
Shaping Elmbridge A New Local Plan



Local Plan: Regulation 19 Consultation Statement 2022



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

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Introduction

Purpose of the document

- 1.1 The purpose of this document is to set out how the council has consulted and engaged with communities and stakeholders in the preparation of the Elmbridge Local Plan. This is in order to fulfil the council's statutory duty in accordance with the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012 and the Statement of Community Involvement.
- 1.2 The objectives of this document are:
 - To confirm which bodies and persons the Local Planning Authority has invited to make representations under Regulation 18.
 - To set out how those bodies and persons were invited to make representations under Regulation 18.
 - To provide a summary of the main issues raised by representations pursuant to Regulation 18.
 - To quantify representations made pursuant to Regulation 18 and how these have been taken into account.
- 1.3 The council's Statement of Community (SCI) sets out how the council will involve local people when preparing planning documents. In undertaking the consultation on the Local Plan, the council has followed the principles of the adopted SCI accordingly.
- 1.4 The Elmbridge Local Plan will replace the Elmbridge Core Strategy, 2011 and Development Management Plan 2015. It will outline plans for how the council will deliver its vision and manage development in the borough until 2037, whilst outlining clear policies on how, where and what type of development should take place.
- 1.5 National Planning Practice Guidance states there is considerable flexibility open to the local planning authorities in how they carry out the initial stages of plan production, provided they comply with the specific requirements set out in the Local Plan regulations, and make clear how any consultation fits within the wider Local Plan process.
- 1.6 This Consultation Statement will assist the Inspector at examination in determining whether the borough's Local Plan complies with the requirements for public participation and government guidance. The report shows the consultation carried out by the council has complied with the Local Plan regulations.

Background

- 1.7 As part of the preparation of the new Local Plan the council has completed three Regulation 18 consultations. These are the:
- [Strategic Options consultation, 2016/2017](#)
 - [The Options consultation, 2019](#)
 - [Creating our vision, objectives and the direction for development management policies consultation, 2020.](#)
- 1.8 The Strategic Options 2016/17 consultation included an initial preferred option for housing and explored key planning issues affecting the borough. Some 3760 responded to the consultation. The Options consultation 2019 included 5 options for the location and distribution of growth with 6554 responding to the consultation. The final Regulation 18 consultation in 2020 presented a vision, objectives and direction for the detailed development management policies and 657 people responded to this consultation. The links above provide the consultation statements for each consultation.
- 1.9 Various other engagements have taken place such as call for sites and local green space suggestions in preparation for evidence.

Structure of the document

- 1.10 The report summarises the outcomes of three Regulation 18 consultations with the following headings:
1. Who was consulted and how?
 2. How many responses were received?
 3. What were the main issues raised?
 4. How have these been taken into account?

Regulation 18: Strategic Options

- 2.1 Please see the [Summary of Consultation responses July 2017](#) for the full report which includes the consultation responses and analysis.
- 2.2 This consultation was the first step in local plan-making and intended to seek the views of the community and other stakeholders on the Strategic Options for meeting development needs as part of the preparation of a new Local Plan. In particular, it set out the council's preferred option for a new spatial strategy. Other social, economic and environmental planning topics were also presented for comment.

The consultation took place from Friday 16 December 2016 to Friday 24 February 2017.

Who was consulted and how?

- 2.3 In total, 1655 people were consulted directly via letter or e-mail as they were registered on the Elmbridge planning database. A list of people consulted is available to view at Appendix 5 of the [Summary of Consultations responses July 2017](#).
- 2.4 An e-mail was sent in advance to every Councillor informing them that the consultation was open on 16 December 2016. A similar e-mail was sent to Planning Services and Surrey County Members.
- 2.5 All information was made available on the council's website, including a link to the consultation document on the planning policy pages, the planning news page and on the 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.
- 2.6 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 weekday. Every drop-in session was open to all residents to attend not just those from the locality of where the event was being held. Officers also attended four residents' groups meetings throughout the consultation period.
- 2.7 A frequently 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.

2.8 Various other consultation methods were also employed including an article in the Elmbridge review, a radio interview and local press meeting. In addition to this, a public notice was displayed on council owned noticeboards. Posters were distributed to community, leisure centres and schools across the borough. Social media played an important role, with a webcast from the Chief Executive, regular tweets, as well as Facebook which was used to notify people of the upcoming drop-in events.

