
Shaping Elmbridge A New Local Plan



Answers to pre-submitted questions

Tuesday 27 August – Weybridge

What consultation has Elmbridge had with the other boroughs in Surrey about developing one new town with required infrastructure to address part of the housing shortfall. Possibly in Mole Valley or Waverley where there is so much Green Belt good road networks.

All Councils have a duty to cooperate when developing Local Plans, this duty is written in Government policy and tested during each Local Plan examination by the Secretary of State. We have been in contact with all of the 11 districts and boroughs throughout Surrey to ascertain whether any of them have capacity to help meet our need. Whilst the majority are proposing to meet their own need they have not identified surplus land.

It can happen, both Waverley and Guilford have been instructed at the examination of their plan to take a share of Woking's unmet need. Tandridge are also proposing a new town but this will meet their need, it has no additional capacity. It will be interesting to see what the Inspector makes of Tandridge's plan and the proposed town. If we think our neighbouring authorities have capacity to meet some of our unmet need we will pursue this in our representations on their plan and at their examination but for now there is no reasonable prospect of this happening.

Following recent flaws, how under the Local Plan will SCC planning consultation responses on highways matters, better & properly address specific concerns within Weybridge, particularly in respect of proven & acknowledged parking stress & vehicular access, plus take account of all local objections.

We are aware of residents' concerns in relation to parking and the issues varies across the borough, this can depend on whether your near to station, a town or local centre or school. As part of the wider preparation of the Local Plan we are looking at the day to day policies and that includes our parking standards, we are also producing a parking supplementary planning document to ensure that development is coming forward with the right provision and parking solutions for the area.

To support both we are undertaking a detailed assessment of local parking issues and how they vary across the borough, we need to build up a picture of the areas of parking stress and how these could be overcome. We will be consulting in the new year on how we are getting on with both the policy and the guidance and it would be great to have your feedback on these then.

Who has been tasked with persuading Central Government to accept the substitution of 2014 housing data with the latest available figures from 2016 which show an approximate 20% reduction in the required target for from 9,345 to some 7,500, what has been done, and what future work is necessary?

The Council has argued against the standard methodology and the retention of the 2014 household projections. However, the Government will not relent. It states we must continue to use the 2014 projections to provide stability for planning authorities and communities, and to ensure the historic under delivery and declining affordability are reflected. It is also important to remember that our need figure of 623 is actually only 40% of our actual housing need. Government introduced as part of the standard methodology caps to try and make the housing figures as deliverable as possible. The standard methodology figure will change annually as each of the inputs for population and affordability are updated.

What is important is that we acknowledge our need figure from Government, it is the starting point or a reference point, but it is not something we are blindly seeking to meet. We will try to marry the requirements put on us by Government through the standard methodology with our wider commitments to place making, the economy, the environment and our communities. The Council will continue to carry out its own assessment of need through the Strategic Housing Market Area Assessment.

Wednesday 28 August – Walton and Hersham

The map for Option 1 shows parcels of land around the Rydens area which are classified as suitable for housing development e.g. on the corner of Severn Drive and Rydens Road. These parcels of land are not shown in Options 2 to 5. What is the reason for their removal?

This site is an example of the 'land swap' element of option 1, which would redevelop open space in the urban and re-provide it in the Green Belt, that is why it is not included in the approach in Options 2 to 5.

You have placed great emphasis on meeting the housing need derived from the standard methodology. What notice have you taken of footnote 6 para 11 of the NPPF which lists reasons where it is possible to "restrict the overall scale of development in a Plan area" The first is Green Belt.

The constraints listed in footnote 6 have informed the absolute constraints used in the evidence base. These are policy designations and status' that would prevent development coming forward, as the impact of development could not be mitigation. This includes ancient woodlands, functional floodplain as well as sites of special scientific interest, such as Esher common. These designations have been taken into account when identifying the sites in each option. Yes, the Green Belt is included in the footnote, however, the NPPF must be read as a whole, in particular the Chapter 13 relating to Green Belt and the paragraphs that state when Green Belt boundaries should be reviewed through the Local Plan process and what the Government considers to be the exceptional circumstances to justify amendments to boundaries.

Please explain- Option 4 has estimate of dwellings in urban area of 5300 (urban capacity study 5454) BUT the LAA 2018 Table 2 has Hsg Land supply 18-33 as 6800 (848 uc+810 pp + 714+1219 +1934 LAA opp sites +SSE of 1275) and 7574 if no discounts. Why have you used the 5300 figure in the Options?

It is important to stress that land supply figures are estimates and this figure comes from the Land Availability Assessment 2018 (LAA 2018).

The figure in the Options consultation document is derived from the raw data. A non-implemented percentage has been applied but no windfall allowances have been used.

To confirm the overall figure of 5,300 is made up of;

- Sites under-construction
- Sites with planning permission- where 10% discount rate has been applied
- Opportunity sites identified in the LAA- where a 15% discount has been applied.

We have chosen not to include a windfall allowance when considering the options for two reasons, firstly the LAA considers sites of 5 or more homes that is already very small and it is very important that at this stage in the plan making we do not heavily rely on windfall as a primary source of delivery.

