
**FLOODING SEQUENTIAL TEST
STATEMENT**

**Outline application for the erection
of up to 60 dwellings.**

Land north of Raleigh Drive, Esher

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1. INTRODUCTION

Scope of Report

- 1.1. This statement addresses **sequential test matters relevant to flood risk considerations** arising in respect of an outline planning application proposing the erection of up to 60 dwellings, associated parking and landscaping alongside open space on land off Raleigh Drive, Esher. It reviews the information within the Council’s “Land Availability Assessment 2022” (LAA) (with base date of 31st March 2022) to determine whether there are potentially sequentially preferable alternative sites. The selection of alternative sites has been undertaken having regard to the guidance within the NPPF, the PPG¹ together with that from the Environment Agency and DEFRA² as detailed in the statement alongside from the Council’s Flood Risk SPD. It also reviews the latest information on housing land supply as of 31st March 2022.
- 1.2. The proposal offers a development that complies with relevant national and local policies, whilst providing 60 no. dwellings in a highly sustainable, settlement location.
- 1.3. The purpose of this statement is to specifically consider flood risk matters from a town planning perspective, particularly the Sequential Test. More general design and planning matters are covered in the Design & Access Statement and Planning Statement prepared by others. Further this statement is supported by a site specific Flood Risk Assessment Including Preliminary Surface Water Drainage Strategy (“FRA”) that covers the engineering aspects of the proposal.

Summary

- 1.4. *This sequential test reviews all the potential sites listed in the LAA (2022) (appendices 2-5) and explains why they are not sequentially preferred to the application site. The Sequential Test has also had regard to the Environment Agency’s flooding data alongside the Strategic Flood Risk Assessments prepared by the Council (2019 and 2022 update). Accordingly, this Sequential Test is up to date and provides a reliable*

¹ Advice in the “Flood Risk and Coastal Change” section under the heading “What is a ‘reasonably available’ site” (ID ref 7-028-20220825).

² Flood risk assessment: the sequential test for applicants - GOV.UK (www.gov.uk)

basis on which to make a decision on the planning application since it accords with the clear guidance from the NPPF and PPG, from the Environment Agency and from DEFRA on such appraisals³.

- 1.5. Consistent with the Environment Agency and DEFRA’s guidance on Sequential Tests⁴, the applicant reviewed sites allocated in the extant and emerging Local Plans (where not already covered in the LAA (2022) schedule) together with any extant unimplemented planning permission at 1st April 2022 (appendix 2 of LAA) – this totalled 153 sites. The Sequential Testing exercise also considered the 199 sites promoted for residential development in the LAA and listed in appendices 3-5.*
- 1.6. All the sites within the LAA (appendices 2-5) were assessed against the following criteria in that they were excluded unless site can accommodate between 50 and 100 dwellings or covers a net site area of at least 1.3ha and is therefore comparable with the application site (under the 2022 LAA assumed capacity).*
- 1.7. From the 153 sites with unimplemented planning permission for residential development (see appendix 2), there were 8 sites which could potentially be a reasonable alternative to the application site by virtue of their size. From the 199 sites which had been promoted and listed in appendices 3-5, 22 sites were left which were potentially comparable with the application site by reason of capacity or site area.*
- 1.8. These 30 sites (8 from the pool with extant planning permission and 22 from appendices 3-5 of the LAA) were then assessed in detail for whether they could be regarded as a reasonable alternative to the application site. This was both having regard to the advice in the PPG⁵ with respect to what is a “reasonably available site” together with that outlined in section 3.3.7 of the SPD.*
- 1.9. Following this detailed exercise, the land ownership details of the potentially comparable 22 LAA sites was then obtained. As the table in appendix 1 indicates, ownership details of one site was unavailable at the Land Registry and consequently there is no certainty of its availability. Letters enquiring about the availability of each*

³ Flood risk assessment: the sequential test for applicants - GOV.UK (www.gov.uk)

⁴ Flood risk assessment: the sequential test for applicants - GOV.UK (www.gov.uk)

⁵ Advice in the “Flood Risk and Coastal Change” section under the heading “What is a ‘reasonably available’ site?” (ID ref 7-028-20220825).

of the remaining 11 sites were sent (a copy is attached as Appendix 1). The response received indicated that there are no available alternative sites within the LAA to the application site.

- 1.10. Having regard to the overall assessment, all comparable sites within appendices 2 to 5 of the LAA (2022) were assessed to determine if they were “in a suitable location for the type of development proposed with a reasonable prospect that the site was available to be developed at the point of time envisaged”. The appraisal indicates that there were no other reasonably available sites having regard to this definition and therefore the scheme passes the sequential test as advised by the Environment Agency.*
- 1.11. The applicant has also reviewed the comparable sites having regard to the approach in paragraph 3.3.7 of the Council’s Flood Risk SPD and its definition of what are “reasonably available” alternative sites. Again the 30 appraised sites were not considered to be sequentially preferable to the application site having regard to the test of “reasonable availability”. The scheme therefore passes the sequential test as outlined in the Flood Risk SPD.*
- 1.12. Since none of the LAA sites are sequentially preferable to the application site off Raleigh Drive by virtue of the appraisal pursuant to both the Environment Agency’s and Council’s guidance, the proposal therefore passes the sequential test. This is particularly as there are no reasonably available comparable alternative sites that can accommodate the proposed development and can also be developed at the point in time envisaged for the land off Raleigh Drive.*
- 1.13. The lack of reasonably available alternative sites also means that there is no other solution to contribute towards addressing the acknowledged shortfall in 5 year housing land supply at 31st March 2020 and that deficit which is still apparent as at 1st April 2022, taking account the information accompanying the Draft Submission Local Plan. Whilst the PPG⁶ indicates that the lack of 5 year supply is not a relevant consideration for the sequential test for individual applications, as detailed in the*

⁶ Advice in the “Flood Risk and Coastal Change” section under the heading “What is a ‘reasonably available’ site (ID ref 7-028-20220825).

Planning Statement, the benefits arising from the application towards resolving the shortfall are nevertheless relevant as material considerations.

- 1.14. *Additionally, whilst there are no reasonable available sites, this is notwithstanding that the majority of the dwellings are proposed in flood zone 1. Those homes shown to be located in flood zone 2 will be included in flood zone 1 as a result of the re-profiling of the obsolete bowling green. Once the obsolete bowling green has been re-profiled, the dwellings proposed on the site would be wholly within flood zone 1.*
- 1.15. *Although the scheme includes the re-profiling of the obsolete bowling green, the proposal (as outlined in this statement) would pass the sequential test should this not occur as there are no reasonable alternatives and consequently this element of the application is not essential. The potential re-profiling of the obsolete bowling green is therefore a measure which could contribute towards an illustration that the scheme has sought to ensure development is located within the areas at lowest risk.*
- 1.16. *The scheme proposes amenity open space which is a water compatible activity within that part of the site in flood zone 3. As amenity open space is a water compatible activity, this is not considered further within the sequential test. The inclusion of amenity open space within the flood zone 3 part of the site is a further illustration of the sequential approach to development such that the uses are located within the site have regard to the flood risk vulnerability classification⁷ and the associated guidance in the PPG regarding where they may be positioned⁸. The consideration of the amenity open space separate to the proposed dwellings through the sequential test reflects the PPG⁹.*
- 1.17. *Overall, the proposed development passes the sequential test. The proposed re-profiling of the obsolete bowling green and its incorporation in flood zone 1 is a further illustration of the acceptability of the proposal. However, as noted, irrespective of the proposed re-profiling, the scheme passes the sequential test.*

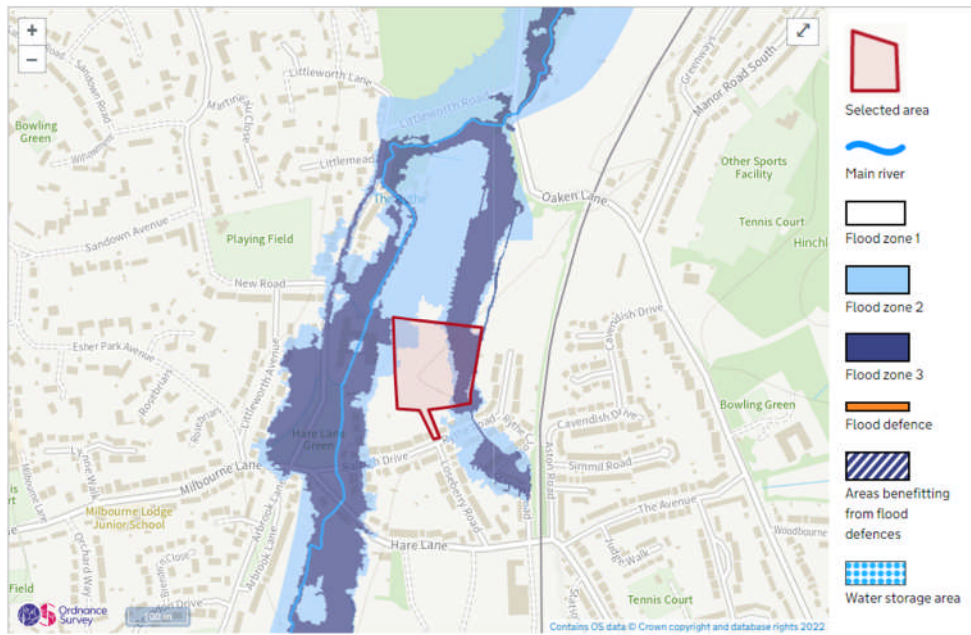
⁷ Annex 3 of NPPF

⁸ Tables 1 and 2 within the subsection headed “Flood Zone and flood risk tables” within the “Flood Risk and Coastal Change” section.

⁹ Last bullet in the notes associated with Table 2 within the subsection headed “Flood Zone and flood risk tables” within the “Flood Risk and Coastal Change” section.

Site Context

- 1.18. The subject site lies to the north of Raleigh Drive, Esher. Although the site is open, it is enclosed on three sides by residential development. To the east and south, these are generally two storeys and include a range of terraced, semi-detached and detached properties. To the west of the site is the three storey apartment building at Esher Park Gardens (converted office building). The application site, as an area of underutilised open land, therefore offers an opportunity for additional residential development consistent with the established residential character of the surrounding area.
- 1.19. As set out in the Planning and Transport Statements supporting the application, the site is located in a highly sustainable location. Numerous services including a convenience store, chemist, other shops, a public house are located within 1km of the site. Claygate train station is within 500m of the site and regular bus services are available from stops within 250 metres from the site. The site therefore comprises a sustainable and accessible location for additional residential development.
- 1.20. The relevant flood zones are illustrated on the below extract taken from the Planning for Flood Risk website. This indicates that the eastern part of the site is within flood zone 3 and the north-western part of the site is within flood zone 2. Dwellings are proposed in flood zone 2 but not flood zone 3.
- 1.21. The FRA indicates that the north-western part of the site is only within flood zone 2 as a result of previous engineering works on the site to create the now unused bowling green. Through the application, the site will be re-engineered to reflect its previous landform. This re-engineering of the bowling green will result in its removal from flood zone 2.
- 1.22. Although a re-engineering of the bowling green to reinstate it to a natural landform is proposed in the application, the passing of this sequential test is not dependent on this. As indicated below, even without the re-engineering, this Sequential Test concludes that the proposal passes the relevant requirements and once the re-profiling has occurred, this further demonstrates the acceptability of the proposal.



Extract from Planning for Flood Risk website indicating flood risk classification on site – website visited on 24th October 2022

Proposed Scheme

- 1.23. The scheme proposes the erection of up to 60 dwellings. The supporting Illustrative Site Plan shows this potential arrangement, whereby the dwellings would avoid the eastern part of the site within flood zone 3. This is illustrated on the extract of the illustrative site plan below. The extract of the site layout overlain with flood risk data indicates that the proposed dwellings (including access roads and driveways) impinge into part of the site within flood zone 2. As noted, the impingement of dwellings within flood zone 2 is a result of previous engineering works on the site to create the bowling green. The application entails the removal of the former bowling green and the restoration of the landform to its previous levels. This will result in the north-western part of the site moving from flood zone 2 to 1.



Extract of illustrative site layout which is overlain the flood risk information. This confirms that no dwellings are envisaged within the parts of the site within flood zone 3. (Appendix H in the FRA)

- 1.24. Within the eastern part of the site (within flood zone 3), open space is envisaged as indicated on the illustrative site plan (a water compatible use and therefore appropriate for this flood risk area).
- 1.25. The PPG indicates¹⁰ that development proposals can be considered in their component parts having regard to the differences in vulnerability. This has been followed for this application with the residential (a more vulnerable use) considered separately to amenity open space (a water compatible use).
- 1.26. Vehicular access to the site is provided from Raleigh Drive. The vehicular access provides a route through dry land for residents on the site, avoiding any areas within flood zones 2 and 3.

¹⁰ Last bullet in the notes associated with Table 2 within the subsection headed “Flood Zone and flood risk tables” within the “Flood Risk and Coastal Change” section (ID ref 7-079-20220825).

2. NATIONAL PLANNING POLICY & GUIDANCE

- 2.1. This section provides a summary of relevant flood risk considerations in relation to national planning policy and guidance.

National Planning Policy Framework (“NPPF”)

- 2.2. The NPPF was first published in March 2012. An updated version was issued in July 2018, alongside further amendments in February 2019 and July 2021. A further draft is currently out for consultation until 2 March 2023. The current NPPF sets out the presumption in favour of sustainable development. It is a material consideration of particular standing in the making of planning decisions, especially when they are to be determined in the context of the wording at paragraph 60 of the NPPF which requires Council’s to support the Government’s objective of significantly boosting the supply of housing.
- 2.3. The NPPF post-dates the evidence base collated as part of producing the existing Elmbridge Borough Local Plan¹¹. The existing Local Plan does not provide for a Framework compliant assessment of local housing need under the requisite Standard Method. Furthermore, as acknowledged in the Council’s most recently published assessment of housing land supply¹², it is unable to demonstrate a five year supply of housing land and consequently, pursuant to paragraph 11d of the NPPF, the tilted balance is engaged.
- 2.4. Paragraph 219 of the NPPF states that due weight should be given to policies in existing plans according to their degree of consistency with the NPPF (the closer the policies in the Plan are to the Framework, the greater the weight that may be given to them).
- 2.5. Furthermore, with respect to the Draft Submission Local Plan (June 2022), NPPF paragraph 48 is clear that the weight to be given to its contents depends on the stage

¹¹ Comprises the Core Strategy (adopted 20th July 2011) and the Development Management Plan (adopted 15 April 2015).

¹² The Council’s Authority Monitoring Report 2020-21 indicates that at 1st April 2020, the Council can demonstrate a 4.88 years supply (Table 34) which equates to a shortfall of 71 dwellings

in its preparation alongside its consistency with National Policy alongside the extent there are unresolved objections. Whilst a consultation has been undertaken on the Draft Submission Plan (from 17th June until 29th July 2022), as of 24th March 2023 it remains to be submitted for examination. At this early stage, only very limited weight is attributable to the Draft Submission Plan, particularly since the emerging approach does not seek to address the Borough Local Housing Need as obligated by the NPPF (paragraph 74).

Presumption in Favour of Sustainable Development

- 2.6. The NPPF sets out a presumption in favour of sustainable development and paragraph 8 identifies that there are three dimensions to sustainable development, comprising (i) economic, (ii) social and (iii) environmental.

Decision Taking

- 2.7. In setting out the presumption in favour of sustainable development, paragraph 11 of the NPPF adds, in relation to decision-making, that this means both approving development proposals that accord with the development plan without delay, but also where there are no relevant development plan policies, or the most important policies for determining the application are out of date (as defined in footnote 7 which includes the inability of the authority to demonstrate a five years supply of housing), granting permission unless (a) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (the policies are those listed in footnote 7) in the Framework indicate development should be restricted or (b) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Implementation

- 2.8. Paragraph 2 refers to planning law and the need for planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. Paragraph 219 goes onto acknowledge that the policies in the Local Plan should not be considered out of date simply because they were adopted prior to the publication of the NPPF. In this case, the policies in the 2011 Core Strategy are

based on housing requirements that are long out of date such that the weight that can be attached to them is significantly reduced.

- 2.9. Paragraph 218 notes that the policies in the NPPF are material considerations which are to be taken into account from the date of publication.

Meeting the Challenge of Climate Change, Flooding & Coastal Change

- 2.10. Chapter 14 of the NPPF requires that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. If development is to be proposed in flood zones 2 or 3 (i.e. areas of higher flood risk), then the NPPF requires two tests to be applied and passed. These comprise the sequential and exception tests.

- 2.11. The sequential test is described at paragraph 162 of the NPPF:

‘The aim of the Sequential Test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The Strategic Flood Risk Assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding’.

- 2.12. Paragraphs 163-165 of the NPPF then goes onto describe the exception test:

163 ‘If it is not possible for development to be located in zones with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.

164. The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied

during plan production or at the application stage. For the exception test to be passed it should be demonstrated that:

- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
- b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

165. Both elements of the exception test should be satisfied for development to be allocated or permitted.'

2.13. Paragraph 167 of the NPPF sets out specific requirements for applications in areas at risk of flooding:

'When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
- b) the development is appropriately flood resistant and resilient;
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
- d) any residual risk can be safely managed; and
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.'

The National Planning Practice Guidance (PPG)

2.14. The PPG was adopted in March 2014 with revisions and updates to the various sections issued on an ad-hoc basis. It expands upon and supports the form and content of the NPPF, taking account of any revisions.

2.15. Annex 3 of the NPPF identifies 'buildings used for dwelling houses' as a 'more vulnerable' use in a flood zone. Within the "Flood Risk and Coastal Change" section of the Planning Practice Guidance, Table 2 (ID ref 7-079-20220825) suggests that dwelling

houses (more vulnerable uses) may be accepted in flood zone 3A but only if the sequential and exception tests are passed. It also confirms that dwellings (as a more vulnerable use) are appropriate within flood zone 2. An extract of Table 2 from the PPG is included below.

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	X	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	X	X	X	✓ *

Key:

✓ Exception test is not required

X Development should not be permitted

“†” In Flood Zone 3a essential infrastructure should be designed and constructed to remain operational and safe in times of flood.

“*” In Flood Zone 3b (functional floodplain) essential infrastructure that has passed the Exception Test, and water-compatible uses, should be designed and constructed to:

- remain operational and safe for users in times of flood;
- result in no net loss of floodplain storage;
- not impede water flows and not increase flood risk elsewhere.

2.16. Additionally, annex 3 of the NPPF identifies ‘amenity open space’ as ‘water compatible development’. Table 2 from the PPG (as indicated above) confirms that water compatible development is acceptable in all flood zones, provided it is safe for users and does not result in loss of floodplain storage or increase flood risk elsewhere.

2.17. The supporting test to Table 2 of the PPG (within the last bullet) states:

Some developments may contain different elements of vulnerability and the highest vulnerability category should be used, unless the development is considered in its component parts.

- 2.18. Due to the significant differences in the flood vulnerability of residential development and open space within the NPPF and associated PPG, the appraisal of the scheme through the sequential test is considered in its component parts, thereby reflecting the advice highlighted associated with Table 2 of the PPG. This is therefore for the residential development element separately from the open space.
- 2.19. As indicated in the extract of the illustrative site layout, residential development is only proposed in flood zones 1 and 2 whereas amenity open space is proposed in all the flood zones¹³. The guidance in the NPPF and PPG is clear that for residential development (alongside other more vulnerable uses), only a sequential assessment is required to demonstrate why it is necessary within flood zone 2. Therefore no exception test is required with respect to the residential element of the proposal. To ensure robustness, an exception test is nonetheless applied (and shown to be passed) in the FRA and Planning Statement.
- 2.20. Guidance on the sequential test is provided in the section of the PPG with the sub-heading, “What is the aim of the Sequential Approach”. This states (ID ref 7-023-20220825) states:

‘The approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding. Avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures like flood defences, flood warnings and property level resilience features. Even where a flood risk assessment shows the development can be made safe throughout its lifetime without increasing risk elsewhere, the sequential test still needs to be satisfied. Application of the sequential approach in the plan-making and decision-making process will help to ensure that development is steered to the lowest risk areas, where it is compatible with sustainable development objectives to do so, and developers do not waste resources promoting proposals which would fail to satisfy the test. Other forms of flooding need to be treated consistently with river and tidal flooding in mapping probability and assessing vulnerability, so that the sequential approach can be applied across all areas of flood risk.’

¹³ This is discounting any re-engineering of the site to restore landforms following removal of the obsolete bowling green which would result in the dwellings only being provided in flood zone 1

2.21. The application has had regard to the above advice through the spatial distribution of development within the site, especially the avoidance of flood zone 3 areas for residential development whereas as noted amenity open space is acceptable in this part of the overall parcel. The application is also accompanied by a Detailed Flood Risk Assessment including Preliminary Surface Water Drainage Strategy which shows that development can be made safe throughout its lifetime without increasing flood risk elsewhere. The role of this Sequential Assessment in demonstrating consistency of the proposal with this section of the PPG is dealt with in later sections of this Statement.

2.22. Paragraph 7-024-20220825, under the sub-heading “How can the Sequential Test be applied to the location of development?” states:

‘The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites:

- **Within medium risk areas; and**
- **Then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas.**

Initially, the presence of existing flood risk management infrastructure should be ignored, as the long-term funding, maintenance and renewal of this infrastructure is uncertain. Climate change will also impact upon the level of protection infrastructure will offer throughout the lifetime of development. The Sequential Test should then consider the spatial variation of risk within medium and then high flood risk areas to identify the lowest risk sites in these areas, ignoring the presence of flood risk management infrastructure.

It may then be appropriate to consider the role of flood risk management infrastructure in the variation of risk within high and medium flood risk areas. In doing so, information such as flood depth, velocity, hazard and speed-of-onset in the event of flood risk management infrastructure exceedance and/or failure, should be considered as appropriate. Information on the probability of flood defence failure is unsuitable for planning purposes given the substantial uncertainties involved in such long-term predictions.’

2.23. Guidance “How should the Sequential Test be applied to planning applications?” is provided in paragraph ID ref 7-027-20220825. This indicates:

The Sequential Test should be applied to ‘Major’ and ‘Non-major development’ proposed in areas at risk of flooding, but it will not be required where:

- The site has been allocated for development and subject to the test at the plan making stage (provided the proposed development is consistent with the use for which the site was allocated and provided there have been no significant changes to the known level of flood risk to the site, now or in the future which would have affected the outcome of the test).
- The site is in an area at low risk from all sources of flooding, unless the Strategic Flood Risk Assessment, or other information, indicates there may be a risk of flooding in the future.
- The application is for a development type that is exempt from the test, as specified in footnote 56 of the National Planning Policy Framework.

For individual planning applications subject to the Sequential Test, the area to apply the test will be defined by local circumstances relating to the catchment area for the type of development proposed. For some developments this may be clear, for example, the catchment area for a school. In other cases, it may be identified from other Plan policies. For example, where there are large areas in Flood Zones 2 and 3 (medium to high probability of flooding) and development is needed in those areas to sustain the existing community, sites outside them are unlikely to provide reasonable alternatives. Equally, a pragmatic approach needs to be taken where proposals involve comparatively small extensions to existing premises (relative to their existing size), where it may be impractical to accommodate the additional space in an alternative location.

For nationally or regionally important infrastructure the area of search to which the Sequential Test could be applied will be wider than the local planning authority boundary.

See also advice on who is responsible for deciding whether an application passes the Sequential Test and further advice on the Sequential Test process available from the Environment Agency (flood risk standing advice)

2.24. As indicated in this assessment, the area examined with respect of reasonable alternatives for the proposal is the whole administrative area of Elmbridge Borough. This therefore reflects the approach that housing on the site (both market and affordable) would contribute towards resolving the Borough wide needs of both elements.

2.25. With respect to a “Reasonably available” site, paragraph ID ref 7-028-20220825 advises:

‘Reasonably available sites’ are those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development.

These could include a series of smaller sites and/or part of a larger site if these would be capable of accommodating the proposed development. Such lower-risk sites do not need to be owned by the applicant to be considered ‘reasonably available’.

The absence of a 5-year land supply is not a relevant consideration for the sequential test for individual applications.’

- 2.26. Whilst the PPG indicates that the lack of a five year supply is not a relevant consideration for the sequential test, it is nevertheless clear that it is important to assess whether the alternative is in a suitable location for the type of development and that there is a reasonable prospect that it is available at the time envisaged for the development¹⁴.
- 2.27. Although the PPG indicates that consideration of a portfolio of smaller sites to deliver the equivalent of the proposal could be considered, that is only if they would be capable of accommodating the proposed development. This sequential test does not appraise sites with a capacity of less than 50 dwellings or 1.3ha in area. Paragraph 3.45 of the statement details the reasoning for this, but in essence it is that they would not be comparable to the form of development, including a mix of market and affordable dwellings. With respect to the latter, the applicant highlights the clear guidance in the NPPF (paragraph 64) that affordable housing should not be sought unless the residential scheme comprises major development. This is defined in the NPPF’s Glossary as sites of 0.5ha or delivering 10 or more dwellings.
- 2.28. This Sequential Testing statement appraises those sites which are potentially comparable to the application proposal against the advice within the Environment Agency’s guidance together with the Council’s Flood Risk SPD. This is provided in section 4.
- 2.29. The application proposes the erection of up to 60 dwellings, including 50% affordable housing. The scheme (as shown on the illustrative layout) envisages a mix of dwelling types and sizes including apartments and houses of different types which should

¹⁴ ID ref 7-028-20220825

permission be granted would all be completed by March 2028 i.e. within around 5 years of an approval if given in April 2023. This consequently has informed the identification of “reasonably available sites” as per the PPG advice¹⁵.

- 2.30. The PPG advice on the sequential test concludes with the section on “who is responsible for deciding whether an application passes the Sequential Test?”. This confirms:

Relevant decision makers need to consider whether the test is passed, with reference to the information it holds on land availability. The planning authority will need to determine an appropriate area of search, based on the development type proposed and relevant spatial policies. The applicant will need to identify whether there are any other ‘reasonably available’ sites within the area of search, that have not already been identified by the planning authority in site allocations or relevant housing and/or economic land availability assessments, such as sites currently available on the open market. The applicant may also need to check on the current status of relevant sites to determine if they can be considered ‘reasonably available’. Local planning authorities should inform the applicant and, where relevant, the Environment Agency about the outcome of the sequential test at the earliest opportunity, as this may avoid other work being undertaken unnecessarily.

Local planning authorities may find it helpful to prepare guidance on the appropriate area of search for common development types. They may also find it helpful to keep an up-to-date register of ‘reasonably available’ sites, clearly ranked in flood risk preference. This could be part of their housing and/or economic land availability assessments or as a separate document. This should be informed by the strategic flood risk assessment with any ranking methodology agreed with the Environment Agency. Such an approach could increase certainty for developers and save time at application stage.

Ultimately the local planning authority needs to be satisfied in all cases that the proposed development would be safe throughout its lifetime and not lead to increased flood risk elsewhere.

- 2.31. The Council has not prepared a register of “reasonably available” sites, and the applicant has consequently relied upon the LAA as the basis of the appraisal. The use of the LAA as the evidence to inform the Sequential Test reflects the Environment Agency’s advice, as indicated above.

¹⁵ ID ref 7-028-20220825

2.32. The PPG advice on the sequential test is supplemented by that produced by the Environment Agency alongside DEFRA¹⁶. This is set out below.

Environment Agency and DEFRA guidance on Flood risk assessments: the sequential test for applicants.

2.33. The guidance from the Government prepared by the Environment Agency and DEFRA details the specific information that should be included in the Sequential Test Assessment. This is set out below, including the sub-heading in their advice.

