Fairmile Park Road Residents	Danes Hill Pre-Pre School
Field Place Weybridge Residents Association Ltd	Danes Hill School
Fieldcommon Residents Group	Danesfield Manor School
Godolphin Road Residents Association	Emberhurst School
Hersham Conservation Committee	Esher Church of England High School
Hersham Residents Association	Esher Church School
Hersham Village Society	Esher College
High Pine Close Residents Association	Grovelands School
Hinchley Wood Residents Association	Heathside School
Hurst Park Residents Association	Hinchley Wood Primary School
Leigh Place Cobham Residents Association	Hinchley Wood Secondary School
Long Ditton Residents Association	Hurst Park School
Milbourne Local Group	Long Ditton Infant & Nursery School
Molesey Residents Association	Long Ditton St Mary's C of E (Aided) Junior School
Oakdene Residents Association	Manby Lodge Infants
Ockham & Hatchford Residents' Association	Milbourne Lodge School
Oxshott Way Residents Association	NE Surrey Secondary Short Stay School (previously Hersham Teaching Centre)
Palace Residents Association	Notre Dame Senior School
Portmore Park and District Residents Association	Oatlands School
Portmore Quays Residents Ltd	Parkside School
Rivermount Residents' Association	Reed's School
Rydensdale Association Ltd	Rowan Brae
Sandown Gate (Esher) Residents Association	Rowan Preparatory School
Sandy Way Residents Association	Royal Kent Primary School
Southborough Residents Association	Shrewsbury Lodge
St Georges Residents Association	St Alban's Catholic Primary School
Templemere Residents Society	St Andrews C of E Primary School
Thames Ditton & Weston Green Residents Association	St Borromeo Catholic School
Torrington Close Association	St George's College Junior School and College
Walton Lane & Thames Street R.A.	St James CE Primary School
West End Residents Association	St Lawrence CE (Aided) Junior School
Wey Road & Round Oak Road Residents' Association	St Matthew's Church of England Infant School
Weybridge Society	St Pauls Catholic Primary School
School/College/University	Thames Ditton Infant School
Ashley C of E Primary School	Thames Ditton Junior School
Bell Farm Junior School	The Claremont Fan Court Foundation Ltd
Bloo House	The Orchard School
Brooklands College	Walton Leigh School

School/College/Uni cont'd
Walton Oak School
Weston Green School
Westward Preparatory School
Surveyors
Castle Wildish Chartered Surveyors
Clive Tatlock Associates
Cluttons LLP
Curchod & Co Chartered Surveyors
Gerald Eve LLP
Hughes Associates
Jones Granville
RB Designs Ltd
Turner Associates
Telecommunication Company
British Telecommunications plc
Cable and Wireless
Hutchinson 3G UK Ltd
Mobile Operators Association (MOA)
Mono Consultants Limited
O2 (UK) Ltd - Telefonica Europe plc
T-Mobile UK Ltd
Virgin Mobile Holdings plc
Vodafone Group Plc
Waldon Telecom Ltd
Tourism
Tourism South East
Utilities
Affinity Water
BPA (British Pipeline Association)
British Gas
EDF Energy
EE Limited
National Grid (Land & Development Team)
Scotia Gas Networks
SGN
Sutton and East Surrey Water Plc
UK Power Networks
Veolia Water Central
Youth
Sunbury and Walton Sea Cadets

Appendix 6: List of Libraries in Elmbridge

A hard copy of the Strategic Options Consultation and Statement of Representations Procedure was available at all of the following libraries.

- Cobham Library, Cedar Road, Cobham, Surrey, KT11 2AE
- Dittons Library, Mercer Close, Thames Ditton, Surrey, KT7 0BS (Closed on 16 December 2016 until 10 January 2017- document available from the 10 Jan)
- Esher Library, Old Church Path, Esher, Surrey, KT10 9NS
- Hersham Library, Molesey Road, Hersham, Surrey, KT12 4RF
- Molesey Library, The Forum, Walton Road, West Molesey, Surrey, KT8 2HZ
- Walton library, 54 The Heart (off Hepworth Way), Walton on Thames, Surrey, KT12 1GH
- Weybridge Library, Church Street, Weybridge, Surrey, KT13 8DE

The Content of the letter to the libraries read:

Dear Sir / Madam,

Elmbridge Local Plan: Strategic Options Consultation

I am writing to let you know that Elmbridge Borough Council is consulting on the Strategic Options for the new Local Plan.

Information about this is available online at:

consult.elmbridge.gov.uk/consult.ti/lpsoc/consultationHome

The consultation runs from 9am on 16 December 2016 until 4pm on 10 February 2017.

The Strategic Options Consultation document and a Statement of Representations Procedure are enclosed.

Please ensure that the document and statement is accessible for the public to view.