Thursday 29 August – Molesey

What is the future for the land belonging to Imber Court?

In the past the landowners have promoted it for removal from the Green Belt however, a change in the use has not be sought. The evidence base from the GBBR 2018, identifies this land as not essential for Green Belt to work properly and that is why it has been included option 5 and 3.

What is the definition of site capacity used in the interactive map and Appendix 8 Sites Summary list?

Site capacity means the net amount of dwellings proposed for the site.

Can you explain the discrepancy between the capacity quoted in the interactive map (186) and the Appendix 8 Sites Summary list (93)?

All the site capacity figures for option 1 have been doubled to take account of the density multiplier. This is why it differs from the original LAA figure quoted in Appendix 8.

When will local and Surrey councils stand up to the Government and defend the environment and quality of life over development in this over populated part of the country?

That is a very broad question. The Council and indeed all of the Surrey authorities individually and collectively objected to the standard methodology and the resulting housing needs figure. We also objected to the Government's decision to revert to the 2014 inputs into the formula when the 2016 inputs reduced the figure. But the Government are not for moving.

This does not change the fact that this Council are the custodians of our environment and quality of life for residents. Housing figures from central Government and the NPPF don't override this. The existing core strategy and Development Managements policies seek to protect residents from inappropriate development and the policies contained in the new Local Plan will do the same. Officers have acknowledged in this consultation that our day to day polices that control

development will need to be updated especially our design and environmental policies and we will be back out to consultation in the new year to explore options for doing this.

As Chairperson of Hampton Court Way Allotments I have repeatedly asked Ian Gayton at EBC Allotment Consultative committee meetings about allotment security. Can you also confirm that all Elmbridge allotments are safe from any future housing plans? How has 'Ray Road' allotment appeared on the list?

Ray Road Allotments is an example of the land swapping element of option 1 which will seek to focus all development in the urban area and take those urban open spaces such as allotments and re-provide them in the Green Belt. The Council has made not decide to pursue this Option. As such, the position stated by Ian Gayton stands.

Having a new Local Plan with an up to date housing target will help to ensure the long-term security of allotments.

In meeting our affordable housing need what does affordable mean to the Council? What does it look like?

The NPPF has a broad definition of what affordable housing is and this ranges from shared ownership to social rented and affordable rented (up to 80% of market rates). However, it will be the design policies that will govern what that looks like and there are good examples of well designed, high density developments. If we were to intensify the urban area this would significantly change the character of some areas of the borough.

However, density as a measure can be misleading as the figures can be easily manipulated, what the focus needs to be on is the characteristics of over-development and design standards to ensure the delivery of quality environments which we would be happy live in and we are happy for future generations to live in. For example, we need to introduce amenity standards for flatted developments.

Shouldn't unlocking the greenbelt be contingent on the delivery of schemes that address the housing need in the appropriate proportions, reflecting the housing need?

Yes, if Green Belt release was proposed, of local housing need would form part of the exceptional circumstances.

70% of housing need is for an affordable product, however that is a need figure and does not necessarily mean we will be to deliver this in full. The exact percentage of Affordable Housing will be determined by the financial viability appraisal of the plan and will be vigorously tested at the EiP. Through having an up to date plan we will have new affordable housing policy, this will be robustly tested at the examination. Once adopted there will be little room for negotiation on contributions and provisions.

The current affordable housing policy include different thresholds depending on if the site is brownfield or greenfield, due to the differing land values, it is anticipated that this would continue.

Monday 2 September – Cobham, Oxshott and Stoke D'Abernon

The materials presented focus on specific sites identified for development. What (if any) changes are planned to the broader suite of DM and CS policies that impact on development across the borough. Would this differ depending on which option is selected for the Local Plan?

The new Local Plan will need to include our vision for how we want to develop and support our key employment areas, ensure our town and local centres remain vibrant retail, leisure and community hubs and that we continue to protect and enhance of historic and natural environment.

As such, the Local Plan will include a range of strategic and detailed policies not just housing allocations. The Strategic Options Consultation 2016 touched on these other important matters and the feedback received will inform the approach taken in the Plan.

The review of the broader suite of Development Management policies is in its initial stages, to date, we have identified a number of areas which need to be considered further and a few areas such as policies on sustainability and climate change where our existing policies are lacking.

The detailed policies help deliver the strategic policies, therefore, there are some policies which would differ depending on the approach taken in the Local Plan. An example of that would be detailed policies in relation to design, building heights and density under Option 1 (intensification in the urban area) which would be significant to the approach of optimisation in the urban areas under Options 2-5.

We have asked you for your initial views on how the detailed policies are working and this will feed into our review. We will be consulting on the findings in the New Year.

We moved from London to Cobham this year so our children would have cleaner air and more time amongst nature. We bought next to Green Belt land so they were assured of a greener, cleaner future. If councils build on Green Belt land how can we ever protect our environment for the next generation?

If the Council were to release Green Belt the options suggestion a loss of 3% to 11%, although Green Belt is not an environmental policy the impact on air quality and the environment are important matters when considering the amount of development that can be sustainably planned for in the borough and its location. Indeed, there are strong national environmental policy requirements as well as successful local policies which will need to be taken forward in the new Local Plan. This will potentially include a new national requirement for biodiversity net gains on all developments.

