
Appeal Statement

16-18 Oatlands Drive, Weybridge

LPA reference: 2022/3796

Prepared by Savills on behalf of The Ridge (Oatlands)
LLP

January 2024

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Appendix 1: Site and Surroundings Context extract from Design and Access Statement

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Appendix 5: New Elmbridge Local Plan (Submission Version) August 2023

Appendix 6: Elmbridge Borough Council's Establishing Local Housing Need report (May 2022)

Appendix 7: Planning Inspectorate decision letter in respect of proposals at 8-14 Oatlands Drive

1. Introduction

1.1 Savills has been instructed by The Ridge (Oatlands) LLP (“the Appellant”) to submit an appeal under Section 78 of the Town and Country Planning Act 1990 against the decision by Elmbridge’s Planning Committee to refuse a full planning application despite Officers at Elmbridge Borough Council (EBC) supporting the proposals and recommending it for approval. The appeal relates to the following development proposals.

“Development of 2 detached blocks comprising 33 flats with new vehicular access, associated parking, cycle storage, refuse storage and amenity areas with hard and soft landscaping, and associated engineering and infrastructure works, following demolition of existing houses”

1.2 The application was submitted in December 2022 before being registered on 19th January 2023 under application reference 2022/3796. After almost a whole year of rigorous assessment by the Council’s professional planning officers in relation to a variety of matters, the application was heard at the Council’s Planning Committee Meeting on 14th November 2023. The application was recommended for approval by Officers. However against this advice, a majority of Members of the Planning Committee voted to refuse the application. The decision notice was issued on 16th November 2023. The reasons for refusal given were as follows:

- 1. The proposed development, by reason of its mass and scale would be out of keeping and detrimental to the character of the area when viewed from both Oatlands Drive and the Engine River in conflict with Policy DM2 of the Development Management Plan 2015 and the NPPF.*
- 2. The proposed development fails to enhance the existing landscape or integrate with the surrounding Cowey Sale and Engine River, in conflict with Policy DM6 of the Development Management Plan 2015.*

1.3 This Statement will demonstrate that the reasons for refusal are unjustified and that planning permission should be granted as per the recommendation of the Council’s Planning Officers. This Statement should be read in conjunction with the submitted application drawings and technical reports listed below, which accompany the appeal submission.

- Planning Application Forms & Certificates, prepared by Savills;
- CIL Additional Information Form 1, prepared by Savills;
- Site Location Plan, prepared by MAYD Architecture;
- Planning Application Drawings, prepared by MAYD Architecture;
- Planning Statement including Statement of Community Involvement, prepared by Savills;

- Design and Access Statement, prepared by MAYD Architecture;
- Flood Risk Assessment and Drainage Strategy, including a Sequential Test, prepared by Lanmor Consulting;
- Archaeological Desk-based Assessment, prepared by L-P Archaeology;
- Transport Statement, prepared by Lanmor Consulting;
- Travel Plan and Impact Assessment, prepared by Lanmor Consulting;
- Tree Survey and Impact Assessment, prepared by Keen Consultants;
- Tree Protection Plan, prepared by Keen Consultants;
- Tree Constraints Plan, prepared by Keen Consultants;
- Landscape Masterplan, prepared by Keen Consultants;
- Ecological Report, including BNG Technical Note, prepared by AA Environmental;
- Financial Viability Appraisal, prepared by S106 Management Ltd; and
- Sustainability and Energy Statement, prepared by Envision.

1.4 In addition to the documents submitted as part of the original planning application, and in response to the reasons for refusal, the appeal submission is accompanied by a set of additional CGI's, a photomontage, and an additional, focussed elevation drawing that illustrates several key dimensions. These materials are submitted for illustrative purposes only and to assist the Inspector. They are not intended to be approved drawings.

Structure of this Statement

1.5 This Appeal Statement is set out under the following further sections:

- **Section 2** outlines the site and its context within the surrounding area;
- **Section 3** provides an overview of the site's planning history and background to the appeal;
- **Section 4** provides an outline of the proposals;
- **Section 5** sets out the planning policy context for the site;
- **Section 6** sets out the Grounds for Appeal;
- **Section 7** details the Planning Conditions, Developer Contributions: Planning Obligations and Community Infrastructure Levy; and
- **Section 8** draws together the conclusions.

2. The Appeal Site and Surrounding Area

2.1 This section provides a brief description of the appeal site and the immediate surrounding area.

The Appeal Site

2.2 The appeal site comprises two existing residential dwellinghouses, 16 and 18 Oatlands Drive, and their plots including land to the front, sides and rear. The site, which is comprised of both existing plots, is broadly rectangular in shape and fronts on to Oatlands Drive. Both plots are currently serviced via separate vehicular accesses from Oatlands Drive. An extract of the submitted Site Location Plan is provided at **Figure 2.1** below.



Figure 2.1. Site Location Plan

2.3 **Figure 2.2** below shows the Proposed Site Context Plan, which also includes the adjacent development at 8-14 Oatlands Drive to the northeast of the site. Works to construct the consented development at 8-14 Oatlands Drive are substantially progressed and the development (described in more detail below) must be considered part of the existing context.

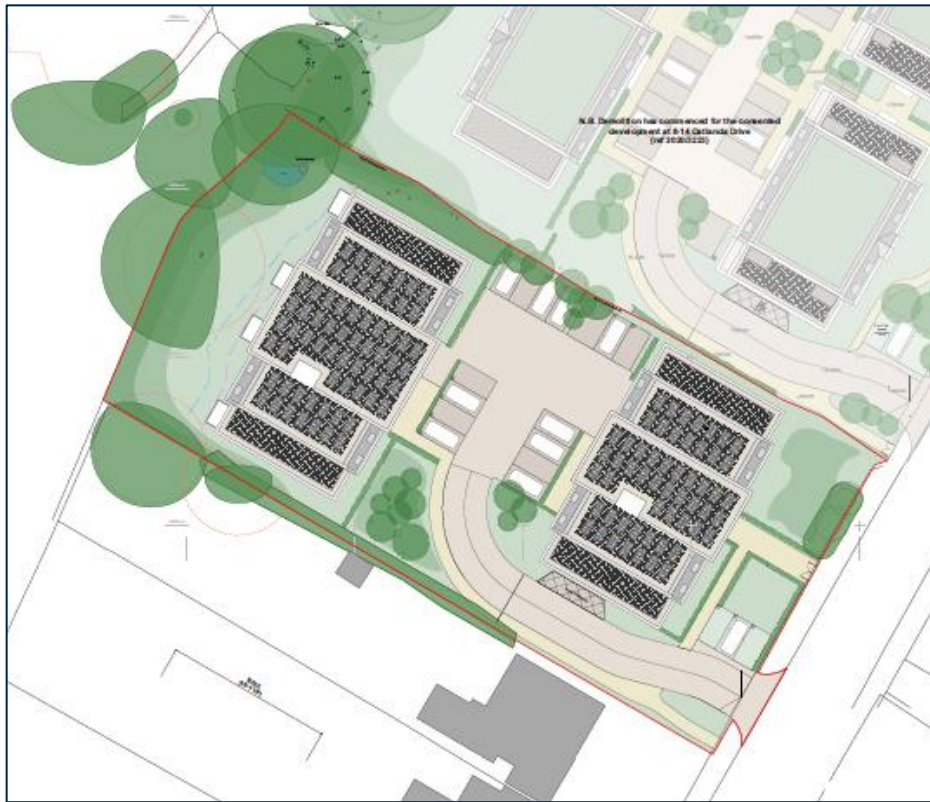


Figure 2.2 Proposed Site Context Plan

- 2.4 The site measures approximately 0.35 hectares and is both wide and deep, 40m wide and 86m deep. No 16 Oatlands Drive (furthest north) is a substantial 4 bedroom bungalow with a pitched roof, set back from Oatlands Drive behind a driveway. No 18 Oatlands Drive, to the south, which is the larger of the two properties, is a two storey 6 bedroom house with a garage, set back again from the highway behind a driveway. Both properties maintain the consistent building line found in this part of Oatlands Drive. The gradient of the site falls away steeply from Oatlands Drive towards the rear boundary of both gardens. Neither of the two buildings are listed and the site is not located within a Conservation Area. On the opposite side of Oatlands Drive, numbers 1 and 3 Oatlands Drive are Grade II Listed Buildings.
- 2.5 To the north of the site lies 8-14 Oatlands Drive, a site which previously contained four individual dwellinghouses, which is currently being redeveloped to provide 51 units of residential accommodation in the form of a flatted scheme in four separate blocks. To the rear of the site on the northwest and western side, lies woodland and the Engine River pond, a branch of the Thames. The Engine River is located within the River Thames Policy Area, although the site itself falls outside of this designated area. Beyond the pond is thick woodland and then a green space known as Cowey Sale, which is designated Metropolitan Green Belt. Beyond this lies the River Thames, approximately 260m to the west of the site.