Assessment of application site alongside the guidance from the Environment Agency and DEFRA

Criteria within Environment and DEFRA guidance	Response (including where covered in this statement)
Information about your proposed site	
<p>If you need to do a sequential test, you need to include both:</p> <ul style="list-style-type: none"> • the name and location of the site you’re proposing for development • an explanation of why you chose that specific site 	<p>The site is located off Raleigh Drive, Claygate as detailed in this Statement and the accompanying documents for the planning application.</p> <p>The reason for undertaking the sequential assessment of this site rather than any other one is that this is where the planning application is to be submitted.</p>
Information on Alternative sites	
<i>Where to look for alternative sites</i>	
<p>Contact your local planning authority to discuss what the search area should be for alternative sites for your development</p>	<p>The search area for alternative sites is the whole of the administrative area of Elmbridge Borough. As indicated above, the identification of the whole borough as the search area reflects the role that any market and/or affordable homes built within the scheme would be to contribute towards addressing the relevant needs of the authority. The selection of the Borough as the area of search reflects the advice in paragraph 3.3.5 (first bullet) of the Council’s Flood Risk SPD (see section 3 of this statement).</p>
<i>Potential alternative sites</i>	
<p>Within the area you’ve agreed with your local planning authority, look for sites that could be suitable for your development.</p>	<p>Section 3 details the review of alternative sites within Elmbridge Borough and how this has included:</p>

¹⁶ Flood risk assessment: the sequential test for applicants - GOV.UK (www.gov.uk)

Criteria within Environment and DEFRA guidance	Response (including where covered in this statement)
<p>First, check your adopted or draft local plan for sites that have already been allocated for development and could be suitable for the development you're proposing.</p> <p>Also look at sites that haven't been allocated in the local plan, but that have been granted planning permission for a development that's the same or similar to the development you're proposing. Your local planning authority will have details of sites with planning permission. Finally, check with your local planning authority whether there are any 'windfall sites' in your search area. Windfall sites are sites that aren't allocated in the local plan and don't have planning permission, but that could be available for development.</p> <p>You can look for windfall sites yourself and you should also check if your local planning authority has information about possible windfall sites (eg urban capacity studies).</p>	<p>1) Sites within the adopted Local Plan (where development is not underway at 1st April 2022);</p> <p>2) Sites within the draft Submission Local Plan¹⁷</p> <p>3) Sites with extant planning permission where development is not underway at 1st April 2022¹⁸</p> <p>4) Potential windfall sites – those listed in appendices 3-5 of the Council's LAA 2022¹⁹.</p> <p>In all instances, as also indicated in section 3 (paragraph 3.45), the applicant has applied the following thresholds:</p> <p>a) An area threshold of 1.3 ha (noting that the extent of the proposed application is 2.2 ha); or</p> <p>b) A net capacity for at least 50 dwellings (noting that the application is for at least 60 dwellings).</p> <p>For the reasons detailed in paragraph 3.45, these thresholds are considered appropriate in determining reasonable alternative sites given the mix of dwellings, density and characteristics of the proposal.</p> <p>The use of the LAA, thresholds and the consideration of site availability reflects the advice in paragraphs 3.3.5 and 3.3.7 of the Flood Risk SPD.</p> <p>With respect to alternatives for open space, the LAA does not provide any other promoted land for this use. Therefore, there are no alternatives to this element of the proposal.</p>
<i>Estimate approximate capacity</i>	
<p>You need to check the approximate capacity of each potential alternative site, eg how many houses can be built per hectare on the site.</p> <p>If your local planning authority has a density policy (a rule on the density of new developments), you should take</p>	<p>To determine the approximate capacity of the potential alternative site, the applicant has used the figured assigned to them within each of the four categories listed above.</p>

¹⁷ These are included in appendices 3-5 of the LAA

¹⁸ Included in appendix 2 of the Council's LAA (2022) at

https://www.elmbridge.gov.uk/_resources/assets/attachment/full/0/8790.pdf

¹⁹ https://www.elmbridge.gov.uk/_resources/assets/attachment/full/0/8790.pdf

Criteria within Environment and DEFRA guidance	Response (including where covered in this statement)
<p>this into account when estimating capacity.</p> <p>If your local planning authority doesn't have a density policy, you should consider the average density at which houses have been built on the site in the past.</p> <p>Check with your local planning authority if you're unsure if it has a density policy.</p>	
<i>Information to provide about alternative sites</i>	
<p>For each of the potential alternative sites, you need to state:</p> <ul style="list-style-type: none"> • its name and address • whether it has been allocated in the local plan (ie identified for a specific use like housing) • any issues that would prevent development on the site (eg roads that are too small) and whether these issues could be overcome • your estimate of its approximate capacity <p>You also need to include the following information:</p> <ul style="list-style-type: none"> • the status of the local plan (eg whether it's been adopted or is in draft) • supporting documentation about your alternative sites, eg the local plan background and evidence base documents or housing and economic land availability assessments <p>You can find this information by speaking to your local planning authority or by checking the planning section of their website.</p>	<p>This is covered in section 4 of this statement for each respective alternative site.</p>
How to compare flood risk	
<p>You need to compare the risk of flooding at the site you're proposing to use with the risk of flooding at the alternative sites you've identified.</p> <p>You can use the following resources to compare flood risk:</p> <ul style="list-style-type: none"> • the Environment Agency's Flood Map for Planning • the Environment Agency's Long Term Flood Risk Information 	<p>The applicant has appraised the Environment Agency's Flood Map for Planning (Flood map for planning – GOV.UK (flood-map-for-planning.service.gov.uk)) together with the Council's Strategic Flood Risk</p>

Criteria within Environment and DEFRA guidance	Response (including where covered in this statement)
<ul style="list-style-type: none"> • a strategic flood risk assessment if one's been adopted as part of the local plan – contact your local authority to check this and to get a copy • existing flood risk assessments on the sites – contact your local planning authority to get these • any other source of flooding information (eg surface water management plans from your lead local flood authority) <p>If the sites you're comparing are in the same flood zone and you compare them using the Environment Agency flood map, you'll have to use at least one other method of comparison as well as the flood map to get sufficient detail.</p>	<p>Assessments (2019²⁰ and 2022 addendum²¹) for each alternative site.</p> <p>The usage of the Environment Agency's Flood map for planning service alongside the Council's SFRA reflects the advice in paragraph 3.3.5 of the Flood Risk SPD (see section 3 of this Report).</p> <p>The results of these appraisals are covered in section 4 of this statement for each respective alternative site.</p>
Your conclusion	
<p>You need to conclude whether any of the alternative sites you have identified have a lower risk of flooding than your proposed site.</p>	<p>As indicated in section 1 of this statement, this statement concludes that there are no reasonably available alternative sites and therefore it passes the sequential test. This applies to both the residential and open space elements of the proposal.</p>
How to submit your test	
<p>You need to submit your sequential test and your flood risk assessment with your planning application to your local planning authority.</p> <p>Your local planning authority will review your sequential test and tell you if it's been accepted. If it's accepted, you'll need to wait for the result of your planning application.</p>	<p>The sequential test has been submitted alongside the planning application for the erection of up to 60 dwellings off Raleigh Drive, Claygate.</p> <p>This sequential assessment is separate to the FRA which accompanies the application.</p>

2.34. As indicated in the above table, the requirements with the Environment Agency's and DEFRA's advice on the sequential test is covered in other parts of this statement. It therefore details which alternative sites have been considered alongside the conclusions of the appraisal.

²⁰ https://www.elmbridge.gov.uk/_resources/assets/attachment/full/0/5747.pdf and https://www.elmbridge.gov.uk/_resources/assets/attachment/full/0/5748.pdf

²¹ https://www.elmbridge.gov.uk/_resources/assets/attachment/full/0/8794.pdf

3. LOCAL PLANNING POLICY

3.1. This section provides a summary of relevant local policy.

Elmbridge Core Strategy (Adopted in July 2011)

3.2. The existing development plan for the purpose of determining the application with respect to flood risk matters are the policies of the Elmbridge Core Strategy.

3.3. The Core Strategy's Plan period is from April 2011 through to March 2026 as confirmed by the housing requirements detailed in policy CS2 and the statement in paragraph 1.1. The latter states:

'The Elmbridge Core Strategy Development Plan Document (DPD) is the main document in the Council's Local Development Framework (LDF) which will eventually replace the Elmbridge Borough Replacement Local Plan 2000. It sets out a plan for the future development of the Borough in the period 2011 to 2026.'

3.4. Policy CS26 refers to development within areas liable to flood:

In order to reduce the overall and local risk of flooding in the Borough:

- 1. Development must be located, designed and laid out to ensure that it is safe; the risk from flooding is minimised whilst not increasing the risk of flooding elsewhere; and that residual risks are safely managed. Planning permission therefore will only be granted, or land allocated for development where it can be demonstrated that:**
 - Through a sequential test it is located in the lowest appropriate flood risk zone in accordance with PPS25 and the Elmbridge Strategic Flood Risk Assessment.**
 - It would not constrain the natural function of the flood plain, either by impeding flood flow or reducing storage capacity.**
 - Where sequential and exceptions tests have been undertaken, any development that takes place where there is a risk of flooding will need to ensure that flood mitigation measures are integrated into the design to minimise the risk to property and life should flooding occur.**
- 2. Permitted development rights for development which could result in a loss of flood storage capacity or impede flood flow will be removed from new developments in flood zone 3, in order to ensure the risk of flooding is not increased through unregulated development.**

- 3. In the event that development takes place in flood zones 2 or 3, the Council will require flood resistance and resilience measures in line with current Environment Agency advice, and advice included within the Elmbridge SFRA.**
- 4. New developments will need to contain SuDS, in line with the Council's Climate Neutral Development Checklist. All development within flood zones 2 and 3 will require surface water runoff to be controlled, as near to its source as possible, and at greenfield rates. Where SuDS have not been used in these areas the applicant should justify these reasons**
- 5. For the classification of flood zones, the Council will take account of the recommendations of the most recent Strategic Flood Risk Assessment, and reclassify to take account of climate change and the protection of dry islands surrounded by high flood risk areas (see CS14-Green Infrastructure and CS15-Biodiversity).**
- 6. The Council will support recommendations contained within the Lower Thames Strategy, provided that these do not result in an unacceptable impact on the local environment.**
- 7. The Council will protect all undeveloped flood plains such as Desborough Island and Hurst Park, East Molesey, from non-flood compatible uses, and promote flood-compatible ones in accordance with PPS25.'**

3.5. The approach of Core Strategy policy CS26 is amplified in the Adopted Flood Risk SPD (adopted 3rd May 2016). Within paragraphs 3.3.5 to 3.3.9 of the SPD, it provides further advice on how the sequential test should be applied to individual applications. This is further illustrated in figure 4 of the SPD. Copies of these paragraphs and figure 4 are provided below.

3.3.5 The following provides guidance for undertaking the Sequential Test for planning applications:

- **Identify the geographical area of search over which the test is to be applied; this could be the Borough area, or a specific catchment if this is appropriate and justification is provided (e.g. school catchment area or the need for affordable housing within a specific area).**
- **Identify the source of 'reasonably available' alternative sites; usually drawn from evidence base / background documents produced to inform the Local Plan e.g. Land Availability Assessment**
- **State the method used for comparing flood risk between sites; for example the Environment Agency Flood Map for Planning, the SFRA mapping, site-specific FRAs if appropriate, other mapping of flood sources.**
- **Apply the Sequential Test; systematically consider each of the available sites, indicate whether the flood risk is higher or lower than the application site, state whether the alternative option being considered is allocated in the Local Plan, identify the**

capacity of each alternative site, and detail any constraints to the delivery of the alternative site(s).

- Conclude whether there are any reasonably available sites in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed.
- Where necessary, apply the Exception Test (see below).

3.3.6 Within each Flood Zone, surface water and other sources of flooding also need to be taken into account.

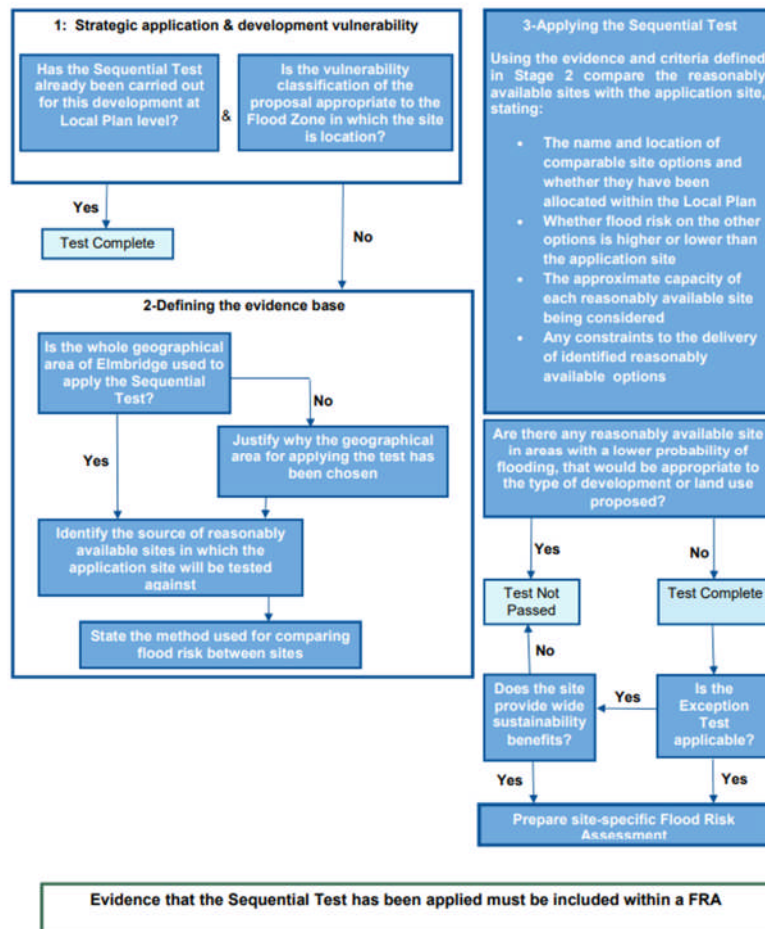
3.3.7 A site is considered ‘reasonably available’ under the following circumstances:

- It is of a comparable size and can accommodate the requirements of the proposed development;
- Either: owned by the applicant, for sale at a fair market value or is publicly owned and surplus; and
- It is not safeguarded in the Local Plan for another use.

3.3.8 A site would not be considered to be available if it fails to meet any of the above requirements or already has planning permission that is likely to be implemented.

3.3.9 Figure 4 below provides a flow chart of the Sequential Test process.

Figure 4: Sequential Test process



- 3.6. As indicated in section 2, the applicant has had regard to the advice in the Flood Risk SPD when preparing this Sequential Test appraisal taking account of the approach outlined by the Environment Agency and DEFRA. Whilst figure 4 of the SPD indicates that the sequential test should be included within the FRA, for the application of land off Raleigh Drive, it is included in this separate appraisal.
- 3.7. The other guidance within the Flood Risk SPD has informed the preparation of other documents accompanying the application, primarily the FRA.
- 3.8. The applicant has not considered the allocations in the existing Local Plan within this sequential test report as the Council does not indicate that they form part of its supply as listed in the LAA. This is as a result of their implementation since the relevant parts of the Local Plan were adopted. Consequently, there are no outstanding site allocations to be assessed through this appraisal.
- 3.9. Whilst this Statement adheres to the approach advocated in the Council's Flood Risk SPD, it also reflects the PPG together with the Environment Agency's guidance²². Its conclusions in adhering to all approaches demonstrates the robustness of the assessment.

The Emerging Borough Local Plan

- 3.10. A pre-submission version of the emerging Draft Elmbridge Local Plan was published in June 2022 for consultation from 17th June until 29th July 2022. As noted in section 1 of this statement, whilst the Council's Local Development Scheme (February 2022) envisaged submission of the document for examination by the Secretary of State in autumn 2022, as of 24th March 2023 this has yet to occur. Details of responses to the consultation have yet to be published. At this early stage, applying the criteria in paragraph 48 of the NPPF, only very limited weight can be given to the emerging Local Plan, taking account of both unresolved objections and any unjustified inconsistency with national policy.
- 3.11. An illustration of inconsistency with national policy is shown by the current approach of the emerging Local Plan to seek the delivery of at least 6,785 dwellings from 2021

²² Flood risk assessment: the sequential test for applicants - GOV.UK (www.gov.uk)

through to 2037 (in policy SS3)) whereas the Borough's minimum Local Housing Need is for 9,705 dwellings from 2022 through to 2037 (as noted in paragraph 3.19). The NPPF (paragraph 61) is clear that an area's housing requirement should be informed by the Local Housing Need figure unless exceptional circumstances can be demonstrated, which would need to be considered as part of the examination of the Local Plan (which has yet to occur).

- 3.12. In the intervening period, these uncertainties indicate that very limited weight (if any) should be applied to the policies of the emerging Draft Submission Local Plan. This attributing of very limited weight would also apply to the emerging policy on flood risk in the document (Draft Policy CC5).
- 3.13. Whilst noting the very limited weight attributable to the draft Local Plan (consistent with paragraph 48 of the NPPF), relevant content from the emerging Local Plan is summarised below.

Meeting Housing Needs

- 3.14. Paragraph 1.12 of the Draft Submission Local Plan acknowledges the significant need for homes within the Borough:

'The evidence shows that there is a significant need for new homes in the borough, in particular smaller homes of 1, 2 and 3 bedrooms and more affordable housing.'

- 3.15. This need is further clarified in paragraph 2.7 which highlights the high cost of housing within the Borough. This is consequently a very significant factor which the emerging Local Plan should seek to address:

The borough is one of the most expensive areas in the country to live, with high land values and intense pressure for new development. As a result, too many young people and families are moving out of the borough to have a realistic prospect of owning or renting their own home. Our older residents are struggling to affordably downsize in a way that will enable them to continue to live independently or with care packages and remain in their local community. The cost of housing and reliance on people travelling into the borough is also making it difficult for local businesses and valued services to attract and retain employees, this includes essential key workers, such as teachers and health care providers'.

3.16. The need for residential development in the Borough is further highlighted in paragraphs 3.18 to 3.21. These confirm:

‘3.18 One of the major challenges for the borough is delivering housing and the council will need to work in partnership with the development industry, bring forward publicly owned land and make effective use of its planning powers to ensure growth can be positively and appropriately delivered, whilst protecting our environment.

3.19 Elmbridge’s objectively assessed housing need has been based on the Government’s standard method of calculating local housing need, as set out in planning practice guidance. Using 2022 as the base year for calculation, the housing need for the borough equates to 647 dwellings per annum and over the plan period 9,705 homes.

3.20 The evidence in the Local Housing Need Assessment 2020 sets out the type of homes that are needed over the plan period. The housing target in the policy is in line with the Elmbridge Housing Trajectory set out in Appendix A5. The need for Gypsy, Roma and Traveller pitches during the plan period has been informed by the Gypsy and Traveller Accommodation Assessment 2020.

3.21 Although the evidence shows that the most pressing need for development in the borough is for housing, assessments have also been undertaken in relation to the borough’s employment and retail needs. The borough benefits from a strong local economy, however, we cannot be complacent, and we need to continue to plan and invest to maintain our competitive edge and realise our growth potential.’

3.17. Policy SS3 (Scale and location of good growth) of the Draft Plan states:

1. The Plan will make provision for the delivery of the following development between 2021 and 2037:

- a) At least 6,785 net additional homes, with at least 30% to be affordable,**
- b) Provision for Gypsy, Roma, and Traveller pitches.**
- c) Retail, leisure, community and other town and village centre uses to support the evolving needs of residents, workers and visitors.**
- d) A range of business and employment floorspace including modern, flexible and well-connected workspaces to increase employment opportunities for residents.**
- e) Infrastructure to support housing and other development.**

2. A ‘brownfield first’ approach will be taken, using opportunities to develop previously developed land within the urban area of the borough as they offer the most sustainable locations.

3. Development opportunities will be encouraged within the urban areas which accord with other policies in the Plan and meet the following strategic aims:

- a) Enhancing the vitality and viability of town and district centres.
- b) Repurposing/redevelopment/diversification of specific sites now vacant in employment use.
- c) Repurposing/redevelopment of previously developed sites into mixed uses.
- d) Optimisation of development within the urban area to increase the efficient use of land. All new residential development adjacent to town, district and local centres and train stations, should be predominately one- and two- bedroom homes. An exception will be made for proposals for one for one replacement of an existing home.

4. Development will be delivered across the borough in the following broad locations:

Settlement	No. of units*	% of total
Claygate	320	4.7
Cobham & Oxshott, Stoke D’Abernon and Downside	870	12.8
East & West Molesey	730	10.7
Esher	1,125	17.9
Hersham	560	8.3
Long Ditton, Thames Ditton, Hinchley Wood & Weston Green	635	9.3
Walton-on-Thames	1,255	18.5
Weybridge	1,200	17.7
Total	6,785	100

* rounded to the nearest 5. Includes permissions, units under construction, and Land Availability Assessment (LAA) sites. Not including non-implementation discount rates or windfalls

5. The council will support the delivery of development that makes an important contribution to the borough at the following locations and as identified on the Policies Map:

- a) Brooklands College for higher education, further education and vocational training and up/skilling
- b) Lower Green for community regeneration
- c) Whiteley Village for specialist care facilities

6. Comprehensive development that achieves a co-ordinated approach with adjoining sites will be encouraged, especially when it may result in additional benefits such as, for example, improved access arrangements, greater efficient use of land, increased provision of affordable housing, integration of green and blue infrastructure and biodiversity links through the development site.

3.18. The above discussion confirms that there is a pressing need to provide housing in Elmbridge Borough and it highlights the role that the application proposal has in addressing housing needs over the emerging plan period.

3.19. The scheme accords with these objectives by accommodating additional growth within Claygate and it includes integration of green and blue infrastructure and biodiversity links within the scheme.

3.20. Paragraph 3.32 notes that the Council relies upon its most recent LAA (Land Availability Assessment) to detail those sites which are expected to contribute dwellings to achieve the minimum housing targets, in addition to the sites with permission. The applicant as detailed in this assessment has used this evidence to determine those sites which could be considered as potential alternatives to the application site. The preceding paragraph (3.31) outlines the Council position that no changes to the Green Belt are envisaged.

3.21. Paragraphs 3.31 and 3.32 states:

3.31 The council has considered making changes to the Green Belt boundary, and has followed national planning policy, which requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. In making this assessment and informed by the evidence, the council has concluded that exceptional circumstances have not been fully evidenced and justified to make changes to the Green Belt boundaries in the borough.

3.32 Details of all the sites which are expected to come forward for development during the plan period can be found in the latest Land Availability Assessment (LAA) or equivalent land supply evidence base document. The LAA and the housing trajectory will be annually reviewed and updated as required and the findings reported and published in the council's Authority Monitoring Report (AMR).

3.22. The Council's discounting of Green Belt sites is noted since it does not consider exceptional circumstances can be demonstrated. This has subsequently informed the Council's assessment of sites within its LAA, which does not include any locations within the Green Belt. Therefore, as no locations in the Borough's Green Belt are included in the LAA, and the applicant is not aware of any Green Belt sites that are comparable to the application site, no alternative Green Belt sites have been appraised in this assessment. This Sequential Assessment therefore only includes sites within the Council's LAA within the pool of potential locations for appraising for their comparability with the application scheme.

- 3.23. The sites that the Council subsequently identified as allocations in the emerging Local Plan (Chapter 9) encompass those within the LAA. Therefore, as this document appraises all the land potentially available, it is a comprehensive and robust assessment.

Managing Flood Risk

- 3.24. Proposed Policy CC5 (Managing Flood Risk) states:

‘To reduce the overall and local risk of flooding and manage water resources:

- 1. Development must be located, designed and laid out to ensure that it is safe; the risk from flooding is minimised whilst not increasing the risk of flooding elsewhere; and that residual risks are safely managed. Planning permission therefore will only be granted, or land allocated for development where it can be demonstrated that:
 - a) Through a sequential test it is located in the lowest appropriate flood risk zone in accordance with national policy and the Elmbridge Strategic Flood Risk Assessment (SFRA);**
 - b) It would not constrain the natural function of the flood plain, either by impeding flood flow or reducing storage capacity; and**
 - c) Where sequential and exception tests have been undertaken, any development that takes place where there is a risk of flooding will need to ensure that flood mitigation measures are integrated into the design to minimise the risk to property and life should flooding occur.****
- 1. Permitted development rights for development which could result in a loss of flood storage capacity or impede flood flow will be removed from new developments in flood zone 3, in order to ensure the risk of flooding is not increased through unregulated development.**
- 2. In the event that development takes place in flood zones 2 or 3, the council will require flood resistance and resilience measures in line with current Environment Agency advice and guidance included within the Elmbridge SFRA and Flood Risk Supplementary Planning Document (SPD).**
- 3. Development proposed must attenuate surface water run-off so that the run-off rate is no greater than the run-off prior to development taking place or, if the site is previously developed, development actively reduces run-off rates and volumes.**
- 4. All new development is required to ensure that sustainable drainage systems are used for the management of surface.**

3.25. As indicated in the Flood Risk Assessment accompanying this application together with this Sequential Test Statement, the application accords with the approach of the emerging Local Plan, especially as it has taken account of national policy, the Strategic Flood Risk Assessment (“SFRA”) document together with the Council’s Flood Risk SPD.

3.26. The SFRA Addendum (January 2022) as noted in paragraph 2.1 of the document has been updated from the Level 1 document prepared in 2019 to take account of **“Changes to national policy and updated guidance on flood risk assessments and the EA’s climate change allowances data”**.

3.27. Paragraphs 2.8 to 10 of the SFRA Addendum confirms:

‘2.8. In accordance with the NPPF and PPG, the council has reviewed the data that sits behind the SFRA Level 1 Report to understand whether the flood extent has changed since when it was prepared and whether this would have an impact on the future spatial strategy and policies of the emerging Local Plan and if the SFRA needs to be updated.

2.9 In early 2021, provision of GIS data from the EA covering The Mole (central and south of Elmbridge), The Wey and Tributaries (west Elmbridge including Weybridge) and Maidenhead and Sunbury (north Elmbridge along the River Thames) updated internal council mapping of Flood Zone 3b.

2.10 It was discovered that there was a slight increase of areas affected by Flood Zone 3b (see Table 1) in the borough. Though, it should be noted that in 2018 the flood mapping did not include the total coverage of Flood Zone 3b on the rivers. This remodelling of Flood Zone 3b now includes the borough’s rivers, inflating the surface covered but accurately defining areas of flood risk. It is therefore likely, that there is a decrease in Flood Zone 3b, but it is now more accurately presented.’

3.28. It is consequently clear that the SFRA (Addendum’s) assessment is an appropriate tool for determining flood risk of the application alongside potential reasonable alternative sites.

3.29. Whilst paragraph 3.8 of the SFRA Addendum indicates that **“The council will update the Flood Risk Supplementary Planning Document (SPD) (May 2016) in accordance with updated NPPF, the PPG, advice set out by the EA and evidence produced in this**

Addendum”, this has yet to be prepared. Therefore, the applicant has had regard to the approach in the existing SPD alongside national policy and the SFRA in preparing this sequential test report. As previously outlined, the approach in this Sequential Test also appraises sites having regard to the Environment Agency’s advice for Sequential Tests²³.

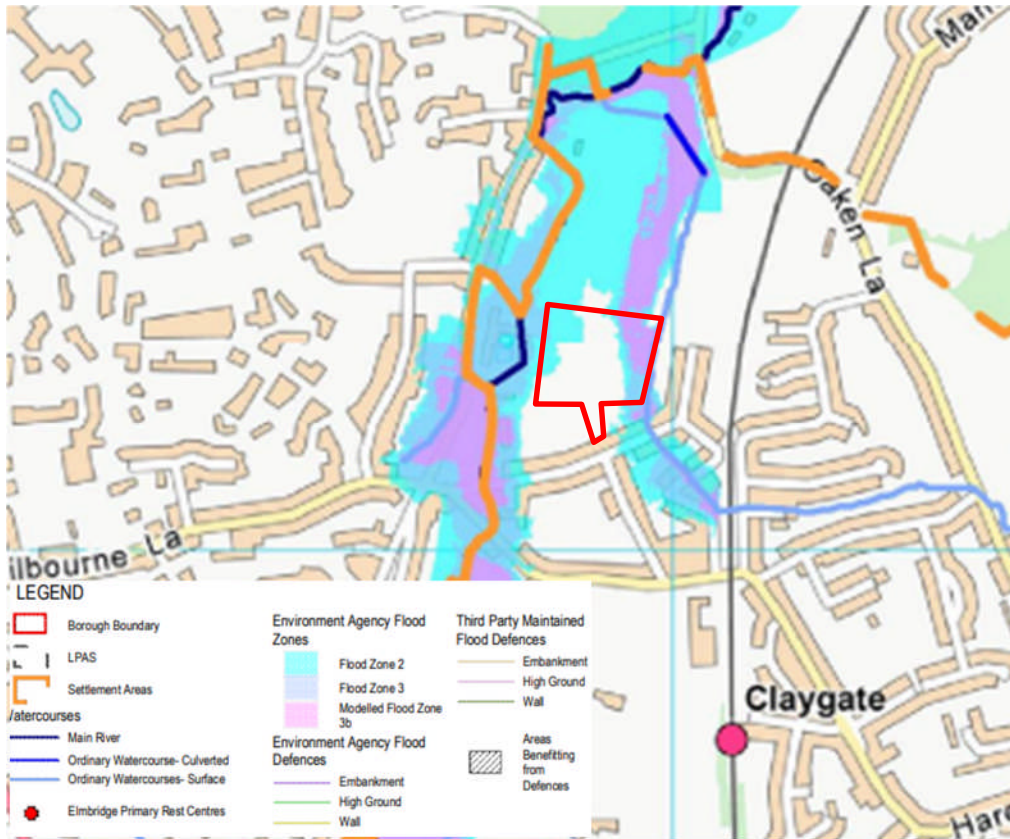
3.30. The consideration of the SFRA Addendum’s conclusion with respect of the potential flood risk of the reasonably alternative sites to the application’s location alongside that of the application site itself is detailed in section 4. This assessment is therefore consistent with the advice in undertaking the relevant comparison exercise.

3.31. In advance of this comparison exercise, extracts of the SFRA and the SFRA Addendum illustrating the potential flood risk of the application site is shown below.

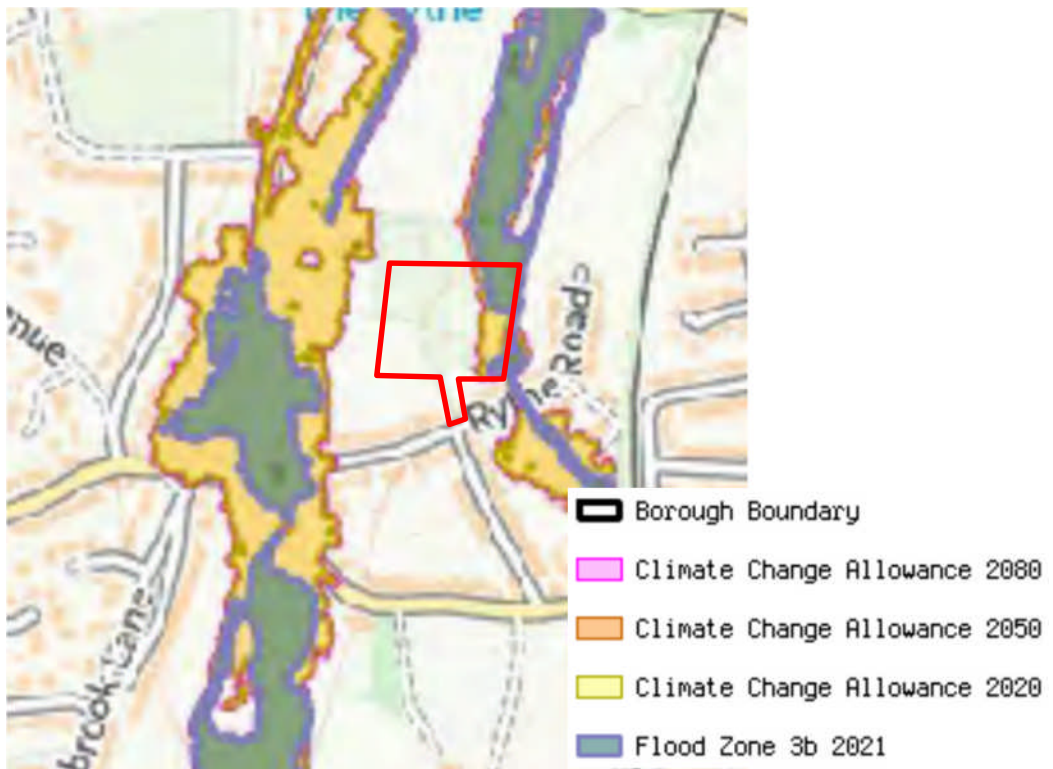


Extract of illustrative masterplan alongside flood risk information (source Appendix H of FRA)

²³ Flood risk assessment: the sequential test for applicants - GOV.UK (www.gov.uk)



Extract of the SFRA Level 1 (2019) with application site edged red (approx.)