Considering the significant increase in homes & population proposed in the new Local Plan, could the Council please share the findings of the infrastructure (water, waste, public transportation, roads, schools) surveys that have been completed and which would support such a population increase?

To support this Options Consultation, we have asked the infrastructure providers and agencies to consider the impact of delivering the local housing need figure evenly across the urban area. The outcome of that assessment concluded that there would be no show- stoppers in infrastructure terms that would prevent development coming forward.

The findings of this has been published in the Infrastructure Delivery Plan 2018 and 2019 update and these are available to view on the website. Following this consultation, when we are determining an approach for the Local Plan and sites that could be brought forward in the draft

plan will ask the providers to re-assess the impact. This will be an iterative process as their response will influence where, when and if development can come forward in a location.

In relation to the impact on highways, a transport assessment is being prepared and a baseline model is being completed and we know that there are those key pinch points at peak times. As with all the infrastructure assessments, the next stage is to test the impact of sites and identify any mitigation measures.

All options will have significant infrastructure impacts ranging from 'considerable' to 'immense' - - each option should have an related assessment and cost impact analysis to inform viability of options and a guarantee that residents are no worst off than now. Will that be the case?

Refer to previous answer. However development will need to 'wash its own face', it cannot come forward without the infrastructure in place and that is why an Infrastructure Delivery Plan is produced, tested at examination and reviewed regularly.

It is important to stress, that if a site is allocated and it is dependent on infrastructure improvement, then planning permission for the development will only be granted if the infrastructure improvement is made.

How are options being assessed to ensure that pollution related health standards are not breached, with attendant adverse health impacts for residents, linked to increased traffic volumes (e.g. A244 and other roads that take significant levels of traffic 7 days per week throughout the day)?

In terms of air quality and pollution, an air quality study has been commissioned and this is available to view on our [evidence base webpages](#).

This presents the baseline information as we are at the very early stages of plan making.

At the next stage of the plan making process, we will undertake a further study to consider the impact from development and the findings of this assessment will inform the approach of the draft plan and site selection, this includes the location of future development.

Suppose the consultation produced overwhelming support for Option 4 but Elmbridge decided that this did not enable it to meet housing targets. Would Elmbridge be likely to conclude that the Green Belt should remain sacrosanct and that the only way forward would be to intensify urban development?

The options are illustrated from the evidence base, they are not draft plans. The results from consultation in conjunction with the evidence base will inform the Council's approach to the Local Plan and site selection. At this stage, we don't know what that approach will include.

Regardless of the Local Plan direction, there will need to be evidenced justification for the approach of the Local Plan and the sites it includes and does not include. This will be tested by the Inspector, however, experience from other local authority Local Plan examinations indicates that the greater the shortfall the greater the challenge.

Are the Planners expecting that only one option will be taken forward or more than one? What is the decision making process once the details of the Consultation Questionnaires have been examined for the next eighteen months?

As outlined, the options are illustrations from the evidence base, they are not draft plans. The results from consultation in conjunction with the evidence base will inform the Council's approach to the Local Plan and site selection. At this stage, we don't know what that approach will include.

Following consultation, the timetable for the new Local Plan will be reviewed as is the case after each consultation stage, however, we will be feeding back the results before Christmas and will be consulting in the new year on the vision for the Local Plan and the review of the detailed day to day policies. This will need to be approved by the Council's cabinet in November.

The draft plan which will follow next year, will need to be approved for consultation and submission to the Secretary of State by the Council's Cabinet and Full Council.

Please confirm that Options 2 and 4 are valid options (despite them being below the standard methodology quota and notwithstanding your FAQ that implies they are not). Will the Council be arguing a) that 'market signals' like up to date population and housing statistics suggest a lower number; b) that the amount of Green Belt in Elmbridge makes providing the full quota impossible; and c) that there are real opportunities for other over-providing 'neighbours' to take the strain (e.g. Guildford)?

The FaQ does not suggest this. We must explore all reasonable options in preparing the Local Plan and this consultation is part of that requirement, this includes advancing options that have been formed from the evidence base which would lead to a shortfall or indeed overprovision of new homes.

There will need to be evidenced justification for the approach of the Local Plan and the sites it includes and excludes. It is the Council's case to make, the basis of the case will need to be evidenced. This will be tested by the Inspector, however, experience from other local authority Local Plan examinations indicates that the greater the shortfall the greater the challenge.

The excess of the number of dwellings in Elmbridge over the number of households in Elmbridge is growing fast (now nearly 3,000). New homes will bring yet more of these 'second homes' but how can this be a 'very special consideration' to release Green Belt?

The number of second homes in the borough is very limited, 308.

How many of these houses will be 'affordable' (i.e. social rent, intermediate rent or shared ownership). How will the number of market homes built be limited e.g. to 30% of the total (or <10% per the SHMA)?

The SHMA evidence indicates that 70% of housing need is for an affordable housing product, that is a need figure and we will try our best to ensure we get as close to meeting it as possible. However, it will be extremely challenging to secure that level of provision across each development site.

What Density policy conforms to the various options? Will we have one borough-wide density target or e.g. one that is different e.g. in town centres and urban areas?