Please contact Planning Policy if you require any further information via email at palanningpolicy@elmbridge.gov.uk or on (01372) 474474. Alternatively, further information is available from the Council's website www.elmbridge.gov.uk/planning/policy.

Yours faithfully,

Mark Behrendt

Planning Policy Manager

Appendix 7: Statement of Representations Procedure (updated with extended deadline date)

Shaping Elmbridge A New Local Plan



Statement of Representations Procedure for commenting on the Elmbridge Borough Council Local Plan Regulation 18 Consultation

Planning and Compulsory Purchase Act 2004

Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulation 18

Elmbridge Borough Council is preparing a new Local Plan that will guide and manage future development in the Borough up to 2035. The Strategic Options Consultation is the first stage in the process and sets out the Council's preferred option for a new strategy. The document also presents questions on a range of issues which will help inform the development of a new Local Plan.

The Borough Council is inviting comments on the Strategic Options consultation for an eight week period starting on **Friday 16 December 2016**.

Copies of the Strategic Options Consultation, Sustainability Appraisal and Habitats Regulations Assessment Screening Report can be viewed and downloaded from the Council's website:

consult.elmbridge.gov.uk/consult.ti/lpsoc/consultationHome

Hard copies of these documents are also available for public inspection at the Council Offices, Civic Centre, High Street, Esher, Surrey, KT10 9SD. The Offices are open between 8.45am- 5pm (Monday to Thursday) and 8.45am- 4.45pm (Friday).

A copy can also be found at all the libraries in the Elmbridge Borough area. Please check with the library or [website](#) for opening times.

Representations must be made in writing and received no later than **4pm on Friday 24 February 2017**. Ideally responses should be made online using the consultation portal at - consult.elmbridge.gov.uk/consult.ti/lpsoc/consultationHome

Alternatively, you can download and complete a response form, returning it to:

The Planning Policy Team
Planning Services
Elmbridge Borough Council
Civic Centre
High Street
Esher
Surrey
KT10 9SD

Or e-mail the response form to: PlanningPolicy@elmbridge.gov.uk

Responses will be made public and a summary of the consultation findings will be made available on the website.

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

Appendix 8: Notice displayed on Borough's public noticeboards

Shaping Elmbridge A New Local Plan



Strategic Options Consultation

Due to a lack of housing in the country the Government has challenged Councils to allow more homes to be built. In response Elmbridge Borough Council is preparing a new planning strategy, the Local Plan.

The Strategic Options Consultation is the first stage in the process and sets out the Council's preferred option for a new strategy. The document also presents questions on a range of issues which will help inform the development of a new Local Plan.

More information about the consultation can be found at **consult.elmbridge.gov.uk**.

Alternatively, you can inspect the consultation document at the Civic Centre, between 8.45am- 5pm (Monday to Thursday) and 8.45am- 4.45pm (Friday).

A hard copy is also available to inspect at the Borough libraries.

All comments must be received by **4pm on Friday 10 February 2017**. You can submit your comments in a number of ways:

- **Online:** consult.elmbridge.gov.uk
- **Email:** planningpolicy@elmbridge.gov.uk
- **In writing:** The Planning Policy Team, Planning Services, Elmbridge Borough Council, Civic Centre, High Street, Esher, Surrey, KT10 9SD

For further information please call 01372 474474 or email planningpolicy@elmbridge.gov.uk



Appendix 9: Consultation Poster

Shaping Elmbridge A New Local Plan



We need to hear from you

Due to severe housing shortages across the Country the Government is requiring Councils to plan for more homes to be built. In response to this challenge Elmbridge Borough Council is preparing a new planning strategy, the Local Plan.

We have provided three options to meet the Government's demands but we want to hear your views on the planning challenges facing Elmbridge. The consultation starts at **9am on Friday 16 December 2016 and ends at 4pm Friday 24 February 2017**.

During this time, we will be available to give you as much information as possible on the strategic options for house building in the Borough for the next 20 years.

Where to find out more

Date	Time	Venue
Tuesday 10 January	7-9pm	Lecture Hall, 1st Floor Weybridge Library
Wednesday 11 January	7-9pm	Cobham Community Centre
Thursday 19 January	7-9pm	Hinchley Wood Secondary School
Monday 23 January	7-9pm	Cecil Hepworth Playhouse, Walton
Thursday 26 January	7-9pm	Civic Centre, Esher High Street
Saturday 4 February	10-2pm	Civic Centre, Esher High Street

Exhibition at the Civic Centre

An exhibition will also be permanently displayed throughout January and up until 24 February in the Civic Centre Reception, High Street, Esher. You can also view the consultation document at the Civic Centre and at the Borough's local libraries.