Extract of SFRA Addendum (2022) with extent of application site edged red (approx.).

- 3.32. The above analysis confirms that no residential development is proposed within flood zone 3. Whilst four dwellings (proposed plots 51-54) are within flood zone 2, the analysis in section 4 indicates that this is appropriate once the borough wide sequential appraisal is considered. Furthermore, as previously noted, the application has directed residential development to the parts of the site with the lowest risk profile consistent with national and local advice.
- 3.33. Additionally, whilst the conclusion that this Sequential Assessment is passed does not depend on it, the north-western part of the site is included in flood zone 2 as a result of the engineering works on site to restore the former obsolete bowling green to a natural landform.
- 3.34. Through this application, the former bowling green part of the site will be remodelled which will result in its inclusion in flood zone 1. As indicated in the accompanying Flood Risk Assessment, the restoration of the former bowling green to the natural land form will not impact upon flood storage capacity on the site and will also not increase flood risk on other sites. Such reprofiling of a site which maintains flood storage capacity was considered acceptable pursuant to NPPF paragraph 167 within the appeal decision for Pakefield House-Fortescue House, St Johns Street, Bicester allowed on 20th October 2022²⁴.
- 3.35. Had the bowling green not been constructed on the site, this part of the site would not have been in flood zone 2 and no sequential test would have been required. Nevertheless, this sequential test indicates that irrespective of restoration of the former landform on the site, the application is still acceptable.
- 3.36. Open space is proposed across the site, although it is primarily in flood zone 3. As a water compatible use, this is not considered further, especially as there are no known alternatives as no land in the LAA has been promoted for open space use.

²⁴ See paragraph 8 of the decision (PINS ref APP/C3105/W/21/3287556).

Summary

- 3.37. The Council’s SFRA documents alongside the flood risk information with the application indicates how residential development has been focused on the parts of the site with the least risk.
- 3.38. Open space is proposed across the site, although focused in flood zone 3. As a water compatible use, it is appropriate in this location.

Review of the Council’s Land Availability Assessment (LAA) (2022)

- 3.39. Consistent with the PPG, advice from the Environment Agency and the Council’s Flood Risk SPD, the applicant has appraised the potential of all sites listed in the Council’s latest Land Availability Assessment. This is those sites with an extant outstanding planning permission (listed in appendix 2) together with those without this status but which are nevertheless considered by the Council to either be deliverable (appendix 3) or developable (appendices 4 and 5).
- 3.40. As noted above, the Council through section 9 of the emerging Local Plan allocates sites from those listed in appendices 3 to 5 of the LAA as its mechanism to achieving its housing needs. Nevertheless, this sequential appraisal considers all sites within appendices 2 to 5.
- 3.41. For clarification, the applicant has discounted the sites in appendix 1 as these are currently under development and reflecting the advice from the Environment Agency and the Council’s Flood Risk SPD, these are excluded from the appraisal. This is because as the sites were under construction at 1st April 2022 they could not be appraised for potential for an alternative type of development which could be comparable to that envisaged off Raleigh Drive. Furthermore, as under development, they could not be available to be developed at the point of time envisaged for the development and therefore conflicts with the PPG²⁵.

²⁵ “What is a ‘reasonably available’ site?” in the “Flood Risk and Coastal Change” section of the PPG.

- 3.42. In undertaking the assessment, the applicant has been conscious of the clear advice from the Environment Agency²⁶ that an alternative site would be one be similar to that proposed. In this context, as the proposal entails the erection of up to 60 dwellings on a 2.2ha site, the applicant considers that a similar proposal would be one for between 50 and 100 dwellings or covers a site area of at least 1.3 ha. The applicant in considering alternatives will have regard to the extent that the alternative site could accommodate a mix of dwelling types, although as with the proposal it would need to have a majority of houses rather than apartments otherwise it would not provide a similar contribution towards qualitative alongside quantitative needs.
- 3.43. The use of such ranges for determining reasonable alternatives also reflect the advice in the Council’s Flood Risk SPD (paragraph 3.3.7).
- 3.44. In assessing the sites within the 2022 LAA, the applicant has also had regard to the advice in the PPG (Flood Risk and Coastal Change section) with respect to “What is a ‘reasonably available’ site?” (ID ref 7-028-20220825). This states:

Reasonably available sites’ are those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development.

These could include a series of smaller sites and/or part of a larger site if these would be capable of accommodating the proposed development. Such lower-risk sites do not need to be owned by the applicant to be considered ‘reasonably available’.

The absence of a 5-year land supply is not a relevant consideration for the sequential test for individual applications.

- 3.45. The applicant has excluded any site that does not provide the scope for at least 50 dwellings or covers a site area of at least 1.3 ha for the following reasons:
- a) For sites of less than 0.5ha or with a capacity of up to 9 dwellings, the NPPF (paragraph 64) is clear that they cannot contribute towards affordable housing. Since the application includes a mix of market and affordable dwellings, any site which cannot provide affordable housing cannot be comparable. The exclusion of sites below these size limits also imposes a limitation of their ability to be combined

²⁶ Reference in the “potential alternative sites” section of their advice at [Flood risk assessment: the sequential test for applicants - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/612222/PPG-Flood-Risk-and-Coastal-Change-Section-2020.pdf)

into a larger site which would consequently exceed the threshold. Whilst such combinations of smaller sites is advocated as an approach in the PPG²⁷, since the component parts are exempt from affordable housing there is no certainty that the owners would be amenable to a comprehensive development.

- b) For sites of 10 to 50 dwellings or between 0.5 and 1.3ha, whilst these could include a contribution towards affordable housing, the implicit density of development required to provide a scheme of 60 dwellings is such that it is unlikely to include the same character and form of development. To even achieve 60 dwellings on 1.3ha equates to a density of 46dph which compares to the 27 dph associated with the application proposal (60 dwellings on 2.2ha). A density of 46dpa is considered to be able to broadly deliver a house rather than apartment led development and would consequently be reflective of the application. The application provisionally includes a mix of dwellings including 14 apartments, 2 coach-houses (flats over garages) and 44 houses and it is therefore a scheme which includes a majority of houses (73%) and not flats. Higher densities than 46dph are not considered to be reflective of the proposal and therefore would not be comparable; and
- c) Whilst the approach discounts sites with a capacity for over 100 dwellings, where the site area is specified (within appendices 3-5 of the LAA), this has enabled an appraisal of consistency with the densities envisaged for the site. This is therefore taken as another indication of comparability for a primarily housing led scheme. The discounting of schemes for over 100 dwellings also acknowledges the difference in character of the proposal to that off Raleigh Drive which is a further reason for discounting as there was only one scheme with extant permission for over 100 dwellings listed in Appendix 2 of the LAA²⁸.

In considering alternatives, it is therefore necessary (consistent with the PPG) to determine whether the other sites are equally able to make a qualitative as well as a quantitative contribution towards the Borough's housing needs. The approach of discounting sites based upon the above thresholds is consequently consistent with this.

²⁷ "What is a 'reasonably available' site?" in the "Flood Risk and Coastal Change" section of the PPG.

²⁸ The sole scheme in LAA appendix 2 with extant unimplemented planning permission for over 100 dwellings is application 2020/0832. This is for a 222 unit residential care scheme at the former Homebase site, New Zealand Avenue, Walton-on-Thames. This application was allowed on appeal on 21st June 2021. Paragraph 17 of the appeal decision highlights that the built form of the proposal would mirror that of the opposite side of the road in the town centre. Paragraph 18 references that the proposal includes 8 storey building. It is therefore not of a similar built form to the application scheme. As a town centre site, a lower density development reflective of the application would not be consistent with maximisation of use of such a sustainable location.

- 3.46. Having regard to the advice in the PPG, the site area and capacity thresholds applied are considered appropriate and fully in accordance with the relevant advice. Although the PPG indicates that the absence of a 5 year supply is not relevant to the sequential test, the ability to address qualitative and quantitative needs for both market and affordable homes are important factors since these are integral to the form of development envisaged.
- 3.47. In summary, the sequential assessment reviewed all the sites within the 2022 LAA and identifies those which are:
- a. Excluded as site has planning permission which is being implemented at 1st April 2022; and
 - b. Excluded unless site can accommodate between 50 and 100 dwellings or extends to an area of at least 1.3ha and are therefore comparable with the application site (under the 2022 LAA assumed capacity). For those assessed with respect of area, these will also be reviewed for consistency of capacity with the application site and the extent that they could address a mix of market and affordable housing needs in the Borough.
- 3.48. Reflecting this assessment (within appendices 2 and 3), the appraisal identifies the potential alternative sites which need reviewing through a sequential assessment.
- 3.49. Appendix 2 details the 154 sites listed in appendix 2 of the LAA (2022) which have extant planning permission for residential development in the borough. Applying the criteria to the sites with permission (primarily site capacity), the table below therefore lists those 8 sites which have to be assessed in detail to establish if they could be sequentially better than the application site, and would also be acceptable for residential development sites which would likewise address a range of affordable and market housing needs. This further assessment includes consideration of whether they are currently available for residential development, following direct contact with the land owner (information obtained from the Land Registry) alongside a review of whether the status of the site would enable the site to be a reasonable alternative to the application site on land off Raleigh Drive, Esher. Whilst ownership of the site is discounted as a factor in the PPG’s guidance on sequential tests²⁹, it is included within paragraph 3.3.7 of the Council’s Flood Risk SPD.

²⁹ In “What is a ‘reasonably available’ site?” in the “Flood Risk and Coastal Change” section.

Sites in Appendix 2 of the LAA (2022) for review through applicant’s sequential assessment

App No.	Address	Dwellings (Net)
2019/3232	Building A Benchmark House 203 Brooklands Road Weybridge KT13 0RH	60
2019/0329	Site of Crow Gables 131 Fairmile Lane Cobham KT11 2BU	74
2019/2134	Site of Claygate House Littleworth Road Esher KT10 9PN	51
2019/3272	Britannia House Pool Road West Molesey KT8 2AB	75
2020/3345 2021/2626	Members Hill Brooklands Road Weybridge KT13 0QU	57
2020/2095	4 Littleworth Road Esher KT10 9FP	62
2019/2005	Units1 & 2 Hampton Court Estate Summer Road Thames Ditton KT7 ORG	78
2019/1813	The Royal Cambridge Home, 82-84 Hurst Road East Molesey KT8 9AH (C2)	62
Total		519

3.50. Appendix 3 details the 199 sites listed in appendices 3 to 5 of the LAA (2022) which have been promoted for development in the borough and are considered by the Council to be either deliverable or developable by virtue of their ability to see development provided on them within 15 years. Applying the criteria to the sites with permission (primarily site capacity), the table below therefore lists those 22 sites which have to be assessed in detail to establish if they could be sequentially better than the application site, and would also be acceptable for residential development sites which would likewise address a range of affordable and market housing needs.

Sites in Appendices 3 to 5 of the LAA (2022) for review through applicant’s sequential assessment

LPA Ref	Site name	Area (ha)	Capacity (net)
US462	Sundial House, The Molesey Venture, Orchard Lane, East Molesey, KT8 0BN	0.62	61
US279	Esher Place, 30 Esher Place Avenue, Esher, KT10 8PZ	2.8	22
US475	Willow House, Mayfair House and Amberhurst, Claremont Lane, Esher, KT10 9DW	0.5	57
US379	Hersham Shopping Centre, Molesey Road, Hersham	1.55	200
US326	9-21a High Street, Walton-on-Thames	0.24	71
US350	Leylands House, Molesey Road, Walton-on-Thames	0.31	56
US33	River Mole Business Park, Mill Road, Esher, KT10 8BJ	2.1	200
US39	Unit A & B Sandown Industrial Park, Esher, KT10 8BL	1.33	40
US456	Molesey Community Hospital, High Street, KT8 2LU	0.73	70
US84	Elm Grove, 1 Hersham Road, Walton-on-Thames, KT12 1LH	1	70
US178	Sainsbury's car park, Bridge Way, Cobham, KT11 1HW	1.03	58
US287	15 Clare Hill Esher KT10 9NB	1.35	55
US531	Civic Centre, High Street, Esher, KT10 9SD	2.71	400
US43	Hersham Technology Park (Air Products)	4.1	0
US435	Car Park next to Waterloo Court	0.63	62
US56	Joseph Palmer Centre, 319a Walton Road	0.5	60 (C2)
US72	Courtlands & 1-5 Terrace Road, Walton-on-Thames	0.44	63
US356	Station Avenue Car Park, Station Avenue, Walton-on-Thames	0.59	50

LPA Ref	Site name	Area (ha)	Capacity (net)
US92	GlaxoSmithKline, St. Georges Avenue, Weybridge, KT13 0DE	2.58	100
US93	Horizon Business Village, Brooklands Road, Weybridge, KT13 0TJ	1.9	n/a
US110	The Heights, Weybridge	20	n/a
US407	Foxholes, Weybridge KT13 0BN	4.1	78

3.51. Section 4 of this statement therefore appraises the 30 sites (8 with extent planning permission and 22 which are potentially deliverable or developable) in detail to establish if they could be sequentially better than the application site, and would also be acceptable for residential development sites which would likewise address a range of affordable and market housing needs. This further assessment includes consideration of whether they are currently available for residential development, following direct contact with the land owner (information obtained from the Land Registry) alongside a review of whether the status of the site would enable the site to be a reasonable alternative to the application site of land off Raleigh Drive, Claygate.

3.52. As indicated in section 4, there are no sequentially preferable available sites for a comparable scheme to that proposed on the site within the Brough and therefore it passes the sequential test.

3.53. As the LAA does not list any alternative sites for open space, having regard to the guidance, there are no other locations for this component of the proposal.

4. THE SEQUENTIAL TEST

- 4.1. Having regard to the above sections, we now apply the sequential test to the proposal as required by NPPF paragraph 167, existing Core Strategy Policy CS26 and emerging Local Plan Policy CC5.

The Site's Sustainability Merits

- 4.2. As set out in detail in the supporting Transport and Planning Statements, the site is located in a highly accessible location. This points to the suitability for housing growth of Claygate, and specifically the area within which the site is located.

Access-egress to dry land

- 4.3. As set out in the supporting FRA all future residents will have a safe access/egress to dry land. Consequently, this supports demonstration that the sequential test is passed.

Other Available Sites in the Borough

- 4.4. As detailed in this statement, we have reviewed the latest LAA (2022) as a way of identifying any alternative sites in the borough with the potential for residential development. Such an approach reflects the Environment Agency's advice³⁰ together with that detailed in paragraph 3.3.5 of the Council's Flood Risk SPD.
- 4.5. This follows from the assessments in section 3 of this statement which appraised the 154 sites with extant planning permission at 1st April 2022 (where construction had not occurred)³¹ together with 199 other sites listed in the LAA, which were considered deliverable or developable by the authority at 1st April 2022³².

³⁰ See "Potential alternative sites" section at [Flood risk assessment: the sequential test for applicants - GOV.UK \(www.gov.uk\)](#)

³¹ As listed in appendix 2 of the LAA

³² As listed in appendices 3 to 5 of the LAA (2022)

4.6. These were then appraised as to whether they were a suitable alternative to the application site in that they could accommodate a similar number of dwellings³³ which would address a range of needs. This resulted in 30 sites³⁴ to be assessed through this further sequential test.

4.7. In assessing the 30 sites for appraising through the sequential test, the applicant has had regard to the specific guidance associated with the NPPF on sequential tests. This is that outlined in the PPG (Flood Risk and Coastal Change section) with respect to “What is a ‘reasonably available’ site?” which confirms:

‘Reasonably available sites’ are those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development.

These could include a series of smaller sites and/or part of a larger site if these would be capable of accommodating the proposed development. Such lower-risk sites do not need to be owned by the applicant to be considered ‘reasonably available’.

The absence of a 5-year land supply is not a relevant consideration for the sequential test for individual applications.

4.8. This guidance has also been considered alongside that from the Environment Agency³⁵. The Environment Agency’s advice is clear that the sequential test should:

Within the area you’ve agreed with your local planning authority, look for sites that could be suitable for your development.

First, check your adopted or draft local plan for sites that have already been allocated for development and could be suitable for the development you’re proposing.

Also look at sites that haven’t been allocated in the local plan, but that have been granted planning permission for a development that’s the same or similar to the development you’re proposing. Your local planning authority will have details of sites with planning permission.

Finally, check with your local planning authority whether there are any ‘windfall sites’ in your search area. Windfall sites are sites that aren’t

³³ As indicated in section 3, this is taken to be capacity as identified in the Council’s LAA for between 50 and 100 dwellings and for potential deliverable/developable sites also include a threshold site area of 1.3ha

³⁴ 8 sites from those listed in appendix 2 of the LAA (2022) with extant planning permission and 22 sites from those listed in appendices 3 to 5 of the LAA (2022)

³⁵ Flood risk assessment: the sequential test for applicants - GOV.UK (www.gov.uk)

allocated in the local plan and don't have planning permission, but that could be available for development.

You can look for windfall sites yourself and you should also check if your local planning authority has information about possible windfall sites (eg urban capacity studies). (my emphasis)

- 4.9. The above has therefore informed the appraisal of the 30 sites for further assessment through this sequential test. As indicated in section 3 of this statement, the applicant had applied the following as thresholds for determining whether the site was “suitable for the development proposed” as required by the PPG and Environment Agency’s advice. The applicant has excluded any site that does not provide the scope for at least 50 dwellings or covers a site area of at least 1.3 ha for the reasons specified in paragraph 3.45. In considering alternatives, it is therefore necessary (consistent with the PPG) to determine whether the other sites are equally able to make a qualitative as well as a quantitative contribution towards the Borough’s housing needs. The approach of discounting sites based upon the above thresholds is considered to be reflective of this.
- 4.10. In the context of suitability of location, this is taken as inclusion in the Council’s LAA as any unsuitable sites have been discounted. As detailed in the assessment, a reasonable prospect that it is available to be developed at the point in time envisaged means that the landowner either has an extant permission or is acknowledged as deliverable (rather than developable) within the LAA. Since the application has been submitted in March 2023, having regard to evidence in the research by Lichfields³⁶ which has been accepted in housing appeals on timeframes of deliverability and build out rates³⁷ this suggests (figure 4) that on average there is 3.3 years³⁸ from submission of an application to the first completion on the site. Applying this to this application on land off Raleigh Drive indicates that the first dwelling could be completed on the site in Summer 2026. This is therefore relevant for determining if the alternative site **“is available to be developed at the point in time envisaged for the development”** as required by the PPG.

³⁶ Most recently issued in February 2020 at [Start to Finish \(second edition\): What factors affect the build-out rates of large scale housing sites? \(lichfields.uk\)](#)

³⁷ See paragraph 78 of the appeal decision for land off Scotland Lane, Haslemere allowed on 1st February 2022 (PINS ref APP/R3650/W/21/3280136) and paragraph 14 of the appeal decision for land at Lady Grove, Didcot allowed on 15th September 2021 (PINS ref APP/Q3115/W/21/3272377)

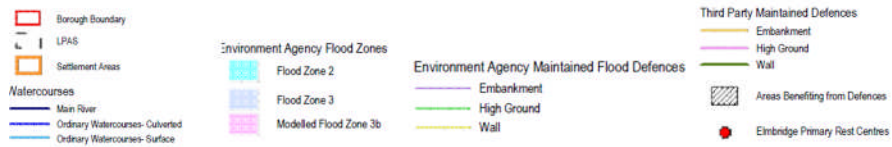
³⁸ Based upon comparable sites of up to 99 dwellings

4.11. In the tables below we review the 30 sites having regard to the clear guidance on sequential tests provided by the Environment Agency and the Council’s Flood Risk SPD. This includes consideration of the various evidence on flood risk; including the Flood Map for Planning³⁹ website together with the SFRA (2019 and 2022 (Addendum)). The Map legends from the 2019 and 2022 SFRA are provided below.

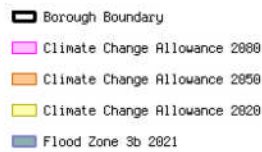
Flood Map for Planning key



Legend for 2019 SFRA (approximate extent of site edged red)



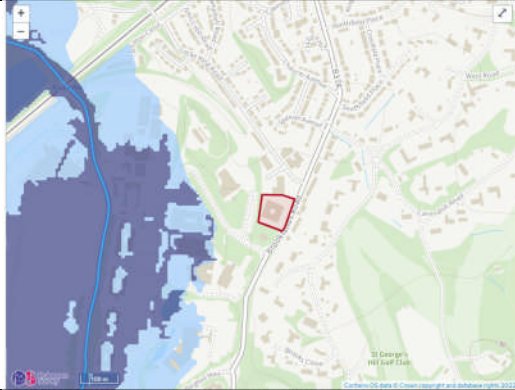
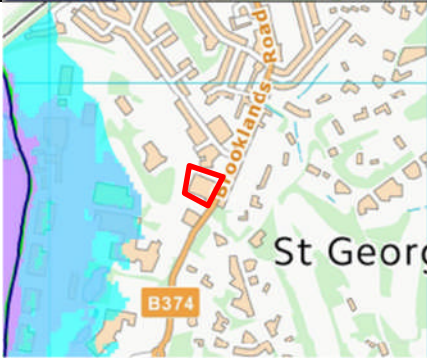
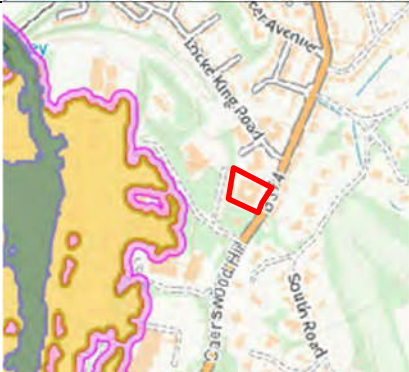
Legend for 2022 SFRA (Addendum) (approximate extent of site edged red)



Appraisal of sites with extant planning permission (appendix 2 of LAA (2022))

Site location & reference	Building A Benchmark House 203 Brooklands Road Weybridge KT13 0RH
Planning status	Prior approval application 2019/3232 for change of use of offices to 60 dwellings (apartments) approved 10/1/20
Site location	

³⁹ Flood map for planning - GOV.UK (flood-map-for-planning.service.gov.uk)



<p>EA Planning for Flood data – This shows the site in flood zone 1</p>	
<p>SFRA 2019 – This shows the site in flood zone 1</p>	
<p>SFRA (2022 Addendum) - This shows the site in flood zone 1</p>	
<p>Consideration of site against sequential test advice</p> <p>With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the planning permission infers the site is suitable, as this is for an apartment scheme it is not the same type of development as proposed in the application. Furthermore, as a prior approval scheme no affordable homes are required which is a further departure from the type of development proposed on the site. Whilst the site adjoins a site with extant permission at Members Hill (2020/3345 and 2021/2626), this is also a scheme for apartments (57 units) which was also consented through prior approval. The Members Hill scheme like Benchmark House does not include any affordable housing and is for apartments. Whilst a combined Members Hill and Benchmark House site could potentially accommodate a housing led scheme, it is not considered that there is a reasonable prospect of such a proposal given the difference in land values associated with the extant schemes without affordable housing compared to one with. Therefore, it is not considered that there is a reasonable prospect of the site coming forward for a similar primarily housing led scheme with affordable units, rather than an apartment-based scheme as approved, especially having regard to its availability at the point in time envisaged for the land off Raleigh Drive (Summer 2026). It is therefore not a “reasonably available site” pursuant to the PPG.</p>	

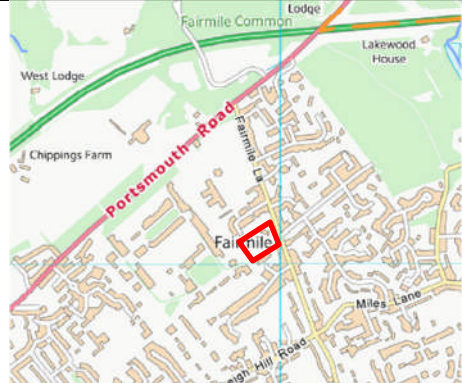
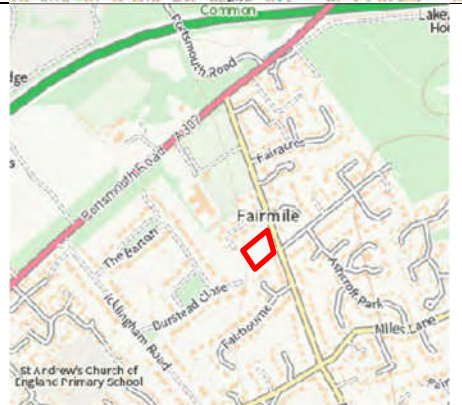
The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to Benchmark House, it cannot accommodate the requirements of the proposal in terms of both housing led with on-site affordable housing and is not owned by the applicant or on the market. Therefore, it is not a “Reasonably available site” pursuant to the SPD. This conclusion that it is not a “reasonably available site” is not affected by the site’s inclusion within flood zone 1.

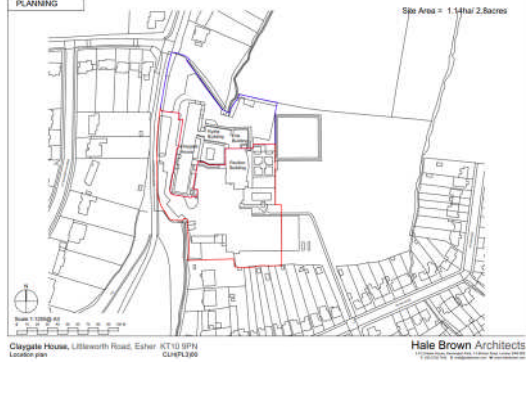

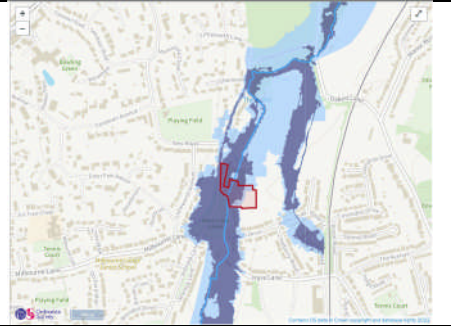
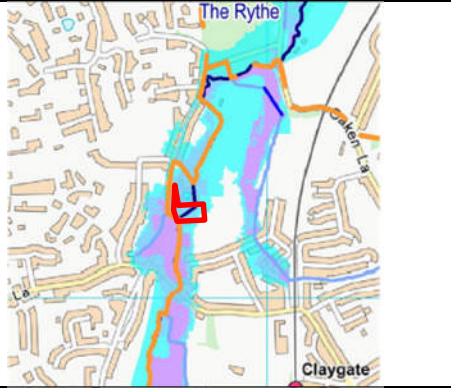

Sequential Test Conclusions for site

The permission allows for the delivery of apartments on the site. It therefore differs from the mix of houses and apartments as envisaged on land off Raleigh Drive. Furthermore, since the permission is through prior approval, no affordable housing is proposed.

Therefore, unlike the application, it is not comparable to the proposal by virtue of the qualitative and quantitative contribution towards a range of market and affordable homes in the Borough. Although the site lies within Flood zone 1, since the assessment of the site compared to the advice in the PPG and SPD indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.