Although current policy seeks an overall housing density target of 40 dwellings per hectare, the number of homes attributed to each site is an estimate, which takes into consideration average land take ratios (so the proportion of a site which is used for housing as there will be an amount for roads, grass verges/ open spaces etc), the site's location and any previous planning history so the densities do vary, depending on their location and what is being proposed, for example a town centre location or a conversion of a building into flats will have a higher density.

However, there needs to be a move away from density calculations as a measure of 'acceptability' as they can be mis-leading. The focus needs to be on ensuring good quality design and standards that led to the efficient use of land.

Tuesday 3 September- The Dittons and Hinchley Wood

The EBC plan includes units for 186 people on the Hampton Court Estate and 40 people on the pony field both having a single access onto Summer Road between Hampton Court Way and the level crossing. What will EBC do to ensure that the increase in traffic does not increase danger at HCW/SR junction

To inform the approach of the Local Plan and the selection of sites the Council in conjunction with Surrey County Council the highway authority is undertaking detailed highway modelling as part of a transport assessment to identify the cumulative impact of development along with any mitigation measure that maybe required.

It is important to stress that if a site is taken forward in the Local Plan it will still require planning permission and as part of the planning application process the impact on highway safety will be considered. If the proposals lead to adverse impact on highway safety, that cannot be mitigated then planning permission will be refused.

Who would be eligible for low cost/affordable housing? Would they have to be already resident in Elmbridge? What proportion of new housing would be 'affordable'?

Affordable housing is managed Housing Associations or Registered Social Landlords. The percentage of housing nominations each housing association allocates to Elmbridge residents is negotiated and managed by the housing team and is managed on a case by case or portfolio approach. Officers are exploring ways to increase the nomination allocation for sites as part of the Local Plan. The exact percentage of Affordable Housing will be determined by the financial viability appraisal of the plan and will be vigorously tested at the EiP. We have a need for 70% all new homes to be Affordable Housing it would be extremely challenging to deliver that ratio on all sites.

For forty years residents have benefitted from the sustained water levels in the Mole and Ember. The EA are proposing to reduce the level and destroy the amenity. What will EBC do to ensure that the amenity is maintained.

The Council has formally objection to the Environment Agency's proposals, however, this falls outside the remit of the Local Plan.

Can those who plan and build the houses/flats be held to a commitment to provide affordable housing rather than the large executive houses which are often built locally?

Yes, through our local policies we can ensure that new development responds to local housing need. We are already doing that, and indeed we have been refusing planning application for new

homes that do not represent efficient use of land and that includes the size of homes and number of bedrooms. We have also been successful defending these decisions at appeal.

Through having an up to date plan we will have new affordable housing policy, this will be robustly tested at the examination. Once adopted there will be limited scope for negotiation on contributions and provisions.

EBC have said they have taken into all comments following the last Local Plan in 2016. Why then is the new Local Plan still based on the original flawed Arup report which stated that Area 58 was 'weakly performing' when it is clearly 'strongly performing' ticking all the criteria boxes for GB land?

We are aware that there were strong representations made to the elements of the Green Belt Boundary Review methodology. We asked Arup to respond to these comments and this included the assessment of parcel 58, they maintained that the assessment was correct and that there would be no justification to change the assessment. This has been published. In addition, Officers have overseen the production of the assessment and are confident it is correct. The methodology is sound and has already been robustly tested at the Drakes Park Public Inquiry. It also meets the Government's requirements on Green Belt work.

The consultation evidence bias appears to be the same, only repackaged. Have the Council addressed the key assumptions and deficiencies identified in the first methodological exercise? What has been done differently.

The evidence base is not biased, it has been produced in line with national requirements and best practice. Some elements of the technical work include the use of professional judgement either provided by independent specialist consultants and checked by officers or by officers themselves.

It's also important to remember that the evidence itself will be tested at the examination by the Inspector and if you remained concerned then you are welcome to challenge its use at the examination.

Please can you explain what is meant by 'Retained Open Space' in the options for development of greenbelt land?

Retained open space would be just that it would be area of land that would be designated for open space use as opposed to an allocation for development.

Please can you explain how you will guarantee the preservation of the ecology of the Stokes Field Nature Reserve in the event of development of the Green Belt around the reserve, noting the potential impact on migratory behaviour and the clear interaction of the reserve with the meadowland?

It is extremely important that development does not lead to such harm, there would need be a high-level assessment to support any allocation and it would again be assessed in detail at the planning application stage. If it cannot be demonstrated at each respective stage that any harm cannot be mitigated, then the site and the development will not come forward.

National and local policy requires this and in fact it is expected that changes in national policy will expect all developments to lead to biodiversity net gains.

Why do you need to, or want to, declassify the whole of area 58 when you propose that housing will be on part but not the whole of the area? The concern is that you will be opening up the flood gates for Taylor Wimpey who purchased a large part of the area days after the last consultation.

A requirement of Green Belt to work effectively is for it to have clear defensible boundaries. The Green Belt Boundary Review identified parcels of land based on defensible boundaries. If you were to try and make area 58 smaller it would not have a strong boundary which mean that the resultant boundary would not be fit for purpose.