How many responses were received?

2.9 The Council received 3,760 complete responses 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

2.10 Three petitions were also submitted by:

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

What were the main issues raised?

Strategic Development Options and Green Belt

2.11 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. A significant number of these responses also

disagreed with the methodology used in assessing the Green Belt¹ and the findings of this study.

- 2.12 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.
- 2.13 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.
- 2.14 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.
- 2.15 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.
- 2.16 The main questionnaire findings in terms of the preferred option were as follows:
- 91% of respondents stated that Option 2 was not the most appropriate option.
 - 91% of respondents stated that the exceptional circumstances were not sufficient to support the amendment of the Green Belt boundary.
 - 93% of respondents stated that they disagree that the 3 key strategic area are appropriate for removal from the Green Belt.
 - 89% of respondents stated that no other land should be removed from the Green Belt.

¹ Green Belt Boundary Review 2016 by ARUP

2.17 This is a summary of the commentary received on the key strategic areas

- 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.
- 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.

2.18 The consultation questionnaire then went on to ask questions about other planning matters and the following summaries and the commentary were received.

Assessment of Housing Need

2.19 A large number of respondents disagreed with the assessment of housing need. Respondents stated that the assessment was 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. External influences that could impact on the borough's need for new homes included issues such as the review of the London Plan, Crossrail 2, and the proposed expansion of Heathrow Airport.

Affordable Housing

2.20 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.

2.21 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

- 2.22 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.
- 2.23 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 in the borough. 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

- 2.24 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

- 2.25 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.
- 2.26 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.

- 2.27 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

- 2.28 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

- 2.29 Many respondents expressed concern regarding the impact on the environment, from increased health risks arising from pollution through to the potential loss of habitats and protected species. Many responses considered the council should continue to give a high level of protection to open spaces in the urban areas 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.

How have these been taken into account?

- 2.30 Many respondents stated that not enough work had been done to identify urban sites to deliver the housing need required in the borough. Immediately after the consultation, work began on seeking to find more urban sites. An Urban Capacity Study was undertaken as well as a community call for sites and a revised land availability assessment was written. Additionally, some respondents said the Green Belt parcels were too large in the Arup report and therefore a further study was undertaken that sub divided the Green Belt parcels. These important evidence base documents helped to inform the next Regulation 18 consultation which presented further 2 options to consider alongside the previous 3 options.
- 2.31 Respondents stated that there should not be preferred option provided for the next Regulation 18 consultation and it should be for the community to choose an option. As 91% of respondents disagreed with the preferred approach, it was important to set the options out for the community to consider. A new

option for an urban only strategy was included as it was clear from responses that this was an option the community wanted to be included.

- 2.32 There was feedback regarding the consultation itself and many respondents were unhappy at the lack of notice given on the consultation. This has been taken on board and early engagement techniques were developed for the following Regulation 18 consultations to give people time to discuss and provide feedback.
- 2.33 The strategic options consultation has helped shape the direction of the Local Plan. The 5 main principles in the draft Local Plan take into account the feedback from the responses from tackling climate change, protecting and enhancing the quality of the environment, growing a prosperous economy, delivering homes and providing infrastructure - all issues that were highlighted in the consultation as important to Elmbridge residents.
- 2.34 The final draft Local Plan presents a strategy that seeks to optimise development in the urban area with no Green Belt boundaries being revised. This takes into full account the strength of feeling from the participants of this consultation as over 90% of respondents disagreed with using 3 key strategic areas and 89% with using any other Green Belt areas to meet the borough's housing need.

Representation 18: The Options

- 3.1 Please see the [Options Consultation Statement 2019](#) for the full report which includes the consultation responses and analysis.
- 3.2 As a result of the consultation responses from the Strategic Options consultation, the updated National Planning Policy Framework, Planning Practice Guidance and in particular the introduction of the new Standard Methodology for calculating housing need, it was considered appropriate to review and re-evaluate the options. The review and re-evaluation included additional technical work which led to the identification of five options for housing growth, including the evolved original three options. The options consultation was the second Regulation 18 consultation that was undertaken to inform the Local Plan.
- 3.3 A formal call for sites exercise, which ran alongside the consultation promoted 25 sites for residential or mixed-use development.