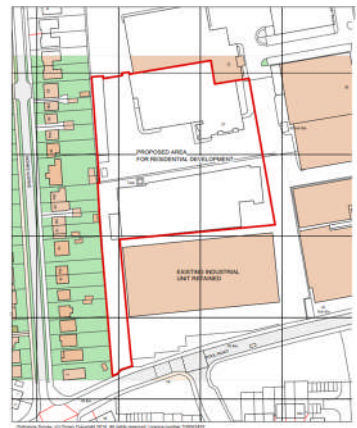

Site location & reference	Site of Crow Gables 131 Fairmile Lane Cobham KT11 2BU	
Planning status	Application 2019/0329 for 74 units of Class C2 (apartments for the elderly) approved 27/5/20s	
Site location		
EA Planning for Flood data – This shows the site in flood zone 1		

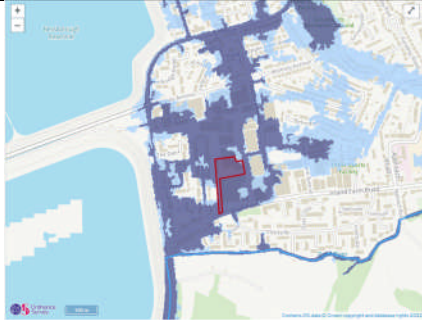
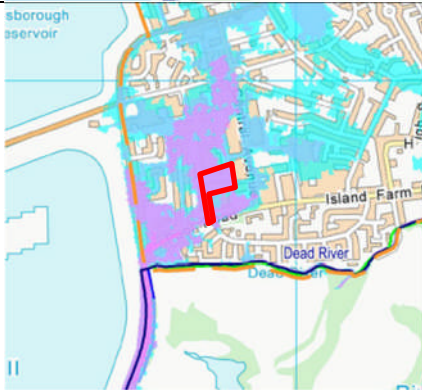
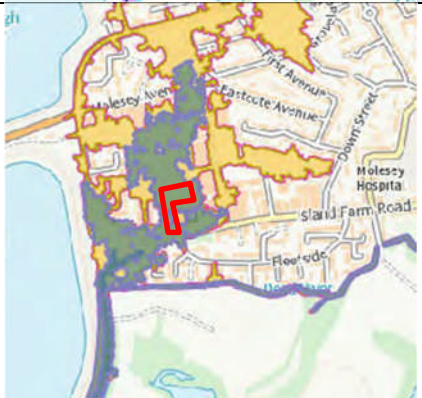
<p>SFRA 2019- This shows the site in flood zone 1</p>	
<p>SFRA (2022 Addendum) – This shows the site in flood zone 1</p>	
<p>Consideration of site against sequential test advice</p> <p>With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the planning permission infers the site is suitable, as this is for an apartment scheme it is not the same type of development as proposed in the application. Furthermore, it is a C2 Class scheme rather than a C3 dwellings proposal. Having regard to the extant planning permission, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units, rather than an apartment-based scheme as approved, especially having regard to its availability at the point in time envisaged for the land off Raleigh Drive (Summer 2026). It is therefore not a “reasonably available site” pursuant to the PPG.</p> <p>The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to the site of Crow Gables, it cannot accommodate the requirements of the proposal in terms of both housing led with on-site affordable housing and is not owned by the applicant or on the market. Therefore, it is not a “Reasonably available site” pursuant to the SPD.</p> <p>This conclusion that it is not a “reasonably available site” is not affected by the site’s inclusion within flood zone 1.</p>	
<p>Sequential Test Conclusions for site</p> <p>The permission allows for the delivery of apartments for the elderly on the site. It therefore differs from the mix of houses and apartments as envisaged on land off Raleigh Drive. Furthermore, since the permission is through prior approval, no affordable housing is proposed.</p> <p>Therefore, unlike the application, it is not comparable to the proposal by virtue of the qualitative and quantitative contribution towards a range of market and affordable homes in the Borough. Although the site lies within Flood zone 1, since the assessment of the site compared to the advice in the PPG and SPD indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.</p>	

Site location & reference	Site of Claygate House Littleworth Road Esher KT10 9PN	
Planning status	Application 2019/2134 for 51 dwellings (11 houses and 40 flats) following demolition of existing buildings approved 18/6/20	
<p>Site location</p> 	<p>Proposed site plan</p> 	
<p>EA Planning for Flood data – this shows the site is split between flood zones 1, 2 and 3</p>		
<p>SFRA 2019 – this indicates that the site is within flood zones 1, 2, 3a & 3b</p>		
<p>SFRA (2022 Addendum) – this shows the site is within flood zones 1 and 2</p>		
<p>Consideration of site against sequential test advice With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst it is acknowledged that the extant permission is also for a</p>		

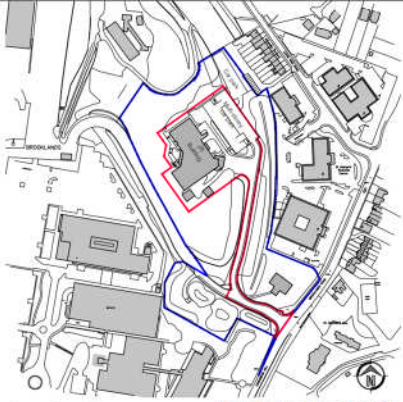
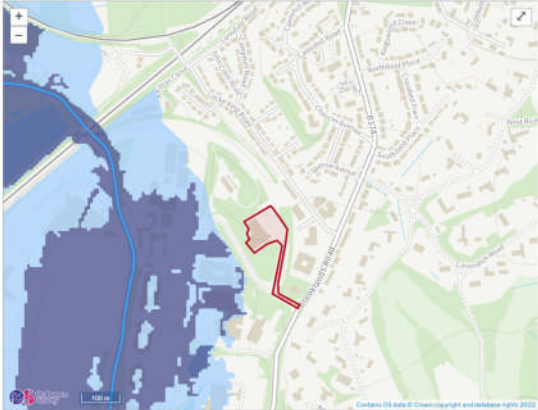
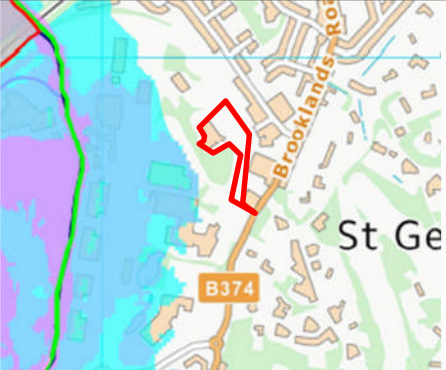
mixed dwelling scheme including 11 houses and 40 flats, the clear emphasis is on apartments and not houses. It is therefore not comparable with the application proposal. Given the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible for the site especially as the site already has extant permission for an apartment led proposal (application 2020/2095 for 62 apartments). Having regard to the extant planning permissions, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units, rather than either an apartment-based or focused scheme as approved, especially having regard to its availability at the point in time envisaged for the land off Raleigh Drive (Summer 2026). It is therefore not a “reasonably available site” pursuant to the PPG. The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to Claygate House, it cannot accommodate the requirements of the proposal in terms of both housing led with on-site affordable housing and is not owned by the applicant or on the market. Therefore, it is not a “Reasonably available site” pursuant to the SPD. Whilst the site is not considered to be a “reasonably available” alternative to the application proposal, it is also recognised that the site off Claygate House is primarily with flood zones 2 and 3, with the site access only available through flood zone 3. Therefore on flood risk alone, the site is not sequentially preferable to the application proposal.

Sequential Test Conclusions for site
Further to the consideration of the site that it does not provide a reasonably available alternative when assessed have regard to the PPG and SPD advice, the site includes dwellings that are potentially within the parts of the site within flood zones 2 and 3. Furthermore, unlike the application site off Raleigh Drive, access in an emergency is only feasible through flood zone 3. Therefore, given these factors, it is not considered to be a sequentially preferable site to the application scheme.

Site location & reference	Britannia House Pool Road West Molesey KT8 2AB	
Planning status	Application 2019/3272 for 75 dwellings (61 flats and 7 pairs of semi-detached houses) approved 2/10/20	
Site location	Site layout	
		

<p>EA Planning for Flood data – This indicates that the site is in flood zone 3.</p>		
<p>SFRA 2019 – this indicates that the site is in flood zone 3</p>		
<p>SFRA (2022 Addendum) – this indicates that the site is in flood zone 3</p>		
<p>Consideration of site against sequential test advice</p> <p>With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst it is acknowledged that the extant permission is also for a mixed dwelling scheme including 14 houses and 61 flats, the clear emphasis is on apartments and not houses. It is therefore not comparable with the application proposal. Given the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible. Having regard to the extant planning permission, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units, rather than an apartment-based as approved, especially having regard to its availability at the point in time envisaged for the land off Raleigh Drive (Summer 2026). It is therefore not a “reasonably available site” pursuant to the PPG.</p> <p>The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to Britannia House, it cannot accommodate the requirements of the proposal in terms of both housing led with on-site affordable housing and is not owned by the applicant or on the market. Therefore, it is not a “Reasonably available site” pursuant to the SPD.</p> <p>Whilst the site is not considered to be a “reasonably available” alternative to the application proposal, it is also recognised that the Britannia House site is primarily with flood zone 3. Therefore on flood risk alone, the site is not sequentially preferable to the application proposal.</p>		

Sequential Test Conclusions for site
Further to the consideration of the site that it does not provide a reasonably available alternative when assessed have regard to the PPG and SPD advice, the site includes dwellings that are potentially within the parts of the site within flood zone 3. Therefore, given these factors, it is not considered to be a sequentially preferable site to the application scheme.

Site location & reference	Members Hill Brooklands Road Weybridge KT13 0QU
Planning status	Applications 2020/3345 & 2021/2626 for 57 dwellings. Application 2020/3345 approved 24/2/21 for approval for change of use from offices to residential (57 apartments). Application 2021/2626 was identical to 2020/3345 and was approved on 8/10/21.
Site location	 <p style="font-size: small;">Location Plan Ordinance Survey (c) Crown Copyright 2020 All rights reserved. Licence number 100022432</p>
EA Planning for Flood data – this indicates that the site is in flood zone 1	
SFRA 2019 - this indicates that the site is in flood zone 1	

SFRA (2022 Addendum) - this indicates that the site is in flood zone 1



Consideration of site against sequential test advice

With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the planning permission infers the site is suitable, as this is for an apartment scheme it is not the same type of development as proposed in the application. Furthermore, as a prior approval scheme no affordable homes are required which is a further departure from the type of development proposed on the site. Whilst the site adjoins a site with extant permission at Benchmark House (2019/3232), this is also a scheme for apartments (60 units) which was also consented through prior approval. The Benchmark House scheme like Members Hill does not include any affordable housing and is for apartments. Whilst a combined Members Hill and Benchmark House site could potentially accommodate a housing led scheme, it is not considered that there is a reasonable prospect of such a proposal given the difference in land values associated with the extant schemes without affordable housing compared to one with. Therefore, it is not considered that there is a reasonable prospect that the site coming forward for a similar primarily housing led scheme with affordable units, rather than an apartment-based scheme as approved, especially having regard to its availability at the point in time envisaged for the land off Raleigh Drive (Summer 2026). It is therefore not a “reasonably available site” pursuant to the PPG.

The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to Members Hill, it cannot accommodate the requirements of the proposal in terms of both housing led with on-site affordable housing and is not owned by the applicant or on the market. Therefore, it is not a “Reasonably available site” pursuant to the SPD.

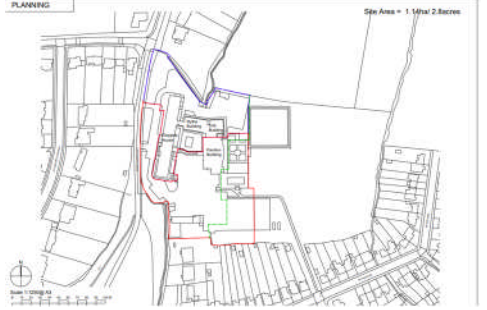
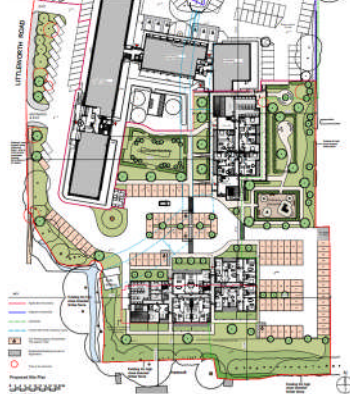
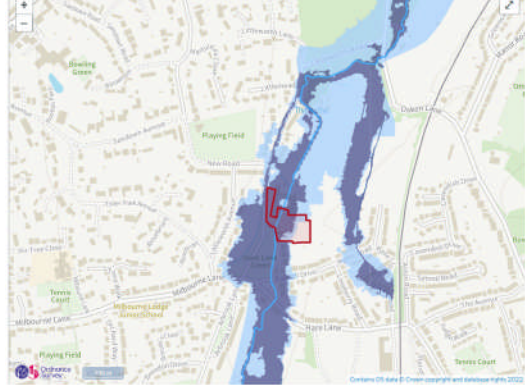
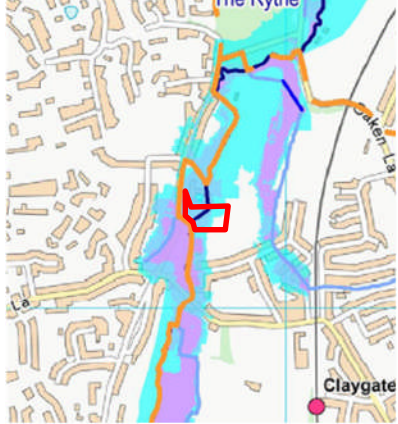

This conclusion that it is not a “reasonably available site” is not affected by the site’s inclusion within flood zone 1.

Sequential Test Conclusions for site

The permission allows for the delivery of apartments on the site. It therefore differs from the mix of houses and apartments as envisaged on land off Raleigh Drive. Furthermore, since the permission is through prior approval, no affordable housing is proposed.

Therefore, unlike the application, it is not comparable to the proposal by virtue of the qualitative and quantitative contribution towards a range of market and affordable homes in the Borough. Although the site lies within Flood zone 1, since the assessment of the site compared to the advice in the PPG and SPD indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.

Flooding Sequential Test Statement – March 2023
Land off Raleigh Drive, Esher

Site location & reference	4 Littleworth Road Esher KT10 9FP
Planning status	Application 2020/2095 for 62 dwellings (apartments) approved 13/5/21
<p>Site location</p> 	<p>Site layout</p> 
<p>EA Planning for Flood data – this shows the site is split between flood zones 1, 2 and 3</p>	
<p>SFRA 2019 – this indicates that the site is within flood zones 1, 2, 3a & 3b</p>	
<p>SFRA (2022 Addendum) – this shows the site is within flood zones 1 and 2</p>	

Consideration of site against sequential test advice

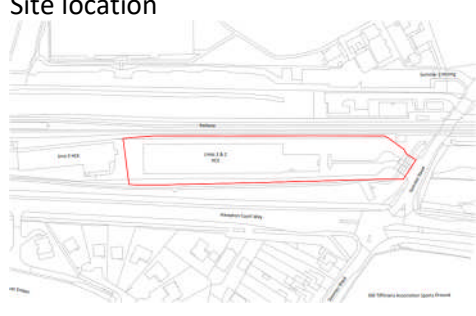
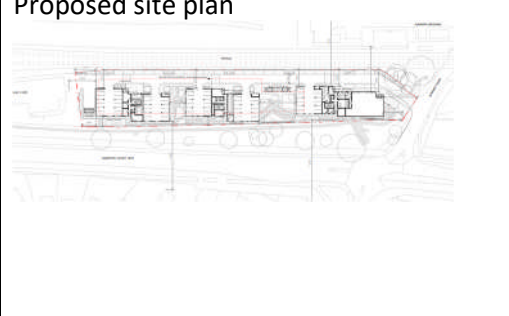
With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), the extant permission is for 62 apartments. It is therefore not comparable with the application proposal. Given the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible for the site, as the other scheme approved on the site (2019/2134) includes 51 dwellings, of which 40 were flats). Having regard to the extant planning permission, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units, rather than either an apartment-based or focused scheme as approved, especially having regard to its availability at the point in time envisaged for the land off Raleigh Drive (Summer 2026). It is therefore not a “reasonably available site” pursuant to the PPG.

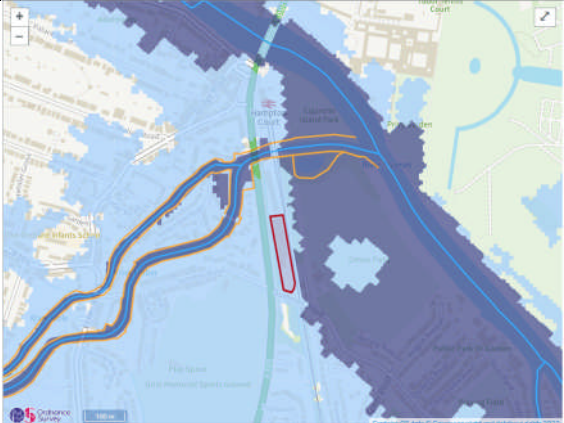


The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to 4 Littleworth Road, it cannot accommodate the requirements of the proposal in terms of both housing led with on-site affordable housing and is not owned by the applicant or on the market. Therefore, it is not a “Reasonably available site” pursuant to the SPD.

Whilst the site is not considered to be a “reasonably available” alternative to the application proposal, it is also recognised that the site at 4 Littleworth Road is primarily with flood zones 2 and 3, with the site access only available through flood zone 3. Therefore on flood risk alone, the site is not sequentially preferable to the application proposal.

Sequential Test Conclusions for site

Further to the consideration of the site that it does not provide a reasonably available alternative when assessed have regard to the PPG and SPD advice, the site includes dwellings that are potentially within the parts of the site within flood zones 2 and 3. Furthermore, unlike the application site off Raleigh Drive, access in an emergency is only feasible through flood zone 3. Therefore, given these factors, it is not considered to be a sequential preferable site to the application scheme.

Site location & reference	Units 1 & 2 Hampton Court Estate Summer Road Thames Ditton KT7 0RG	
Planning status	Application 2019/2005 for 78 dwellings (apartments) with ground floor offices (318sqm) allowed on appeal (28/9/21)	
Site location	Proposed site plan	
		

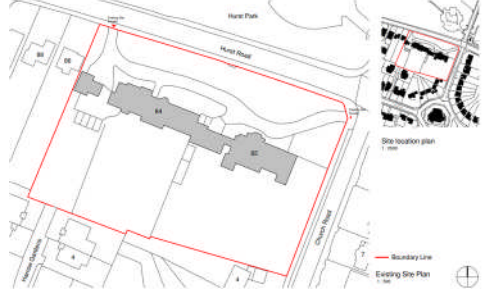
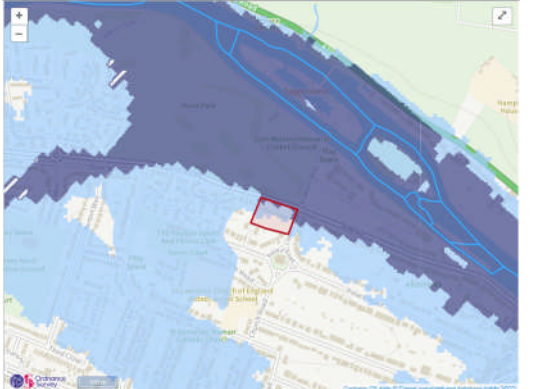
<p>EA Planning for Flood data – This indicates that the site is in food zone 2</p>	
<p>SFRA 2019 – this indicates that the site is in flood zone 2</p>	
<p>SFRA (2022 Addendum)</p>	
<p>Consideration of site against sequential test advice</p> <p>With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the planning permission infers the site is suitable, as this is for an apartment scheme it is not the same type of development as proposed in the application. It is therefore not comparable with the application proposal. Given the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible. Having regard to the extant planning permission, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units, rather than an apartment-based as approved, especially having regard to its availability at the point in time envisaged for the land off Raleigh Drive (Summer 2026). It is therefore not a “reasonably available site” pursuant to the PPG.</p>	


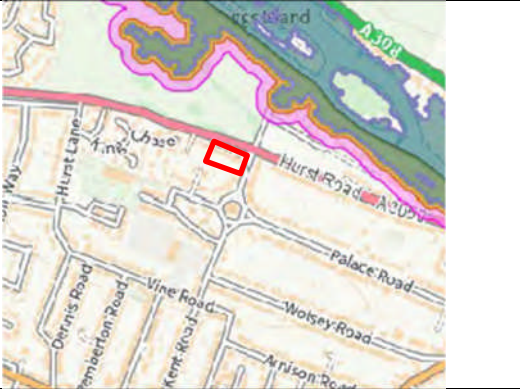
The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to Units 1 & 2 Hampton Court Estate, it cannot accommodate the requirements of the proposal in terms of both housing led with on-site affordable housing and is not owned by the applicant or on the market. Therefore, it is not a “Reasonably available site” pursuant to the SPD.

Whilst the site is not considered to be a “reasonably available” alternative to the application proposal, it is also recognised that Units 1 & 2 Hampton Court Estate is primarily with flood zone 2. Therefore on flood risk alone, the site is not sequentially preferable to the application proposal which only includes a small element of housing in flood zone 2 (on land which will be reprofiled, and so should be within flood zone 1 on redrawing the flood maps) with the majority in zone 1.

Sequential Test Conclusions for site

Further to the consideration of the site that it does not provide a reasonably available alternative when assessed have regard to the PPG and SPD advice, the site includes dwellings within flood zone 2. Therefore, given these factors, it is not considered to be a sequentially preferable site to the application scheme.

Site location & reference	The Royal Cambridge Home, 82-84 Hurst Road East Molesey KT8 9AH	
Planning status	Application 2019/1813 for 32 bed care home (C2) and 60 extra care (age restricted apartments) allowed on appeal 8/10/21.	
Site location		Site plan
EA Planning for Flood data- this indicates that the site is primarily in flood zone 2		

<p>SFRA 2019 – this indicates that the site includes parts within flood zone 2</p>	
<p>SFRA (2022 Addendum)</p>	
<p>Consideration of site against sequential test advice</p> <p>With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the planning permission infers the site is suitable, as this is for an apartment scheme (including a C2 care home) it is not the same type of development as proposed in the application. It is therefore not comparable with the application proposal. Given the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible. Having regard to the extant planning permission, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units, rather than an apartment-based as approved (including a C2 use care home), especially having regard to its availability at the point in time envisaged for the land off Raleigh Drive (Summer 2026). It is therefore not a “reasonably available site” pursuant to the PPG.</p> <p>The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to The Royal Cambridge Home, it cannot accommodate the requirements of the proposal in terms of both housing led with on-site affordable housing and is not owned by the applicant or on the market. Therefore, it is not a “Reasonably available site” pursuant to the SPD.</p> <p>Whilst the site is not considered to be a “reasonably available” alternative to the application proposal, it is also recognised that part of the site of The Royal Cambridge Home is partly within flood zone 2. Therefore on flood risk alone, the site is not sequentially preferable to the application proposal which likewise includes a small element of housing in flood zone 2 (which will be reprofiled to raise its level) with the majority in zone 1.</p>	
<p>Sequential Test Conclusions for site</p> <p>The permission allows for the delivery of apartments for the elderly on the site. It therefore differs from the mix of houses and apartments as envisaged on land off Raleigh Drive.</p> <p>Therefore, unlike the application, it is not comparable to the proposal by virtue of the qualitative and quantitative contribution towards a range of market and affordable</p>	

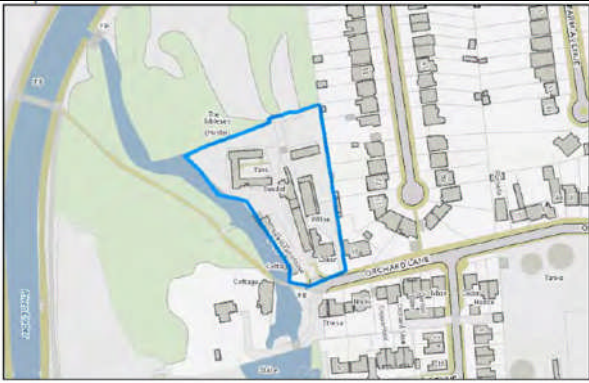
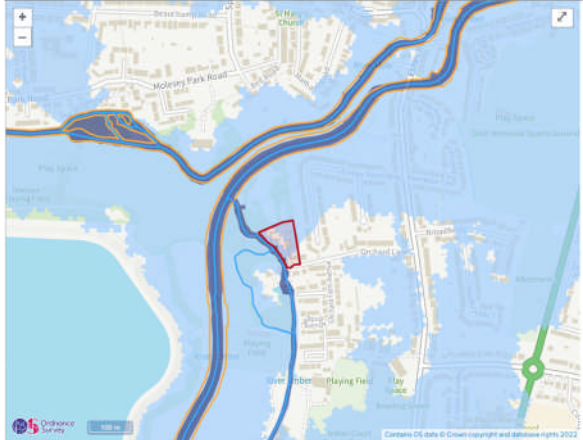
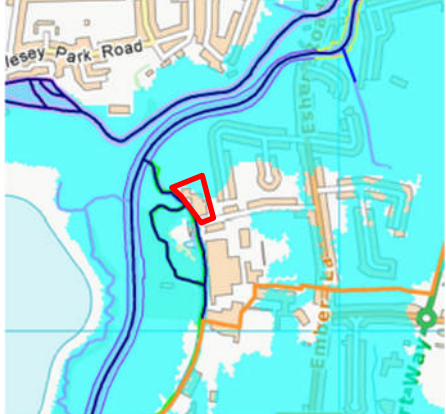
homes in the Borough. Furthermore, the site includes a part within flood zone 2 and is therefore comparable to the application site. Nonetheless, since the assessment of the site compared to the advice in the PPG and SPD indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.

- 4.12. None of the 8 sites with permission provide a scheme which is either comparable to the application scheme (in terms of both qualitative and quantitative provision) and also within an area of equal or less risk of flooding. Consequently, none of the sites with extant permission is considered to be sequentially preferable to the application site having regard to the advice and approach in the PPG together with the Council’s Flood Risk SPD.

Sites listed in appendices 3-5 of LAA (without planning permission at 1st April 2022)

- 4.13. For the sites listed in Appendices 3-5 of the LAA, the applicant has likewise considered whether they are comparable in terms of qualitative and quantitative provision. Furthermore, given the reference to availability within the SPD, unlike the PPG, for each of the sites within this category which are potentially comparable, letters were written to the registered owner. This was to confirm the availability of the site for residential development as detailed in appendix 1.
- 4.14. The only response received was with respect of the Hersham Centre. This confirmed that the site is not available to the applicant. It also confirmed that the owner is assessing the viability of any redevelopment. This raises concerns about the feasibility of the scheme including affordable housing to illustrate its comparability with the application site. As no other responses were received, none of the sites listed in appendices 3-5 of the LAA are available to the applicant and this consequently informs the applicant’s assessment of whether they are comparable and therefore potentially sequentially preferable.
- 4.15. Since none of these sites are available to the applicant, they are not reasonably available as envisaged by paragraph 3.3.3 of the SPD.
- 4.16. Whilst ownership is not relevant for the PPG’s consideration of reasonably available, the lack of any response raises doubts whether any of them could be available at the

point in time envisaged for the development (as previously stated this is assumed to be Summer 2026). This therefore excludes all of these sites as being reasonably available and therefore irrespective of flood zone location they would not be sequentially preferred. This is detailed within the analysis below.

Site location & reference	Sundial House, The Molesey Venture, Orchard Lane, East Molesey, KT8 0BN
Planning status	LAA ref US462. Site area (0.62ha) with capacity for 61 dwellings. The envisaged density of development is 120dph. The LAA indicates that the site is expected to be delivered within the first 5 years.
Site map	
EA Planning for Flood data – this indicates that the site is primarily in flood zone 2	
SFRA 2019 – this indicates that the site is split between flood zones 1 and 2	



Consideration of site against sequential test advice

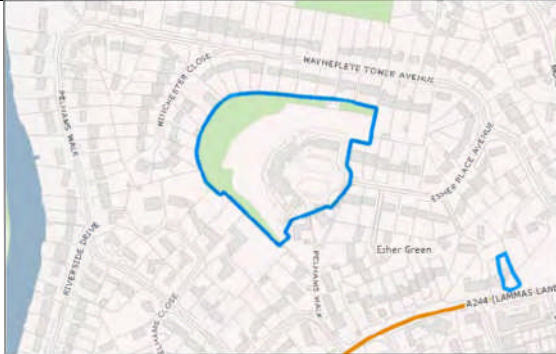
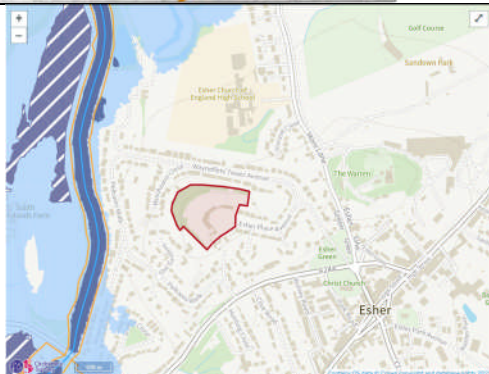

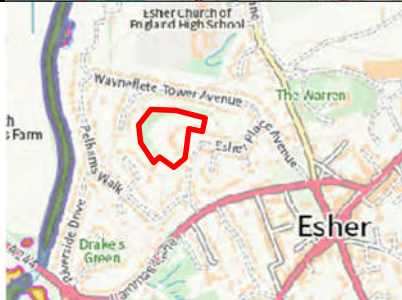
With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential suitability, the density of development implicit by the site’s capacity indicates that this is for an apartment scheme. It is not the same type of development as proposed in the application. It is therefore not comparable with the application proposal. Given the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible. Having regard to the LAA appraisal of the site and its assumed density, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units, especially having regard to its availability at the point in time envisaged for the land off Raleigh Drive (Summer 2026). It is therefore not a “reasonably available site” pursuant to the PPG.

The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to Sundial House, it cannot accommodate the requirements of the proposal in terms of both housing led with on-site affordable housing and is not owned by the applicant or on the market. Additionally, as no response was received to the letter requesting confirmation of availability (see appendix 1), this confirms it is not available. Therefore, it is not a “Reasonably available site” pursuant to the SPD. This is notwithstanding the assessment that it could be delivered in the first five years as envisaged in the LAA. Whilst the site is not considered to be a “reasonably available” alternative to the application proposal, it is also recognised that part of the site of The Royal Sundial partly within flood zone 2. Therefore on flood risk alone, the site is not sequentially preferred to the application proposal which likewise includes a small element of housing in flood zone 2 (in an area which is to be re-profiled) with the majority in zone 1.

Sequential Test Conclusions for site

Further to the consideration of the site that it does not provide a reasonably available alternative when assessed have regard to the PPG and SPD advice, the site includes dwellings within flood zone 2. Therefore, given these factors, it is not considered to be a sequentially preferable site to the application scheme.

Site location & reference	Esher Place, 30 Esher Place Avenue, Esher, KT10 8PZ
Planning status	LAA ref US279. Site area (2.8ha) with capacity for 22 dwellings. The envisaged density of development is 8dph. The LAA indicates that the site is expected to be delivered within the first 5 years.