- 2.6 Along the north and the western edges of the site, there are several mature trees which notably limit the site's visibility from the rear, and the adjacent site at 8 -14 Oatlands Drive. Some of the trees contained within the site are subject to Tree Preservation Orders (TPO's). Any necessary works to trees within the site, including those which are subject to a TPO, are described within the accompanying Arboricultural reports. During the determination of the application, EBC's Tree Officer reviewed the proposals and concluded that they had no objection to the proposals on Arboricultural grounds.
- 2.7 The site is located within the 'WALL11: Oatlands Park' sub area of the Elmbridge Design and Character (2012) SPD which describes the area as *"predominantly mixed residential 20th Century two-storey houses at a low to medium density on medium to large plots with some post-war three-storey flatted development interspersed throughout"*. The site is predominantly located within Flood Risk Zone 1, however a small area of land to the rear of the site also falls within Flood Risk Zones 2 and 3. A sequential test was submitted as part of the planning application (included within the Flood Risk Assessment) and concludes that the proposals meet the requirements of the sequential test to allocate development to lower flood risk areas. This sequential test was independently reviewed by external flood risk consultants appointed by the Council, who concluded the sequential test had undertaken a satisfactory assessment.

Site Context

- 2.8 The immediate context has experienced a change in character with a densification of the townscape. Adjacent to the site to the northeast lies 8-14 Oatlands Drive, which is being redeveloped pursuant to a planning permission granted in 2021 for the redevelopment of four existing dwellings to provide 51 flats in four separate blocks set in a two-tier arrangement. Construction works are at an advanced stage on the site at 8-14 Oatlands Drive. The emerging character in this locality therefore includes newer flatted development in addition to the post-war flatted buildings referred to within the Council's Design and Character SPD. **Figures 2.3 and 2.4** and the images below show how this application site currently sits in context with the adjacent development.



Figure 2.3 Street View of existing site and adjacent development at 8-14 Oatlands Drive



Figure 2.4 Aerial Plan



Image 1: Existing streetscene with the appeal site - no. 18 and 16 visible set behind tall solid brick boundary walls and adjacent to the new flatted development at 8-14 Oatlands Drive



Image 2: View of existing streetscene with no's 4-6 Oatlands Visible alongside the new development at no. 8-14 and the appeal site adjacent to the far flatted building.



Image 3: Appeal site visible adjacent to the new flatted development



Image 4: 8-14 Oatlands Drive, adjacent to the site



Image 5: Additional view of the development at 8-14 Oatlands Drive

Wider Context

- 2.9 Standing at the junction of Oatlands Drive and Bridge Street to the north, a number of much larger buildings are visible to the north and east, indicating the transitional nature of the end of Oatlands Drive at the edge of the town centre. These include the two-storey office buildings, 80 and 70 Bridge Street, and the Aston Martin garage, located at the entrance to New Zealand Avenue. Beyond this, to the north east, the Wellington Close flats (ground plus nine storeys above) are also readily visible.
- 2.10 New Zealand Avenue extends eastwards from the Oatlands Drive and Bridge Street junction, providing a main thoroughfare through the town centre. The site is located close to the edge of the town centre. Other significant buildings in this location include the Heart Shopping Centre multi-storey car park and Sainsbury's supermarket. Further eastwards along New Zealand Avenue, the Heart development includes a mixed use building facing New Zealand Avenue of ground plus six storeys, featuring restaurants at ground, with residential accommodation above.
- 2.11 Opposite the Heart development, planning permission has been granted for the redevelopment of the former Homebase site, for a retirement living scheme providing 222 accommodation units with associated community facilities, in a building rising to a maximum height of eight storeys. The Inspector's decision notice, granting

permission for the retirement living development, described the part of Walton in which the scheme is located, as a “*distinctly urban, town centre location*”. The town centre, which is within walking distance of 16 - 18 Oatlands Drive, has a good range of shops and services and other facilities necessary for day-to-day living.

2.12 Overall Oatlands Drive is mixed in character and contains a range of building typologies. The northwestern side of Oatlands Drive, where the appeal site sits, has a different character to the southeastern side of the road as it contains a number of flatted blocks and runs of terraced houses. Included at **Appendix 1** is the site context section taken from the submitted Design and Access Statement, which includes a buildings typology map and accompanying photographs showing this variation in building type along Oatlands Drive that includes a number of high density flatted blocks that rise to three storeys in height. Additional extracts from the DAS, showing the flatted developments present on the northwestern side of Oatlands Drive are also included below, along with birds-eye images. These clearly show the variation in building style but also that three storey flatted developments, as seen from Oatlands Drive are present and form part of the existing local context and character. When viewed from the rear, four and even five storey blocks are clearly visible due to site topography. Photographs of these buildings are also included below along with an extract of the typology map at **Figure 2.5**.



Figure 2.5: Extract from Design and Access Statement (enhanced) showing variety of building typologies on the northern side of Oatlands Drive.

Development at 8-14 Oatlands Drive

Context Analysis



Riverside Gardens, 8-14 Oatlands Drive - Oatlands Drive elevation (under construction)

Oatlands Drive - northwest context



Riverside Gardens, 8-14 Oatlands Drive - Oatlands Drive elevation (under construction)



Riverside Gardens, 8-14 Oatlands Drive - Oatlands Drive elevation (under construction)

Chaseley Court, 42 Oatlands Drive – Front and Rear elevations, location map and birds-eye

Context Analysis



Chaseley Court, 42 Oatlands Drive - Oatlands Drive elevation

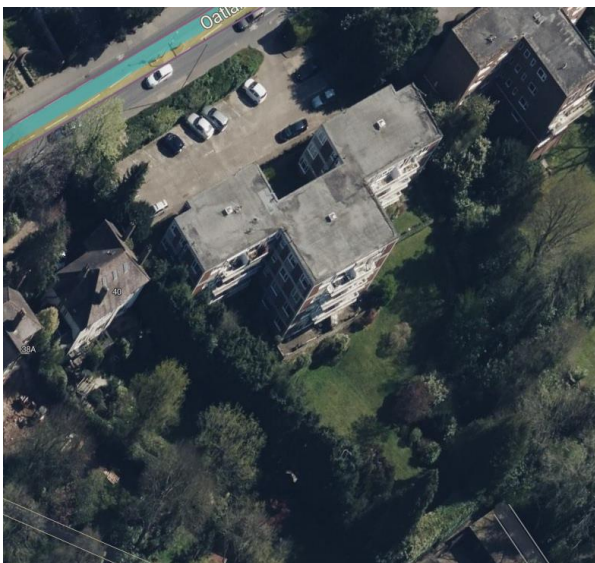
Oatlands Drive - northwest context



Chaseley Court, 42 Oatlands Drive - Oatlands Drive elevation



Chaseley Court, 42 Oatlands Drive - Rear elevation



Anarth Court, Treglos Court, Ablany Court, 44, 46 & 48 Oatlands Drive

Context Analysis



Anarth Court, Treglos, Albany Court, 44, 46 & 48 Oatlands Drive - Oatlands Drive elevation

Oatlands Drive - northwest context



Anarth Court, Treglos, Albany Court, 44, 46 & 48 Oatlands Drive - Oatlands Drive elevation



Anarth Court - Rear elevation



Oakhill Gardens, Beckworth Place, Oatlands Drive

Context Analysis



Oakhill Gardens - Oatlands Drive elevation

Oatlands Drive - northwest context



Ridge Mount - Oatlands Drive elevation (back land development)



Oakhill Gardens - Rear elevation



Oakhill Gardens (left), Beckworth Place (centre) and Albany Court (right), Oatlands Drive.

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Broad Water Place and Berkeley Court, Oatlands Drive