If the site was to be allocated, the site boundary of the developable area will be extremely clear and it is important to remember that there are other designations on that land that would prevent development coming forward, with just as much if not a greater constraint than Green Belt. As part of the Local Plan the Council would have the option to protect the undeveloped area with a separate designation.

Much has been made of the possibility of a Local Plan that features less residential units than laid down by the Governments' calculation methods being rejected by the Planning Inspectorate. What actual legal evidence is their to support these concerns?

The plan needs to have place making at its heart, it is not about chasing numbers, but we do have to have regard to them and this consultation is part of that process.

There will need to be evidenced justification for the approach of the Local Plan and the sites it includes and excludes. It is the Council's case to make, the basis of the case will need to be evidenced. This will be tested by the Inspector, however, experience from other local authority's Local Plan examinations (such as Cheshire east, Guildford, Wycombe, Eastleigh, St Albans) indicates that the greater the shortfall the greater the challenge.

What plans are there in place to ensure no overspill of water allowed in to that part of the river Thames that may cause flooding in the future between Hampton Court and Teddington Lock?

Flood risk is something that is taken very seriously, there are very robust national and local policies to ensure that new development does not increase or disperse flood risk elsewhere.

I want to know which councillors individually are committed to saving the Green Belt land from development, those that are supporting a partial development (how much?) and those that fully support a full development?

We haven't asked Councillors that question as it is their role to listen to the consultation responses and the evidence put before them to inform their decision on the draft plan to be submitted to the Inspector for examination.

They will need to digest the result of the responses from across the borough, as along with the evidence they will help shape the Local Plan. It is important to stress that for the plan to be considered robust it must follow the right plan -making process, positively prepared and not be predetermined.

I am Planning Officer for the LDRA. I wrote to Elmbridge Planning (24.2.17) as a comment on "A New Local Plan". I challenged Arup's interpretation that Green Belt Area 58 is weakly

performing. On the contrary it performs the main function in preventing urban sprawl. I gave alternatives with no reply.

Firstly, we are aware that there were strong representations made to the elements of the Green Belt Boundary Review methodology. We asked Arup to respond to these comments and this included the assessment of parcel 58, they maintained that the assessment was correct and that there would be no justification to change the assessment. This has been published. In addition, officers have overseen the production of the assessment and are confident it is correct and meets the Government's requirements on Green Belt work.

Secondly, thank you for participating in the Strategic Options Consultation, your views have been taken into consideration when considering this consultation and indeed will be used to inform the draft plan. As you will recall over 3,000 residents' comments in 2017 and unfortunately, officers cannot provide individual replies to each.

Can you confirm that Councillors are allowed to make their preferences known and to openly represent the views of the majority of their residents during the consultation?

It is up to individual Councillors as to how they are involved in the preparation of the new Local Plan and consultations. It is for the individual if they wish to let their views be made public.

However, collectively, they will need to come together to decide on the plan that is submitted to the Inspector for examination. Officer's advice would be that this consultation, the purpose is to find out resident's views and their role should be to listen.

It is important to stress that the options presented are not draft plans and we have already advised that it is unlikely that each could be rolled out uniformly across the Borough. This consultation is not picking an option to form the plan, rather identify the approach you consider will be best for your area.

At this stage in our plan making, we do not know if our plan will or will not meet need or whether it will or will not include Green Belt release. However, the plan and the sites it includes and does not include will be led by the evidence and informed by your response to consultations.

Elmbridge have declared a climate emergency, how does building on Green Belt sit with this? The UK is being encouraged to plant more trees. Shouldn't Elmbridge be encouraging the maintenance of green infrastructure to address concerns about air quality, especially with the expansion of Heathrow

If the Council were to release Green Belt the options suggestion a loss of 3% to 11%, although Green Belt isn't an environmental policy the impact on air quality and the environment are important matters when considering the amount of development that can sustainably be planned for in the borough and its location.

Indeed, there are strong national environmental policy requirements as well as successful local policies which will need to be taken forward in the new Local Plan. This will potentially include a new national requirement for biodiversity net gains on all developments.

Please can you confirm that the Government's housing target (from Standard Methodology) is only a starting point and still needs to be tested against policies, evidence and other priorities and therefore can go up and down? Will Elmbridge challenge the Government number, providing a robust case?

The plan needs to have place making at its heart, we aren't chasing numbers, but we do have to have regard to them and this consultation is part of that process.

The Council has argued against the standard methodology as well as the retention of the 2014 household projections. However, the Government will not relent.

There will need to be evidenced justification for the approach of the Local Plan and the sites it includes and excludes. It is the Council's case to make, the basis of the case will need to be evidenced. This will be tested by the Inspector, however, experience from other local authority Local Plan examinations (such as Cheshire east, Guildford, Wycombe, Welwyn Hatfield, Eastleigh, St Albans) indicates that the greater the shortfall the greater the challenge.

If we do not offer up Green Belt, do you really believe that an Inspector will tell us to use GB? If this is your belief, what evidence do you have that shows any council, who has not already made the exceptional circumstances case, has been so ordered?