<p>Site map</p>		
<p>EA Planning for Flood data – this indicates that the site is in flood zone 1</p>		
<p>SFRA 2019 – this indicates that the site is in flood zone 1</p>		
<p>SFRA (2022 Addendum)</p>		
<p>Consideration of site against sequential test advice</p> <p>With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential suitability, the density of development also implies that a mixed scheme of houses and apartments is envisaged. Taking account of these matters, Esher Place might consequently be comparable to that proposed on the application site. It is noted that an application for residential development of the site was submitted which included conversion of the existing Listed Building together with extensions and new structures. These applications were refused, and the subsequent appeals dismissed on 10th November 2022 as listed below:</p> <ol style="list-style-type: none"> 1. Application 2020/0437 for change of use of conference centre to 21 flats (PINS ref 3275789) 2. Application 2020/0438 for contemporary extension to main house to accommodate 8 two bedroom flats (PINS ref 3275803) 		

3. Application 2020/0439 for erection of 3 three bedroom mews houses (PINS ref 3275808).
4. Application 2020/0440 for the erection of 4 three bedroom semi-detached houses (PINS ref 3275811)

One of the reasons for the dismissal of the appeals was the collectively ability to contribute towards affordable housing and the viability of development which only arose if all schemes were allowed. This is referenced in paragraphs 75-77 of the appeal decision under PINS ref 3275808 which states:

“Notwithstanding my findings above, the assumptions in the appraisals of both parties, particularly the RLV and BLV, relate to the aggregate of four developments on four sites, rather than this singular development on this particular site. The calculations and conclusions in the FVA do not separate the development in this appeal from the developments in the other appeals. There is no means to disaggregate the elements in the FVA relevant to this proposal from the other proposals. There is also no certainty that all the developments included in the FVA will gain the necessary planning permissions and listed building consents. Nor is there any certainty that they would be implemented, and no mechanism to secure an adjustment in the event that they were not.

In other words, whereas the applications concern four separate proposals, the financial calculations are based on the collective value. This flies in the face of DMP policy DM4 which encourages developers of adjoining sites to work together to deliver comprehensive development. It means that the success of each appeal on this issue, is dependent on the success of each of the other appeals, or as the appellants put it during the Hearing; it’s either all of them or its none of them.

In these circumstances, it is not possible to conclude that the proposal should not make a financial contribution to affordable housing. In fact, the evidence suggests that it should. In the absence of any contribution, the development would be in conflict with CS policy CS21. This weighs against the proposal.” (My emphasis). These paragraphs are repeated in the decisions on the other schemes (paragraphs 85-87 of PINS ref 3275789, paragraphs 77-79 of PINS ref 3275811 and paragraphs 86-88 of PINS ref 3275803).

In addition, with respect to the conversion of the Listed Building at Esher Place, the Inspector in this appeal decision at paragraph 30 stated **“the internal subdivision necessary to change the use of the building into flats as proposed would undermine the integrity of that spatial character. Aside from being unable to appreciate, in the core of the building, the sequential and hierarchical effect of linked rooms, with their intentionally different characters reflecting their different functions, the essence of the building would become constrained by the fragmenting and sterilising effect of subdivision. For instance, the architectural device of grand doorways, highly decorated features here which signal connection and which invite movement, could, in many instances, no longer be passed through; the library would become a living room; and the discrete connections of the more utilitarian stairs and narrow passages from the south wing into the main section of the house would be lost.”** This was also a factor in dismissing this appeal and as a result of their confirmed inter-relationship all the schemes were dismissed.

The lack of affordable housing in the various applications for development on the site indicates that Esher Place would not be capable of accommodating a comparable scheme including affordable homes. Furthermore, the rejection of the appeals indicates that there is uncertainty as to when an alternative proposal might be forthcoming having regard to both viability of development and whether it is achievable within the context of the heritage value of the site. This raises concerns that it would not be available at the point in time envisaged for the land off Raleigh



Drive (Summer 2026). It is therefore not a “reasonably available site” pursuant to the PPG.


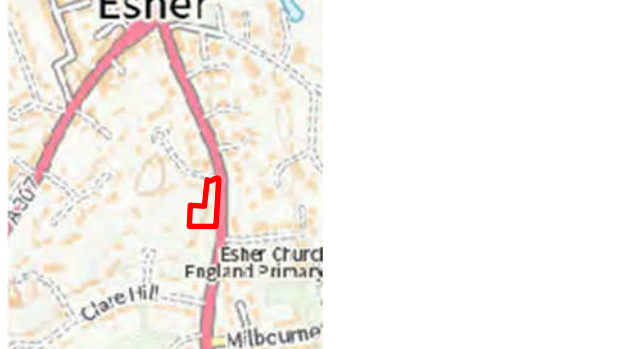
The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to Esher Place, it cannot accommodate the requirements of the proposal in terms of both housing led with on-site affordable housing and is not owned by the applicant or on the market. Additionally, as no response was received to the letter requesting confirmation of availability (see appendix 1), this confirms it is not available. Therefore, it is not a “Reasonably available site” pursuant to the SPD. This is notwithstanding the assessment that it could be delivered in the first five years as envisaged in the LAA.

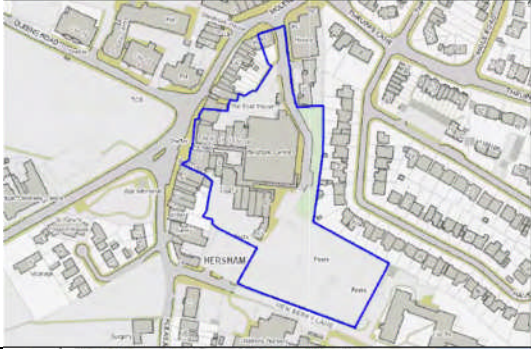


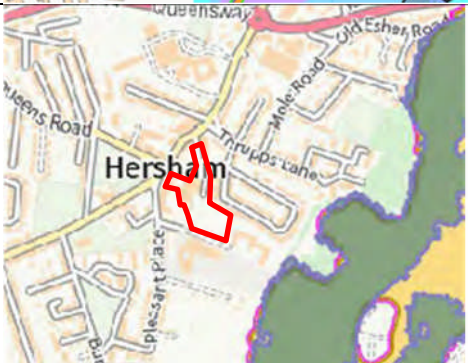
This conclusion that it is not a “reasonably available site” is not affected by the site’s inclusion within flood zone 1.

Sequential Test Conclusions for site

Although the site lies within Flood zone 1, since the assessment of the site compared to the advice in the PPG and SPD indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.

Site location & reference	Willow House, Mayfair House and Amberhurst, Claremont Lane, Esher, KT10 9DW	
Planning status	LAA ref US475. Site area (0.5ha) with capacity for 57 dwellings. The envisaged density of development is 120dph. The LAA indicates that the site is expected to be delivered within the first 5 years.	
Site map		
EA Planning for Flood data – this indicates that the site is in flood zone 1		

<p>SFRA 2019 – this indicates that the site is in flood zone 1</p>	
<p>SFRA (2022 Addendum)</p>	
<p>Consideration of site against sequential test advice</p> <p>With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential suitability, the density of development implicit by the site’s capacity indicates that this is for an apartment scheme. It is not the same type of development as proposed in the application. It is therefore not comparable with the application proposal. Given the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible. Having regard to the LAA appraisal of the site and its assumed density, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units, especially having regard to its availability at the point in time envisaged for the land off Raleigh Drive (Summer 2026). It is therefore not a “reasonably available site” pursuant to the PPG.</p> <p>The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to Willow House, Mayfair House and Amberhurst, it cannot accommodate the requirements of the proposal in terms of both housing led with on-site affordable housing and is not owned by the applicant or on the market. Additionally, as no response was received to the letter requesting confirmation of availability (see appendix 1), this confirms it is not available. Therefore, it is not a “Reasonably available site” pursuant to the SPD. This is notwithstanding the assessment that it could be delivered in the first five years as envisaged in the LAA.</p> <p>This conclusion that it is not a “reasonably available site” is not affected by the site’s inclusion within flood zone 1.</p>	
<p>Sequential Test Conclusions for site</p> <p>Although the site lies within Flood zone 1, since the assessment of the site compared to the advice in the PPG and SPD indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.</p>	

Site location & reference	Hersham Shopping Centre, Molesey Road, Hersham
Planning status	LAA ref US379. Site area (1.55ha) with capacity for 200 dwellings (mix of C2 and C3 units). The envisaged density of development is 129dph. The LAA indicates that the site is expected to be delivered within the first 5 years.
Site map	
EA Planning for Flood data – this indicates that the site is in flood zone 1	
SFRA 2019 – this indicates that the site is in flood zone 1	
SFRA (2022 Addendum)	
<p>Consideration of site against sequential test advice</p> <p>With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential suitability, the density of development implicit by the sites capacity indicates that this is for an apartment scheme. It is not the same type of development as proposed in the application. It is therefore not comparable with the application proposal. Given</p>	

the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible, especially as this is a site in a defined District Centre as detailed in the Local Plan. Having regard to the LAA appraisal of the site and its assumed density, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units at density where houses would predominate since this would not reflect national and local policy with respect of efficient use of land in a district centre. It is also not considered to be available at the same point in time envisaged for the land off Raleigh Drive (Summer 2026). It is therefore not a “reasonably available site” pursuant to the PPG.


The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to the Hersham Centre, it cannot accommodate the requirements of the proposal in terms of both housing led with on-site affordable housing and is not owned by the applicant or on the market. Additionally, the response from the landowner (26th October 2022) regarding availability (within appendix 1) states **“We are currently working in partnership with a development manager to assess the viability of redeveloping the Hersham site, for which we are actively engaging with Elmbridge Borough Council. We are not seeking any further partners or stakeholders in relation to this project/site.”** As the response highlights potential viability matters associated with the redevelopment, this is a matter which indicates that it is unlikely to be a comparable scheme with a mix of affordable and market dwellings with a similar emphasis on houses like the site off Raleigh Drive.


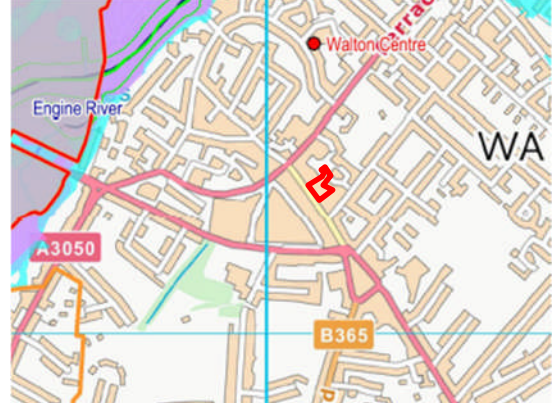
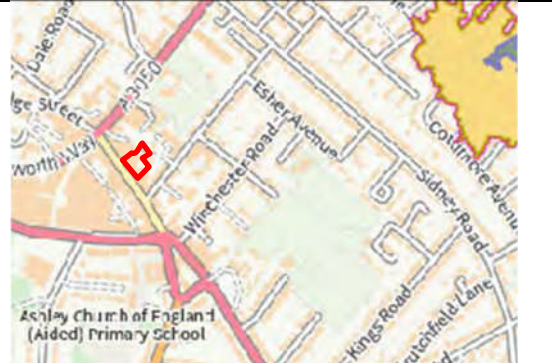
The response from the landowner indicates that there are clear doubts that it will be delivered within the five years envisaged by the LAA. Therefore, it is not a “Reasonably available site” pursuant to the SPD.

This conclusion that it is not a “reasonably available site” is not affected by the site’s inclusion within flood zone 1.

Sequential Test Conclusions for site


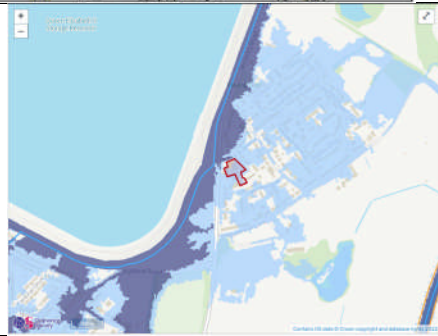

Although the site lies within Flood zone 1, since the assessment of the site compared to the advice in the PPG and SPD indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.

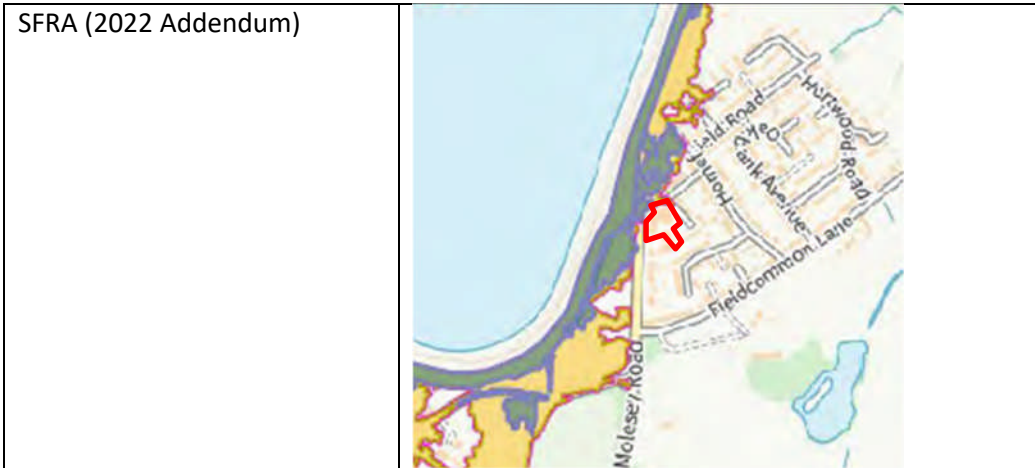
Site location & reference	9-21a High Street, Walton-on-Thames
Planning status	LAA ref US326. Site area (0.24ha) with capacity for 71 dwellings. The envisaged density of development is 300dph. The LAA indicates that the site is expected to be delivered within the first 5 years.
Site map	

<p>EA Planning for Flood data – this indicates that the site is in flood zone 1</p>	
<p>SFRA 2019 – this indicates that the site is in flood zone 1</p>	
<p>SFRA (2022 Addendum)</p>	
<p>Consideration of site against sequential test advice</p> <p>With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential suitability, the density of development implicit by the sites capacity indicates that this is for an apartment scheme. It is not the same type of development as proposed in the application. It is therefore not comparable with the application proposal. Given the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible, especially as this is a site in a defined Town Centre as detailed in the Local Plan. Having regard to the LAA appraisal of the site and its assumed density, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units at a density where houses would predominate since this would not reflect national and local policy with respect of efficient use of land in a town centre. It is also not considered to be available at the same point in time envisaged for the land off Raleigh Drive (Summer 2026). It is therefore not a “reasonably available site” pursuant to the PPG.</p> <p>The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to 9-21a High Street, it cannot</p>	

accommodate the requirements of the proposal in terms of both housing led with on-site affordable housing and is not owned by the applicant or on the market. Additionally, as no response was received to the letter requesting confirmation of availability (see appendix 1), this confirms it is not available. Therefore, it is not a “Reasonably available site” pursuant to the SPD. This is notwithstanding the assessment that it could be delivered in the first five years as envisaged in the LAA. This conclusion that it is not a “reasonably available site” is not affected by the site’s inclusion within flood zone 1.

Sequential Test Conclusions for site
Although the site lies within Flood zone 1, since the assessment of the site compared to the advice in the PPG and SPD indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.

Site location & reference	Leylands House, Molesey Road, Walton-on-Thames, KT12 3PW
Planning status	LAA ref US350. Site area (0.31ha) with capacity for 56 dwellings. The envisaged density of development is 181dph. The LAA indicates that the site is expected to be delivered within the first 5 years.
Site map	
EA Planning for Flood data – this indicates that the site is in flood zone 2	
SFRA 2019 – this indicates that the site is in flood zone 2	



Consideration of site against sequential test advice

With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential suitability, the density of development implicit by the site’s capacity indicates that this is for an apartment scheme. It is not the same type of development as proposed in the application. It is therefore not comparable with the application proposal. Given the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible. Having regard to the LAA appraisal of the site and its assumed density, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units, especially having regard to its availability at the point in time envisaged for the land off Raleigh Drive (Summer 2026). It is therefore not a “reasonably available site” pursuant to the PPG.

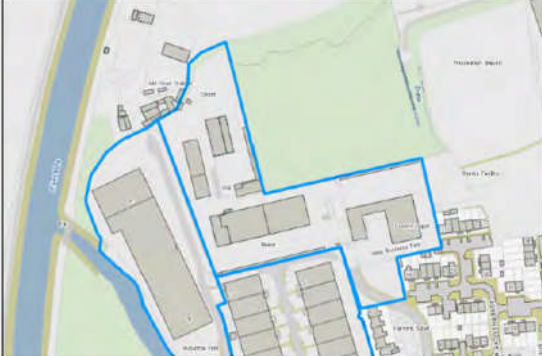
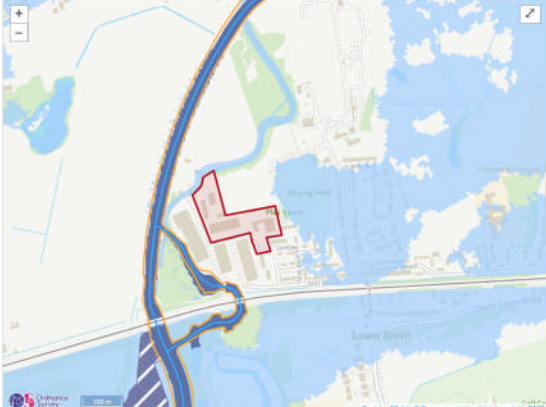
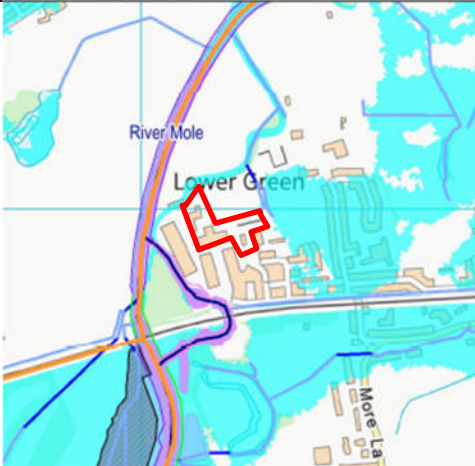

The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to Leylands House, it cannot accommodate the requirements of the proposal in terms of both housing led with on-site affordable housing and is not owned by the applicant or on the market. Additionally, as no response was received to the letter requesting confirmation of availability (see appendix 1), this confirms it is not available. Therefore, it is not a “Reasonably available site” pursuant to the SPD. This is notwithstanding the assessment that it could be delivered in the first five years as envisaged in the LAA.

Whilst the site is not considered to be a “reasonably available” alternative to the application proposal, it is also recognised that Leylands House is wholly within flood zone 2. Therefore on flood risk alone, the site is not sequentially preferable to the application proposal which is primarily in flood zone 1 with a small element of housing in flood zone 2 (in an area which will be re-profiled).

Sequential Test Conclusions for site

Further to the consideration of the site that it does not provide a reasonably available alternative when assessed have regard to the PPG and SPD advice, the site includes dwellings within flood zone 2. Therefore, given these factors, it is not considered to be a sequentially preferable site to the application scheme.

Site location & reference	River Mole Business Park, Mill Road, Esher, KT10 8BJ
Planning status	LAA ref US3. Site area (2.1ha) with capacity for 200 dwellings. The envisaged density of development is 95.2dph. The LAA indicates that the site is expected to be delivered within years 6-10.

<p>Site map</p>	
<p>EA Planning for Flood data – this indicates that the site is in flood zone 1</p>	
<p>SFRA 2019 – this indicates that the site is in flood zone 1</p>	
<p>SFRA (2022 Addendum)</p>	
<p>Consideration of site against sequential test advice With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential suitability, the density of development implicit by the site’s capacity indicates that</p>	

this is for an apartment scheme. It is not the same type of development as proposed in the application. It is therefore not comparable with the application proposal. Given the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible. Having regard to the LAA appraisal of the site and its assumed density, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units, especially having regard to its availability at the point in time envisaged for the land off Raleigh Drive (Summer 2026). This lack of availability is confirmed by the absence of a response to the applicant’s letter as indicated in appendix 1.

Whilst the site adjoins other sites included in appendices 3 to 5 of the LAA (US39 – Units A & B Sandown Industrial Park and US38 – Units C & D Sandown Industrial Park), these like River Mole Business Park (US3) are included within the LAA as being potentially developable with an expected availability for years 6-10. Therefore, none of the parcels individually or in combination are “available to be developed at the point of time envisaged for the development” for the land off Raleigh Drive (Summer 2026). Therefore, although similar primarily housing led scheme with affordable units might be feasible on each of the parcels within the LAA and might be a similar type of development, as it is unlikely that homes could be completed on the site(s) from Summer 2026 it is not a “reasonably available site” pursuant to the PPG.


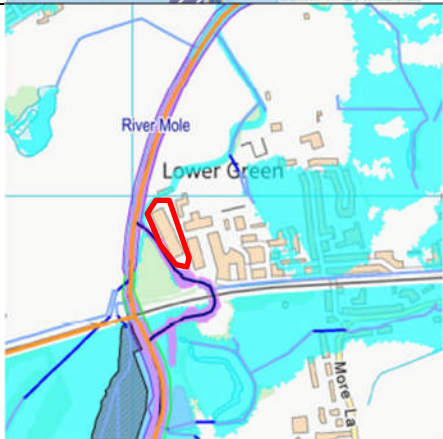

The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to River Mole Business Park, it is not owned by the applicant or on the market and consequently it is not a “Reasonably available site” pursuant to the SPD.

This conclusion that it is not a “reasonably available site” is not affected by the site’s inclusion within flood zone 1.

Sequential Test Conclusions for site


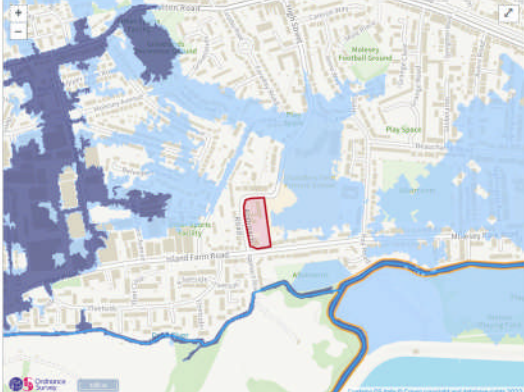
Although the site lies within Flood zone 1, since the assessment of the site compared to the advice in the PPG and SPD indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.


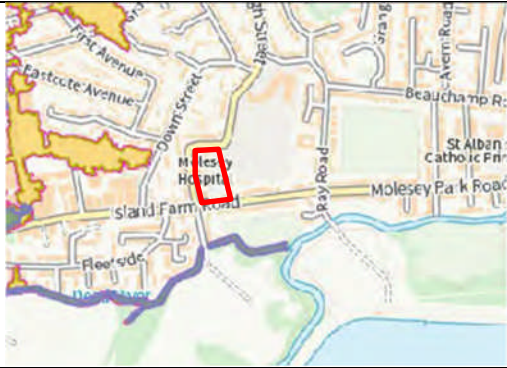
Site location & reference	Unit A & B Sandown Industrial Park, Esher, KT10 8BL
Planning status	LAA ref US39. Site area (1.33ha) with capacity for 40 dwellings. The envisaged density of development is 30dph. The LAA indicates that the site is expected to be delivered within years 6-10.
Site map	


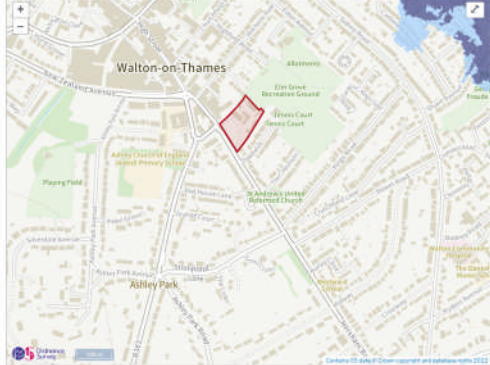

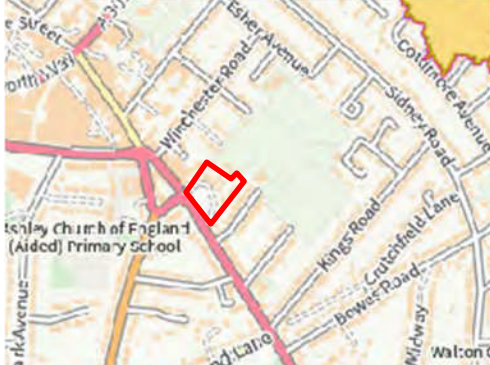
<p>EA Planning for Flood data – this indicates that part of the site is in flood zone 3</p>	
<p>SFRA 2019 – this indicates that part of the site is in flood zone 3</p>	
<p>SFRA (2022 Addendum)</p>	
<p>Consideration of site against sequential test advice</p> <p>With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential suitability, the density of development implicit by the site’s capacity indicates that this is for an apartment scheme. It is not the same type of development as proposed in the application. It is therefore not comparable with the application proposal. Given the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible. Having regard to the LAA appraisal of the site and its assumed density, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units, especially having regard to its availability at the point in time envisaged for the land off Raleigh Drive (Summer 2026). This lack of availability is confirmed by the absence of a response to the applicant’s letter as indicated in appendix 1.</p> <p>Whilst the site adjoins other sites included in appendices 3 to 5 of the LAA (US33 – River Mole Business Park and US38 – Units C & D Sandown Industrial Park), these like Units A & B Sandown Industrial Park (US39) are included within the LAA as being potentially developable with an expected availability for years 6-10. Therefore, none of the parcels individually or in combination are “available to be developed at the point of time envisaged for the development” for the land off Raleigh Drive (Summer 2026). Therefore, although similar primarily housing led scheme with affordable units might be feasible on each of the parcels within the LAA and might be a similar type of</p>	

development as it is unlikely that homes could be completed on the site(s) from Summer 2026 it is not a “reasonably available site” pursuant to the PPG. The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to Units A & B Sandown Industrial Park, it is not owned by the applicant or on the market and consequently it is not a “Reasonably available site” pursuant to the SPD. Whilst the site is not considered to be a “reasonably available” alternative to the application proposal, it is also recognised that parts of Units A & B Sandown Industrial Park is within flood zone 3. Therefore on flood risk alone, the site is not sequentially preferred to the application proposal which is primarily in flood zone 1 with a small element of housing in flood zone 2 (in an area which is to be re-profiled).

Sequential Test Conclusions for site
The site extends partly into flood zone 3 and therefore on this basis it would not be sequentially preferred. This is irrespective of the assessment of the site compared to the advice in the PPG and SPD which indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.

Site location & reference	Molesey Community Hospital, High Street, KT8 2LU	
Planning status	LAA ref US456. Site area (0.73ha) with capacity for 70 dwellings. The envisaged density of development is 96dph. The LAA indicates that the site is expected to be delivered within years 6-10.	
Site map		
EA Planning for Flood data – this indicates the site is in flood zone 1		

<p>SFRA 2019 – this indicates that the site is in flood zone 1</p>	
<p>SFRA (2022 Addendum)</p>	
<p>Consideration of site against sequential test advice</p> <p>With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential suitability, the density of development implicit by the site’s capacity indicates that this is for an apartment scheme. It is not the same type of development as proposed in the application. It is therefore not comparable with the application proposal. Given the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible. Having regard to the LAA appraisal of the site and its assumed density, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units, especially having regard to its availability at the point in time envisaged for the land off Raleigh Drive (Summer 2026). This unavailability to be developed at the same point in time is reflected in the absence of a response to the applicant’s letter as indicated in appendix 1 together with the LAA categorising its construction as being potentially within years 6-10. It is therefore not a “reasonably available site” pursuant to the PPG.</p> <p>The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to Molesey Community Hospital, it cannot accommodate the requirements of the proposal in terms of both housing led with on-site affordable housing and is not owned by the applicant or on the market. Additionally, as no response was received to the letter requesting confirmation of availability (see appendix 1), this confirms it is not available. Therefore, it is not a “Reasonably available site” pursuant to the SPD which reflects the timeframe for delivery in the LAA (years 6 to 10).</p> <p>This conclusion that it is not a “reasonably available site” is not affected by the site’s inclusion within flood zone 1.</p>	
<p>Sequential Test Conclusions for site</p> <p>Although the site lies within Flood zone 1, since the assessment of the site compared to the advice in the PPG and SPD indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.</p>	

Site location & reference	Elm Grove, 1 Hersham Road, Walton-on-Thames, KT12 1LH
Planning status	LAA ref US84. Site area (1ha) with capacity for 70 dwellings. The envisaged density of development is 70dph. The LAA indicates that the site is expected to be delivered within years 6-10.
Site map	
EA Planning for Flood data – this indicates that the site is in flood zone 1	
SFRA 2019 – this indicates that the site is in flood zone 1	
SFRA (2022 Addendum)	
<p>Consideration of site against sequential test advice</p> <p>With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential suitability, the density of development implicit by the site’s capacity indicates that this is for an apartment scheme. It is not the same type of development as proposed</p>	

in the application. It is therefore not comparable with the application proposal. Given the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible, especially as this is a site in a defined Town Centre as detailed in the Local Plan. Having regard to the LAA appraisal of the site and its assumed density, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units at density where houses would predominate since this would not reflect national and local policy with respect of efficient use of land in a town centre. It is also not considered to be available at the same point in time envisaged for the land off Raleigh Drive (Summer 2026), especially as the LAA indicates that development on the site is envisaged in years 6 to 10.

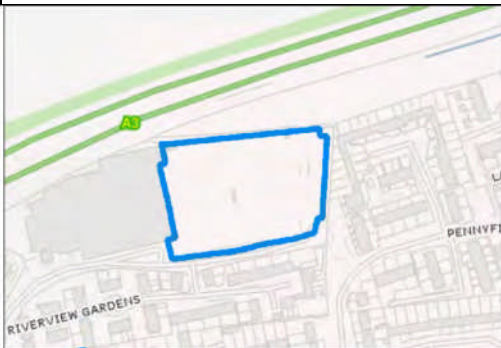
The PPG also advocates consideration of the site in combination with adjoining land to determine if this might then be a “reasonably available” parcel. With regard to Elm Grove, the LAA indicates that Case House, 85-89 High Street (US321) is an adjoining parcel. However, the LAA indicates that development on this parcel is envisaged for years 11-15 and for a density of development reflecting its town centre location. It is therefore not a site which would accommodate the same “type of development” as envisaged for the land off Raleigh Drive. It is therefore not a “reasonably available site” pursuant to the PPG.