Context Analysis



Broad Water Place - Oatlands Drive elevation

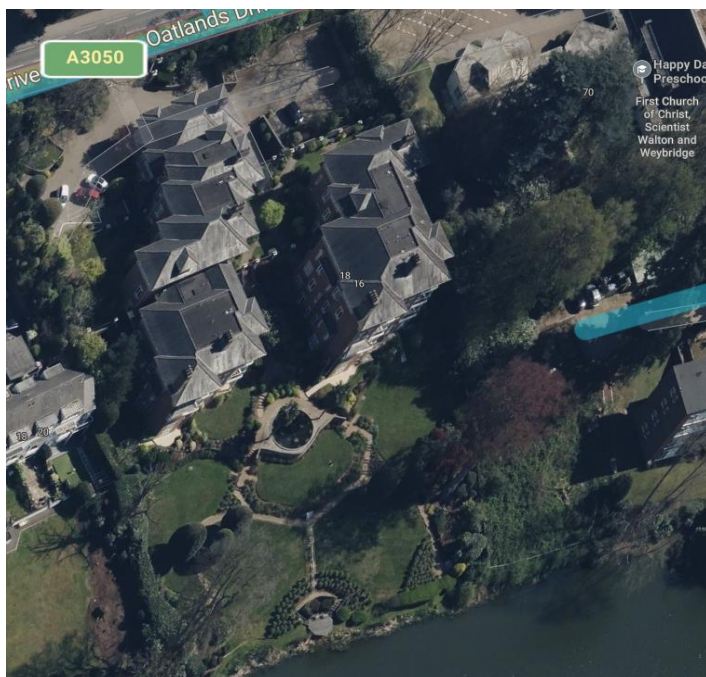
Oatlands Drive - northwest context



Berkeley Court elevation



Broad Water Place - Rear elevation



Austin Place, Oatlands Drive

Context Analysis



Austin Place - Oatlands Drive elevation

Oatlands Drive - northwest context



Berkeley Court elevation



Berkeley Court - Rear elevation

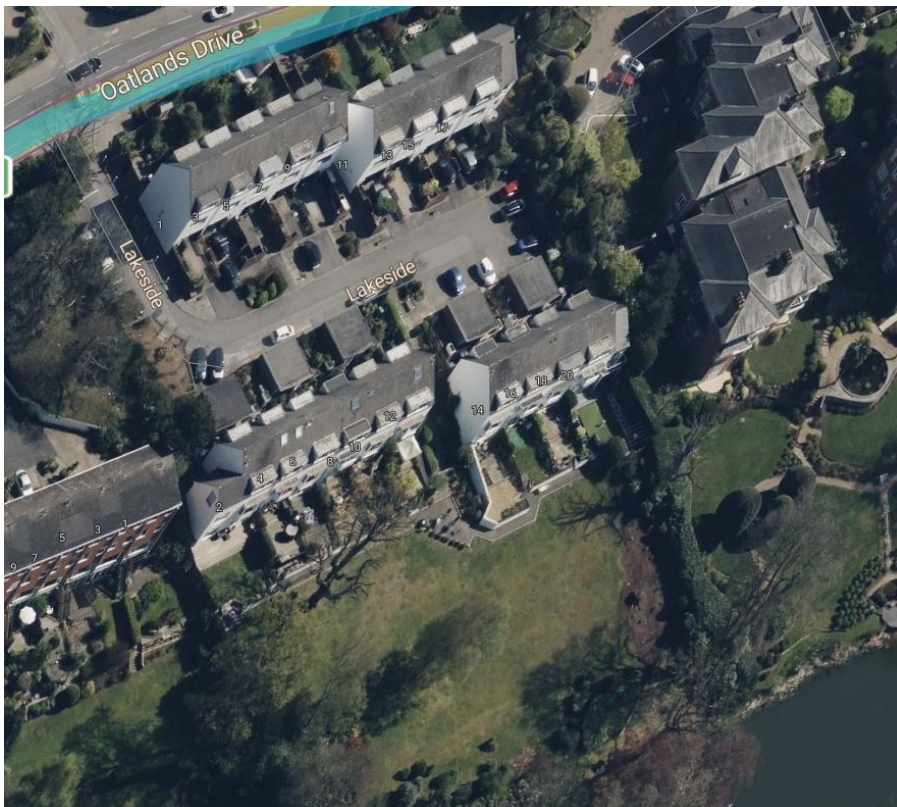


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Lakeside (set behind / north of Oatlands Drive)



2.13 It is apparent from the above examples that the character of Oatlands Drive is varied, both in the immediate context and wider local context. Flatted developments rising to three storeys fronting Oatlands Drive are clearly visible, and due to the falling topography at the rear (north), four or five storeys are visible from Cowey Sale and other rear vantage points. Tandem development is also precedent and is an established part of the local character for flatted developments.

3. Background

3.1 This section provides a brief summary of the relevant planning application history of the site at 16-18 Oatlands Drive, and that of the immediately adjacent sites including 8-14 Oatlands Drive and 4-6 Oatlands Drive, which were also recently the subject of separate applications for planning permission. Numbers 4-18 Oatlands Drive were also the subject of a historic planning application and appeal, which is also detailed below.

Planning History

16-18 Oatlands Drive (The Site)

3.2 Number 16 Oatlands Drive has been subject to one previous planning application dating back to 1962 according to Elmbridge Borough Council's online planning register. However, this is considered to be historic and of no direct relevance to the submitted proposals.

3.3 Number 18 Oatlands Drive has been subject to a number of domestic planning applications. This includes most recently an application to install vehicular gates, which was approved in 2016. An application was also approved in 2015 for extensions to convert the existing single storey house into a two storey house, which has been built out. There have been no planning applications that have sought the comprehensive redevelopment of the site containing both properties.

8-14 Oatlands Drive

3.4 Adjacent to the site (extending northwards), 8-14 Oatlands Drive is a site which previously contained four similar plots containing individual residential dwelling houses, numbered 8–14 Oatlands Drive. This site was recently the subject of two separate planning applications (2020/0691 & 2020/3223) which sought to demolish the existing dwelling houses to facilitate a comprehensive redevelopment the site to provide new residential buildings containing 51 apartments.

3.5 Both applications proposed 51 apartments split between four separate blocks (2020/3223) and three separate blocks (2020/0691) in a courtyard arrangement, both schemes rising to two and a half storeys in height. The applications were refused by Elmbridge Borough Council for reasons mainly related to the overall design, scale and appearance proposed.

3.6 Appeals were submitted against both refusals and in June 2021, the Planning Inspectorate issued a single decision letter, overturning both decisions of Elmbridge Borough Council, and granting detailed planning permission for both applications. The Inspector's decision establishes a number of important principles which are relevant to the consideration of the current application proposal at 16–18 Oatlands Drive. These will be referred to in more detail at the appropriate stages later within this statement.

3.7 The development approved under application 2020/3223 at 8–14 Oatlands Drive has since been commenced on site through the demolition of all four of the existing dwelling houses. The development is currently at an advanced stage of construction and once completed will form part of the established character of the immediate area in which the current proposals at 16–18 Oatlands Drive must be considered.

4-6 Oatlands Drive

3.8 Further north, beyond the site at 8–14 Oatlands Drive, Number 4 Oatlands Drive has been the subject of a number of planning applications, however these are considered to be historic and of no direct relevance to the submitted proposals. Most recently, in 2012, planning permission was granted for the erection of a two-storey rear extension. The permitted extension has since been constructed. Number 6 Oatlands Drive on its own has no planning history according to the Elmbridge Borough Council online planning register.

3.9 However, an application was submitted in July 2022 for the comprehensive redevelopment of 4-6 Oatlands Drive to provide two residential flatted buildings containing 27 dwellings (LPA Ref. 2022/2118). The proposals included the provision of car parking, cycle parking, refuse storage and amenity areas, hard and soft landscaping and all associated engineering, infrastructure and works. This application was not determined by Elmbridge Borough Council therefore an appeal was submitted to the Planning Inspectorate under Section 78 of the Town and Country Planning Act 1990 against the non-determination of a planning application. The appeal was dismissed on 29th September 2023.

3.10 The appeal was dismissed based on the proposed developments impact on the character and appearance of the streetscene and to the area. The nature of the site and the proposals are wholly different to 16-18 Oatlands Drive, being a much more visually exposed site from the Engine Pond to the rear, and from the two roads it fronts on to. In addition the development at 4-6 was larger and taller than that proposed for this appeal at 16-18. Officers concluded in their committee report, at para 67, that there is clear distinction between 16-18 Oatlands Drive context and that at 4-6 Oatlands Drive, noting *“the development at 4-6 Oatlands Drive, conversely was found to have a harmful impact on the character of the area. That development however was a corner plot with a vastly larger development proposed.”*

3.11 The site context at this appeal site and its visibility from the rear is materially different to 4-6 Oatlands. This appeal site has a heavily wooded backdrop and does not back onto the Engie Pond. Views of it are much more limited and filtered than at 4-6 Oatlands. When assessing the proposals at 16-18, Officers concluded in their committee report that the views of this site would be limited from the footpath by the retained trees and acknowledge that the character of the area has already been changed by the consented development at 8-14.

4-18 Oatlands Drive.

- 3.12 In 2007 an application to redevelop the site containing the above dwellings was submitted by others. This was refused and dismissed at appeal in the same year. The 2007/0841 appeal decision, whilst historic, and encompassing a larger site than the appeal site, is a material consideration insofar as its conclusions relate to the impact of that scheme on the character and appearance of the area. Overall the Inspector found there to be visual harm to Oatlands Drive from insufficient gaps (2m) between the taller and bulkier houses, and the height seen from the street through to the block of 5 flats at the rear (3.5 storeys in height). Added to this was harm resulting to the wooded backdrop given the close proximity of the rear buildings to some of the trees, that would likely result in regular coppicing.
- 3.13 With regards to the visual impact when seen from the rear and on the setting of the Green Belt, the Inspector concluded that the proposal would not be particularly open to view from the Green Belt and thus not conflict with Policy GRB27.
- 3.14 In that appeal a four storey flatted building was proposed at no. 4-6 Oatlands Drive, and was found to be of an appropriate scale at that location. The images below at **Figure 3.1** and **Figure 3.2** include a site plan and elevation drawings.



