
Shaping Elmbridge A New Local Plan



Regulation 19: Pre-submission Draft of the Elmbridge Local Plan

Representation Strategy

May 2022



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

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1. Introduction

- 1.1 The purpose of this document is to set out how the local authority will advise residents and key stakeholders about the representations they can make for the Regulation 19: Pre-submission Draft of the Elmbridge Local Plan representations stage.
- 1.2 This is the last stage of public engagement before submitting the draft plan, supporting documents and the representations received to the Inspectorate for examination. This is a formal process that requires representations on the soundness and legal compliance of the plan.
- 1.3 This is in line with consultation requirements prescribed in the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2021.

Background

- 1.4 The council has prepared a draft Local Plan which sets out how communities and places within the borough will develop over the next 15 years. The Local Plan is a statutory requirement and the Government has made it clear that all local authorities must have an up-to-date Local Plan by December 2023.
- 1.5 The draft Local Plan sets out the vision for the borough and the approach to development over a 15-year period (up to 2037). It contains targets for the delivery of different types of development, provides guidance on locations as to where this development will take place and establishes which areas should be protected. It also sets out policies by which future planning applications will be determined.
- 1.6 The draft Local Plan contains strategic policies, allocations and designations along with detailed policies which will support the implementation of the council's preferred approach for growth, referred to as the spatial strategy.
- 1.7 Once adopted, the Local Plan will replace the 2011 Core Strategy and 2015 Development Management Plan.

What consultation has taken place so far?

- 1.8 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.](#)

- 1.9 The Strategic Options consultation 2016/17 included an initial preferred option for the delivery of new homes and explored key planning issues affecting the borough. Some 3760 stakeholders responded to the consultation. The Options consultation 2019 included five options for the location and distribution of growth with 6554 stakeholders 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 stakeholders responded to this consultation. The links above provide the consultation statements for each consultation.
- 1.10 With consideration of the feedback from each consultation, technical evidence (from the various policy areas) and the sustainability appraisal work, a draft Local Plan has been written. The next stage of the process is inviting representation of the draft Plan on the specific questions of soundness and legal compliance as required by the Planning Inspectorate.

Structure of this document

- 1.11 It is not for this representation strategy to discuss the actual content of the draft Local Plan. Instead, it will set out our strategy for ensuring that our stakeholders know about the representation period early on and have every opportunity to provide their formal representation in line with regulation 19.
- 1.12 The document starts with the early consultation preparation including engagement with our Councillors and the wider publicity methods we will adopt to make sure our stakeholders know when the representation period will commence and close. It will then discuss the public engagement we will use in line with regulation and the SCI.

2. Representation preparation

Engagement with Councillors

- 2.1 Early engagement with Councillors on progress with the draft Local Plan has been an important part of the plan-making process and has been continuous since the process of preparing a new Local Plan started in 2014.
- 2.2 Local Plan Working Group meetings, Member workshops and briefings have taken place throughout the last 7 years and have discussed the following matters;
- Changes in the national planning policy context and the implications for the emerging Local Plan.
 - The outcomes of the evidence base documents including the Sustainability Appraisal.
 - The details and outcomes of the Regulation 18 consultations.
 - Potential development strategies and their implications in terms of the amount and location of new development.
 - Activities relating to the Duty to Cooperate and the implications for the emerging Local Plan.
 - Working drafts of the emerging Local Plan including the detailed wording of the drafted policies and supporting text.

Early publicity

- 2.3 Once the council has approved the draft Local Plan for public representation, early publicity can start. The council's website, news items and Local Plan pages will be updated so that the dates of the representation period are known as early as possible. Other publicity methods will include full use of social media including twitter and Facebook.
- 2.4 Specific e-mails will be sent to residents' associations and Claygate Parish Council to inform them when the representations period starts. This will allow these groups and the Parish Council to inform their communities early in the process. Local Surrey County Councillors will also be informed of this before the representation period starts.

- 2.5 Some respondents in the Strategic Options consultation stated that Kingston residents were not informed. Our neighbouring authorities will be informed of the regulation 19 representation period.
- 2.6 As well as discussing the representation period in Planning Service meetings, we will also keep internal departments such as Environmental Health, Environmental Care, Community Services and Housing aware of the representation period either through direct emails to Heads of Service or through discussions at Leadership Group
- 2.7 An e-mail note will be created to be posted on all Planning Services e-mails to publicise the forthcoming representation period.
- 2.8 Before the representation period starts, frontline staff in customer services will be briefed, so they are aware of it and can advise people on how to respond. They can also transfer more complicated calls to the Local Plan team if required.