Website

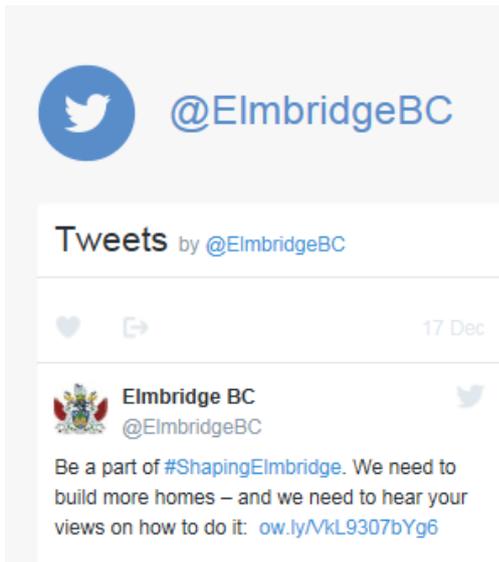
The document is also available to view and respond to online at consultation.elmbridge.gov.uk. If you have any queries you can contact the us by email at planningpolicy@elmbridge.gov.uk or by calling us on **01372 474474**.



Appendix 10: Examples of Social Media used: Tweets and Facebook



Elmbridge BC @ElmbridgeBC · Jan 4
 Come to our #HinchleyWood drop-in to give your views & find out more information on a new Local Plan ow.ly/QdUW307c0j7 pic.twitter.com/FJ7SpYkMyX



@ElmbridgeBC · Jan 18
 We are here to talk Local Plan at #MyElmbridge #ShapingElmbridge pic.twitter.com/vn9H82W9AOL



@ElmbridgeBC

Tweets by @ElmbridgeBC



Elmbridge BC
@ElmbridgeBC



The consultation for our Local Plan is now open – find out more and play your part in #ShapingElmbridge ow.ly/inBy307bYlg



20h

Facebook



My Elmbridge shared their event.

23 hrs · 🌐



Come to our Walton drop-in session to give your views and find out more information on a new Local Plan.

You can find out more about the #ShapingElmbridge consultation here: <http://consult.elmbridge.gov.uk/consult.../.../consultationHome>



JAN
23

Elmbridge Local Plan - Walton Drop-in...

Mon 19:00 - Walton-on-Thames
8 people interested · 2 people going

★ Interested

571 people reached



Boost Event

Like Comment Share



Appendix 12: Exhibition boards



Shaping Elmbridge

A New Local Plan



01

Preparing A New Local Plan The Basics



What is a Local Plan?
The Local Plan sets out how we will meet our needs, where and how with the help of our partners and the private sector. It is a key document for our future development and sets out the framework for our future growth.

Why Do We Need A New Plan?
We need a new plan to set out how we will meet our needs for the next 15 years. Our current plan is due to expire in 2023. We need to set out how we will meet our needs for the next 15 years.

What is This Consultation About?
This is the first stage of preparing a new Local Plan. We are consulting on the approach we will take to meet our needs for the next 15 years.

02

How We Developed Our Options



Global Evidence On Development Needs

- To be a top 100 city in the world by 2030
- To be a top 100 city in the world by 2030
- To be a top 100 city in the world by 2030

What Are The Options For Increasing The Supply Of Developable Land?

- To increase the amount of land available for development
- To increase the amount of land available for development
- To increase the amount of land available for development

What is The Most Sustainable?

The most sustainable option is the one that meets our needs for the next 15 years in the most sustainable way.

03

Our Options



The Government is requiring Councils to consider all options for meeting development needs.

Option One
This option focuses on increasing the supply of developable land.

Option Two
This option focuses on increasing the supply of developable land.

Option Three
This option focuses on increasing the supply of developable land.



Shaping Elmbridge

A New Local Plan



04

Our Preferred Option Option Two



Why And Where?

- Balances the need for housing whilst protecting the character of our towns and villages
- Land would be released if it delivered homes to meet our need for affordable homes and smaller properties
- Seeks development opportunities in those areas of the Green Belt that are only weakly meeting its purposes
- Enables development and infrastructure to be considered together




05

Other Key Issues

Other issues will need to be addressed and we want to hear your views on:

- What improvements do you think are needed to our infrastructure?
- How we can deliver homes for first time buyers, older people and Gypsies and Travellers
- Should we maintain the protection and expansion of land containing offices, warehouses and factories and the jobs and businesses they support?
- How we can ensure our town and village centres remain vibrant retail areas.
- Which are the most important open spaces that should be protected and improved?

Appendix 13: The Chief Executive of Elmbridge Borough Council talks about the Local Plan consultation



Appendix 14: Consultation Leaflet

Where can I find out more information about the Local Plan?

More details about the Local Plan including the official timetable (the Local Development Scheme) can be obtained from the Local Plan web page: elmsbridge.gov.uk/planning/local-plan

Details about this specific consultation including the 'Strategic Options' document itself can be obtained from the consultation page: consult.elmsbridge.gov.uk/consult.ti

The consultation document is also available to view at the Council's offices at the Civic Centre and at libraries throughout the Borough.