Figure 3.1 Previously Appealed Scheme Layout



Figure 3.2 Previously Appealed Scheme Elevation

Public Consultation

3.15 In relation to the application which is the subject of the current appeal, a virtual public consultation event was held in November 2022. Following this consultation, the scheme was amended to respond to the feedback received. This resulted in the following changes:

- A reduction in the quantum of units proposed
- A reduction in the overall bulk and scale of the proposal
- An improved ratio of dwellings to parking spaces
- Reduced massing on the streetscene to Oatlands Drive.

3.16 It is considered that as a result of the exercise described above the Appellant fulfilled their responsibilities to consult with the public in a proportionate manner in advance of the planning application submission.

4. The Appeal Scheme Proposals

4.1 This section of the Statement sets out the proposed development for which planning permission is sought. The description of the proposed development is:

“Development of 2 detached blocks comprising 33 flats with new vehicular access, associated parking, cycle storage, refuse storage and amenity areas with hard and soft landscaping, and associated engineering and infrastructure works, following demolition of existing houses”

4.2 Full details of the appeal scheme are set out in the Design and Access Statement and Plans that are submitted in support of this appeal.

4.3 Following demolition of the two existing dwellings, the site would be re-developed to provide a pair of residential buildings containing 33 dwellings. Building A, located at the front of the site facing Oatlands Drive, is set over ground, first and second floors and contains 15 dwellings. Parking spaces are provided at the lower ground floor level.

4.4 Building B, being located to the rear of the site, respects the hierarchy of Building A. Due to the site levels which fall away steeply to the rear of the site (westwards), despite being set over four floors Building B is shorter than Building A and appears as only 3 storeys from the front. Building B is 4 storeys from the rear view as a result of the sloping levels. It contains basement, lower ground floor, ground floor and first floor. Building B contains 18 dwellings. This stepping down is also seen in the neighbouring example of 8-14 Oatlands Drive and a number of other flatted developments along Oatlands Drive, which also slope down towards the rear of the properties.

4.5 In total there are 33 dwellings proposed in the following mix:

- 3 X 1-bed dwellings
- 28 X 2-bed dwellings
- 2 X 3-bed dwellings

4.6 Located between both buildings is a courtyard area containing surface level car parking. In total, 34 car parking spaces are provided for the residents of the proposed dwellings, including 3 wheelchair accessible parking spaces. In addition, 40 cycle parking spaces are provided for the occupants in two secure cycle parking units.

4.7 A single vehicular access from Oatlands Drive is proposed that will replace the four existing accesses and exits, as both current properties have in and out driveway arrangements. .

- 4.8 All of the proposed dwellings either meet or exceed the Nationally Described Space Standards (NDSS), and a mixture of private and shared amenity spaces are provided. The land surrounding the proposed buildings will be enhanced via sensitive landscaping, including new tree planting and enhancements to the site's biodiversity. At present, the front of the two plots is almost entirely covered by hardstanding, with tall solid brick boundary walls. This creates a hard edge to the urban environment. The proposed scheme incorporates soft landscaping to improve the existing situation, softening it and adding urban greening.
- 4.9 The proposed massing is three-storeys in height with the majority of the accommodation at the second floor in a mansard roof. The massing is broken by steps in the building and ridge lines, which reduce the bulk of the buildings and also make a reference to a large number of the properties along Oatlands Drive. The proposed massing responds positively to the site's setting within the urban context and the broader streetscene of Oatlands Drive. The proposal shows a three-storey building fronting onto Oatlands Drive, which drops down to two storeys on each side to respect the neighbouring properties, existing and in construction. A generous gap of 10m will exist between the proposed built form and the neighbouring properties on either side.
- 4.10 The front building is similar in height to the approved planning consent at 8-14 Oatlands Drive and is proposed to be only slightly taller in the central bay only. The proposals are in keeping with the building line at the adjacent development at 8-14 Oatlands Drive next door. A considered design is proposed and the use of articulation, hierarchy and materiality provide a high amount of visual interest, in keeping with the surrounding context. The CGIs of the proposed development are included below at **Figures 4.1, 4.2 and 4.3** and at **Appendix 2**.



Figure 4.1. CGI of proposed development from Oatlands Drive



Figure 4.2. CGI of proposed development from Oatlands Drive



Figure 4.3. CGI of proposed development from Oatlands Drive

- 4.11 The scheme uses the natural topography of the site to introduce a second tier of development at the rear as is the case with the adjacent development at 8-14 Oatlands Drive. When seen from the front, the rear block rises to three storeys in the central bay, dropping down to two storeys on each side to respect the neighbouring properties. This also reflects the approach to massing of the approved application at 8-14 Oatlands Drive. Due to the falling topography there is a lower ground floor included which is visible from the rear.
- 4.12 In their committee report recommending the application for approval, Officers state that the proposed additional height would not be a prominent feature in the streetscene. In comparing the proposals to the approved scheme at 8-14, Officers conclude “*There is also an increased massing and scale to both of the proposed blocks. They are wider than the blocks at 8-14 Oatlands Drive, taking advantage of the application site’s plot width. The increase provides a different massing to the neighbouring scheme, while making the blocks appear somewhat more prominent, it also provides some variety in the streetscene*”. Officers conclude that the proposals are not considered to result in significant harm to the character of the area or the streetscene.

4.13 The design approach respects the style of the flatted development being constructed adjacent. It comprises a formal architectural approach, with regular fenestration, projecting and stepped elements to provide for variation and interest in the bulk, mass and overall appearance. The proposed buildings are dressed in heritage stock facing brick and off-white ashlar render. The windows will be timber double glazed vertical sliding sash windows with dark grey GRP dormer with profiled fascia. A wetcase reconstituted stone banding / detailing is proposed as well as slate roof tiles. The overall architectural composition has due regard to both the immediate locality and that found in the wider area, and is considered to be of high quality.

4.14 The rear of the site contains a landscaped communal garden. This extends to 40m in width and 14m in depth and measures some 560 sqm in area providing a generous landscaped amenity space and buffer between the rear block and Cowey Sale beyond. This garden amenity is itself screened from the main Cowey Sale area by a wooded backdrop. Below at **Figure 4.4** and at **Appendix 2** is a CGI of the rear elevation of Block B fronting onto the landscaped communal garden.



Figure 4.4. CGI of proposed development's rear elevation fronting on to landscaped communal garden

4.15 A timeline is given below which summarises the key stages in the LPA's assessment of the application:

Date	Action
December 2022	Application submitted.
January 2023	Application registered and validated.
January 2023 – November 2023	Consultation and application assessment.
November 2023	The application was heard at planning committee. Members voted against the Officer's recommendation and refused the application.
November 2023	Decision Notice was issued on 16 th November 2023.

5. Planning Policy Context

- 5.1 The proposed development has been conceived taking account of the Development Plan as well as other material considerations. This section of the Statement sets out a summary of the relevant planning policy and guidance documents, whilst the following section demonstrates compliance with the policies contained within.
- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004, and Section 70(2) of the Town and Country Planning Act 1990, both require that applications for planning permission are determined in accordance with the provisions of the Development Plan, unless any other material considerations indicate otherwise.
- 5.3 In this case the Development Plan comprises the adopted Core Strategy (2011) and the Development Management Plan (2015). The Core Strategy is the principal, strategic document that sets out the vision, spatial strategy and core policies which apply to developments within the council's administrative area. The Development Management Plan contains more detailed policies and standards.
- 5.4 In addition to these main documents, the council has adopted a number of Supplementary Planning Documents (SPD) which provide more detailed guidance on a number of policy matters. These include Design and Character, Flood Risk, and Parking. The SPDs will be referred to where relevant.
- 5.5 In addition to the Development Plan documents listed above, the National Planning Policy Framework (December 2023) and associated Guidance, are material considerations in the determination of all planning applications in England. They provide the Government's latest policy direction for local planning authorities and applicants to follow. The NPPF states that policies in the Framework are material considerations which should be taken into account in dealing with applications from the day of publication. Plans may also need to be revised to reflect policy changes which the Framework has made.
- 5.6 Elmbridge are also in the process of preparing a new Development Plan. The New Local Plan has been submitted to the Planning Inspectorate for examination, however given the prematurity of the New Local Plan, it is considered that the policies within it carry no weight and the current application falls to be assessed against the adopted policies within the current Development Plan. Additionally, Officers did not refer to the New Local Plan in their assessment of the development proposals within their committee report, which recommended planning permission should be granted.

National Planning Policy

- 5.7 At the national level, the NPPF (December 2023) provides an overarching framework for the production of local policy documents and the determination of planning applications. The Government's NPPF acts as guidance for local planning authorities and decision takers, both in drawing up plans and making decisions

about planning applications. At the heart of this document at Paragraph 11 is a presumption in favour of sustainable development running through both plan-making and decision-taking. For decision-taking, this means:

c. "Approving development proposals that accord with an up-to-date development plan without delay; or

d. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. 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." (Paragraph 11)

5.8 The NPPF also states that planning decisions should promote and support the development of under-utilised land and buildings generally. This is even more crucial in an area such as Elmbridge where the supply of suitable land for development is restricted by fundamental constraints such as the Green Belt. This is why the NPPF states that substantial weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs.