The plan will be robustly tested by the Inspector and the risks could range from the Inspector finding the plan unsound or requesting modifications to include additional or alternative sites. These are based on the experience of other Local Plan examinations across the country. Examples of this include St Alban, Cheshire East, Wycombe, Welwyn Hatfield and Eastleigh.

Both councillors and officers say there is a high risk that the Government will intervene and take responsibility away from EBC if they go forward with a plan that does not meet the Government's target and does not release Green Belt (eg Option 4). If that the case can we see the evidence?

Refer to the above in relation to plan-making. It is unlikely, that Government will come and write the plan for us, although they have threatened that as a measure. The real risk of intervention will come through speculative developments being allowed appeal as we do not have an update Local Plan or 5-year housing land supply.

Elmbridge state that there is a shortage of affordable homes. Could you please outline how much of the developer contributions you have received to date have been spent on delivery of affordable housing?

To date, approximately £12m has been collected and approximately £5m has been spent, £3m in the last financial year.

Update: As of August 2019, the current balance of the enabling fund was just over £8.92m, after allowing for existing commitments. Since 2011, just over £15m has been collected from S106 agreements from planning permissions has been collected and just over £9.1m from the enabling fund has been committed to fund the increase of affordable housing since 2011.

In the summer of 2018 Elmbridge won at appeal to stop a development of over 1,000 homes within the West Molesey/Hersham Green Belt, called Drake Park. At the time Elmbridge won the case. Given that the Long Ditton Green Belt is also part of Strategic Area A – and arguably is one of the most strategically important parts of Area A given that it abuts the London boundary, why has this same strategic logic applied by the Elmbridge's QC not been applied to the assessment Area 58? Surely all of Strategic Area A should have been discounted from the more detailed evaluation of GB sites?

Yes, the evidence from the GBBR was used to support the Drakes Park appeal. This was a speculative planning application for development in the Green Belt, this was predicated on there being very special circumstances that would outweigh harm to the Green Belt.

The national planning policies in relation to planning applications in the Green Belt are different to the policies in relation to plan-making and the need to review Green Belt boundaries.

The GBBR assessed Green Belt performance at two levels, first the strategic and then at a local level. The local area in which the drakes park site was within was deemed to be strongly performing.

If Elmbridge makes the case for 'exceptional circumstances' to release Green Belt, presumably all Green Belt comes back into play (including Drake Park, Sandown Park etc...) as the Inspector will have to test the preferred options of EBC against alternatives that have been submitted by developers and land owners?

If the Council concludes that there are exceptional circumstances to justify amendments to the Green Belt and each location proposed for removal there will need to be evidenced justification for the approach taken and the sites it includes and does not include. This will be tested by the Inspector at the examination.

Regardless of whether the Council proposes to include Green Belt sites, it is certain that at the examination it is certain that those landowners and developers whose sites weren't included in the Council's approach will be arguing for their site to be included.

Has the Council carried out an environmental and equalities assessment to pick up the difference between the options? e.g. community use and infrastructure provision to create a sustainable future development, their implications, costs, and benefits will affect choice of option.

Yes, to inform the options consultation a sustainability appraisal is used, and this tested the environmental, social and economic impacts, positive and negative of each option. In relation to equalities an impact assessment was prepared to support the consultation document itself as well as the consultation. These are both important documents that have been published alongside the consultation document.

As explained in the presentation to support this Options Consultation we have asked the infrastructure providers and agencies to consider the impact of delivering the local housing need figure evenly across the urban area. The outcome of that assessment concluded that there would be no show-stoppers in infrastructure terms that would prevent development coming forward.

The findings of this has been published in the Infrastructure Delivery Plan 2018 and 2019 update and these are available to view on the website. Following this consultation, when we are determining an approach for the Local Plan and sites that could be brought forward in the draft plan will ask the providers to re-assess the individual and cumulative impact. This will be an iterative process as their response will influence where, when and if development can come forward in a location.

In 2017 consultation we were told that if the Long Ditton Green Belt was declassified the current Council could give residents no guarantees about what this, or future, councils might decide in terms of developing on Council owned land (e.g. SHC, allotments, LDCC) Has this position changed?

If the land was to be removed from the Green Belt and a site was to be allocated for development, the site boundary of the developable area will be extremely clear.

Our stance that Surbiton hockey club, the cricket club, cemetery, allotments and Stokes Field Nature Local Nature Reserve will be maintained has not changed since 2017. They remain vital community assets and important open spaces required to support the community.

If part Area 58 was developed for housing, what pressures do EBC anticipate on Hinchley Wood School places, bearing in mind existing difficulties, eg for Thames Ditton and Claygate residents. Currently 350+ first choice applications for 220 places, children living north of TD station not getting in.

To support this Consultation, we have asked the infrastructure providers and agencies, SCC as the education authority to consider the impact of delivering the local housing need figure evenly across the urban area.

The outcome of that assessment concluded that there was plenty of school capacity in the Dittons based on current housing trajectory and birth data and that if 100 new homes were built each year in the Dittons there would be no requirement for additional places. Now it is accepted that the places may not be parent first choices, however, whilst SCC has a duty to find a school place for each child, unfortunately, the Local Plan cannot ensure it is the first choice.