There will also be public exhibitions at the following venues:

Date	Time	Venue
Tuesday 10 January	7-9pm	Weybridge Library Lecture Hall (1F)
Wednesday 11 January	7-9pm	Cobham Community Centre
Thursday 19 January	7-9pm	Hinchley Wood Secondary School
Monday 23 January	7-9pm	Cecil Hepworth Playhouse (Walton)
Thursday 26 January	7-9pm	Civic Centre, High Street, Esher
Saturday 4 February	10-2pm	Civic Centre, High Street, Esher

An exhibition will be permanently displayed throughout January and up until 10 February in the Civic Centre reception area, Esher High Street.

How can I take part in this consultation?

There are many ways that you can take part in this consultation but responses must be made in writing:

- Online – consult.elmsbridge.gov.uk/consult.ti
- Email – planningpolicy@elmsbridge.gov.uk
- By post – Planning Policy, Planning Services, Elmbridge Borough Council, Civic Centre, High Street, Esher, Surrey, KT10 9SD

When is the deadline for comments?

The consultation is open for eight weeks from 9am on Friday 16 December 2016. The deadline for the submission of comments is 4pm on Friday 10 February 2017.

What happens after my comments have been made?

We will assess all the comments once the consultation has closed. We will then 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 the summer 2017.

Shaping Elmbridge A New Local Plan



Strategic Options Consultation
Friday 16 December 2016 to Friday 10 February 2017



TOT025_Elmbridge Council_Local Plan Flyer_14&210_App_2016_v4.indd 1-2

06/12/2016 11:39

Shaping Elmbridge through the new Local Plan



The need to reconsider the planning strategy for Elmbridge stems from the Government's determination to tackle the lack of housing in England. It wants to ensure that there are enough homes to meet the country's increasing need and as part of their approach the Government is demanding that all Councils meet their housing needs.

In response to the Government's demands we are updating our planning strategy known as the 'Local Plan' and we are providing options for how we can deliver more homes, jobs and improved infrastructure in Elmbridge. We are offering these options for consultation to the Elmbridge community but it is important to note that no decisions have yet been made as to the best way forward.

The Government has placed this demand on all Councils including Elmbridge and they are clear that if we do not seek to meet our housing needs then they will step in and make decisions for us. No one wants that to happen.

We know Elmbridge is a very desirable place to live but the cost of housing is high. We need more affordable housing,

more two and three bedroom homes to allow first time buyers, key workers and growing families to buy homes in Elmbridge and to ultimately allow our children and grandchildren to continue to live in the Borough. Our aim in updating the Local Plan is to create new homes and jobs for current and future generations, while retaining the unique and attractive character of the Borough.

Roads, school places, drainage, access to GPs surgeries, all of these, and more, concern our residents when any new development is proposed. Building homes through an established and agreed upon Local Plan considers all of these infrastructure aspects and seeks to improve infrastructure in the Borough to meet our growing needs.

Frequently Asked Questions

What is the Local Plan?

The Local Plan will set out a strategy until 2035 that aims to meet the need for new homes in Elmbridge, while seeking to protect our cherished environment.

The goal is to achieve a future for the Borough where people have the ability to live and work and enjoy good access to community facilities.

Why is a new Local Plan being prepared now?

The Government is determined to tackle the lack of housing in England. It wants to ensure that everyone has a safe and secure place to live and that means building more homes. As part of their plan, Government is demanding that Councils meet their housing needs.

If we do not prepare a plan then the Government has said it will intervene and prepare a plan on our behalf and we will be less able to refuse those planning applications we think are inappropriate. To meet this directive we are proposing to update our Local Plan and are providing options for how Elmbridge can deliver more homes and improved infrastructure.

We are offering these options for consultation to the Elmbridge community. No decisions have been made.

What stage of plan-making is this?

This is the first stage of plan-making. It is a time to consider the broad direction and approach to a development strategy and identify the key issues the Plan should address.

At this stage detailed policies and site allocations are not included. These will feature in the next consultation on the preferred approaches in the summer 2017.

What is the purpose of this consultation?

1. To engage local people, groups, businesses and others on this consultation.
2. To identify the challenges that the Local Plan needs to address in terms of housing need, economic development, habitat protection etc.
3. To identify a potential strategy to respond to these challenges.

Will there be additional opportunities to take part in plan-making?

Yes. This is the first stage. There will be at least one additional consultation stage on the Local Plan in 2017 before the plan is submitted to Government for examination by an Inspector.

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Shaping Elmbridge A New Local Plan



Frequently Asked Questions

About the Local Plan

What is the Local Plan?