5.9 With regard to housing, Paragraph 60 of the NPPF identifies measures to "...boost significantly the supply of housing..." and Paragraph 11 states that Local Plans should meet the objectively assessed need for housing in local authority areas. Paragraph 11 further elaborates stating that housing applications should be in the context of the presumption in favour of sustainable development which, as set out above, running through both plan-making and decision-taking.

5.10 The Government published its National Planning Practice Guidance (NPPG) notes in March 2014. The NPPG supports the NPPF and provides high level guidance with regard to specific planning issues and processes. Where applicable, the NPPG notes are referenced within this document.

Elmbridge Borough Council's Housing Land Supply Position

5.11 Of relevance to the consideration of the proposed appeal is the local planning authorities current housing land supply.

5.12 Paragraph 11(c) of the NPPF requires that applications which accord with an up to date development plan should be approved without delay.

5.13 If this is not the case, then under Paragraph 11(d), of the NPPF, where there are no development plan policies, or the policies which are most important for determining applications are out of date, decision takers should grant permission unless:

- The application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (i.e. the site is located within the Green Belt, or other protected landscape area); or
- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework when taken as a whole.

5.14 As footnote 8 to Paragraph 11(d) makes clear, where applications involving the provision of housing are proposed, then planning policies are considered out of date in circumstances where the local planning authority cannot demonstrate a five year housing land supply, or a four year supply, if applicable, as set out in paragraph 226, of deliverable housing sites (with a buffer, if applicable, as set out in paragraph 77); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.

5.15 Paragraph 226 sets out that Local Planning Authorities need to demonstrate a supply of specific deliverable sites sufficient to provide a minimum of four years' worth of housing against the housing requirement where they have submitted a new Local Plan for examination, including both a policies map and proposed allocations, or where a Local Plan is at Regulation 18 or 19 stage.

5.16 Paragraph 77 provides that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide either a minimum of five years' worth of housing, or a minimum of four years' worth of housing if the provisions in paragraph 226 apply. The supply should be demonstrated against either the housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old. Where there has been significant under delivery of housing over the previous three years, the supply of specific deliverable sites should in addition include a buffer of 20% (moved forward from later in the plan period).

5.17 Footnote 43 clarifies that the 20% buffer is based on the Housing Delivery Test score (where it is indicated that delivery was below 85% of the housing requirement), however this does not apply where a Local Planning Authority is not required to continually demonstrate a five year housing land supply.

5.18 Elmbridge have recently submitted their draft Local Plan to the Inspectorate for examination. This includes a draft policies map and site allocations¹. As such they are now required to show a four year housing land supply. In addition, because Elmbridge are not required to demonstrate a five year housing land supply, the 20% buffer (moved forward from later in the plan period) does not apply if the HDT results are less than 85%. That said, para 79 is relevant and provides the following:

“To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below the local planning authority’s housing requirement over the previous three years, the following policy consequences should apply:

- a. where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years;*
- b. where delivery falls below 85% of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites as set out in paragraph 77 of this framework, in addition to the requirement for an action plan.*
- c. where delivery falls below 75% of the requirement over the previous three years, the presumption in favour of sustainable development applies, as set out in footnote 8 of this Framework, in addition to the requirements for an action plan and 20% buffer.*

5.19 Para 80 states that the Housing Delivery Test consequences set out above will apply the day following the annual publication of the Housing Delivery Test results, at which point they supersede the previously published results. Until new Housing Delivery Test results are published, the previously published result should be used. The latest Housing Delivery Test results (published 19 December 2023), show the Council achieved 90% of delivery over the last three years and so need to produce an action plan.

5.20 The latest Annual Monitoring Report for 2022-2023 (**Appendix 3**), also published in December 2023 (**after** the committee report was published), puts the current supply at 3.81 years. This is below the four year housing land supply required by the NPPF. The Council’s published trajectory from their AMR is set out below.

¹ In respect to the site allocations, of note is that no. 75 Oatlands Drive and no. 181 Oatlands Drive are allocated for developments of 9no. and 12no. residential units respectively. This would inevitably require flatted developments.

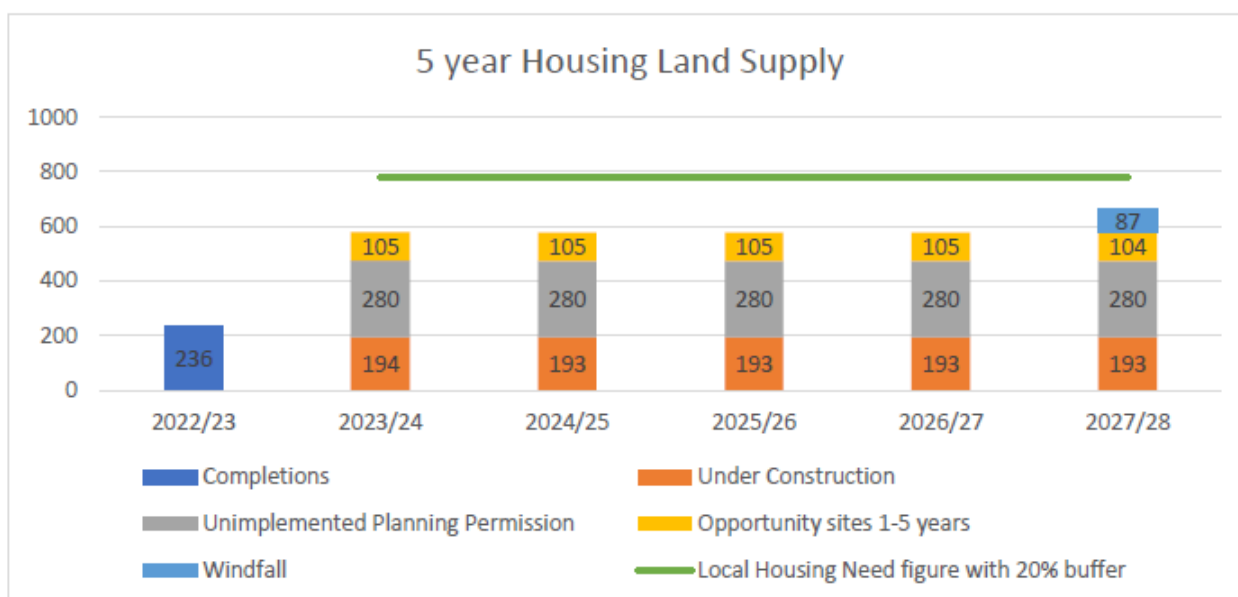


Figure 5: The Council's 5 Year Housing Land Supply

Sourced from The Council's AMR published December 2023.

5.21 The Appellant does not agree that some of the sources of the Borough's projected housing supply should be considered deliverable sites and so count towards their trajectory and overall housing supply. In particular the Council are relying on 105 units per year for years 2-5 being delivered from Opportunity Sites, which would not benefit from planning permission, particularly so earlier in the trajectory period. It is therefore considered that these sites should be excluded from being deliverable in the early part of the delivery period and so we consider that 210 units being relied upon in the years 2023/24 and 2024/25 should be discounted. In addition, it is considered that a delivery of 105 units per year from the opportunity sites for the years 2025/26 and 2026/27 are overly optimistic and so these should be halved. This then results in a housing land supply of 3.1 years.

5.22 The NPPF test now is to calculate a four year supply against the Council's requirement. The table below therefore sets out the annual Local Housing Need figure, and the four year housing land supply position. This includes both the Council's own published trajectory (sourced from Figure 5 of the AMR above) and also Savills calculated supply, as the Council's supply trajectory is disputed by the appellant for reasons set out above.

	2023/24	2024/25	2025/26	2026/27	Total	Years Supply
Annual Requirement	650	650	650	650	2,600	
Council's HLS Position (AMR report)	579	578	578	578	2,313	3.5 years
Savills HLS Position	474	473	526	526	1,999	3.1 years

5.23 In both the above scenarios, including the Council's published supply figures, the Council do not have a four year housing land supply, with EBC's own supply figures showing 3.5 years. However Savills consider the supply to be 3.1 years. As such the presumption in favour of sustainable development as provided for by paragraph 11(d) of the NPPF is engaged.

5.24 A lack of 5YLHS (as was required at the time) was also confirmed in the committee report for this refused application, however as noted above, the housing supply figure is now superseded by the publication of the Council's Annual Monitoring Report (December 2023), and the appellant submits that the Council's annual supply is even lower than the figure given by the Council in the AMR report.

5.25 Furthermore, it should also be noted that, contrary to the Government's stated objective to significantly boost the supply of homes, the New Local Plan which has been submitted for examination acknowledges that the Plan fails to address the Council's Objectively Assessed Need (OAN) figure in full. Paragraph 3.19 of the New Local Plan (**Appendix 5**) states that:

"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."

5.26 It is explained in the submitted Plan that the Council is taking a "brownfield first" approach (which the appeal proposal accords with), in order to safeguard the Green Belt, which makes up a significant proportion of the Council area, from development. Paragraph 1.15 of the submitted Plan, copied below, acknowledges this.