The consultation took place from Monday 19 August 2019 to Monday 30 September 2019.

Who was consulted and how?

- 3.4 On Monday 19 August 2,653 people registered on the Elmbridge planning database received an e-mail or letter to inform them that the consultation was open. The mailout included specific consultees, residents and key stakeholders in line with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and Appendix 1 of the 2018 SCI. The letter included a brief overview of the consultation, where to access the information and how to respond.
- 3.5 A specific consultation webpage was created for the consultation. This provided people with an introduction to the consultation, information of how to respond and included the library of consultation documents. Other publicity methods included a press release, a formal newspaper article, public noticeboard poster, leaflets and social media messages using twitter and Facebook.
- 3.6 E-mails were sent to all Councillors on 19 August, the day the consultation started. An e-mail was also sent to all officers of Planning Services at the council to ensure that everyone knew the consultation had started. Planning officers e-mail signature image was also updated containing the link to the consultation webpage.

- 3.7 In response to feedback from our previous consultation held in 2016, an interactive online map was also available allowing people to see the sites included in each option. Clicking on the site provided a summary of information about the timescale, capacity and source of the site's information.
- 3.8 A2 size hard copies of the consultation document and the Frequently Asked Questions sheet were available to view at the Civic Centre and the borough libraries throughout the consultation time.
- 3.9 An animation was also created to provide a visual account of the consultation content. This was included on the consultation webpage and press release and was uploaded on the Civic Centre reception tv screen for visitors to the Council to view.
- 3.10 Six public meetings were held between 27 August and 5 September 2019. These took place during the second and third week of the consultation to present the options to residents and answer any questions they may have had. A live webcast of these meetings was available to enable as many people as possible to view the meetings.

How many responses were received?

3.11 6,554 completed questionnaires were received in total. These included:

Type of Respondent	Number	%
Resident	6,419	98
Residents Associations/Group	31	0.4
Local Business	29	0.4
Non-Elmbridge Resident	15	0.2
Planning Consultant/Agent	9	*
Developer/Builder/Landowner	8	*
CAAC/Heritage/Conservation	8	*
Architects	5	*
Estate Agents	4	*
Amenity Group/Club	3	*
Environment	3	*
Religious Group	3	*
Central government	2	*
Local Government	2	*
Political Parties	2	*
Parish Council	2	*
School/College/Uni	2	*
Utilities	2	*
Youth Group	2	*
Care/Support	1	*
Housing Association	1	*

Media	1	*
Total	6,554	100

3.12 In addition to the completed questionnaires, 94 formal representations were submitted from the following stakeholders:

- 34 Planning Consultants (defined as an Architect, Planning Consultant/ Agent, Estate Agent or Developer/ Builder/ Landowner)
- 24 Residents
- 11 Resident Associations/ Groups
- 2 Parish Councils (Claygate and Ockham)
- 9 Government bodies including Surrey County Council, Greater London Authority and statutory bodies.
- 8 local planning authorities
- 1 Local Business (Brooklands Museum)
- 1 heritage body (Historic Royal Palaces)
- 2 transport bodies (Transport for London, Highways England)
- 1 charity (Woodlands Trust)
- 1 telecommunication business (BT)
- 1 Utility company (National Grid)

What were the main issues raised?

3.13 Much of the feedback focussed on the 5 options. However, the initial questions were designed to assist in the formation of the vision and objectives. Respondents stated that the following were key characteristics that made their area a great place to live:

- The amount of green space available and access to it, this included Green Belt land.
- Village character and sense of community.
- Accessibility - rail links to London, road links to London (A3 and M25) - providing easy access to international airports and the job market.