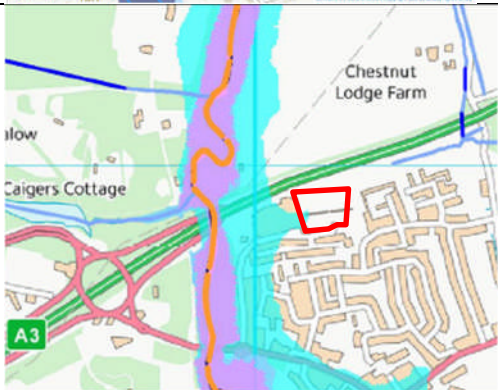
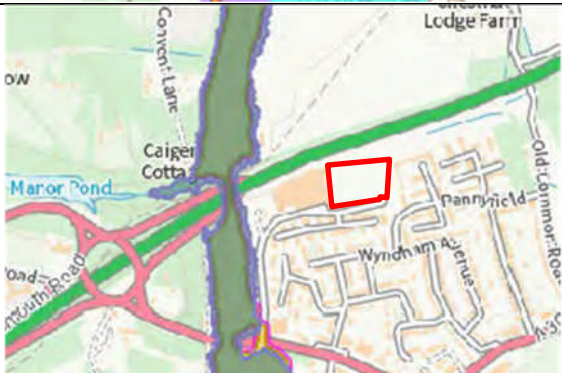
The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to Elm Grove, it cannot accommodate the requirements of the proposal in terms of being housing led and is not owned by the applicant or on the market. Additionally, as no response was received to the letter requesting confirmation of availability (see appendix 1), this confirms it is not available. Therefore, it is not a “Reasonably available site” pursuant to the SPD. This is notwithstanding the assessment that it could be delivered in the first five years as envisaged in the LAA.

This conclusion that it is not a “reasonably available site” is not affected by the site’s inclusion within flood zone 1.

Sequential Test Conclusions for site

Although the site lies within Flood zone 1, since the assessment of the site compared to the advice in the PPG and SPD indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.

Site location & reference	Sainsbury's car park, Bridge Way, Cobham, KT11 1HW
Planning status	LAA ref US178. Site area (1.03ha) with capacity for 58 dwellings. The envisaged density of development is 56dph. The LAA indicates that the site is expected to be delivered within years 11-15.
Site location map	

<p>EA Planning for Flood data – this indicates that the site is in flood zone 1</p>	
<p>SFRA 2019 – this indicates that the site is in flood zone 1</p>	
<p>SFRA (2022 Addendum)</p>	

Consideration of site against sequential test advice

With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential suitability, the density of development implicit by the site’s capacity indicates that this is for an apartment scheme. It is not the same type of development as proposed in the application and would not therefore be comparable with the application proposal. Given the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible. Having regard to the LAA appraisal of the site and its assumed density, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units, especially having regard to its availability at the point in time envisaged for the land off Raleigh Drive (Summer 2026). This availability at the same point in time as the land off Raleigh Drive is also reflective of the expectation in the LAA that development would occur in years 11-15. This unavailability of the site for development at the point of time envisaged indicates that the site is not reasonably available, even if a layout was feasible which included a similar emphasis on housing and provided affordable homes. It is therefore not a “reasonably available site” pursuant to the PPG.




The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to Sainsbury’s car park, it cannot

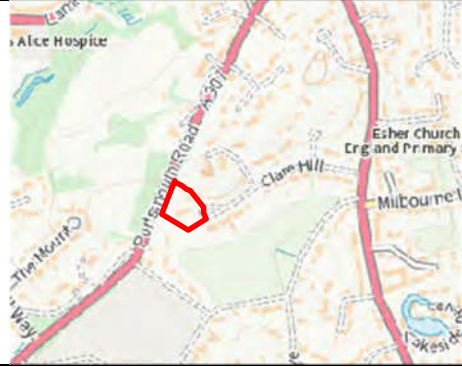
accommodate the requirements of the proposal in terms of both housing led with on-site affordable housing and is not owned by the applicant or on the market. Additionally, as no response was received to the letter requesting confirmation of availability (see appendix 1), this confirms it is not available consistent with the LAA expectation of delivery within years 11-15. Therefore, it is not a “Reasonably available site” pursuant to the SPD.

This conclusion that it is not a “reasonably available site” is not affected by the site’s inclusion within flood zone 1.

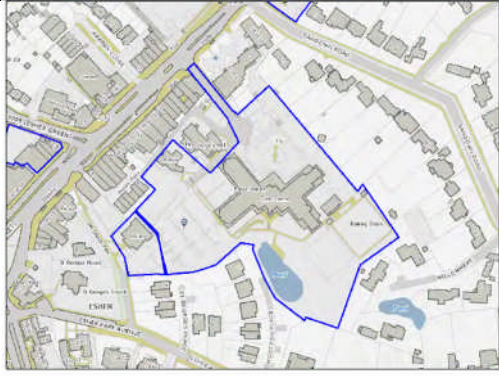
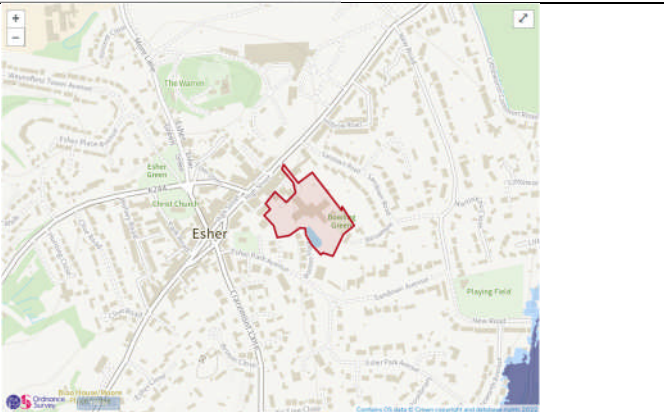
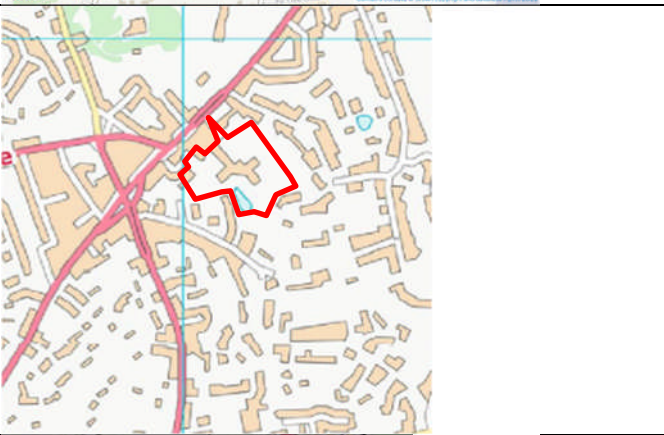
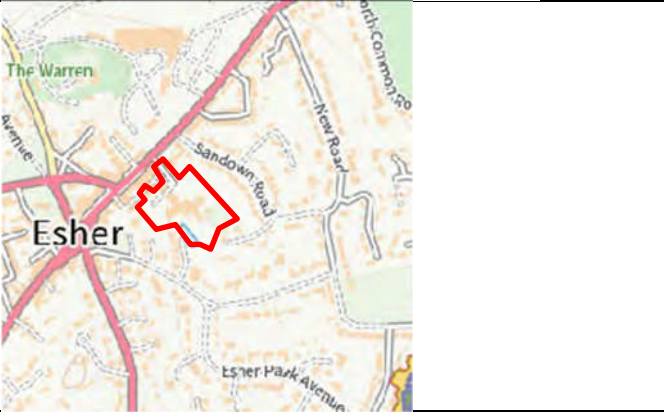
Sequential Test Conclusions for site

Although the site lies within Flood zone 1, since the assessment of the site compared to the advice in the PPG and SPD indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.

Site location & reference	15 Clare Hill Esher KT10 9NB
Planning status	LAA ref US287. Site area (1.35ha) with capacity for 55 dwellings. The envisaged density of development is 41.5dph. The LAA indicates that the site is expected to be delivered within years 11-15.
Site location map	
EA Planning for Flood data – this indicates that the site is in flood zone 1	
SFRA 2019 – this indicates that the site is in flood zone 1	

SFRA (2022 Addendum)	
<p>Consideration of site against sequential test advice</p> <p>With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential suitability, the density of development implicit by the site’s capacity indicates that this is for an apartment scheme. It is not the same type of development as proposed in the application and would not therefore be comparable with the application proposal. Given the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible. Having regard to the LAA appraisal of the site and its assumed density, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units, especially having regard to its availability at the point in time envisaged for the land off Raleigh Drive (Summer 2026). This availability at the same point in time as the land off Raleigh Drive is also reflective of the expectation in the LAA that development would occur in years 11-15. This unavailability of the site for development at the point of time envisaged indicates that the site is not reasonably available, even if a layout was feasible which included a similar emphasis on housing and provided affordable homes. It is therefore not a “reasonably available site” pursuant to the PPG.</p> <p>The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to 15 Clare Hill, it is not owned by the applicant or on the market. Additionally, as no response was received to the letter requesting confirmation of availability (see appendix 1), this confirms it is not available consistent with the LAA expectation of delivery within years 11-15. Therefore, it is not a “Reasonably available site” pursuant to the SPD.</p> <p>This conclusion that it is not a “reasonably available site” is not affected by the site’s inclusion within flood zone 1.</p>	
<p>Sequential Test Conclusions for site</p> <p>Although the site lies within Flood zone 1, since the assessment of the site compared to the advice in the PPG and SPD indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.</p>	

Site location & reference	Civic Centre, High Street, Esher, KT10 9SD
Planning status	LAA ref US531. Site area (2.71ha) with capacity for 400 dwellings. The envisaged density of development is 147dph. The LAA indicates that the site is expected to be delivered within years 11-15.

<p>Site location plan</p>	
<p>EA Planning for Flood data – this indicates that the site is flood zone 1</p>	
<p>SFRA 2019 – this indicates that the site is in flood zone 1</p>	
<p>SFRA (2022 Addendum)</p>	
<p>Consideration of site against sequential test advice With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential suitability, the density of development implicit by the site’s capacity indicates that this is for an apartment scheme. It is not the same type of development as proposed in the application. It is therefore not comparable with the application proposal. Given</p>	

the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible, especially as this is a site in a defined District Centre as detailed in the Local Plan. Having regard to the LAA appraisal of the site and its assumed density, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units at density where houses would predominate since this would not reflect national and local policy with respect of efficient use of land in a district centre. It is also not considered to be available at the same point in time envisaged for the land off Raleigh Drive (Summer 2026), especially as the LAA indicates that development on the site is envisaged in years 11 to 15.

The PPG also advocates consideration of the site in combination with adjoining land to determine if this might then be a “reasonably available” parcel. With regard to the Civic Offices, the LAA indicates that Esher Library (US519) is an adjoining parcel. However, the LAA indicates that development on this parcel is envisaged for years 6-10 and for a density of development reflecting its district centre location. It is therefore not a site which would accommodate the same “type of development” as envisaged for the land off Raleigh Drive. It is therefore not a “reasonably available site” pursuant to the PPG.


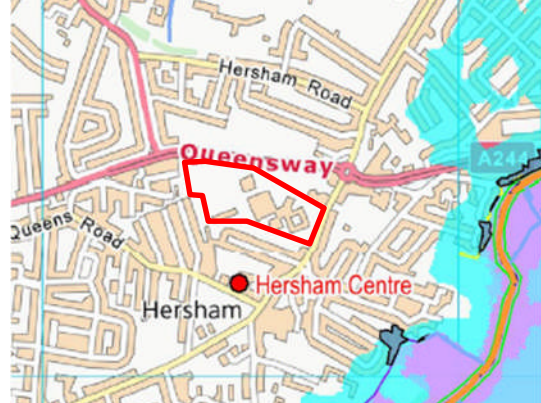
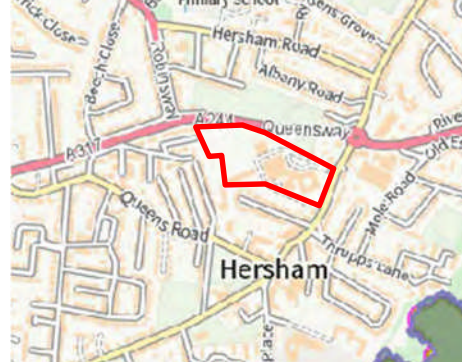
The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to the Civic Centre, it cannot accommodate the requirements of the proposal in terms of being housing led and is not owned by the applicant or on the market. Additionally, as no response was received to the letter requesting confirmation of availability (see appendix 1), this confirms it is not available. Therefore, it is not a “Reasonably available site” pursuant to the SPD.

This conclusion that it is not a “reasonably available site” is not affected by the site’s inclusion within flood zone 1.

Sequential Test Conclusions for site

Although the site lies within Flood zone 1, since the assessment of the site compared to the advice in the PPG and SPD indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.

Site location & reference	Hersham Technology Park (Air Products), Molesey Road, Hersham, KT12 4RZ
Planning status	LAA ref US43. Site area (4.1ha) with capacity for 0 dwellings (promoted for 4,350sqm commercial floorspace). The LAA indicates that the site is expected to be delivered within years 11-15.
Site map	


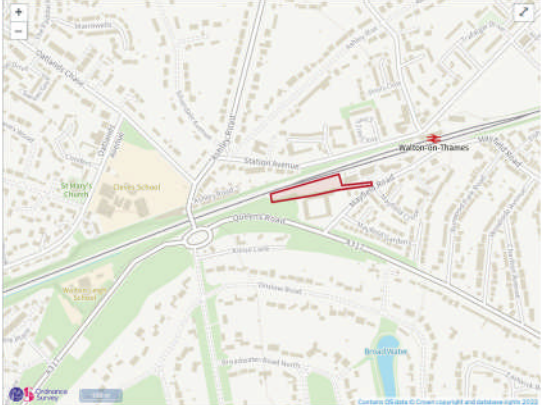

<p>EA Planning for Flood data – this indicates that the site is in flood zone 1</p>	
<p>SFRA 2019 – this indicates that the site is in flood zone 1</p>	
<p>SFRA (2022 Addendum)</p>	
<p>Consideration of site against sequential test advice</p> <p>With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential suitability, the land has been promoted for commercial rather than residential development. Therefore, although by virtue of site area it could be comparable with the land off Raleigh Drive, the type of development is completely different. Furthermore, the LAA envisages development on the site between years 11 and 15 which is inconsistent with the point in time envisaged for the land off Raleigh Drive (Summer 2026). Although the site adjoins Trinity Hall and 63-67 Molesey Road (US376), this on its own is 1.1ha and consequently below the threshold for comparable land with the site off Raleigh Drive (minimum of 1.3ha). Therefore although the PPG advocates consideration of wider parcels within a comprehensive site for assessing whether it is comparable, given the differences in promoted use this is not considered appropriate. The envisaged capacity of US376 at 47 dwellings (net) is also below the minimum to be comparable (at least 50 dwellings). Taking account of the above, it is not a “reasonably available site” pursuant to the PPG.</p> <p>The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to Hershams Technology Park, it cannot accommodate the requirements of the proposal in terms of both housing led with on-</p>	

site affordable housing and is not owned by the applicant or on the market. Additionally, as no response was received to the letter requesting confirmation of availability for a residential rather than commercial led scheme (see appendix 1), this confirms it is not available. Therefore, it is not a “Reasonably available site” pursuant to the SPD.

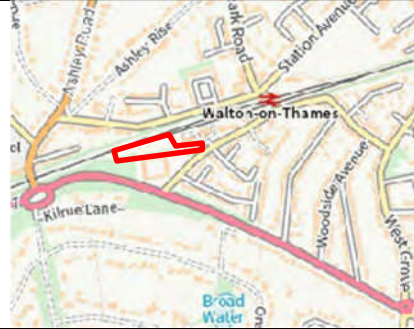
This conclusion that it is not a “reasonably available site” is not affected by the site’s inclusion within flood zone 1.

Sequential Test Conclusions for site

Although the site lies within Flood zone 1, since the assessment of the site compared to the advice in the PPG and SPD indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.

Site location & reference	Car Park next to Waterloo Court, Mayfield Road, Hersham
Planning status	LAA ref US435. Site area (0.63ha) with capacity for 62 dwellings. The envisaged density of development is 98.4dph. The LAA indicates that the site is expected to be delivered within years 11-15.
Site map	
EA Planning for Flood data - this indicates that the site is in flood zone 1	
SFRA 2019 – this indicates that the site is in flood zone 1	

SFRA (2022 Addendum)



Consideration of site against sequential test advice

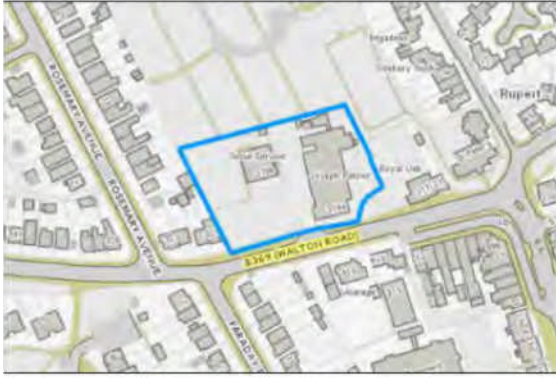
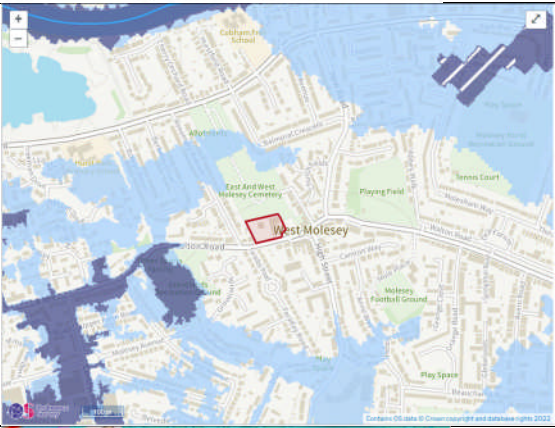

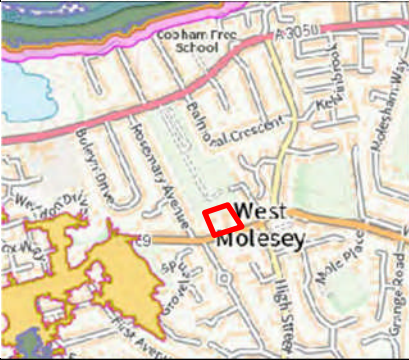
With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential suitability, the density of development implicit by the site’s capacity indicates that this is for an apartment scheme. It is not the same type of development as proposed in the application and would not therefore be comparable with the application proposal. Given the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible. Having regard to the LAA appraisal of the site and its assumed density, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units, especially having regard to its availability at the point in time envisaged for the land off Raleigh Drive (Summer 2026). This availability at the same point in time as the land off Raleigh Drive is also reflective of the expectation in the LAA that development would occur in years 11-15. This unavailability of the site for development at the point of time envisaged indicates that the site is not reasonably available, even if a layout was feasible which included a similar emphasis on housing and provided affordable homes. It is therefore not a “reasonably available site” pursuant to the PPG. Whilst the site adjoins land west of Fenner House, Queens Road (US387), this is discounted by the Council as it has “physical limitations that cannot be overcome in the plan period – open green space and trees”. On this basis, irrespective of the PPG advice regard assessing wider parcels for a comprehensive scheme, this is not feasible if it incorporated US387. Therefore, the conclusion that it is not a “reasonably available site” pursuant to the PPG applies.

The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to the car park next to Waterloo Court, it cannot accommodate the requirements of the proposal in terms of both housing led with on-site affordable housing and is not owned by the applicant or on the market. Additionally, as no response was received to the letter requesting confirmation of availability (see appendix 1), this confirms it is not available consistent with the LAA expectation of delivery within years 11-15. Therefore, it is not a “Reasonably available site” pursuant to the SPD.

This conclusion that it is not a “reasonably available site” is not affected by the site’s inclusion within flood zone 1.

Sequential Test Conclusions for site

Although the site lies within Flood zone 1, since the assessment of the site compared to the advice in the PPG and SPD indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.

Site location & reference	Joseph Palmer Centre, 319a Walton Road, West Molesey, KT8 2QQ
Planning status	LAA ref US56. Site area (0.5ha) with capacity for 60 Class C2 residential units. The envisaged density of development is 40dph. The LAA indicates that the site is expected to be delivered within years 11-15.
Site map	
EA Planning for Flood data	
SFRA 2019	
SFRA (2022 Addendum)	
<p>Consideration of site against sequential test advice With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential</p>	


suitability, the density of development implicit by the site’s capacity indicates that this is for an apartment scheme. It is not the same type of development as proposed in the application and would not therefore be comparable with the application proposal. Given the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible. Having regard to the LAA appraisal of the site and its assumed density, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units, especially having regard to its availability at the point in time envisaged for the land off Raleigh Drive (Summer 2026). This availability at the same point in time as the land off Raleigh Drive is also reflective of the expectation in the LAA that development would occur in years 11-15. This unavailability of the site for development at the point of time envisaged indicates that the site is not reasonably available, even if a layout was feasible which included a similar emphasis on housing and provided affordable homes. It is therefore not a “reasonably available site” pursuant to the PPG.


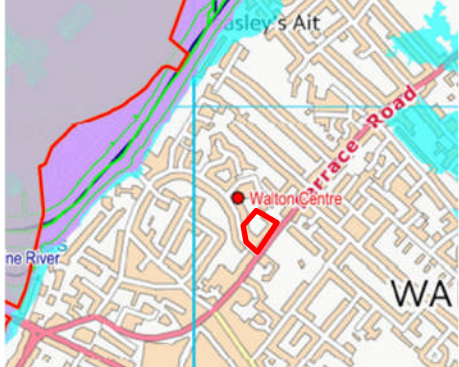
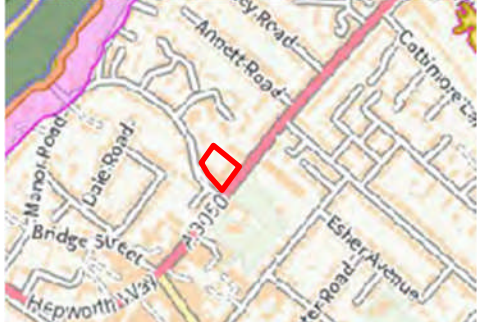
The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to the Joseph Palmer Centre, it is not owned by the applicant or on the market. Additionally, as no response was received to the letter requesting confirmation of availability (see appendix 1), this confirms it is not available consistent with the LAA expectation of delivery within years 11-15. Therefore, it is not a “Reasonably available site” pursuant to the SPD.

This conclusion that it is not a “reasonably available site” is not affected by the site’s inclusion within flood zone 1.

Sequential Test Conclusions for site

Although the site lies within Flood zone 1, since the assessment of the site compared to the advice in the PPG and SPD indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.

Site location & reference	Courtlands & 1-5 Terrace Road, Walton-on-Thames, KT12 2SS
Planning status	LAA ref US72. Site area (0.44ha) with capacity for 63 dwellings. The envisaged density of development is 177dph. The LAA indicates that the site is expected to be delivered within years 11-15.
Site map	


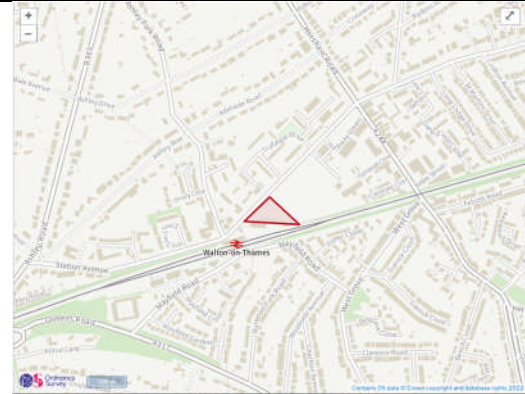

<p>EA Planning for Flood data - this indicates that the site is in flood zone 1</p>	
<p>SFRA 2019 – this indicates that the site is in flood zone 1</p>	
<p>SFRA (2022 Addendum)</p>	
<p>Consideration of site against sequential test advice</p> <p>With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential suitability, the density of development implicit by the site’s capacity indicates that this is for an apartment scheme. It is not the same type of development as proposed in the application. It is therefore not comparable with the application proposal. Given the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible, especially as this is site is partly within a defined District Centre as detailed in the Local Plan. Having regard to the LAA appraisal of the site and its assumed density, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units at density where houses would predominate since this would not reflect national and local policy with respect of efficient use of land in a district centre. It is also not considered to be available at the same point in time envisaged for the land off Raleigh Drive (Summer 2026), especially as the LAA indicates that development on the site is envisaged in years 11 to 15. It is therefore not a “reasonably available site” pursuant to the PPG.</p> <p>The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to Courtlands and 1-5 Terrace Road, it cannot accommodate the requirements of the proposal in terms of being housing led and is not owned by the applicant or on the market. Additionally, as no response was</p>	

received to the letter requesting confirmation of availability (see appendix 1), this confirms it is not available. Therefore, it is not a “Reasonably available site” pursuant to the SPD.

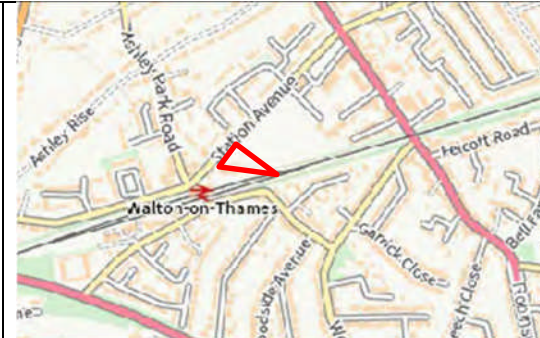
This conclusion that it is not a “reasonably available site” is not affected by the site’s inclusion within flood zone 1.

Sequential Test Conclusions for site

Although the site lies within Flood zone 1, since the assessment of the site compared to the advice in the PPG and SPD indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.

Site location & reference	Station Avenue Car Park, Station Avenue, Walton-on-Thames	
Planning status	LAA ref US356. Site area (0.59ha) with capacity for 50 dwellings. The envisaged density of development is 84.7dph. The LAA indicates that the site is expected to be delivered within years 11-15.	
Site map		
EA Planning for Flood data - this shows that the site is in flood zone 1		
SFRA 2019 – this shows that the site is in flood zone 1		

SFRA (2022 Addendum)



Consideration of site against sequential test advice

With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential suitability, the density of development implicit by the site’s capacity indicates that this is for an apartment scheme. It is not the same type of development as proposed in the application and would not therefore be comparable with the application proposal. Given the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible. Having regard to the LAA appraisal of the site and its assumed density, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units, especially having regard to its availability at the point in time envisaged for the land off Raleigh Drive (Summer 2026). This availability at the same point in time as the land off Raleigh Drive is also reflective of the expectation in the LAA that development would occur in years 11-15. This unavailability of the site for development at the point of time envisaged indicates that the site is not reasonably available, even if a layout was feasible which included a similar emphasis on housing and provided affordable homes. It is therefore not a “reasonably available site” pursuant to the PPG. Whilst the site adjoins Walton Audi, 1 Station Avenue (US355) this is discounted by the Council as it is “not available”. On this base, irrespective of the PPG advice regard assessing wider parcels for a comprehensive scheme, this is not feasible if it incorporated US355. Therefore, the conclusion that it is not a “reasonably available site” pursuant to the PPG applies.


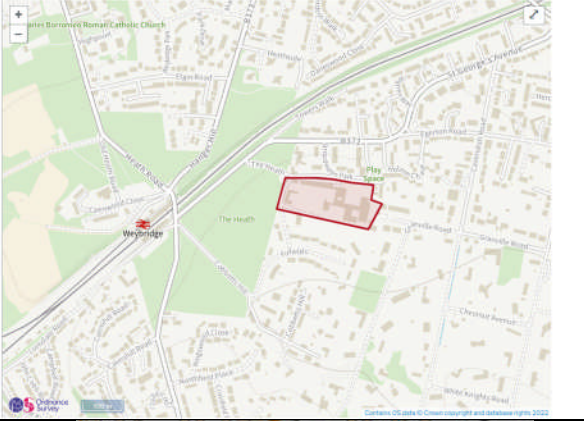
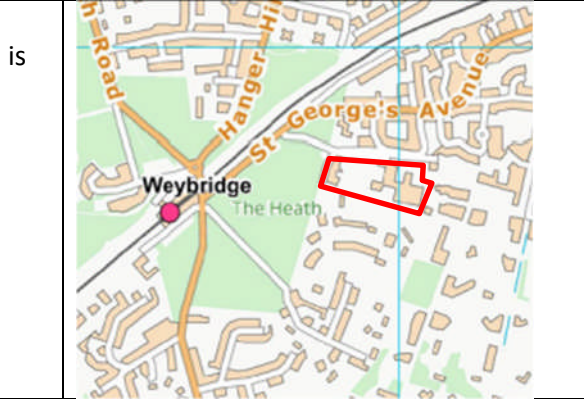

The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to Station Avenue car park, it cannot accommodate the requirements of the proposal in terms of both housing led with on-site affordable housing and is not owned by the applicant or on the market. Therefore, it is not a “Reasonably available site” pursuant to the SPD.

This conclusion that it is not a “reasonably available site” is not affected by the site’s inclusion within flood zone 1.

Sequential Test Conclusions for site

Although the site lies within Flood zone 1, since the assessment of the site compared to the advice in the PPG and SPD indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.

Site location & reference	GlaxoSmithKline, St. Georges Avenue, Weybridge, KT13 ODE
Planning status	LAA ref US92. Site area (2.58ha) with capacity for 100 dwellings. The envisaged density of development is 128dph. The LAA indicates that the site is expected to be delivered within years 11-15.