"The council, whilst recognising that this efficient use of land will help to respond to demand, it will not meet all of it. The council has chosen this approach in response to the need to balance growth with protecting and continuing to conserve and enhance what is important to our residents and helps shape our places and communities. This includes the Green Belt and our open spaces, as well as safeguarding other areas of recognised importance such as ancient woodland, habitat sites and heritage assets of international and national importance and avoiding areas unsuitable for new development for example, where they are at high risk from flooding."

5.27 Therefore, although the Council is only required to demonstrate a 4 year housing land supply currently, on account of the fact they have submitted the New Local Plan for examination, it is questionable as to whether the examination Inspector will find the new Local Plan sound, and capable of adoption. The prospect of a long, drawn out examination is therefore real, and this will further delay the delivery of much needed new homes in Elmbridge which has one of the highest housing affordability ratios in the country.

5.28 The ratio, which measures the difference between median house prices and median workplace earnings, was **17.32** according to the Council's Establishing Local Housing Need report (May 2022) – provided at **Appendix 6**. However, for the same year, the Office for National Statistics Data calculated the ratio in Elmbridge as **20.00**.

This is based on the median house price of £700,000 and the median workplace earning of £34,927.00. The ratio in 2024 is now likely to be even higher of course.

- 5.29 This statement will demonstrate that the proposed development is acceptable in its own right, having regard to the Development Plan and so the presumption in favour at paragraph 11(c) of the NPPF applies. In addition as set out in this statement, the Council's published AMR report confirms they do not have a four year housing land supply and so the 'titled balance' at paragraph 11(d) is also engaged even if the Inspector were to find non-compliance with the Development Plan.
- 5.30 The proposed development is a deliverable housing site located in a sustainable location and could be delivered in the next 4 years, therefore it will make an immediate, and meaningful contribution to Elmbridge's housing supply. Officer's concluded in their committee report at Paragraph 128 that "*The proposal would add thirty one net additional housing units which is of an acceptable unit mix, Officers attribute significant weight to this. The proposal is also acceptable in terms of policy for design, impact on neighbouring properties, impact on future occupiers, highways, safety and parking, trees and ecology, which are given moderate weight*".

6. Grounds for Appeal

- 6.1 Section 38(6) of The Planning and Compulsory Purchase Act 2004 states: *If regard is to be had to the development plan for the purpose of and determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.*
- 6.2 This requires the decision maker to have regard to the totality of the development plan; identify and have regard to what can be considered as material considerations; and to determine the appeal in accordance with the development plan unless the material considerations indicate otherwise. Furthermore, it requires a decision-maker to weigh the planning benefits arising from one aspect of a proposal against disadvantages or harm arising.
- 6.3 In light of the relevant planning policy and guidance, material planning considerations, and the reason for refusal (RfR's) cited on the Decision Notice, this Statement will examine the following key issues:
1. Addressing the two reasons for refusal
 2. The Appellant's case – why planning permission should be granted
- 6.4 Before addressing the reasons for refusal, it is particularly pertinent to note that following an extensive period of assessment (see timeline at Section 4 above), professional Officers recommended the development proposals for approval. In their committee report (October 2023), the Officers set out at Paragraph 127 that the council could not demonstrate a five-year supply of housing and this stood at 4.36 years.
- 6.5 However, the Council's 2023 Annual Monitoring report² which was published **after** the planning committee meeting in December 2023 puts the supply at the lower figure of 3.81 years. As noted earlier in this statement, assessed against their four year requirement, the Council's own trajectory shows 3.5 years of supply, although the Appellant puts the actual figure at 3.1 years as the Council are relying on some 420 homes as 'opportunity sites' identified in their Land Availability Assessment during years 1-4 that do not benefit from planning permission and so this figure is reduced to a more realistic delivery rate.
- 6.6 It should be common ground with the Council that the tilted balance remains engaged, despite the reduced housing land supply requirement.
- 6.7 The policy test is therefore whether the adverse impacts of the development **significantly and demonstrably** outweigh the benefits. In their committee report, Officers concluded that *“as such the adverse impacts of granting planning permission are not considered to significantly and demonstrably outweigh the benefits and*

² Provided at Appendix 3

therefore the application is recommended for approval". The benefits of the scheme that would result are notable, and include the following:

- Delivering 33 residential units that will clearly contribute in a significant way to the Council's housing land supply in a sustainable urban location. This should be given substantial weight given the Council's low housing land supply and very poor track record in housing delivery;
- Delivering the size and mix of smaller units sought in the Borough. This should be given substantial weight given the identified housing need for smaller units in the Borough;
- Making efficient use of a previously developed site in a sustainable location. This should be given moderate weight given the environmental constraints in the Borough which mean that the delivery of such numbers of residential units in these locations is infrequent;
- Delivering a net gain in Biodiversity. This should be given moderate weight as this is not a requirement of planning policy at the time the planning application was submitted and determined;
- Having direct and indirect economic benefits through the construction of the development and after through spending within the local economy. This should be given moderate weight, especially given the current economic climate and the need to boost the economy;
- Providing electric charging points to encourage the use of electric cars. This should be given a low degree of weight; and
- A notable contribution towards CIL, which will help fund wider infrastructure improvements in the Borough. This is given modest weight as this is a notable contribution towards the Council's CIL fund.

6.8 The appellant strongly refutes both reasons for refusal and maintains that the scheme accords with the Development Plan and no harm will result, therefore the presumption in favour applies. If however, the Inspector was to find some harm resulting, then the tilted balance also applies and that such harm is not significant nor demonstrably able to outweigh the clear benefits of the development.

6.9 Below we address the two reasons for refusal.

Reason for Refusal 1

The proposed development, by reason of its mass and scale would be out of keeping and detrimental to the character of the area when viewed from both Oatlands Drive and the Engine River in conflict with Policy DM2 of the Development Management Plan 2015 and the NPPF.

- 6.10 RfR 1 alleges that the proposed development would be out of keeping and detrimental to the character of the area, due to its mass and scale, when viewed from both the front and rear of the site.
- 6.11 Policy DM2 of the Development Management Plan 2015 is referred to. Policy DM2 relates to Design and Amenity and sets out “*All new development should achieve high quality design, which demonstrates environmental awareness and contributes to climate change mitigation and adaptation. The Council will permit development proposals that demonstrate that they have taken full account of the following:*
- a. *All development proposals must be based on an understanding of local character including any specific local designations and take account of the natural, built and historic environment. Development proposals will be expected to take account of the relevant character assessment companion guide in the Design and Character SPD.*
 - b. *Proposals should preserve or enhance the character of the area, taking account of design guidance detailed in the Design and Character SPD, with particular regard to the following attributes:*
 - *Appearance*
 - **Scale**
 - **Mass**
 - *Height*
 - *Levels and topography*
 - *Prevailing pattern of built development*
 - *Separation distances to plot boundaries*
 - *Character of the host building, in the case of extensions*
 - c. *Proposals should take account of landform, layout, building orientation, massing and landscape to minimise energy and water consumption*
 - d. *Development proposals should create safe and secure environments and reduce opportunities for crime.*
 - e. *To protect the amenity of adjoining and potential occupiers and users, development proposals should be designed to offer an appropriate outlook and provide adequate daylight, sunlight and privacy. This is particularly important when considering proposals for windows, external staircases, balconies, raised terraces and roof gardens.*
- 6.12 Policy DM2 concerns design and amenity. It states that the council will permit development proposals which are based on an understanding of the local character including any specific local designations, and take account of the natural, built and historic environment. Development proposals are expected to take account of the relevant character assessment companion guide in the Design and Character SPD.
- 6.13 Therefore, in order to assess whether the proposal would be at odds (out of keeping) or detrimental to the character of the area (as alleged), it is important to have a strong appreciation of the existing character of the area, and how it is derived. In this regard. Policy DM2 refers to the Design & Character SPD, however this was published in 2012 so is now outdated.

- 6.14 Despite its age, the SPD recognises that the site is located within the WAL11: Oatlands Park character sub area, although the companion guide actually confirms that the character sub area which should be consulted is WEY09: Oatlands Park, York Road and Oatlands Chase environs. The guide states that the area is characterised by a ***mix of predominantly two-storey houses at a low to medium density on medium to large plots with some post-war three storey flatted development interspersed throughout.***
- 6.15 It is relevant to highlight therefore that the guide recognises there are already some three storey flatted developments interspersed throughout, dating from the post war period. The proposed building facing Oatlands Drive is also three storeys, although unlike the surrounding post-war flatted buildings which are typically flat roofed, the visual impact of the height of Building A facing Oatlands Drive is lessened by the fact that the uppermost storey is largely contained within the roof space.
- 6.16 The appellant submits that this statement, published in 2012, underplays the amount of flatted development within the area, particularly on the northern side of Oatlands Drive. The submitted Design & Access Statement contains further details of the existing flatted developments and should be referred to.
- 6.17 Section 2 of this statement includes a typology map and images of nearby developments. This typology map is included again below at **Figure 6.1** to illustrate the amount of flatted developments within the area, and on the appeal site's north-western side of Oatlands Drive.