Whether adequate transport has been provided by SCC for the secondary schools is not a planning matter that can be addressed through the Local Plan

The findings of this has been published in the Infrastructure Delivery Plan 2018 and 2019 update and these are available to view on the website.

Following this consideration, when we are determining an approach for the Local Plan and sites that could be brought forward in the draft plan will ask the providers to re-assess the impact. This will be an iterative process as their response will influence where, when and if development can come forward in a location.

Why has the Council omitted the various community uses of the Long Ditton Green Belt from their summary documents and assessments? By excluding it, aren't the Council asking residents & councillors who are unfamiliar with the area to make decisions based on incomplete information?

These are important uses that we will be seeking to protect through the Local Plan this Consultation focuses on how we can approach housing growth. However, these uses are clear in the mapping and that is why we have worked extremely hard to improved visual element of the consultation to ensure that the maps provided for each option are easy to use and clear.

You say you have listened to the consultation feedback, but why therefore in three of the five options have you left the three larger parcels of GB in their entirety, rather than subdividing them to smaller areas?

We have listened to the consultation feedback this this informed the further technical work we have undertaken and the decision to review and re-evaluation the options for how we approach housing growth. The conclusion of which is that the original options remain valid.

There is not the evidence to support the sub-division of the three key strategic area as they would not result in defensible boundaries and would lead to the creation of smaller weakly performing parcels with unfit boundaries. It is important to stress that the removal of the Green Belt designation does not result in the area in its entirety being developed.

The potential area for development has been made clear in the consultation mapping and the boundary of any allocation will be clear. Removal from the Green Belt would not result in the whole parcel being given a 'white land' status there will be designations and policies that will protect the nature reserve and the community assets.

Can the Council please explain why a number of community assets within Area 58, which we let you know were important to us in the first consultation have not been added to the proposed 'Local Green Spaces'? These include the Sugden Road allotments, Long Ditton Cricket Club and Stokes Field Nature Reserve.

These are important uses that we will be seeking to protect through the Local Plan. Our stance that 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, this stance has not changed since 2017. However, this Consultation focuses on how we can approach housing growth.

Within Key Strategic Area of Area 58 in Options 2, 3 and 5 there is an area marked 'Retained Open Space'. Why is this? Is it because this area forms part of Village Green applications and, if so, where is this referred to in the latest evidence as these applications have been ongoing for 2 years?

The retained open space acknowledges the community's use of this land and its exclusion from the developable area within the wider parcel. It is unclear of the progress of the village green applications with Surrey County Council, but we can seek an update from County and will include this response on our webpage of FAQs.

Could you please tell me why Surrey County Council is supporting Taylor Wimpey in opposing the application for One Tree Hill to be a village green?

The process and considerations for applications for a village green status is defined in law and it will be for SCC to consider the evidence to whether there is the right to apply and if so whether it is registered, it is certainly not a matter of supporting the applicant or the landowner.

Thursday 5 September: Esher and Claygate

Will the new proposed new development benefit people living in PA housing accommodation? Many people were housed by Elmbridge council then passed to pa housing and are trapped in accommodation that is far too small. (Always told try transfer or no three bed property available as it go to council)

We are acutely aware that there are many families in accommodation that is too small or not meeting their needs, this is an issue not just for those in PA housing accommodation. Therefore, it is important that new development meet local needs, and this includes the sizes of homes needed for market homes and affordable homes.

New housing developments will need to include affordable housing contributions and ideally on-site homes that are built alongside market homes to create cohesive communities. When affordable housing is being planned, planning and our housing team work together to seek to marry up as best we can the what will be provided with the needs on the housing register.

The more homes market and affordable will increase that choice and one of the benefits of large site is the ability to deliver more on-site affordable housing with a wider range of type of homes.

Housing, how much control do the Council have over provision of really affordable properties, i.e. for single people or young wanting a home?

It is right to pick up on the fact that not all Affordable Housing is genuinely affordable. Affordable Housing is a broad definition given to a range of products that can up to 80% of market rents or shared ownership models. As part of our review of the Development Management policies and our Contributions SPD we will be reviewing whether to include criteria to ensure a percentage of the Affordable Housing is equivalent to Social Rent.

Many sites, identified in all options are shown as availability TBC. Are these sites assumed as being available and included in the total number for each option; have all the owners of these sites been contacted by EBC and what happens if they are not available or no response is received?

Letters were sent out to all landowners in the Summer 2018. If owners returned the form stating that the site was not available for development, then the site was discounted and removed from the option.

In line with standard practice and where we did not receive feedback forms to our letter from owners, we have left the site in the LAA and stated that availability still needs to be confirmed (TBC) and the timeframe for when development could come forward was increased to 11-15 years to reflect this uncertainty.

Do you propose to issue Compulsory Purchase Orders on sites identified in Options 1, 2, 3, 4 and 5 as suitable for development that are not owned by Elmbridge Borough Council?

The Council has CPO powers and they can be used for land assembly, in general they are primarily used in regeneration areas or town centre schemes where there can be multiple land ownership issues. Similar for large infrastructure schemes. Given the site options, it's not foreseen that we would need to utilise these powers, certainly not extensively as their use is something that is not undertaken lightly. The Council would need to carefully weigh up the public benefit of the proposal before using its powers.