3. Representation publicity arrangements

Representation requirements

3.1 Appendix 2 of the Statement of Community Involvement (SCI) 2021 sets out the public/stakeholder involvement arrangements for preparing the draft Local Plan. It states that the draft documents should be published for consultation for a minimum of six weeks and, at the start of the representation period, should include:

Table 1: SCI 2021 representation requirements

Key stages	Involvement Level	Public/stakeholder involvement arrangements
Publication of the proposed submission	Asking what you think?	<ul style="list-style-type: none">• Publish the Local Plan and relevant documents for a minimum of six weeks.• At the start of the consultation period, publish a statement of representations procedure.• Publish the Sustainability Appraisal report for consultation.• Publish a Consultation Statement summarising all comments received from the previous stages and how the comments have been considered and taken into account.• Publish relevant supporting documents.• Inform specific consultation bodies.• Inform relevant consultation bodies, other interested bodies and individuals on the consultation database.• Make hard copies of consultation documents available for inspection at the Civic Centre and borough libraries.• Issue public notice in local newspaper

		<ul style="list-style-type: none"> • Issue press release in local paper. • Add consultation information on council's social media sites. • Arrange exhibition or presentation to interest groups if necessary.
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3.2 The following sections of this chapter sets out in detail what we will do and how this complies Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's SCI 2021.

Representation timescales

3.3 The representation period will run for the six weeks as stated in Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's SCI 2021.

Consulting people

3.4 Everyone registered on our database will be informed of the representation period by e-mail or letter. This includes specific consultees, residents and key stakeholders. This is in line with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and Appendix 1 of the 2021 SCI. The letter will include a brief overview of the representation period, where to get the information from and how to make representations.

3.5 There will be a press release and public notice in the local newspaper in the first week of the consultation. Social media messages using twitter and Facebook will also be used to publicise the representation period when it starts and throughout the six weeks to encourage people to make their representations online.

3.6 E-mails will be sent to all Councillors on the day the representation starts. An e-mail will also be sent to all of Planning Services to ensure that everyone knows the representation period has started. An e-mail signature will also be updated with the link to the representation webpage.

Representation documents

3.7 Representation documents will be available online on the Regulation 19: Pre-Submission of the Elmbridge Local Plan representation webpage. This will have a web library of documents including the draft Local Plan, policies map link to the interactive map, online representation form, statement of representation procedure and supporting documents such as the

Sustainability Appraisal assessment, Habitats Regulation Assessment and an Equity Impact Assessment.

- 3.8 A guidance note will also be available and will explain to people how to make representations. This is important as there is a formal way of responding to this representation period.
- 3.9 A hard copy the draft Local Plan will be available for inspection at the Civic Centre by appointment only and at the borough's libraries¹. People can also view the consultation homepage at both the Civic Centre and libraries which will allow them to access the policies map. They may need to book an appointment with the library to use the computer.
- 3.10 Planning policy officers can answer any questions on the telephone or via e-mail. The policy team will endeavour to try and advise and find solutions to allow as many people to view the draft Local Plan and make representations if they wish.
- 3.11 Evidence base documents will be available to view online in the evidence base library. In addition to that, topic papers on the key policy areas will also be available online and these will summarise the key findings from the evidence base documents.

Exhibitions / public meetings

- 3.12 At this regulation 19 stage of the Local Plan process, a workshop or face to face meetings are not considered necessary. This is because the representations stage presents what the council considers to be the final version of the Elmbridge Local Plan. The public engagement at this stage is no longer concerned with shaping the content of the document but allows interested parties to comment on the draft Plan and supporting information before it is submitted to the Inspector for examination.
- 3.13 It is considered important to produce an animation that will explain how to respond using the response form. The benefits of this approach are that people can view this whenever they wish. Officers will of course be able to answer any questions via telephone or e-mail.

Responding to the representation

- 3.14 At the regulation 19 stage, there is a formal method of responding that is required by the Planning Inspectorate. Only comments on the soundness and

¹ In line with the Government's 'Living with Covid-19' plan, there are currently no restrictions to viewing documents, however if this should change we will update the representation guidance.

legal compliance of the plan can be made and it must be targeted to a specific policy or paragraph in the draft Plan.

- 3.15 An online form on the council's consultation portal will allow people to refer to a policy, policies map reference, diagram, paragraph or supporting document (e.g. the Sustainable Appraisal/ and or Habitats Regulation Assessment) and then to explain why they think it is or is not legally compliant or/and sound. It will also include a question asking people to set out the modification that they consider necessary to make the pre-submission Local Plan legally compliant and/or sound including any revised wording. Respondents will have the ability to attach supporting documents to their justification if relevant.
- 3.16 The respondent will also be asked whether they wish to participate at the oral examination if they are seeking a modification and to explain why. It is the Inspector that will determine the most appropriate way to hear those who have indicated that they wish to participate at the oral examination.
- 3.17 The response form will also ask whether the respondent wishes to be kept informed of the submission, publication and adoption stage of the local plan process. A guidance note will be made available so that people understand how they can respond.
- 3.18 We will encourage the use of electronic documents and ask people to submit their representations electronically. If people cannot get access to a computer, then we will help them find an alternative.

4. Next Steps

- 4.1 All representations received during the representation period will be sent to the Planning Inspectorate together with the draft Local Plan and supporting documentation. The Planning Inspectorate will conduct an independent review of the plan and the representations made, to determine whether the plan is sound. This is called an Examination in Public.