Figure 6.1. Types of properties on Oatlands Drive

- 6.18 The map shows that there is no one dominant building typology on the northwestern side of Oatlands Drive. The area's character is formed of a mixture of flatted buildings, terraced dwellinghouses, and individual dwellinghouses, with a flatted development sitting directly adjacent to the appeal site of a commensurate height, bulk and mass. This diagram demonstrates that there is a large proportion of properties on the northern side of Oatlands Drive that are flats or terraces in long runs with very few detached homes. Also, the length of street frontage which comprises terraced or flatted buildings is greater than the length of frontage that includes individual dwellings. These flatted developments rise to three storeys when fronting Oatlands Drive and at the rear, due to falling topography, rise to a visible four, or in some cases, five storeys as shown in Section 2 of this statement. The appeal site sits directly adjacent to a flatted development and it is of a commensurate height and scale to it. Therefore, in terms of the streetscene as viewed from Oatlands Drive, the proposal would not be **out of keeping**, as is alleged by RfR1. It is of a building typology and form wholly commensurate with the character of the area.
- 6.19 In addition, the guide recognises that all houses are set back from the roadside in gardens and the building line is generally consistent with roads giving an often uniform and pleasing rhythm to the layout of streets. In terms of opportunities, the guide acknowledges that development is likely to take the form of both sub-division of larger plots and replacement of houses with flatted development. There is therefore an acknowledgement within the character guide that further flatted development is likely to come forwards, and this will surely re-enforce that aspect of the area's character.
- 6.20 This was recognised in the Inspectors decision for the appeal at 8-14 Oatlands Drive (**Appendix 7**). At paragraph 14 the Inspector states:
- “The Council does not object to the principle of residential redevelopment or to the approach with second tier of development on the rear part of the site. I have no reason to disagree with this as a strategy. The area immediately surrounding the site is characterised by single dwellings, and a development of flats at a higher density to make more effective use of the land would inevitably result in buildings of a greater scale and form and some change in character. But both proposals would reflect the scale and form of flatted developments, elsewhere along Oatlands Drive on wider sites. The proposals scale would be compatible with the Elmbridge Design and Character Guide SPD (2012) Companion Guide which describes this area as “Predominantly mixed residential 20th Century two-storey houses at a low to medium density on medium to large plots with some post-war three-storey flatted development interspersed throughout.”*
- 6.21 The proposals are for the replacement of two existing houses with a flatted development, which the guide acknowledges is suitable in principle. Within Oatlands Drive, there is not considered to be any predominant architectural style which contributes to the general character of the street, however there are some consistent characteristics such as the continuous building line, set back from the highway, and the use of brick and other traditional materials. Roofs are typically pitched rather than flat, albeit there are examples of flatted schemes with flat roofs (post-war), however these are the exception. This is confirmed by the Inspector for 8-14 Oatlands

who concludes that Oatlands Drive is residential in character with a mixture of bungalows, two storey houses and some higher flatted developments to the south.

- 6.22 The proposed Building A, as viewed from Oatlands Drive, reflects the characteristics described above which are said to contribute to the general character of the street. The building is set back from the highway and respects the prevailing building line. The proposed buildings are to be constructed of traditional materials including brick, stone and slate tiles. The building roofs are a mixture of flat and pitched (similar to the adjacent building at 8-14 Oatlands Drive). Despite being new buildings, the architecture is traditional, to a high quality, well-articulated and wholly in keeping with the local area and the character of Weybridge. In this regard it should be noted that RfR 1 does not allege the design itself is unacceptable, although the appellant maintains that the new NPPF provisions requiring beauty in design would be fully met by this proposal. The Officers report additionally concludes at paragraph 128 that *“the proposal is also acceptable in terms of policy for design”*.
- 6.23 With regards to the contention that the proposed scheme would be out of scale, this is also strongly refuted. As discussed above, the existing character within the immediate vicinity of the appeal site features 8-14 Oatlands Drive which is of a comparable height and, of an even greater scale than the appeal scheme, by virtue of the fact there are 4 buildings compared to the 2 proposed.
- 6.24 The proposed streetscene drawings submitted (extract below at **Figure 6.2**) show that the proposed Building A is of a comparable height and that there would be a gap of 10.5m in the streetscene between the two developments. In this way, the developments would represent a positive addition within the medium to large plots which are referred to within the character guide as a feature of the existing area.

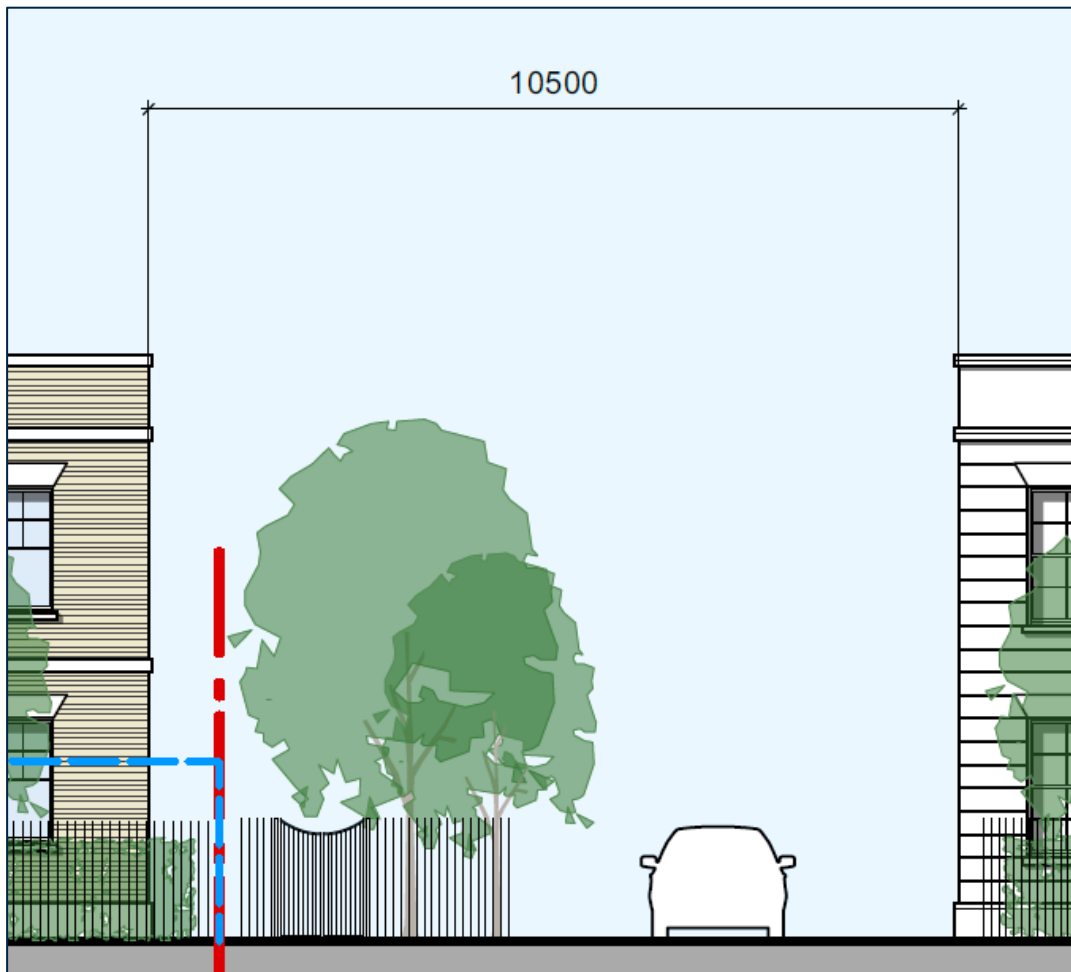


Figure 6.2. Elevation

6.25 On the other (western) side, the below diagram at **Figure 6.3** demonstrates that the proposed Building A would be separated from the nearest existing dwelling, No.20 Oatlands Drive, by a similar distance. The distance between the closest elevations would be 10.48m and at this distance the proposed building is two storeys. Where the building rises to three storeys the separation distance increases to 14.48m. This approach was recognised in the consultation response of the Council’s design officer who states “*Gaps are retained between the site and its neighbours which in my view helps to preserve an element of the current character.*” This was agreed by Officers who concluded in their committee report at Paragraph 80 that “*The separation distance and boundary treatment is considered to be acceptable to ensure the proposed development would not be overbearing, over dominant, or result in a significant loss of light or overshadowing, nor give rise to harmful levels of overlooking or loss of privacy. The proposal therefore complies with Policy DM2.*”