- The Local Plan will set out a strategy that aims to meet identified needs for new homes, jobs, community facilities, roads etc., whilst seeking to protect our natural, built and historic environments.
- It looks forward fifteen years until 2035, providing a vision as to what kind of place Elmbridge Borough could be.
- The goal is to achieve a future for the Borough where people have more opportunities to live and work in Elmbridge as well as enjoying good access to community facilities.

Why is a new Local Plan being prepared now?

- There is a significant undersupply of housing across the country and in particular across London and the South East of England. In Elmbridge it is expected that we will need to build a further 9480 new homes by 2035.
- Due to this undersupply the Government is committed to significantly increasing house building and has challenged Councils to meet the housing needs for their areas.
- We also need to respond to local evidence on the need for increasing job opportunities and retail provision etc.
- To plan positively for the future of the Borough and to keep important decisions about future development locally rather than risking Government interventions.

What will happen if we don't prepare a new Local Plan?

- The Government will intervene and appoint another body, such as the Planning Inspectorate or County Council, to prepare one for us.
- We could also be forced to work with another local authority or authorities to prepare a joint strategy.
- The longer we leave these decisions we expose ourselves to challenge from developers seeking to build in places that are inappropriate.

What is the status of the existing Local Plan?

- The set of adopted documents (**Core Strategy, Development Management Plan, Developer Contributions SPD, Design and Character SPD and Flooding SPD**) still represents the Council's Local Plan.
- The new Local Plan will not replace the majority of documents and will only replace the Core Strategy once adopted, which is likely to be in 2018.
- Until this adoption date, the emerging Local Plan is a material consideration in decisions about planning applications, although the weight it can be afforded at this early stage is limited.

About the Consultation

What is the purpose of this consultation?

There are three clear purposes of this consultation:

1. To engage local people, groups, businesses and others on the options for new development over the next 20 years.
2. To identify the challenges that the Local Plan needs to address in terms of housing need, economic development, habitat protection etc.
3. To identify a potential strategy to respond to these challenges.

What stage of plan-making is this?

- This is the first stage of plan-making, formally known as the Regulation 18 consultation.
- It is a time to consider the broad direction and approach to a development strategy and identify the key issues the Plan should address.
- At this stage detailed policies and site allocations are not included. These will feature in the next consultation on the preferred approaches in the summer 2017.

Will there be additional opportunities to take part in shaping the Local Plan?

- Yes. This is the first stage. There will be at least one additional consultation stage on the Local Plan next year before the plan is submitted to Government for examination by an independent Inspector.

The content of the Strategic Options consultation document

Why are we proposing options that amend Green Belt boundaries?

- The Government are forcing all authorities to consider all options for meeting their development needs including, the consideration of Green Belt amendments.
- 10 of the 11 Surrey boroughs and districts have either finished a review of the Green Belt in their area or have at least started the process.

- Guildford, Runnymede and Woking are all planning to release some Green Belt land within their areas to accommodate an increase in housing delivery.
- This is not just restricted to Surrey and the South-East. All 10 local authorities in the city region of Greater Manchester are amending Green Belt boundaries to accommodate up to 60,000 homes over the next 20 years.

What housing needs are other areas facing?

- The under supply of housing is a national problem with figures of up to 250,000 new homes per annum being quoted to keep up with demand.
- In comparison to neighbouring authorities, Elmbridge has a 'mid-point' housing need which is generally proportionate of the Borough's size, existing population and the overall sub-urban and semi-rural character.
- Local authorities with a more urban character and which are larger in size (both geographical and population) are facing much higher housing numbers than Elmbridge. For example, if the following local authorities were to meet their housing needs they would have to provide:
 - Guildford – 13,860 homes
 - Kingston – 14,384 homes
 - Spelthorne – 15,140 homes
 - Woking – 10,340 homes
 - Waverley – 10,380 homes

What are the benefits of the approach we are proposing?

- Our preferred approach seeks to balance the needs for housing whilst recognising there are constraints on development within the Borough.
- The protection of Green Belt remains a key priority however; the proposed strategy recognises that there are areas of land currently designated as Green Belt that are no longer meeting the purposes.
- This approach therefore seeks to utilise these areas and provide not only an increase in housing supply, but provide for the types of homes required by our communities.
- This includes smaller homes, more affordable properties and opportunities for self / custom house building.
- This approach will also protect the character of the urban area and maintain our existing settlement pattern.
- It enables infrastructure provision to be provided alongside developments where there is the space to provide the essential services and importantly, it will allow us to continue to plan for our communities.

The Green Belt Boundary Review (GBBR) identifies 13 weakly performing Local Areas however only 3 are identified in the Consultation Document for potential release.

What is happening with the remaining 10 Local Areas?

- As this consultation focuses on the strategic issues, we have only identified the three weakly performing areas that are key to significantly increasing our housing land supply and meeting our housing needs.