<p>Site map</p>	
<p>EA Planning for Flood data – this shows that the site is in flood zone 1</p>	
<p>SFRA 2019 – this shows that the site is in flood zone 1</p>	
<p>SFRA (2022 Addendum)</p>	
<p>Consideration of site against sequential test advice With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential suitability, the density of development implicit by the site’s capacity indicates that this is for an apartment scheme. It is not the same type of development as proposed in the application and would not therefore be comparable with the application proposal. Given the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible. Having regard to the LAA appraisal of the site and its assumed density, it is not considered that there is a reasonable</p>	

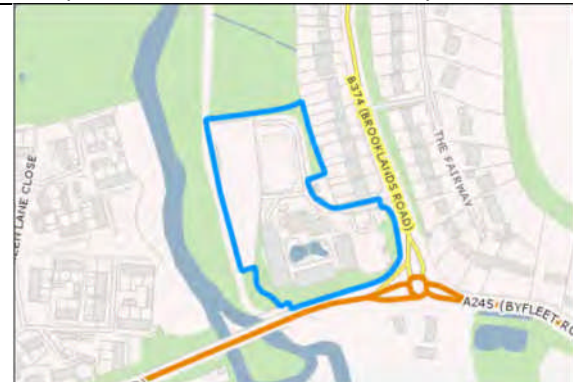
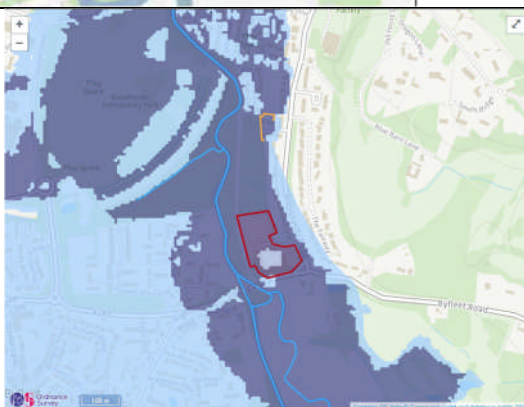
prospect that the site could come forward for a similar primarily housing led scheme with affordable units, especially having regard to its availability at the point in time envisaged for the land off Raleigh Drive (Summer 2026). This availability at the same point in time as the land off Raleigh Drive is also reflective of the expectation in the LAA that development would occur in years 11-15. This unavailability of the site for development at the point of time envisaged indicates that the site is not reasonably available, even if a layout was feasible which included a similar emphasis on housing and provided affordable homes. It is therefore not a “reasonably available site” pursuant to the PPG.

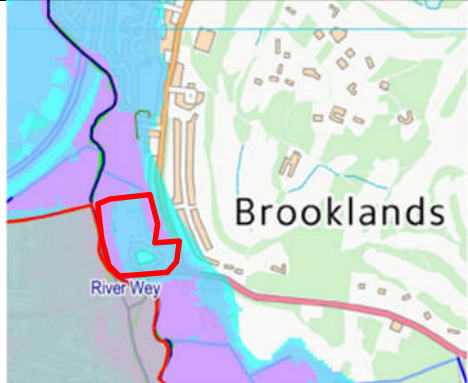
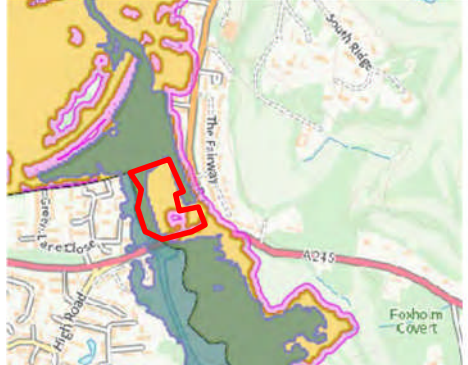
The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to GlaxoSmithKline, it cannot accommodate the requirements of the proposal in terms of both housing led with on-site affordable housing and is not owned by the applicant or on the market. Therefore, it is not a “Reasonably available site” pursuant to the SPD.

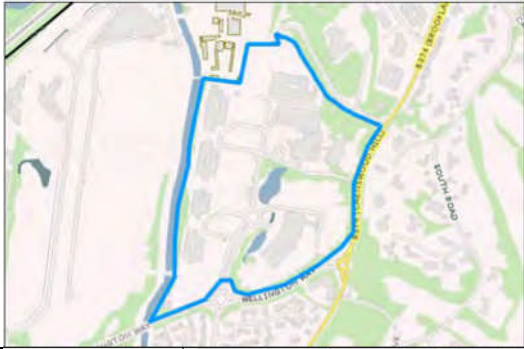
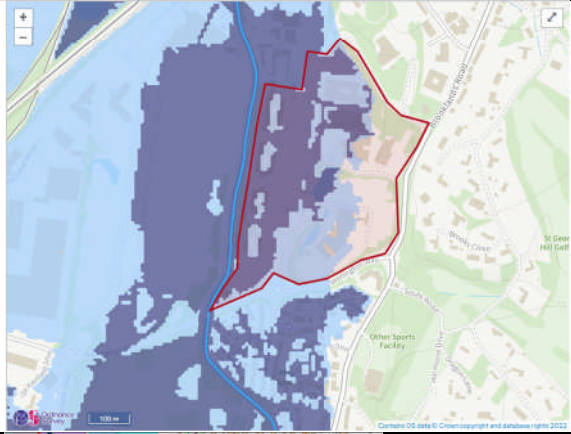
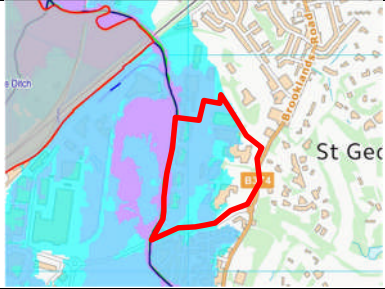
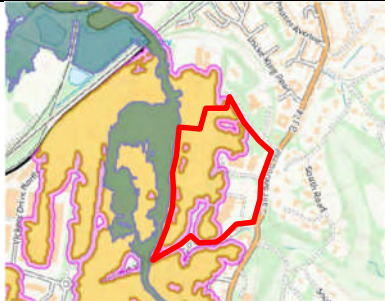
This conclusion that it is not a “reasonably available site” is not affected by the site’s inclusion within flood zone 1.

Sequential Test Conclusions for site

Although the site lies within Flood zone 1, since the assessment of the site compared to the advice in the PPG and SPD indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.

Site location & reference	Horizon Business Village, Brooklands Road, Weybridge, KT13 0TJ	
Planning status	LAA ref US93. Site area (1.9ha) with capacity for 0 dwellings (promoted for 6,000 sqm offices). The LAA indicates that the site is expected to be delivered within years 11-15.	
Site map		
EA Planning for Flood data – this shows that the site is primarily in flood zone 3 with a part in zone 2		

<p>SFRA 2019 – this shows that the site is primarily in flood zone 3 with a part in zone 2</p>	 <p>The map shows the Brooklands area with a red outline indicating the site. The site is primarily in flood zone 3 (purple) with a small portion in flood zone 2 (blue). The River Wey is visible to the west.</p>
<p>SFRA (2022 Addendum)</p>	 <p>The map shows the Brooklands area with a red outline indicating the site. The site is primarily in flood zone 3 (purple) with a small portion in flood zone 2 (blue). The River Wey is visible to the west.</p>
<p>Consideration of site against sequential test advice</p> <p>With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential suitability, the land has been promoted for commercial rather than residential development. Therefore, although by virtue of site area it could be comparable with the land off Raleigh Drive, the type of development is completely different. Taking account of the above, it is not a “reasonably available site” pursuant to the PPG.</p> <p>The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to Horizon Business Village, it cannot accommodate the requirements of the proposal in terms of both housing led with on-site affordable housing and is not owned by the applicant or on the market. Additionally, as no response was received to the letter requesting confirmation of availability for a residential rather than commercial led scheme (see appendix 1), this confirms it is not available. Therefore, it is not a “Reasonably available site” pursuant to the SPD.</p> <p>Whilst the site is not considered to be a “reasonably available” alternative to the application proposal, it is also recognised that Horizon Business Village is wholly within flood zones 2 and 3. Therefore on flood risk alone, the site is not sequentially preferred to the application proposal which is primarily in flood zone 1 with a small element of housing in flood zone 2 (in an area that is to be re-profiled).</p>	
<p>Sequential Test Conclusions for site</p> <p>Further to the consideration of the site that it does not provide a reasonably available alternative when assessed have regard to the PPG and SPD advice, the site is wholly within flood zones 2 and 3, compared to the application site which is primarily in zone 1. Therefore, given these factors, it is not considered to be a sequentially preferable site to the application scheme</p>	


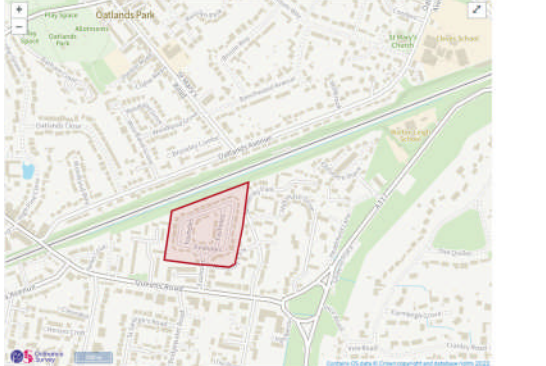
Site location & reference	The Heights, Weybridge, KT13 ONY
Planning status	LAA ref US110. Site area (20 ha) with capacity for 0 dwellings (site is promoted for 9,500sqm of commercial floorspace). The LAA indicates that the site is expected to be delivered within years 11-15.
Site map	
EA Planning for Flood data – this shows that the majority of the site is within flood zones 2 and 3	
SFRA 2019 – this shows that the majority of the site is in flood zones 2 and 3	
SFRA (2022 Addendum)	
<p>Consideration of site against sequential test advice</p> <p>With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential suitability, the land has been promoted for commercial rather than residential development. Therefore, although by virtue of site area it could be comparable with the land off Raleigh Drive, the type of development is completely different. Taking account of the above, it is not a “reasonably available site” pursuant to the PPG.</p>	


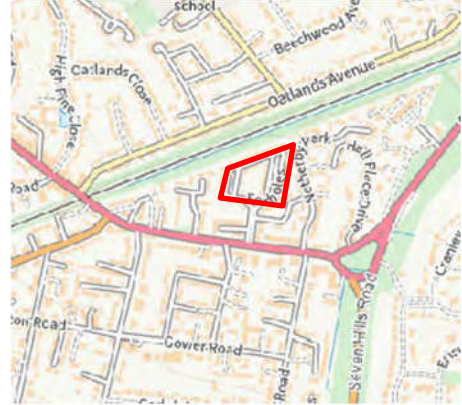
The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to The Heights, it cannot accommodate the requirements of the proposal in terms of both housing led with on-site affordable housing and is not owned by the applicant or on the market.

Whilst the site is not considered to be a “reasonably available” alternative to the application proposal, it is also recognised that significant parts of the overall parcel are within flood zones 2 and 3. Therefore on flood risk alone, the site is not sequentially preferred to the application proposal which is primarily in flood zone 1 with a small element of housing in flood zone 2 (in an area which is to be re-profiled). As the site is not promoted for residential development, it is not known whether this would be feasible as it is not the “type of development” envisaged.

Sequential Test Conclusions for site

Further to the consideration of the site that it does not provide a reasonably available alternative when assessed have regard to the PPG and SPD advice, the majority of the site is within flood zones 2 and 3, compared to the application site which is primarily in zone 1. Therefore, given these factors, it is not considered to be a sequentially preferable site to the application scheme.

Site location & reference	Foxholes, Weybridge KT13 0BN
Planning status	LAA ref US407. Site area (4.1ha) with capacity for 78 dwellings. The envisaged density of development is 37dph. The LAA indicates that the site is expected to be delivered within years 11-15.
Site location map	
EA Planning for Flood data – this shows that the site is in flood zone 1	

<p>SFRA 2019 – this shows that the site is in flood zone 1</p>	
<p>SFRA (2022 Addendum)</p>	
<p>Consideration of site against sequential test advice</p> <p>With respect to the PPG’s advice on what is a “Reasonably available site” (ID ref 7-28-20220825), whilst the inclusion of the site in the LAA is an indication of potential suitability, the density of development implicit by the site’s capacity indicates that this is for an apartment scheme. It is not the same type of development as proposed in the application and would not therefore be comparable with the application proposal. Given the site size, it is not considered that a scheme which includes the same significant emphasis on houses is feasible. Having regard to the LAA appraisal of the site and its assumed density, it is not considered that there is a reasonable prospect that the site could come forward for a similar primarily housing led scheme with affordable units, especially having regard to its availability at the point in time envisaged for the land off Raleigh Drive (Summer 2026). This availability at the same point in time as the land off Raleigh Drive is also reflective of the expectation in the LAA that development would occur in years 11-15. This unavailability of the site for development at the point of time envisaged indicates that the site is not reasonably available, even if a layout was feasible which included a similar emphasis on housing and provided affordable homes. It is therefore not a “reasonably available site” pursuant to the PPG.</p> <p>The Council’s SPD (paragraph 3.3.7) sets out several criteria which illustrates whether a site is “Reasonably available”. With respect to 15 Clare Hill, it is not owned by the applicant or on the market. Additionally, as no response was received to the letter requesting confirmation of availability (see appendix 1), this confirms it is not available consistent with the LAA expectation of delivery within years 11-15. Therefore, it is not a “Reasonably available site” pursuant to the SPD.</p> <p>This conclusion that it is not a “reasonably available site” is not affected by the site’s inclusion within flood zone 1.</p>	
<p>Sequential Test Conclusions for site</p> <p>Although the site lies within Flood zone 1, since the assessment of the site compared to the advice in the PPG and SPD indicates that it is not “reasonably available”, it is not sequentially preferable to the application site and the form of development proposed.</p>	

- 4.17. As detailed above, before the assessment of the sites within appendices 3 to 5 of the LAA, the applicant wrote to the registered owner (copy of letter also included in appendix 1) to establish whether they are currently available for residential development and if they would be interested in allowing the applicant to purchase the site. This is therefore an assessment of whether they are available as a comparable site and therefore potentially sequentially preferred to the land off Raleigh Drive.
- 4.18. In writing to the owners (where the land is registered), only one response was received. A copy of the response is also provided in appendix 1. This confirmed that it was not available to the applicant as an alternative to this scheme. As no responses were received from the other registered owners, the applicant has therefore fully and robustly assessed the availability of the 22 potentially comparable sites within appendices 3 to 5 of the 2022 LAA. This is both with respect to the advice in the PPG and the SPD.
- 4.19. Additionally, as detailed above, the applicant has also considered whether the sites could accommodate a comparable scheme in terms of both the qualitative and quantitative contribution towards the Borough's housing needs.
- 4.20. The assessments results confirms that there are no comparable "reasonably available" sites to the application scheme when appraised taking account of the advice in the PPG and the SPD. Therefore, consistent with the guidance in the NPPF, the PPG, from the Environment Agency and the Council's Food Risk SPD, the scheme passes the sequential test.
- 4.21. This recognition that the proposal passes the sequential test is on the basis that a limited extent of the residential development could be in flood zone 2, whilst the majority is within flood zone 1. However, as indicated in the accompanying FRA, the flood zone 2 status of part of the site is a result of historic engineering on the site to provide the now obsolete bowling green. Through the application, this part of the site will be re-engineered to restore it to a natural profile which results in its inclusion in flood zone 1 (when the flood maps are redrawn). In such an instance, the sequential test as outlined in this statement is unnecessary. Therefore, although the scheme

passes the sequential test, after the re-engineering of the bowling green, the development proposed would not include dwellings outside flood zone 1.

- 4.22. As the scheme has passed the sequential test, the approach of the NPPF does not provide a justification for discounting the site and therefore the tilted balance within paragraph 11d of the NPPF applies.

Site Specific Flood Risk Assessment

- 4.23. As required by the Council's SFRA and NPPF paragraph 162 there is a need to undertake a sequential approach to design whereby the higher vulnerability uses are to be placed on the parts of the site at lower flood risk.

- 4.24. As illustrated in section 1, the eastern part of the site is located in flood zone 3 which is where open space (which is water-compatible development under Annex 3 to the NPPF) is envisaged. In the parts of the site within flood zones 1 and 2, residential development is envisaged. Accordingly, a sequential approach to design has been achieved on the proposed scheme. This is notwithstanding the re-profiling of the obsolete bowling green within the application which would result in the location of all dwellings being within flood zone 1.

Appendix 1 – Further information of sites assessed in detail through sequential assessment

For the 22 sites identified for further review from appendices 3 to 5 of the LAA, the table below provides the registered owners (where listed in Land Registry records). The applicant has discounted sites which were unable to provide a similar number of houses as this would not meet the identified housing needs.

Copy of the Letter sent on 24th October 2022

The Mitfords
Basingstoke Road
Three Mile Cross
Reading
RG7 1AT

Tel: 01189 884923

Email: office@woolfbond.co.uk



Woolf Bond Planning
Chartered Town Planning Consultants

«Name»
«address1»
«address2»
«address3»
«address4»
«address5»

24th October 2022

My ref GR/SB/7679

**QUERY REGARDING AVAILABILITY OF LAND PROMOTED WITHIN ELMBRIDGE
BOROUGH**

Dear «Dear»,

We are currently supporting proposals for around 60 dwellings on a site in Claygate. However, the site is partly located within an area of flood risk, and therefore, having regard to national and local planning policy we need to consider if there are any alternative sites available for the proposed development in Elmbridge Borough.

We note that «Site_name» is considered in the Council's 2020 Land Availability Assessment (LAA) (Site ref «LPA_Ref») and a review of the land registry details indicates that this site is within your control (Land registry title no. «Land_reg» with the sites' description as «site_name_in_land_registry»). The site is shown on the enclosed map from the Council's LAA.

On this basis, could you please advise the state of any development proposals at the site, if the site is currently available for development and whether this would include a scheme involving a mix of flats and houses.

I would be grateful if you could respond at your earliest opportunity and ideally before 11th November 2022, either via letter or email to [REDACTED]

Yours «Salutation»,

Graham Ritchie

Graham Ritchie.

Enc

Table of contact details for letter.

LPA Ref	Site name	Area (ha)	Capacity (net)	Name	address1	address2	address3	address4	address5
US178	Sainsbury's car park, Bridge Way, Cobham, KT11 1HW	1.03	58	Sainsbury PropCo A Ltd	33 Holborn	London	EC1N 2HT		
US279	Esher Place, 30 Esher Place Avenue, Esher, KT10 8PZ	2.8	22	Unite The Union Trustee Company Ltd	2-6 Cannon Street	London	EcC4M 6YH		
US287	15 Clare Hill Esher KT10 9NB	1.35	55	Liberty Worldwide Investments Inc	c/o The National Bank of Abu Dhabi	2 Albert Gate	Knightsbridge	London, SWiX 7PE	SW1X 7PE
US287	15 Clare Hill Esher KT10 9NB	1.35	55	K.M.J.A. Aldhaheri, A.M.J.A. Aldhaheri, M.M.J.A. Aldhaheri & M.M.J.R. Albadi	c/o Trowers & Hamlins LLP	3 Bunhill Row	London	EC1Y 8YZ	
US326	9-21a High Street, Walton-on-Thames	0.24	71	Zahawi & Zahawi Ltd	Oaklands Stables	Shipstone Road	Upper Tysoe	Warwick	CV35 0TR
US33	River Mole Business Park, Mill Road, Esher, KT10 8BJ	2.1	200	Elmbridge Borough Council	Civic Centre	High Street	Esher	KT10 9SD	
US350	Leylands House, Molesey Road, Walton-on-Thames, KT12 3PW	0.31	56	Mr P.E. Alderson & Mr R.G. Alderson	Columbian House	Unit 2	Pool Road	West Molesey	KT8 2NZ
US350	Leylands House, Molesey Road, Walton-on-Thames, KT12 3PW	0.31	56	Paragon Asra Housing Ltd	Third Floor	Pentagon House	52-54 Southwark Street	London	SE1 1UN
US356	Station Avenue Car Park, Station Avenue, Walton-on-Thames	0.59	50	Elmbridge Borough Council	Civic Centre	High Street	Esher	KT10 9SD	

*Flooding Sequential Test Statement (Appendix 1) – March 2023
Land off Raleigh Drive, Esher*

LPA Ref	Site name	Area (ha)	Capacity (net)	Name	address1	address2	address3	address4	address5
US379	Hersham Shopping Centre, Molesey Road, Hersham	1.55	200	Centrica Combined Common Investment Fund Ltd	Millstream	Maidenhead Road	Windsor	SL4 5GD	
US407	Foxholes, Weybridge KT13 0BN	4.1	78	Paragon Asra Housing Ltd	Leathermarket	Weston Street	London	SE1 3ER	
US435	Car Park next to Waterloo Court, Mayfield Road, Hersham, Walton-on-Thames	0.63	62						
US456	Molesey Community Hospital, High Street, KT8 2LU	0.73	70	NHS Property Services Ltd	99 Gresham Street	London	EC2V 7NG		
US462	Sundial House, The Molesey Venture, Orchard Lane, East Molesey, KT8 0BN	0.62	61	The Sons of Divine Providence	13 Lower Teddington Road	Hampton Wick	Kingston upon Thames	KT1 4EU	
US475	Willow House, Mayfair House and Amberhurst, Claremont Lane, Esher, KT10 9DW	0.5	57	Mr D.H. Blair and Mrs V.Blair	Amberhurst	1 Broom Close	Esher	KT10 9ET	
US475	Willow House, Mayfair House and Amberhurst, Claremont Lane, Esher, KT10 9DW	0.5	57	Mr L.B. Lillie	4A Claremont Lane	Esher	KT10 9DW		
US475	Willow House, Mayfair House and Amberhurst, Claremont Lane, Esher, KT10 9DW	0.5	57	Ms A.V. Quashie & Mr A Asimakis	Willow House	4B Claremont Lane	Esher	KT10 9DW	
US531	Civic Centre, High Street, Esher, KT10 9SD	2.71	400	Elmbridge Borough Council	Civic Centre	High Street	Esher	KT10 9SD	
US72	Courtlands & 1-5 Terrace Road, Walton-on-Thames	0.44	63	Courtlands Manor Road Ltd	19 Station Road	Addlestone	KT15 2AL		
US72	Courtlands & 1-5 Terrace Road, Walton-on-Thames	0.44	63	Sorbon Estates Ltd	Sorbon	Aylesbury End	Beaconsfield	HP9 1LW	

*Flooding Sequential Test Statement (Appendix 1) – March 2023
Land off Raleigh Drive, Esher*

LPA Ref	Site name	Area (ha)	Capacity (net)	Name	address1	address2	address3	address4	address5
US84	Elm Grove, 1 Hershams Road, Walton-on-Thames, KT12 1LH	1	70	Elmbridge Borough Council	Civic Centre	High Street	Esher	KT10 9SD	
US92	GlaxoSmithKline, St. Georges Avenue, Weybridge, KT13 0DE	2.58	100	GlaxoSmithKline Consumer Healthcare (UK) Trading Ltd	G S K House	980 Great West Road	Brentford	TW8 9GS	

Copy of response to letters (email addresses omit for data protection)

Email received on 26th October 2022

Graham,

I have been forwarded the attached letter that you sent to my client, Centrica Combined Common Investment Fund Ltd. LaSalle acts as discretionary investment manager for CCCIF's investment property portfolio.

We are currently working in partnership with a development manager to assess the viability of redeveloping the Hersham site, for which we are actively engaging with Elmbridge Borough Council. We are not seeking any further partners or stakeholders in relation to this project/site.

Regards,

Tom Lewis

Fund Manager

LaSalle

Appendix 2 – Review of potential suitability of sites listed in Appendix 2 of the Council’s LAA (2022)

Appendix 2 of the Council’s 2022 LAA details those sites with planning permission at 1st April 2022 for which development had not commenced. These are listed in the table below together with the review by the applicant as to whether they could be a reasonable alternative to the application site on land off Raleigh Drive, Esher. As indicated in the main assessment statement, the applicant only considers that sites with a capacity of between 50 and 100 dwellings (net) could be a reasonable alternative. Such a range having regard to the approved capacity is reflective of the first bullet in paragraph 3.3.7 of the Council’s Flood Risk SPD and is also consistent with the PPG.

As no sites have permission for just open space, there are no alternatives to this component of the proposal.

App No.	Address	Dwellings (Net)	Applicant’s initial assessment of whether reasonable alternative
2019/1660	1 Octagon Road Whiteley Village Hersham Walton-On-Thames Surrey KT12 4EG	-1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/1399	4 High Street West Molesey KT8 2NA	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/0213	17 Thrupps Lane Hersham Walton-On-Thames KT12 4LX	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/2260	Land South of 50 Primrose Road Hersham Walton-On-Thames KT12 5JD	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/2474	19 Baker Street Weybridge Surrey KT13 8AE	5	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.

App No.	Address	Dwellings (Net)	Applicant's initial assessment of whether reasonable alternative
2018/2847	Station House, The Parade Claygate Esher Surrey, KT10 0PB	8	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/0562	Land rear of 32 and 33 Spring Gardens West Molesey Surrey KT8 2JA	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/0515	19 Bridge Road, East Molesey, Surrey KT8 9EU	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/1975	594 Walton Road West Molesey Surrey KT8 2EH	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/3392	Queensgate House South Road Weybridge Surrey KT13 9DZ	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/2556	10 Britain Road Hersham Walton-On-Thames KT12 4LR	3	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/0187	Warehouse 47 Thames Street Weybridge Surrey KT13 8JG	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/1417	39 Charlton Avenue Hersham Walton-On- Thames KT12 5LE	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/2800	1-12 Woodsome Lodge Weybridge KT13 0DH	4	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/3831	Land Northwest of 40 West End Lane Esher KT10 8LA	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.

App No.	Address	Dwellings (Net)	Applicant's initial assessment of whether reasonable alternative
2019/0039 2019/2470	152 High Street West Molesey KT8 2LX	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/1447	Childs Play Centre Manor Road Walton-On-Thames KT12 2PH	8	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/0271 2019/2201 2019/3494	Horsley Bungalow Old Avenue Weybridge KT13 0PS	3	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/2263	Land East of 13A Station Avenue Walton-On-Thames KT12 1NF	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/0039	85 High Street Esher KT10 9QA	3	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/3671	Site of 45 to 55 Waverley Road 1 and 3 Lyfield and 4 to 10 Webster Close Oxshott	11	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/2649	St Michaels 31 Oatlands Chase Weybridge KT13 9RP	6	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/0254	88 Hurst Road East Molesey KT8 9AH	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/1028	6 Winterdown Road Esher KT10 8LJ (Scheme D)	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/3228	21A High Street Walton-On- Thames KT12 1DG	3	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.

App No.	Address	Dwellings (Net)	Applicant's initial assessment of whether reasonable alternative
2019/1676	97 Terrace Road Walton-On-Thames KT12 2SG	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/2694	Bevendean Cottage Warren Lane Oxshott Leatherhead KT22 0SU	8	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/1713	45A Walton Road East Molesey KT8 0DP	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/1258	Nyumbani Ruxley Crescent Claygate Esher KT10 0TZ	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/1161 2020/1081	29 Walton Road East Molesey KT8 0DH	4	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/3323	14 Waverley Road Stoke D'Abernon Cobham KT11 2SS	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/0915	56 Thistledene Thames Ditton KT7 0YJ	3	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/2350	3 New Road Esher KT10 9PG	5	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/3678	1-5 Hillside Portsmouth Road Esher KT10 9LJ	13	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/1160	Ansell Hall Oakbank Avenue Walton-On-Thames KT12 3RB	10	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.

App No.	Address	Dwellings (Net)	Applicant's initial assessment of whether reasonable alternative
2019/1759 2020/1149 2020/1657 2021/3050	8 Holtwood Road Oxshott Leatherhead Surrey KT22 0QJ	4	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/2606	Building B St Georges Business Park Brooklands Road Weybridge KT13 ORH	30	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/2607	Unit C St Georges Business Park Brooklands Road Weybridge KT13 OTS	18	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/2749	Land South of 23 Claremont Road Claygate Esher	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/3490	No. 38 (Chenies) and No. 41 (Chantry) Twinoaks Cobham KT11 2QP	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/2711	1 Manor Road East Molesey KT8 9JU	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/1757	Kingdom Hall 70 High Street West Molesey KT8 2LY	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/3232	Building A Benchmark House 203 Brooklands Road Weybridge KT13 ORH	60	The initial assessment indicates that this site could be a comparable to the application scheme since its approved capacity is within the range of 50 to 100 dwellings. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
2019/3254	The Courtyard 95 Hersham Road Walton-On-Thames KT12 1RN	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.

App No.	Address	Dwellings (Net)	Applicant's initial assessment of whether reasonable alternative
2019/2010	3 Oxshott Rise Cobham KT11 2RW	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/2477	Huntingdon Lodge Cavendish Road St George's Hill Weybridge Surrey KT13 0JZ	-1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/1648	7 Hawkhurst Cobham KT11 2QX	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/2785	Land East of 4 and 4A Castleview Road Weybridge KT13 9AB	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/2378	5 Central Avenue West Molesey KT8 2QX	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/0937	Site of 95 Queens Road Hersham Walton-On-Thames KT12 5LA	8	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/3622	7B High Street Cobham KT11 3DH	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/1227	Land to the rear of no 3 The Mount Esher KT10 8LQ	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/1827	Land East of Touchwood 9 Broom Close Esher	7	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/1971	1 Red House Lane Walton-On-Thames KT12 1EF	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.

App No.	Address	Dwellings (Net)	Applicant's initial assessment of whether reasonable alternative
2019/3567	Land West of 54 Claygate Lane Esher KT10 0BJ	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/2119	Warling Dean 33 New Road Esher KT10 9PG	12	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/1939	41 Onslow Road Hersham Walton-On-Thames KT12 5BA	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/3606	Land South of 8 Arnison Road East Molesey KT8 9JJ	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/3248	11 Oatlands Close Weybridge KT13 9ED	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/1257	10 Old Farmhouse Drive Oxshott Leatherhead KT22 0EY	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/0747 2018/3152	96 Walton Road East Molesey KT8 0DL	5	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/0329	Site of Crow Gables 131 Fairmile Lane Cobham KT11 2BU	74	The initial assessment indicates that this site could be a comparable to the application scheme since its approved capacity is within the range of 50 to 100 dwellings. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
2020/0824	52 High Street Esher KT10 9QY	3	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/0153	Dalveen Lodge Sandy Lodge Cobham KT11 2EP	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.