3.14 Changes respondents wanted to see included:

- Improved infrastructure provision
- Protection of the natural environment
- Housing provision and better-quality design / built environment
- Improvements to local high streets

3.15 The next set of questions related to the 5 options for housing growth in the borough, and the stakeholders' views on which option would best suit their area. The results were as follows:

Option	Number of Respondents	Percentage of Respondents
Option 1-intensify urban area	142	2%
Option 2-optimize urban area and 3 area of Green Belt release	151	2%
Option 3-optimize urban area and large Green Belt release	62	1%
Option 4-optimize urban area	5567	85%
Option 5-optimize urban area and small areas of Green Belt release	353	5%
Other	241	4%

3.16 The commentary received for each of the options is summarised below:

Option 1

3.17 Intensifying development within the urban areas was considered by some respondents to be the most sustainable as development would be close to existing stations, shops, schools and GPs. This was also considered to preserve existing low-density areas and maintain the borough's Green Belt boundaries. Only 2% of respondents supported this option.

Option 2

3.18 For some respondents, Option 2 provided a fairer distribution of development across the borough. It was stated that some areas of the borough should release their Green Belt and take more development. This would protect existing urban areas from significant change in character and release the pressure from urban flatted developments on areas such as Walton which were considered by some respondents to have already taken their fair share of development. Only 2% of respondents supported this option.

Option 3

3.19 In supporting this option respondents considered that this fully met the housing needs of the borough and was the most long-term sustainable option as releasing Green Belt would provide the land needed for new infrastructure to support new housing. The release of poor-quality Green Belt could be used for high quality housing and be linked to environmental improvements. A respondent also commented that this option will assist in meeting years of under delivery that has made housing so expensive in the borough. Respondents felt that this option would avoid overcrowding in areas like Walton and protect areas like Molesey. This option was also considered to be the best way to deliver affordable housing. Only 1% of respondents supported this option.

Option 4

- 3.20 Respondents' comments on Option 4 focused on preserving the Green Belt which would protect the natural environment and provide open spaces for health and well-being of residents. Many respondents commented that the Green Belt is sacrosanct and should not be released for development.
- 3.21 Many stakeholders considered that this option provided the least impact on the borough due to the low housing numbers. Others stated that this option would protect and retain the character of the borough, and maintain space between the villages, limiting and preventing urban sprawl.
- 3.22 Respondents felt that option 4 made the most of urban brownfield land and that this was the more appropriate option. A variety of reasons was given for this including access to existing amenities and infrastructure within urban areas; it will not spoil the countryside as much as other options; it would be in keeping with the area; the area cannot sustain large scale development; and more affordable housing can be delivered through this option, allowing the affordability issue to be addressed. 85% of respondents supported this option.

Option 5

- 3.23 One of the main points raised in responses to option 5 was that it provided a good balance. It would meet housing need whilst also preserving the overall feel and character of the borough. One respondent commented that the village feel of the area would largely be maintained by choosing this option, and another felt that the borough is well served by open space and that this option despite the loss of some would still preserve the overall feel, whilst others supported this option because it would avoid overdevelopment with high rise buildings while supplying housing to meet need.
- 3.24 Other comments considered that this option was fairer through spreading the burden of development over the entire borough, sharing the impact. Responses also considered that this would be achieved through making the best use of the urban areas while allowing for small amounts of Green Belt release and retaining the strategic gaps between settlements. 4% of respondents supported this option.
- 3.25 The following comments were made regarding alternative ways to meet the government's housing target for Elmbridge. Suggestions included:
- Making efficient use of land.
 - Using brownfield land in town centre locations.
 - High density development in urban areas.
 - Using commercial properties for housing.
 - Use of derelict land, empty buildings, industrial land and business parks.
 - Use underutilized car parks.
 - Creation of a new town.

- 3.26 58% of respondents did not offer a specific suggestion about how the council should plan for the new homes needed in the area. They stated that a one size fits all approach would not work and a range of methods were needed to ensure the borough meets its housing needs.
- 3.27 In terms of planning issues that needed to be addressed in the detailed day-to-day planning policies, respondents felt most strongly about parking, open spaces and density. Comments were received across all categories and were as follows:

	Planning Issue	Number of respondents	% of respondents
1	Density	2,605	58
2	Design/ Character	2,350	53
3	Building heights	1,772	40
4	Parking	2,776	62
5	Conservation areas	2,234	50
6	Historic features (e.g. listed buildings)	1,165	26
7	Sustainability / renewable energy	2,127	48
8	Flooding	1,855	42
9	Open Spaces	2,752	62
10	Other	857	19

- 3.28 Respondents also commented that infrastructure provision and transport should be included in future planning policy.