- Having undertaken assessments of each area of Green Belt identified as being weakly performing we identified only three where we consider there to be development opportunities.
- Development in the remaining 10 parcels is prevented by constraints such as its location in the flood plain or its status as a Park or Garden of Historic Interest, or they are considered to be too small as to any reasonable scope for new strategic development.
- Following this consultation the Council will need to consider whether these should remain as Green Belt or whether an alternative designation, such as Local Green Space, would be more appropriate.

The consultation document states that the 3 Key Areas identified account for 3% of Elmbridge's Green Belt. How is this calculated?

- Elmbridge covers an area of 9,634 hectares with 57% of the Borough being designated Green Belt (5,491 hectares).
- The Strategic Options Consultation Document identifies 3 Key Areas that are considered weakly performing and are not wholly covered by constraints that would prevent development.
- Of the three 3 Key Areas, Local Area 58 straddles the administrative boundary of Elmbridge and the Royal Borough of Kingston upon Thames. The remaining 2 Key Areas (Local Areas 14 & 20) are located entirely within Elmbridge Borough.
- Discounting the section of Local Area 58 located within the neighbouring Borough, the total number of hectares of land within the 3 Key Areas is 187.9.
- 187.9 hectares is 3.4% of the total area of Green Belt located in Elmbridge Borough.
- Not all of the 187.9 hectares is however developable. There is land within these areas that is covered by constraints to development such as ancient woodlands and SSSIs, and also designations such as Local Nature Reserves.

How much land within the 3 Key Areas identified does Elmbridge Borough Council own?

- Elmbridge Borough Council owns land within each of the 3 Key Areas.
- The extent of this is shown in dark green on the maps set out at the end of these FAQs.
- Land owned by the Borough Council is generally that where development is restricted by a variety of national designation for example, Ancient Woodland; SSSI and Registered Commons.
- Within Local Area 58 (Long Ditton) the Borough Council also owns an area of land which is used for a variety of open space, sports and recreation activities alongside the cemetery. For example, the sports ground, hockey club, allotments and Local Nature Reserve (Stokes Field). The Council does not intend to develop these areas.

Will the Council consider smaller amendments to the Green Belt boundary in addition to those identified in the consultation document?

- The Council will need to look at amending minor anomalies at the next stage in the preparation of the Local Plan. Such anomalies include where the Green Belt boundary runs through the middle of a garden or building and will aid both residents and the Council when applying policy appropriately.

- The Council also expects small development proposals to be proposed through this consultation in Green Belt not identified as being weakly performing. Such proposals will be considered following the consultation and any amendments consulted on within the next consultation in the summer of 2017.

What about Infrastructure?

- More houses will add to the pressure on existing infrastructure. Schools will be a key focus 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 local and strategic road networks will be considered through detailed modelling. This modelling will be used to identify congestion hotspots and outline potential solutions.
- As with our current approach, we will continue to seek contributions from developers to help deliver new infrastructure.
- We will also review our current Community Infrastructure Levy charges and to ensure the necessary resources are available to support infrastructure improvements

How to get involved

Where can I find out more information about the new Local Plan and the consultation?

- More details about the new Local Plan including the official timetable (the Local Development Scheme) can be obtained from the Local Plan web page: www.elmbridge.gov.uk/planning/local-plan/
- Details about this specific consultation including the ‘Strategic Options’ document itself can be obtained from the consultation page: consult.elmbridge.gov.uk/consult.ti
- The consultation document is available to view at the Council’s offices at the Civic Centre and at libraries throughout the Borough.
- There will also be public exhibitions at the following venues:

Date	Time	Venue
Tuesday 10 January	7-9pm	Lecture Hall, 1st Floor Weybridge Library
Wednesday 11 January	7-9pm	Cobham Community Centre
Thursday 19 January	7-9pm	Hinchley Wood Secondary School
Monday 23 January	7-9pm	Cecil Hepworth Playhouse (Walton)
Thursday 26 January	7-9pm	Civic Centre, High Street, Esher
Saturday 4 February	10-2pm	Civic Centre, High Street, Esher

An exhibition will be permanently displayed throughout January and up until 24 February 2017 in the Civic Centre Reception, Esher under the stairwell to the right of the entrance.

How can I take part in this consultation?

We would encourage you to submit your comments online using the consultation portal at: consult.elmbridge.gov.uk/consult.ti

Alternatively, you can fill out a response form and submit responses via:

- E-mail – planningpolicy@elmbridge.gov.uk

- By post - submit responses to the questionnaire to: Planning Policy, Planning Services, Elmbridge Borough Council, Civic Centre, High Street, Esher, Surrey, KT10 9SD.

A copy of the response form can be downloaded from the consultation portal at:

consult.elmbridge.gov.uk/consult.ti

All responses must be made in writing.

When is the deadline for comments?