App No.	Address	Dwellings (Net)	Applicant's initial assessment of whether reasonable alternative
2019/1764	35 Ashley Drive Walton-On-Thames KT12 1JT	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/0145	Admiral Rodney House 17 Church Street Walton-On-Thames Surrey KT12 2QT	3	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/2134	Site of Claygate House Littleworth Road Esher KT10 9PN	51	The initial assessment indicates that this site could be a comparable to the application scheme since its approved capacity is within the range of 50 to 100 dwellings. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
2019/2469	32 Green Lane Cobham KT11 2NN	3	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/0575	Land East of 82 Island Farm Road West Molesey KT8 2LQ	5	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/1575	Land South of 75 and North of Copse Mews St Marys Road Weybridge KT13 9PZ	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/2381	Station House The Parade Claygate Esher Surrey KT10 0PB	9	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/0627	21 Station Avenue Walton-On-Thames KT12 1NF	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/1450	Crown House 2 Church Street Walton-On-Thames KT12 2QS	3	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/3272	Britannia House Pool Road West Molesey KT8 2AB	75	The initial assessment indicates that this site could be a comparable to the application scheme since its approved capacity is within the range of 50 to 100 dwellings. A further assessment is necessary, including

App No.	Address	Dwellings (Net)	Applicant's initial assessment of whether reasonable alternative
			whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
2020/1656	37 Onslow Road Hersham Walton-On-Thames Surrey KT12 5BA	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/2695 2020/3278 2020/2483	Abbey House Wellington Way Weybridge KT13 OTT	34	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/3239	27 Meadow Road Claygate Esher KT10 ORZ	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/2680	Site of 363 to 367 Molesey Road Walton-On-Thames	8	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/2552	1 High Street Oxshott Leatherhead KT22 OJN	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/2745	Birch Mead The Ridgeway Oxshott Leatherhead KT22 OLJ	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/3409	22 Southville Road Thames Ditton KT7 OUL	-1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/1524	Land to Rear of 43 Oatlands Chase Weybridge KT13 9RP	3	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/2309	9 Leigh Court Close Cobham KT11 2HT	4	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.

App No.	Address	Dwellings (Net)	Applicant's initial assessment of whether reasonable alternative
2020/1246	61A Carlton Road Walton-On-Thames KT12 2DQ	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/2903	70 Fairmile Lane Cobham KT11 2DE	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/3601	Thamesview House Felix Road Walton-On-Thames KT12 2SL	33	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/1438	10 Ship Yard Weybridge Surrey KT13 8BH	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/3345 2021/2626	Members Hill Brooklands Road Weybridge KT13 0QU	57	The initial assessment indicates that this site could be a comparable to the application scheme since its approved capacity is within the range of 50 to 100 dwellings. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
2020/2299	1 & 2 Orchard Cottages Weybridge KT13 9NW	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/0766	27B High Street Weybridge KT13 9AX	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/2569	412 Walton Road West Molesey KT8 2JG	38	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/0862	5 High Street Esher KT10 9RL	3	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/2095	4 Littleworth Road Esher KT10 9FP	62	The initial assessment indicates that this site could be a comparable to the application scheme since its approved capacity is within the range of 50 to 100 dwellings. A further assessment is necessary, including

App No.	Address	Dwellings (Net)	Applicant's initial assessment of whether reasonable alternative
			whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
2020/3340	32 Hersham Road Walton-On-Thames KT12 1UX	3	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/2423	42 High Street Walton-On-Thames KT12 1BZ	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/1106 2021/1103	40 Baker Street Weybridge KT13 8AR	6	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/1218	11 St Marys Long Ditton KT6 5EU	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/1708	20 The Drive Cobham KT11 2JQ	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/0395	Two Oaks Castlevew Road Weybridge KT13 9AA	12	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/1194	2A Criterion Buildings Portsmouth Road Thames Ditton KT7 0SS	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/0691	8 Oatlands Drive Weybridge KT13 9JL	47	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/1403 2021/3417 2022/0091	Auckland House New Zealand Avenue Walton-On-Thames Surrey KT12 1PL	11	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.

App No.	Address	Dwellings (Net)	Applicant's initial assessment of whether reasonable alternative
2020/0832	Homebase New Zealand Avenue Walton-On-Thames KT12 1XA	209	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme. Whilst the capacity of the site exceeds that envisaged for the application, the proposal entails the delivery of apartments and a housing led scheme would not be appropriate for this town centre location. This is a further indication of why the site is not a reasonable alternative ⁴⁰ .
2020/0749	31 Hurstfield Road West Molesey KT8 1QU	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/0290	4 Churchfield Road Walton-On-Thames KT12 2TF	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/2078	9 Esher Road Hersham Walton-On-Thames KT12 4JZ	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/1306	37 Rectory Lane Long Ditton Surbiton KT6 5HP	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/2176	Greenways 46 Copsem Lane Esher KT10 9HJ	21	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/2416	Willow Cottage Ridgeway Close Oxshott Leatherhead KT22 0LQ	4	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/0582	Claremont House, 34 Molesey Road, Hersham, KT12-4RQ	6	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.

⁴⁰ This application was allowed on appeal on 21st June 2021. Paragraph 17 of the appeal decision highlights that the built form of the proposal would mirror that of the opposite side of the road in the town centre. Paragraph 18 references that the proposal includes 8 storey building. It is therefore not off a similar built form to the application scheme.

App No.	Address	Dwellings (Net)	Applicant's initial assessment of whether reasonable alternative
2021/1552	85 Queens Road Weybridge KT13 9UQ	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/1948	205 Brooklands Road Weybridge KT13 OTS	28	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/1954	203 Brooklands Road Weybridge KT13 ORH	24	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/0826	360 Walton Road West Molesey KT8 2JE	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/2579	Beechwood Court Station Avenue Walton-On-Thames KT12 1LT	10	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/2591	Walton Lodge Bridge Street Walton-On-Thames KT12 1BT	20	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/2696	6 Snellings Road Hersham Walton-On-Thames KT12 5JG	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/2005	Units1 & 2 Hampton Court Estate Summer Road Thames Ditton KT7 ORG	78	The initial assessment indicates that this site could be a comparable to the application scheme since its approved capacity is within the range of 50 to 100 dwellings. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
2021/2625	Idis House Churchfield Road Weybridge KT13 8DB	24	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/1795	Merrywood Weston Green Thames Ditton KT7 0JZ	25	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.

App No.	Address	Dwellings (Net)	Applicant's initial assessment of whether reasonable alternative
2021/2043	Unit C St Georges Business Park Brooklands Road Weybridge KT13 OTS	6	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/2890	4 Queens Road Hersham KT12 5LS	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/1950	Building C 207 Brooklands Road Elder House Weybridge KT13 ORH	20	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/2561	Garage Block East of 12 Arran Way Esher KT10 8BE	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/2562	Garage Block West of 11 Arran Way Esher KT10 8BE	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/2563	Garage Block North of 47 and West of 49 Douglas Road Esher KT10 8BA	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/2557	Howard House 70 Baker Street Weybridge KT13 8AL	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/2803	241 Brooklands Road Weybridge KT13 ORH	38	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/2805	243 Brooklands Road Weybridge KT13 ORH	20	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2019/1813	The Royal Cambridge Home, 82-84 Hurst Road East Molesey KT8 9AH (C2)	62	The initial assessment indicates that this site could be a comparable to the application scheme since its approved capacity is within the range of 50 to 100 dwellings. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.

App No.	Address	Dwellings (Net)	Applicant's initial assessment of whether reasonable alternative
2021/2004	Land East of Fairmead Evelyn Way Stoke D'Abernon Cobham KT11 2SJ	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/2096	White Lodge Hogshill Lane Cobham KT11 2AL	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/1222	145 Hersham Road Hersham Walton-On-Thames KT12 5NR	16	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/3551	32-34 High Street Walton-On-Thames KT12 1BZ	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/2032	6 The Heights Weybridge KT13 OXP	10	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/0160	16 Stevens Lane Claygate Esher KT10 OTE	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/0092	7 Ashley Road Walton-on-Thames KT12 1HY	16	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/0183	Land at Downside Road Cobham KT11 3LY	26	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/3182	1 Berry Lane Hersham KT12 4HN	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/3413	9 Water Lane Cobham KT11 2PA	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.

App No.	Address	Dwellings (Net)	Applicant's initial assessment of whether reasonable alternative
2021/2608	Garage Block South of 33 to 45 The Roundway Claygate Esher KT10 ODP	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/1923	18 Heath Ridge Green Cobham KT11 2QJ	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/2127	Linbridge Oatlands Avenue Weybridge KT13 9TR	3	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/4040	11 Cross Road Weybridge KT13 9NX	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/0202	Waterside Hampton Court Way East Molesey	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/0944	37 Homefield Road Walton-On-Thames KT12 3RE	8	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/4104	Foxholes Stokesheath Road Oxshott Leatherhead KT22 0PP	2	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/1972	Nusrat Lodge 1 Assher Road Hersham Walton-On-Thames KT12 4RA	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2022/0086	Beechcroft Manor Weybridge KT13 9NY	11	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2021/0201	16 Lakeside Drive Esher KT10 9EZ	1	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.

App No.	Address	Dwellings (Net)	Applicant's initial assessment of whether reasonable alternative
2020/1629	Garage Block South of 2 and 4 Wyndham Avenue Cobham KT11 1AT	3	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2018/2316	Land Northeast of 70 to 79 Berkeley Court Weybridge KT13 9HY	3	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
2020/3499	Garages and playground to the side and rear of 61- 69 Rodney Road 24-30 Ambleside Avenue 10-12 Edgehill Court and Flats 7-11 12-14 St Johns Drive Surrey	6	This is not a reasonable alternative to the application site, as the quantum approved is not within the range of 50 to 100 dwellings. The site with permission therefore cannot be regarded as a reasonable alternative to the application site and scheme.
Total		1,582	

Appendix 3 – Review of potential suitability of sites listed in Appendices 3-5 of the Council’s LAA (2022)

Appendices 3 to 5 of the Council’s 2022 LAA details those sites promoted for development but do not have planning permission at 1st April 2022.

The sites listed in appendices 3 to 5 of the LAA are shown in the table below together with the review by the applicant as to whether they could be a reasonable alternative to the application site on land off Raleigh Drive, Esher. As indicated in the main assessment statement, the applicant only considers that sites with a capacity of between 50 and 100 dwellings or extending to a site area of at least 1.3ha could be a reasonable alternative. Such a range having regard to the approved capacity is reflective of the first bullet in paragraph 3.3.7 of the Council’s Flood Risk SPD and is also consistent with the PPG.

As no sites in these appendices of the LAA have been promoted for just open space, there are no alternatives to this component of the proposal.

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant’s initial assessment of whether reasonable alternative
US3	Torrington Lodge Car Park, Hare Lane, Claygate	0.32	8	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US155	Garages to the rear of Holroyd Road, Claygate	0.08	3	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US156	Garages to the rear of Foxwarren, Claygate	0.12	5	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US159	Garages to the rear of 6-24 Lockhart Road, Cobham	0.1	4	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
				LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US162	Site B, Wyndham Avenue, Cobham	0.06	4	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US165	Garages at Waverley Road, Oxshott	0.08	4	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US472	40 Fairmile Lane, Cobham, KT11 2DQ	0.19	13	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US492	Cedar House, Mill Road, Cobham, KT11 3AL	0.27	7	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US497	Cedar Road Car Park, Cedar Road, Cobham, KT11 2AA	0.05	5	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US521	4 Fernhill, Oxshott, KT22 0JH	0.13	6	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US522	52 Fairmile Lane, Cobham, KT11 2DF	0.28	7	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
US523	Pineview, Fairmile Park Road, Cobham, KT11 2PG	0.24	6	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US530	Garage block, Middleton Road, Downside	0.04	3	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US158	Garages to the rear of Blair Avenue, Esher	0.11	4	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US230	Car Park south of Southbank, Thorkhill Road, Thames Ditton	0.23	7	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US245	Brook House, Portsmouth Road, Thames Ditton, KT7 OEG	0.39	30	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US254	4-6 Manor Road South and 4 Greenways, Hinchley Wood	0.27	33	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US443	47 Portsmouth Road, Thames Ditton, KT7 OTA	0.36	25	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US462	Sundial House, The Molesey Venture, Orchard Lane, East Molesey, KT8 OBN	0.62	61	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha.

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
				A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
US495	Corner Cottage, Portsmouth Road, KT7 OTQ	0.09	5	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US503	89-90 Woodfield Road, Thames Ditton, KT7 ODS	0.07	7	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US506	Land to the rear of 5 Hinchley Way, Esher, KT10 OBD	0.19	6	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US516	Bransby Lodge, St Leonard's Road, Thames Ditton	0.18	5	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US524	Torrington, 18-20, St Mary's Road, Long Ditton, KT6 5EY	0.29	9	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US127	30 Copsem Lane, Esher, KT10 9HE	0.55	21	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US134	Hanover Cottage 6 Claremont Lane Esher KT10 9DW	0.31	12	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.

*Flooding Sequential Test Statement (Appendix 3) –March 2023
Land off Raleigh Drive, Esher*

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
US146	35 New Road, Esher, KT10 9DW	0.19	5	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US276	Cafe Rouge, Portsmouth Road, Esher, KT10 9AD	0.17	20	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US278	45 More Lane, Esher, KT10 8AP	0.26	25	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US279	Esher Place, 30 Esher Place Avenue, Esher, KT10 8PZ	2.8	22	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
US283	1-5 Milbourne Lane, Esher, KT10 9DU	0.36	25	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US286	Highwaymans Cottage Car Park, Portsmouth Road, Esher	0.18	9	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US475	Willow House, Mayfair House and Amberhurst, Claremont Lane, Esher, KT10 9DW	0.5	57	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
US481	6 Bracondale and 43 Claremont Lane, KT10 9EN	0.22	16	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
				LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US526	40 New Road, Esher, KT10 9NU	0.3	6	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US379	Hersham Shopping Centre, Molesey Road, Hersham	1.55	200	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
US441	63 Queens Road, Hersham, KT12 5LA	0.05	5	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US489	19 Old Esher Road, Hersham, KT12 4LA	0.06	5	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US517	Park House, Pratts Lane, Hersham, KT12 4RR	0.05	5	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US151	Garages to the rear of Belvedere Gardens, West Molesey	0.09	4	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US152	Garages to the rear of Island Farm Road, West Molesey	0.1	4	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
US299	East Molesey Car Park, Walton Road, East Molesey	0.4	23	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US507	133-135 Walton Road, East Molesey, KT8 ODT	0.11	8	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US509	2 Beauchamp Road, East Molesey, KT8 OPA	0.24	9	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US529	Garage block west of 14 and north of 15 Brende Gardens, West Molesey	0.05	4	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US135	12-16a High Street, Walton-on-Thames, KT12 1DA	0.08	24	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US166	Garages to the rear of 17-27 Field Common Lane Walton-On-Thames, KT12 3QH	0.08	3	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US326	9-21a High Street, Walton-on-Thames	0.24	71	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
US339	Walton Park Car Park, Walton Park, KT12 3ET	0.34	17	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
				LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US350	Leylands House, Molesey Road, Walton-on-Thames	0.31	56	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
US361	Garages adjacent to 1 Tumbling Bay, Walton-On-Thames	0.05	2	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US464	63-69 High Street, Walton-on-Thames, KT12 1DJ	0.13	28	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US487	16-18 Sandy Lane, KT12 2EQ	0.11	7	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US528	Garages to rear of 84-92 and 94-96 Rodney Road, Walton-on-Thames	0.06	4	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US117	9 and rear of 11 and 13 Hall Place Drive	0.32	7	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US395	Weybridge Hospital and car park, 22 Church Street Weybridge KT13 8DW	0.83	30	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
US416	Garages west of 17 Grenside, Weybridge	0.07	4	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US469	Heath Lodge, St George's Avenue, Weybridge. KT13 ODA	0.14	6	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US470	Oak House, 19 Queens Road, KT13 9UE	0.16	10	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US482	Land to the rear of 24-26 Church Street, Weybridge, KT13 3DX	0.05	15	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US496	Quadrant Courtyard, Weybridge, KT13 8DR	0.15	15	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US505	75 Oatlands Drive, Weybridge, KT13 9LN	0.22	9	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US520	Weybridge Centre for the Community, Churchfield Place, Weybridge, KT13 8BZ	0.06	8	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US525	8 Sopwith Drive, Brooklands Industrial Park, Weybridge, KT13 0YX	1.07	n/a	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
				LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US527	9 Cricket Way, Weybridge, KT13 9LP	0.35	5	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US2	Hare Lane Car Park, Hare Lane, Claygate	0.16	7	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US175	Claygate Centre, Elm Road, Claygate, KT10 0EH	0.28	14	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US160	Garages at Bennett Close, Cobham	0.06	3	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US164	Cobham Health Centre and Garages off Tartar Road	0.9	11	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US187	87 Portsmouth Road, Cobham, KT11 1JH	0.12	10	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US191	73 Between Streets, Cobham, KT11 1AA	0.68	40	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
US193	Glenelm and 160 Anyard Roads, Cobham, KT11 2LH	0.45	34	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US195	Cobham Village Hall and Centre for the Community, Lushington Drive, Cobham, KT11 2LU	0.83	37	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US460	1, 3 and 5 Goldrings Road, Oxshott, Leatherhead, KT22 0QP	0.9	32	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US493	Selden Cottage and Ronmar, Leatherhead Road, KT22 0EX	0.5	18	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US226	Sandpiper, Newlands Avenue, Thames Ditton, KT7 0HF	0.53	29	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US518	Thames Ditton Centre for the Community, Mercer Close, Thames Ditton, KT7 0BS	0.17	18	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US27	81 High Street, Esher, KT10 9QA	0.1	8	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US32	Windsor House, 34-40 High Street, Esher, KT10 9QY	0.14	8	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
				LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US33	River Mole Business Park, Mill Road, Esher, KT10 8BJ	2.1	200	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
US38	Units C and D, Sandown Industrial Park, Mill Road, Esher	0.21	10	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US39	Unit A & B Sandown Industrial Park, Esher, KT10 8BL	1.33	40	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
US157	Garages at Farm Road, Esher	0.1	3	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US274	Two Furlongs and Wren House, Portsmouth Road, Esher, KT10 9AA	0.21	10	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US282	42 New Road Esher KT10 9NU	0.23	6	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US288	Hawkshill Place Portsmouth Road Esher KT10 9HY	0.61	12	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
US519	Esher Library and land adjoining, Church Street, Esher, KT10 9NS	0.2	15	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US40	Hersham Day Centre and Village Hall, Queens Road, Hersham, KT12- 5LU	0.39	15	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US45	Car park to the south of Mayfield Road, Hersham	0.4	9	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US380	New Berry Lane car park, Hersham	0.11	7	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US153	11-27 Down Street, West Molesey, KT8 2TG	0.2	7	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US318	Vine Medical Centre 69 Pemberton Road East Molesey KT8 9LJ	0.11	7	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US456	Molesey Community Hospital, High Street, KT8 2LU	0.73	70	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
US498	7 Seymour Close and Land to rear of 103-113 Seymour Close, East Molesey, KT8 OJY	0.24	5	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
				LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US59	Halfway Car Park, Hershams Road, Walton-on-Thames	0.23	8	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the site is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US84	Elm Grove, 1 Hershams Road, Walton-on-Thames, KT12 1LH	1	70	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
US112	20 Sandy Lane, Walton-on-Thames, KT12 2EQ	0.1	7	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the site is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US168	Garages at Sunnyside, Walton-on-Thames	0.13	4	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the site is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US323	Bradshaw House Bishops Hill and Walton Centre for the Community, Manor Road, Walton-On-Thames KT12 2PB	0.47	18	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the site is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US471	147 Sidney Road, KT12 3SA	0.1	8	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the site is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US532	The Playhouse, Hurst Grove, Walton-on-Thames	0.21	20	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the site is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
US94	Locke King House, 2 Balfour Road, Weybridge	0.17	12	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US108	Weybridge Library, Church Street, Weybridge	0.13	30	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US397	Floors above Waitrose, 62 High Street, Weybridge KT13 8BL	0.17	9	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US403	HFCM House, New Road and 51 Prince's Road Weybridge KT13 9BN	0.08	6	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US411	York Road Car Park, Weybridge	0.12	8	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US6	Crown House, Church Road, Claygate, KT10 0BF	0.21	12	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US169	Claygate Station Car Park, The Parade	0.4	15	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US7	20 Stoke Road, Cobham	0.18	8	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
				LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US121	Oxshott Medical Practice and Village Centre Hall, Holtwood Road	0.81	10	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US124	St Andrew's Church, Oakshade Road, Oxshott, KT22 0LE	0.39	n/a	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US178	Sainsbury's car park, Bridge Way, Cobham, KT11 1HW	1.03	58	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
US183	BMW Cobham, 18-22 Portsmouth Road, Cobham	0.47	27	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US186	78 Portsmouth Road, Cobham	0.6	30	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US188	Ford Garage, 97 Portsmouth Road, Cobham, KT11 1JJ	0.3	21	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US189	Premier Service Station, 101 Portsmouth Road, Cobham, KT11 1JN U	0.1	7	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
S190	Shell Fairmile, 270 Portsmouth Road, Cobham KT11 1HU	0.14	10	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US194	Protech House, Copse Road, Cobham KT11 2TW	0.4	28	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US201	Tiltwood Care Home, Hogshill Lane, Cobham, KT11 2AQ	0.58	24	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US214	Above Waitrose, 16-18 Between Streets, Cobham KT11 1AF	0.67	20	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US215	38 Copse Road, Cobham, KT11 2TW	0.13	7	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US217	68 Between Streets and 7-11 White Lion Gate, Cobham	0.15	6	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US218	Coveham House, Downside Bridge Road and The Royal British Legion, Hollyhedge Road, Cobham	0.26	14	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US221	Garages and parking to the rear of Cobham Gate, Cobham	0.11	8	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
				LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US467	Ambleside, 3 The Spinney, Queens Drive, KT22 0PL	0.43	8	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US18	British Legion, Betts Way, Long Ditton, KT6 5HT	0.17	9	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US24	Flats 9-41 and Garages on Longmead Road, Thames Ditton, KT7 0JF	0.56	37	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US232	Nuffield Health Club, Simpson Way, Long Ditton	0.66	16	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US233	Nuffield Health car park, Simpson Way, Long Ditton	0.32	10	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US237	Ashley Road Car Park, Thames Ditton	0.21	14	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US248	School Bungalow, Mercer Close, Thames Ditton, KT7 0BS	0.2	10	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.

*Flooding Sequential Test Statement (Appendix 3) –March 2023
Land off Raleigh Drive, Esher*

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
US250	Community centres at the junction of Mercer Close and Watts Road, Thames Ditton	0.29	29	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US251	Old Pauline Sports Ground Car Park	0.85	35	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US260	46 St Marys Road, Long Ditton, KT6 5EY	0.25	5	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US265	5A-6A Station Road, Esher, KT10 8DY	0.09	5	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US271	118-120 Bridge Road East Molesey KT8 9HW	0.08	6	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US272	Industrial units at 67 Summer Road East Molesey KT8 9LX	0.17	12	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US280	St Andrews and Hillbrow House, Portsmouth Road, Esher, KT10 9SA	0.28	30	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US287	15 Clare Hill Esher KT10 9NB	1.35	55	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha.

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
				A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
US531	Civic Centre, High Street, Esher, KT10 9SD	2.71	400	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
US43	Hersham Technology Park (Air Products)	4.1	0	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
US374	Hersham Library, Molesey Road, Hersham, KT12 4RF	0.24	13	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US375	Volkswagen Ltd Esher Road Hersham KT12 4JY	0.46	27	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US376	Trinity Hall and 63-67 Molesey Road, Hersham	1.1	47	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US378	All Saints Catholic Church hall Queens Road Hersham KT12 5LU	0.08	8	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US389	Hersham sports and social club 128 Hersham Road Hersham KT12 5QL	0.12	8	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
US390	The Royal George 130-132 Hersham Road Hersham KT12 5QJ	0.12	15	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US435	Car Park next to Waterloo Court	0.63	62	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
US56	Joseph Palmer Centre, 319a Walton Road	0.5	60 (C2)	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
US296	5 Matham Road East Molesey KT8 0SX	0.41	23	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US302	43 Palace Road East Molesey KT8 9DN	0.27	18	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US306	Molesey Clinic and library, Walton Road, West Molesey, KT8 2HZ	0.14	10	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US309	Water Works south of Hurst Road, West Molesey	0.31	14	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US312	Henrietta Parker Centre, Ray Road, West Molesey	0.51	13	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
				LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US315	Parking /garages at Grove Court Walton Road East Molesey KT8 0DG	0.11	7	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US317	Tesco Metro car park, Walton Road, East Molesey	0.21	11	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US319	Pavilion Sports Club car park Hurst Lane East Molesey KT8 9DX	0.34	9	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US72	Courtlands & 1-5 Terrace Road, Walton-on-Thames	0.44	63	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
US79	Regnolruf Court, Church Street, Walton-on-Thames, KT12 2QT	0.23	7	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US321	Case House 85-89 High Street Walton On Thames KT12 1DZ	0.32	28	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US324	Manor Road Car Park, Manor Road, Walton-on-Thames, KT12 2QN	0.29	31	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.

LPA Ref	Site name	Area (ha)	Capacity (net)	Applicant's initial assessment of whether reasonable alternative
US325	Garages to the rear of 8 Sidney Road, Walton-on-Thames	0.07	8	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US327	Bridge Motor Works, New Zealand Avenue, Walton-On-Thames, KT12 1AU	0.29	35	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US331	Land to the rear of 60-70 Sandy Lane, Walton-on-Thames	0.16	8	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US335	Garages at Home Farm Gardens, Walton-on-Thames	0.11	6	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US346	Garages at Collingwood Place, Walton-on-Thames	0.19	9	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US348	Cornerstone Church, 38 Station Avenue, Walton-On-Thames, KT12 1NU	0.17	30	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US351	Land north of Mellor Close, Walton-on-Thames, KT12-3RX	0.2	5	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US352	Fire/Ambulance station Hersham Road Walton-On-Thames KT12 1RZ	0.52	21	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the

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US353	Fernleigh Day Centre Fernleigh Close Walton-On-Thames KT12 1RD	0.61	19	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US354	P G S Court, Halfway Green, Walton-on-Thames, KT12 1FJ	0.67	23	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US356	Station Avenue Car Park, Station Avenue, Walton-on-Thames	0.59	50	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
US357	Rylton House, Hershams Road, Walton-On-Thames	0.23	8	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US360	Walton Comrades Club, 7 Franklyn Road, Walton-On-Thames, KT12 2LF	0.14	16	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US363	Unit Rear of and 12-14 Sandy Lane Walton-On-Thames KT12 2EQ	0.11	9	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US366	Garages off Copenhagen Way, Walton-on-Thames	0.14	7	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.

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US370	The Heath Centre, Rodney Road, Walton-on-Thames, KT12 3LB	1.2	36	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US372	1 Cleveland Close, Walton-On-Thames, KT12 1RB	0.1	8	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US92	GlaxoSmithKline, St. Georges Avenue, Weybridge, KT13 0DE	2.58	100	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.
US93	Horizon Business Village, Brooklands Road, Weybridge, KT13 0TJ	1.9	n/a	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha. A further assessment is necessary, including whether the type of development feasible on the site would be comparable to the housing led scheme envisaged in the application.
US107	Weybridge Delivery Office, Elmgrove Road, Weybridge	0.09	5	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US110	The Heights, Weybridge	20	n/a	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha. A further assessment is necessary, including whether the type of development feasible on the site would be comparable to the housing led scheme envisaged in the application.
US125	Baker Street Car Park, Weybridge	0.12	7	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US391	Woodlawn, Hanger Hill and 2 Churchfields Avenue, Weybridge, KT13 9XU	0.48	11	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the

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US393	The Old Warehouse, 37A Church Street, Weybridge KT13 8DG	0.08	5	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US394	NHS North West, 58 Church Street, Weybridge KT13 8DP	0.26	19	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US398	1-8 Dovecote Close, Weybridge, KT13 8PW	0.47	7	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US402	1 Princes Road Weybridge KT13 9TU	0.27	19	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US404	2-8 Princes Road Weybridge KT13 9BQ	0.19	10	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US406	179 Queens Road Weybridge KT13 0AH	0.41	9	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US407	Foxholes, Weybridge KT13 0BN	4.1	78	The initial assessment indicates that this site could be a comparable to the application scheme since its LAA capacity is within the range of 50 to 100 dwellings and/or its site area exceeds 1.3ha. A further assessment is necessary, including whether the type of units feasible on the site would be comparable to the housing led scheme envisaged in the application.

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US410	Oatlands car park, Oatlands Drive, Weybridge	0.16	8	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US417	Garages to the rear of Broadwater House Greside Road Weybridge KT13 8PZ	0.12	20	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US419	35-47 Monument Hill, Weybridge KT13 8RN	0.57	20	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US420	59-65 Baker St, Weybridge KT13 8AH	0.14	14	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US421	181 Oatlands Drive, Weybridge KT13 9DJ	0.17	12	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US424	Weybridge Bowling Club 19 Springfield Lane Weybridge KT13 8AW	0.21	11	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US429	Garages at Brockley Combe, Weybridge	0.23	7	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
US431	Shell Petrol Filling Station 95 Brooklands Road Weybridge KT13 ORP	0.18	5	This is not a reasonable alternative to the application site, as the quantum envisaged in the LAA is not within the range of 50 to 100 dwellings or the area of the is at least 1.3ha. The site within the

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				LAA therefore cannot be regarded as a reasonable alternative to the application site and scheme by virtue of comparability to the type of development.