How are you going to be able to establish that there are exceptional circumstances for releasing greenbelt when at least one of the options (Option 1 - intensifying urban areas) can provide all of the housing needs without the need for releasing Green Belt?

The options presented are not draft plans and we have already advised that it is unlikely that each could be rolled out uniformly across the Borough. This consultation is not picking an option to form the plan, rather identify the approach you consider will be best for your area.

At this stage in our plan making, we do not know if our plan will or will not meet need or whether it will or will not include Green Belt release. However, the plan and the sites it includes and does not include will be led by the evidence and informed by your response to consultations.

Why is Claygate Tennis Club included on the list of urban sites and who put it there?

We are a thriving club with over 400 members, including 150 juniors, and we have no wish to sell our land. The club committee has not been contacted by EBC and asks that the club is removed from the list.

It is important to stress that the sites are possibilities, they are not site allocations and it does not mean planning permission will be granted.

Claygate Tennis Club was identified by the evidence base, initially the Urban Capacity Study, we wrote to the landowners and given that there was no confirmation of the availability of the site following the issuing of the availability, the potential timeframe was 11 to 15 years.

We will review the LAA regularly and an update will be published next year. The Council would be grateful if the committee could put that in writing for us and we will discount the site accordingly.

Will the planning process take any account of the location and accessibility of school places when deciding which sites to develop? Claygate has a history of problems with long journey times to allocated places, particularly at secondary level. Development may perpetuate and exacerbate this.

Yes, it does. To support this Options Consultation, we have asked the infrastructure providers and agencies, including SCC as the education authority, to consider the impact of delivering the local housing need figure evenly across the urban area. The outcome of that assessment concluded that there would be no show-stoppers in infrastructure terms that would prevent development coming forward.

The findings of this has been published in the Infrastructure Delivery Plan 2018 and 2019 update and these are available to view on the website. Following this consultation, when we are determining an approach for the Local Plan and sites that could be brought forward in the draft plan will ask the providers to re-assess the impact. This will be an iterative process as their response will influence where, when and if development can come forward in a location.

The Brownfield and Green Belt sites would add 50% to the number of dwellings to Claygate. What will Surrey/EBC do to increase the required infrastructure as none are outlined for here?

We are working closely with infrastructure providers in preparing the Local Plan. The IDP is based upon the even spread of the 623 homes across the borough. Over the coming months officers will begin to test the individual sites and their cumulative impact to assess whether they can come forward – it may be that not all sites in a particular area can come forward as it would be impossible to provide the supporting mitigations (new infrastructure). Where sites are selected on the basis of additional infrastructure planning permission will only be granted one this necessary infrastructure is committed either through the Council's CIL or as part of the development paid for by the developer.

The Brownfield sites take in all our well used community facilities, how are these going to be replaced?

We will still protect community facilities. The consultation documents include indicative sites that could come forward for development over the next 15 years and they include many of the Council owned sites.

Their inclusion does not mean that they have been agreed or that they are preferred sites for development.

Importantly in most cases the development would be reliant on the existing community use being re-provided on the site with the proposed housing.

The document does not suggest these facilities should be lost and there is no evidence to support their loss.

The NPPF states that ' new buildings should not be built on Green Belt to prevent urban sprawl, prevent towns merging, safeguard the countryside, preserve the setting and special character of historic towns and villages and encourage recycling of derelict/urban land. is this just being ignored?

The National Planning Policy Framework is clear there is a presumption against development in the Green Belt, but alongside that commitment, Chapter 13 which relates Green Belt states when Green Belt boundaries should be reviewed through the Local Plan process and what the Government considers to be the exceptional circumstances to justify amendments to boundaries. The reviews undertaken by officers are part of this plan preparation according with that guidance.

Government specified that to use Green Belt, councils would need to rule out using brown field sites or land currently underused. Green Belt should not be used so why does the Council consider there to be exceptional circumstances when options 1 and 4 are available?

We are considering options that include Green Belt release as part of the process of identifying the reasonable options for which the Local Plan could be based on. As we do not have a sufficient land supply of brown in the urban area national planning policy requires us to review of Green Belt as part of preparing a new Local Plan.

At this stage in our plan making, we do not know if our plan will or will not meet need or whether it will or will not include Green Belt release. However, the plan and the sites it includes and does not include will be led by the evidence and informed by your response to consultations.

It is important to remember that whilst option 1 is an extreme option and results in the removal of all green space within the urban area, it would also result in significantly taller buildings and higher densities. The acceptability of this approach has not been tested.

EBC recently declared a Climate Emergency. With urban sprawl being one of the biggest threats to climate change - How does the Council reconcile this with its 15 year plan to essentially concrete over large swathes of greenbelt?

If the Council were to release Green Belt, the options suggestion a loss of 3% to 11%, although Green Belt isn't an environmental policy the impact on air quality and the environment are important matters when considering the amount of development that can be sustainably planned for in the borough and its location. Indeed, there are strong national environmental policy requirements as well as successful local policies which will need to be taken forward in the new

Local Plan. This will include detailed policies on sustainable design, climate change and the new national requirement for biodiversity net gains on all developments.