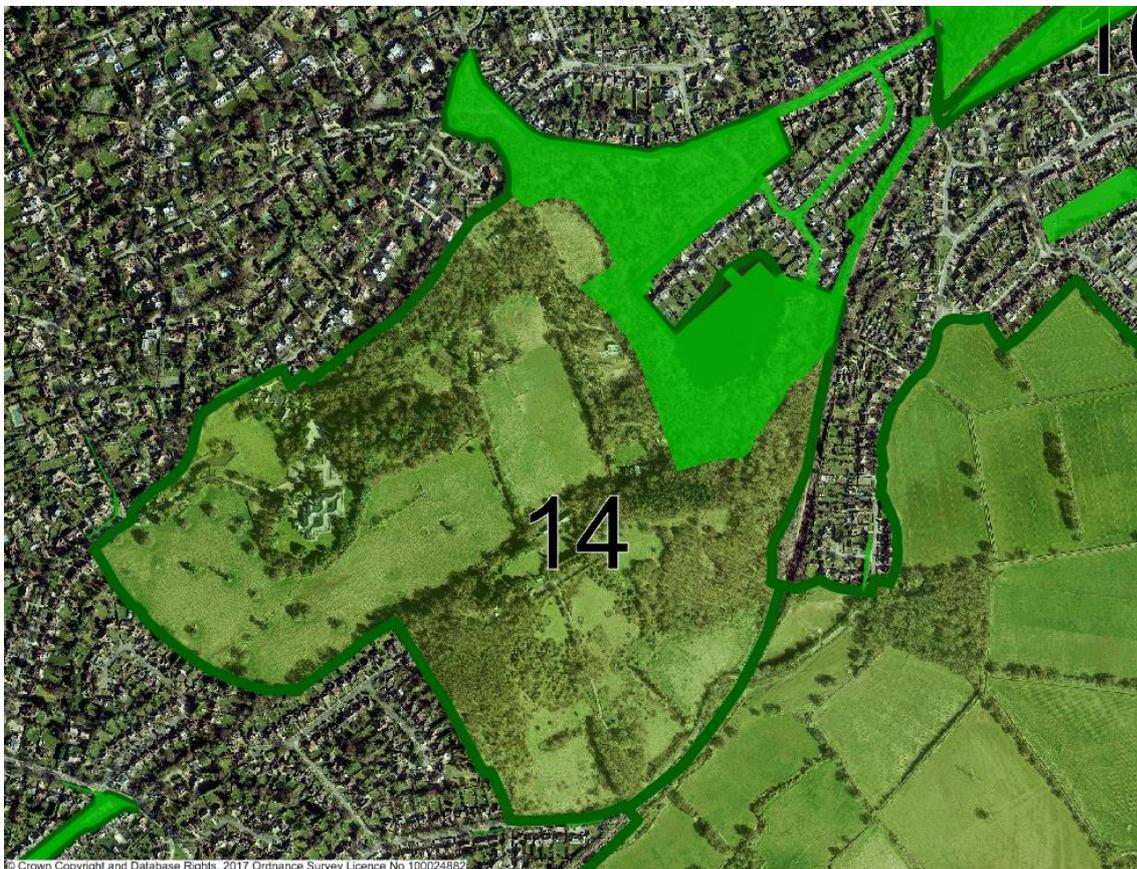
- The consultation is open for ten weeks from 9am on Friday 16 December 2016.
- The deadline for the submission of comments is 4pm on **Friday 24 February 2017**.

What happens after my comments have been made?

- We will consider all the comments once the consultation has closed.
- We will 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 the summer 2017.

Land within the Council's ownership

Local Area 14 - Land north of Blundel Lane including Knowle Hill Park and Fairmile Park, Cobham



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Local Area 20 - Land south of the A3 including Chippings Farm and The Fairmile, Cobham



Local Area 58 – Land north of the A309 and east & west of Woodstock Lane North, Long Ditton



Shaping Elmbridge A New Local Plan



Frequently Asked Questions –

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

Is the area being allocated for a 2000 home Council estate?

No. Should the area be allocated for development, it is likely to be substantially smaller and would need to be a mix of small and medium housing for sale and rent.

Will the removal of Green Belt status see the total loss of open public spaces in this area?

No. Surbiton hockey club, the cricket club, cemetery, allotments and Stokes Field Nature Local Nature Reserve will be maintained. They remain vital community assets and important open spaces required to support the community.

Will any future development require major new access roads through communities?

Until details of the availability of land for development within the area come forward the required access points will not be known.

Will the pressure on existing infrastructure such as schools and GP surgeries be unsustainable?

Any additional pressure on schools and healthcare services will be assessed with the appropriate agencies. Any increase in service provision required as a result of an increase in new homes will be delivered as part of the development. One of the advantages of larger developments is that infrastructure such as schools can be delivered on site where necessary.

How will the additional pressure on roads be managed?

The impacts on the road network will be modelled as part of the next stage of preparing the Local Plan. This will assess the impacts of any development proposed and the improvements that may be required to mitigate these impacts.