How have these been taken into account?

- 3.29 This consultation provided feedback to help formulate the vision and principles which were referred to as objectives in the next Regulation 18 consultation. It provided an understanding of what people valued most about their local area. This also helped when considering the most appropriate strategy for the borough and explains why option 4 was the most supported.
- 3.30 In terms of how this consultation has influenced the draft Local Plan - respondents' comments on the characteristics of their local area and the changes they wish to see helped formulate the vision and principles. Detailed policies also address the planning issues that were highlighted including specific policy on infrastructure provision and transport, as requested. Further evidence base work supports the commentary such as the transport evidence and infrastructure delivery plan.
- 3.31 The draft Local Plan presents an urban only strategy which reflects the 85% of respondents supporting option 4 in this consultation.

Regulation 18: Creating our vision, objectives and direction for development management policies 2020

- 4.1 Please see the [Consultation Statement 2020](#) for the full report which includes the consultation responses and analysis.
- 4.2 The purpose of this consultation was to seek views on what the vision and objectives for the borough should be and the direction of the development management policies. These were informed by previous residents' and stakeholders' views, the emerging Local Plan evidence base, the on-going Sustainability Appraisal, as well as national policy and legislation.
- 4.3 It shared the council's thoughts on what approaches future policies could take in relation to policy topics. The topics were split into three key themes - protecting and enhancing our natural environment, growing a prosperous economy and ensuring health and wellbeing for all.

This consultation took place from Monday 27 January 2020 to 9 March 2020.

Who was consulted and how?

- 4.4 8168 people registered on our planning database with an e-mail address were pre-invited on 22 January 2020 to join the consultation that would commence on 27 January 2020.
- 4.5 On Monday 27 January 2020, 7924 people registered on the database received an e-mail to inform them that the consultation was open. The pre-invite provided guidance on how to unsubscribe, which reduced the numbers that received the notification at the start of the consultation. In addition, 136 people without an e-mail address contact were sent a hard copy letter in the post.
- 4.6 The letter and electronic mailout included specific consultees, residents and key stakeholders in line with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community Involvement. The content of the letter included a brief overview of the consultation, where to access the consultation information and how to respond to the consultation.
- 4.7 All of the borough's public noticeboards included a poster informing residents of the consultation. A formal newspaper notice was published on Friday 31

January 2020 and a feature was also included in a residents e: newsletter. Social media messages using twitter and Facebook were used throughout the consultation to encourage people to respond.

- 4.8 E-mails were sent to all Councillors on 27 January, the day the consultation started. An e-mail was also sent to all staff in Planning Services to ensure that everyone knew the consultation had started. Planning officers e-mail signature image was also updated with the link to the consultation webpage.
- 4.9 A3 hard copies of the consultation document and the 'Frequently Asked Questions' sheet were available to view at the Civic Centre and the borough libraries throughout the consultation time.
- 4.10 Given the wide-ranging remit of the consultation document with its presentation of policy directions, it was considered appropriate to undertake relatively focused consultation events. As such, a series of workshops with local community groups and residents' associations were held within the consultation period. One evening and two-day time workshops were held at the Civic Centre, with the same content to allow flexibility and choice to those invited to attend.

How many responses were received?

- 4.11 The online consultation questionnaire was the main response method and 657 completed questionnaires were received in total. No petitions were received to this consultation. In terms of who responded to the consultation, this is the breakdown of the 657 questionnaire respondents:

Type of Consultee	No. of Responses	Percentage of consultees who responded
Resident	597	93
Residents' Association	19	3
Planning Consultant/Agent	17	3
CAAC/Heritage/Conservation	3	*
Central Government	3	*
Local Government	3	*
Developer/Builder/Landowner	2	*
Housing Association	2	*
Individual outside Elmbridge	2	*
County Council	2	*
Amenity Group	1	*
Architects	1	*
Community Safety (Gatwick)	1	*
Environment	1	*
Parish Council	1	*
Political Parties	1	*
Youth Group	1	*

Total Number of Consultees	657	100
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4.12 A total of 597 questionnaire responses were received from Elmbridge residents. This accounts for 93% of respondents.

What were the main issues raised?

