Introduction

At a meeting of the Cabinet on 5th July 2017, this Position Statement was agreed for publication. Setting out the current context for planning policy within Elmbridge Borough, this Statement acts as a holding position whilst the Council takes stock of and evaluates how to take forward its new Local Plan. This is in light of a number of wider-policy changes announced by Government in recent months and, the need to consider in detail the responses received to the Council’s Local Plan: Strategic Options Consultation (December 2016).

This Statement highlights the new challenges emerging at a national level; the initial findings from the Strategic Options Consultation; and the actions now required including a short-term timetable for this work.

Local Plan: Strategic Options Consultation

For a period of 10-weeks ending Friday 24th February 2017, the Council carried out a public consultation engaging its local communities and other interested stakeholders on its Local Plan: Strategic Options Document. The Council received nearly 3,800 responses from individuals / organisations, generating just under 50,000 separate comments. Of these responses the majority were from the Cobham, Oxshott, Stoke D’Abernon, Hinchley Wood, Thames Ditton and Long Ditton settlements. Of those 3,564 responses which gave an address or postcode 87% were from these areas. The table below sets out the geographical distribution of responses to the consultation and is illustrated diagrammatically in Appendix 1 of this Statement.

<table>
<thead>
<tr>
<th>Area</th>
<th>Responses received</th>
</tr>
</thead>
<tbody>
<tr>
<td>Claygate</td>
<td>46</td>
</tr>
<tr>
<td>Cobham including Oxshott &amp; Stoke D’Abernon</td>
<td>1,800</td>
</tr>
<tr>
<td>East &amp; West Molesey</td>
<td>15</td>
</tr>
<tr>
<td>Esher</td>
<td>33</td>
</tr>
<tr>
<td>Hersham</td>
<td>16</td>
</tr>
<tr>
<td>Dittons including Hinchley Wood, Long Ditton, Thames Ditton &amp; Weston Green</td>
<td>1,299</td>
</tr>
<tr>
<td>Walton-on-Thames</td>
<td>91</td>
</tr>
<tr>
<td>Weybridge</td>
<td>136</td>
</tr>
<tr>
<td><strong>Elmbridge total</strong></td>
<td><strong>3,436</strong></td>
</tr>
<tr>
<td><strong>Total with addresses (includes those living outside Elmbridge)</strong></td>
<td><strong>3,564</strong></td>
</tr>
</tbody>
</table>
A detailed report setting out the issues raised to each of the questions in the Strategic Options Consultation document will be published towards the end of July. Alongside this summary the Council will also make available to the public all the separate responses to the Consultation. It should be noted that any views expressed are not necessarily the views of Elmbridge Borough Council unless stated. A short overview of the issues raised during the Consultation is also set out below.

**Strategic Development Options**

The vast majority of responses 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.

Many of the responses 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.

The Green Belt Boundary Review completed by ARUP was considered by many to be fundamentally flawed due to 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.

A significant number of responses 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.

Whilst in a minority, there were responses submitted that supported the Council’s preferred approach recognising that there needed to be a balanced between protecting Green Belt whilst also seeking to meet housing need. There were also responses that suggested the Council released 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**

The majority of responses 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 were considered 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.

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**

A large number of responses disagreed with our assessment of housing need. These responses 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 responses 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**

Many responses 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 responses 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.

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**

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 responses 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.

In contrast there was also significant disagreement that 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 responses considered 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

The impact of future development was a major concern with a huge number of responses 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

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.

However, there were also responses stating that it was important to retain employment uses in the Borough. Some of these responses suggested the Council have a policy to actively resist the loss of employment land and the conversion of offices to residential units.

Contrary to the statements seeking to protect employment land, a number of responses 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

Whilst many of the responses 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 responses 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

Many responses 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

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 responses referred to the white paper and the Government announcements that it was not weakening its policy on Green Belt.

National Policy Changes

Since 2010 national planning policy has been subject to significant change. Most recently these have included the Housing & Planning Act 2016 and changes to national planning policy and guidance to limit the ability of local authorities to require contributions from developers to support affordable housing delivery. These changes were all considered in preparing the Council’s Strategic Options consultation. However, as stated above the Government published its Housing White Paper during the Council’s consultation.

The Housing White Paper covered a range of issues but it clearly stated the Government’s support of a plan-led system and continues to make clear that local authorities should seek to meet their objectively assessed needs for development through the preparation of a Local Plan. Since 2010 the Government has devolved the responsibility of establishing the number of new homes required in an area to local authorities. A broad approach to assessing development needs has been set out in the Government’s Planning Practice Guidance (PPG); which was the basis of the methodology used by the Council in assessing its own needs.

The Government now considers it necessary to introduce a new standard methodology for assessing development needs. The Government believes that a more standardised approach would provide consistency amongst local authorities when assessing needs and deliver the transparency needed for local people to fully recognise the requirement for new homes within their areas. Consultation on the new standard methodology is proposed Summer 2017 with an expectation that this will be adopted into national policy by April 2018. The Government wants local authorities to use the new standardised approach to produce their Local Plans. Those that do not, will be required to explain why they have not and justify the methodology they have adopted at the examination of their Local Plan. What constitutes a reasonable justification for deviating from the standard methodology is to be consulted on, and will be made explicit in national policy.

In seeking to meet development needs, the Government continues to challenge local authorities such as Elmbridge Borough Council, to consider all options. This includes the potential to amend Green Belt boundaries. National policy remains clear that Green Belt boundaries should be amended only ‘in exceptional circumstances’ when Local Plans are being prepared. Prior to the publication of the Housing White Paper the demonstration of exceptional circumstances was to be determined by each local authority however, Government now wishes to be transparent about what this means in practice. National policy will therefore make clear that authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other options for meeting their identified development requirements. Other options include making effective use of brownfield sites and underused land; increasing densities; and exploring whether other authorities can help to meet unmet needs as part of the Duty to Cooperate.
Impacts on the Preparation of the Local Plan

The scale of the response to the Strategic Options Consultation and the potential changes set out in the Housing White Paper will impact on the timeframe for taking the new Local Plan forward. It has taken longer than anticipated to collate, read and summarise the responses to the Consultation. This alone would have made it extremely difficult for the Council to meet its deadline for producing a Preferred Approach for consultation in Summer 2017. However, in addition to this the Housing White Paper sets 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 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.

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.

Consequently, the Council will not be consulting on the next iteration 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.

A revised LDS will be published in due course once Government have provided a clearer timetable as to the implementation of the proposed changes set out in the Housing White Paper.

Appendix 1

Of the approximate 3,800 responses received from individuals / organisations, 3,564 respondents provided an address or postcode. Using this information the Council has been able to map all the responses received from those within the Borough and just beyond. This has been done by postcode area with the number of responses per postcode area received shown on each point. Three maps have been produced. The first for the entire Borough and surrounding area. Due to the high concentration of responses generated from certain areas within the Borough the number of responses from that postcode area are not visible. Therefore the two remaining maps show this information again focused on the Cobham and Dittons areas. In these two maps the majority of numbers are visible.