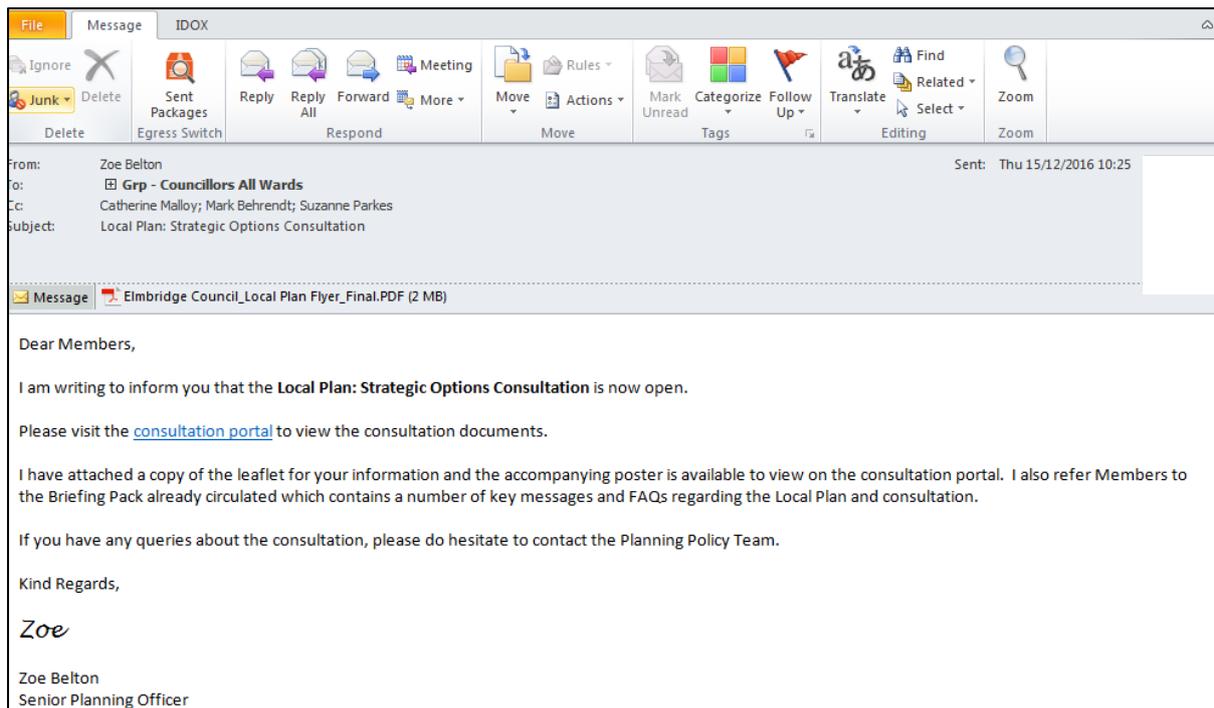
Why has the Local Area been identified as ‘weakly’ performing in Green Belt terms?

The Local Area is enclosed within the existing built up area, with the Kingston Bypass (A309) forming a strong boundary to the south, severing it from the wider Green Belt. It makes only a very limited contribution to the overall gap between Long Ditton (part of the Greater London built up area) and Claygate, with little risk that development would cause visual or physical coalescence. While a significant proportion of the parcel remains open, the sense of rurality is reduced by a number of built developments and areas of managed land, with little connectivity to the wider countryside.

Won't the development of the parcel add to the sprawl of London?

The Local Area is already enclosed by the large built up area along its northern, eastern and western edges and has weak links to the wider Green Belt to the south. The A309 forms a strong, durable southern boundary meaning that there is little risk that development would cause visual or physical coalescence with the wider Green Belt.

Appendix 17: E-mail to Members



The screenshot shows an email client window titled 'Message IDOX'. The toolbar includes icons for Ignore, Delete, Sent Packages, Reply, Reply All, Forward, Meeting, Move, Actions, Mark Unread, Categorize, Follow Up, Translate, Find, Related, Select, and Zoom. The email header shows it was sent on Thu 15/12/2016 10:25. The sender is Zoe Belton, and the recipient is 'Grp - Councillors All Wards'. The subject is 'Local Plan: Strategic Options Consultation'. The email body contains the following text:

Dear Members,

I am writing to inform you that the **Local Plan: Strategic Options Consultation** is now open.

Please visit the [consultation portal](#) to view the consultation documents.

I have attached a copy of the leaflet for your information and the accompanying poster is available to view on the consultation portal. I also refer Members to the Briefing Pack already circulated which contains a number of key messages and FAQs regarding the Local Plan and consultation.

If you have any queries about the consultation, please do hesitate to contact the Planning Policy Team.

Kind Regards,

Zoe

Zoe Belton
Senior Planning Officer