Key issues on the vision and objectives

- Respondents agreed with the key issues identified and supported the ambitions of the vision and provided additional comments to support this.
- Respondents wanted the protection of the Green Belt to be more explicit in the vision and objectives as well as protection of the natural environment and reduction of effects of climate change.
- There were many comments that reiterated the importance of sustainable development that retains the distinctive identity of individual towns and villages, maintains the character and appearance of these areas and conserves the historic environment. Providing affordable housing, infrastructure, public transport, active travel measures and improving air quality were considered important to include in the Plan's vision.

Key issues on protecting and enhancing the natural environment

- One of the most frequent responses related to the importance of the function and conservation of the existing Green Belt. There was a clear view that all development in the Green Belt should be opposed by the council as the Green Belt is integral to the success of the objectives around health, wellbeing, climate change and the natural environment.
- Addressing climate change was commented on, with some respondents stating that our response should be through strong policies to reduce our carbon footprint.
- The issue of transport was also frequently raised with several respondents citing the need for an increase in the quality of public transport to reduce the dependency on private vehicles.
- Improving air quality, biodiversity and flood protection.
- Protecting the character of individual settlement areas.

Key issues on growing a prosperous economy

- Respondents agreed with the policy direction and added that the borough's town centres, and high streets required enhancement to maintain character, functionality and vibrancy.

- To improve the town centres/ high streets, many respondents mentioned that the lowering of business rates, improved broadband network and more opportunities for start-up businesses were needed.
- Policy should protect and enhance existing Strategic Employment Land.
- Comments included safeguarding high streets and providing more parking.
- Residents did support the prospect of improved public transport and sustainable travel as it would make it more attractive for local people to work locally and this would reduce the culture of moving between towns by private vehicles. Nonetheless, residents noted that living and working locally is a challenge due to affordability and the undersupply of homes.

Key issues on health and wellbeing for all

- Respondents supported policy direction on health and wellbeing for all.
- Comments included the importance of quality designed homes, smaller homes and environmentally sustainable homes.
- Need for affordable housing.
- Outdoor play space for children in every new home.
- Protection of Green Belt was missing from policy direction.
- Lack of leisure venues, sporting facilities, public transport and health care services.

How have these been taken into account?

- 4.13 The draft Local Plan's vision reflects the key issues in the above feedback. It states that Elmbridge will be more resilient to climate change and will take responsibility for reducing carbon emissions and deliver positive outcomes for future generations. A new policy chapter on climate change was included in the draft Local Plan that seeks to ensure new development proposals achieve the highest levels of energy efficiency, adopt a circular economy and reduce waste. It also includes policies on sustainable design, sustainable transport and reduction of flood risk which were all key issues expressed by respondents.
- 4.14 In response to many of the comments, principle 2 has been revised and includes the statement that the draft Local Plan will ensure strong protection of the Green Belt from inappropriate development. The plan itself presents an urban only strategy, which was supported by many respondents.
- 4.15 A chapter and suite of policies on protecting and enhancing the environment includes protection of green and blue spaces, local green spaces, Green Belt, heritage assets, biodiversity, landscape and trees. Better environmental

quality and urban design is included with reference to maintaining the uniqueness of the borough. These policies respond to and take into account the comments about environmental quality and their importance to the community.

- 4.16 Known in this consultation as objectives, these are now called principles in the draft Local Plan and contain the five main issues that were raised in the consultation. These flow from the critical issues identified and support the delivery of the vision. Each principle includes detailed policies together with commentary for all issues featured in the consultation.

Conclusion

- 4.17 The council has consulted widely using a range of different methods for the three Regulation 18 consultations as explained in this consultation statement. The council's on-line Consultation portal has been instrumental in facilitating the submission of comments, their recording and the ability of the council to effectively respond.
- 4.18 The results of the consultations have had a tangible impact on the direction of the Plan. The community supported an urban only strategy in order to protect the borough's Green Belt land. Strategic and detailed policies have been developed in order to address the key issues respondents felt strongly about such as tackling climate change, protecting the environment and delivering infrastructure. It is considered that the draft Local Plan has taken into account respondents views.
- 4.19 The representations that are received, when the Draft Local Plan is published for Regulation 19, will be compiled and summarised prior to submission of the Plan to the Secretary of State for its independent Examination.