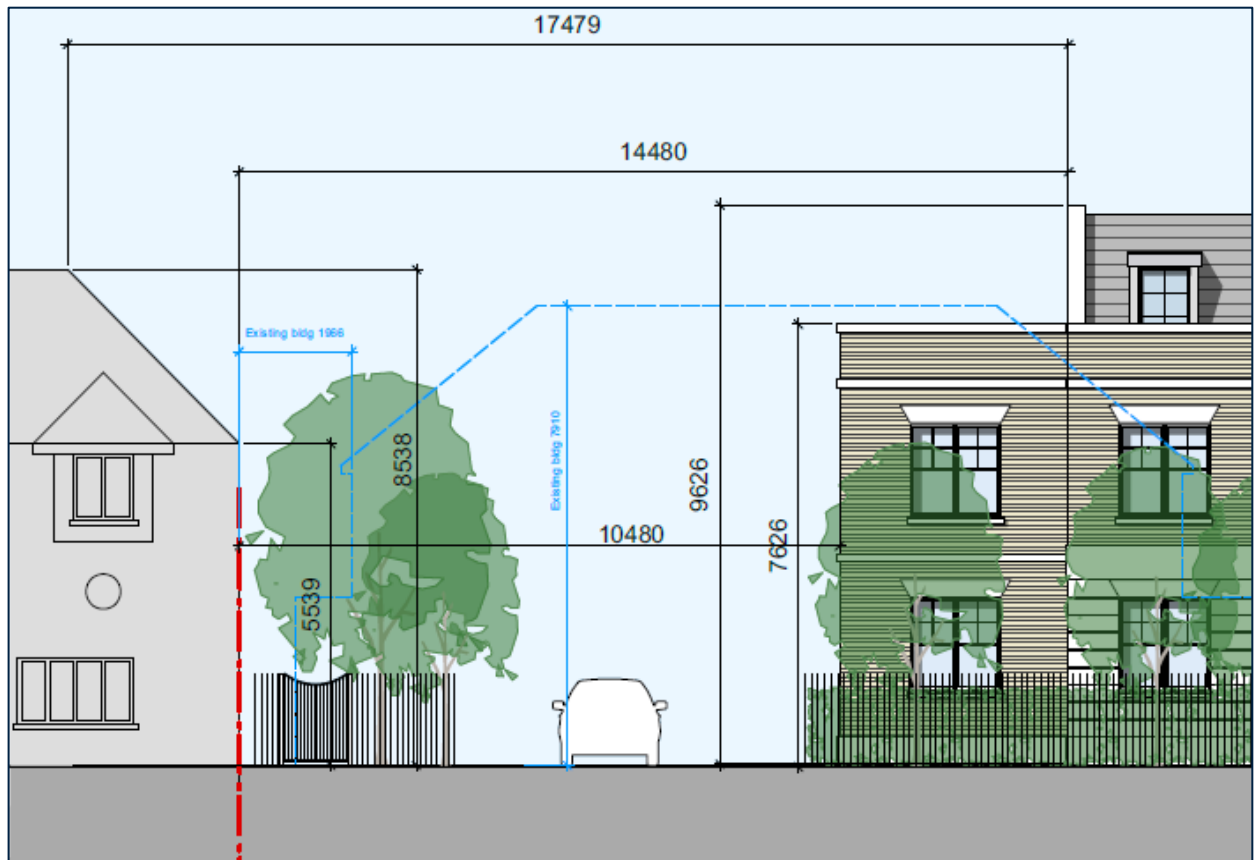


Figure 6.3 Elevation

6.26 Included at below at **Figure 6.4 and 6.5** and at **Appendix 2** are two CGI's of the proposal sitting comfortably within the streetscene.



Figure 6.4 CGI of proposed development from Oatlands Drive



Figure 6.5 CGI of proposed development from Oatlands Drive

- 6.27 It is apparent that the scale of the proposed development is wholly commensurate with that found in the immediate context on Oatlands Drive.
- 6.28 With regards to the proposed height, the Council's design officer commented "*The overall height appears to be greater than the neighbouring development, but the increase is minimal and, in my view, would be unnoticeable. There is also an increased massing and scale to both of the proposed blocks. They are wider than the blocks at 8-14 Oatlands Drive but take advantage of the application sites plot width. The increase provides a different massing to the neighbouring scheme, but it would not, in my view be out of place within the streetscene.*" The design officer's consultee response is summarised as "**no harm to heritage or in design terms**" so much so that, the consultee did not recommend any further design details are secured by condition.
- 6.29 At the neighbouring scheme at 8-14 Oatlands Drive, which was granted planning permission at appeal, the Inspector acknowledged that a development of flats at a higher density, in order to make more effective use of the land, would inevitably result in buildings of a greater scale and form and some change in character. However he found this to be acceptable and stated that the proposals at 8–14 would reflect the scale and form of flatted developments elsewhere along Oatlands Drive on wider sites. He judged the proposals' scale would be compatible with the Elmbridge Design and Character Guide SPD (2012) Companion Guide. The Inspector went on to comment that "*the buildings would have a balanced and well-articulated design approach that would be attractive in its own right*". The proposed development at 16-18 includes a design that is similar to the neighbouring property and should therefore also benefit from the Inspector's observations.
- 6.30 These conclusions made by the Inspector at 8-14 Oatlands Drive in relation to the proposals impact on the character of the area with reference to mass and scale are material considerations and should be taken into account. Similarly, within the Officer's report to Planning Committee when recommending the application for approval, Officers stated that "*Separation between the site and its neighbours is proposed which is considered to help preserve an element of the current character of the area.*" The RfR which alleges the building would be out of keeping is contrary to the Officer's statement.
- 6.31 Part B of Policy DM2 requires that proposals either "*preserve or enhance the character of the area*". The Officer's concluding summary within the committee report is that "*the proposal, on balance, is not considered to result in harm to the character of the area or the streetscene.*" Whilst Officers considered the proposals to preserve the character of the area, and so address Part B of Policy DM2, the appellant considers the proposed development to be an enhancement to the current context – a well-articulated, balanced, and modulated design is proposed with variation in bulk, setbacks and massing. Architectural detailing adds further interest through the use of different materials and details such as banding and window headers. It is considered to meet the aspirations of the NPPF to build beautifully. This is illustrated well in the proposed CGI of the building fronting Oatlands Drive, included at **Figure 6.6** below and at **Appendix 2**.



Figure 6.6. CGI of proposed development from Oatlands Drive

- 6.32 With regards to the allegation within RfR 1 that the development would be out of keeping and detrimental to the character of the area, due to its mass and scale, when viewed from the **rear of the site**, this is also refuted. The rear elevation of Building B is set back from the rear of the site between more than 12 and 14m (on account of the plot's irregular rear boundary).
- 6.33 In addition the Engine River Pond is not located directly behind the sites rear boundary, but to the north west of the site behind the adjacent development at 8-14 Oatlands Drive. Views of the proposed development from the open space of Cowey Sale are heavily obscured by the existing mature tree cover which is to be retained within the scheme with further additional mature tree cover existing outside of the sites boundary. This is demonstrated in the photomontage below at **Figure 6.7**, the vantage point for this image is further north in the Cowey Sale open area and demonstrates the dense tree cover that exists. The image captures a winter time picture, thereafter in Spring, Summer and Autumn, the building would be imperceptible.



Figure 6.7 Photomontage of proposed development viewed from Cowey Sale

- 6.34 The adjacent development at 8-14 Oatlands Drive backs onto the Engine Pond and is more visible from this location than the appeal site. In reaching his decision in allowing the appeal at 8-14 Oatlands Drive, the Inspector had due regard to how the development would be perceived from the Engine River, noting “*Even in close views, the building’s relatively isolated position means it would not be perceived in the close context of other buildings such that it should adhere to immediate local design precedents. Block C would have an acceptable design and its siting would be far enough back from the boundary with the Engine River to provide a suitable landscaped setting and a satisfactory overall appearance*”. It is important to note that the path running alongside the Engine Pond is heavily overgrown, often boggy, and attracts very little foot traffic.
- 6.35 The current appeal site has an even more wooded backdrop with limited views so that it is considered the scheme as viewed from the rear would be in no way harmful.
- 6.36 This is confirmed also by the prevalence of visible built form from the open space and Green Belt from the rear of the properties in the immediate locality, as shown in the images below. **Figure 6.8** below contains images of existing developments along Oatlands Drive, viewed from the open space to the rear.

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Figure 6.8 Photos of Rear View of Properties on Oatlands Drive from open space and green belt to the rear

6.37 Overall, it is demonstrated that the proposal is considered to have an acceptable mass and scale and it is not out of keeping or detrimental to the character of the area. This is demonstrated in the submitted planning application and is agreed by Officer's at EBC and statutory consultees. In their report, Officers conclude at paragraph 70 that "*In summary the proposal, on balance, is not considered to result in harm to the character of the area or the street scene*". Additionally, the Inspector concluded that the similar approach adopted at the neighbouring site was considered to be acceptable.

Reason for Refusal 2

The proposed development fails to enhance the existing landscape or integrate with the surrounding Cowey Sale and Engine River, in conflict with Policy DM6 of the Development Management Plan 2015

6.38 Policy DM6 of the Development Management Plan 2015 relates to landscape and trees and requires that '*Development proposals should be designed to include an integral scheme of landscape, tree retention, protection and/or planting that:*

- a) *Reflects, conserves or enhances the existing landscape and integrates the development into its surroundings, adding scale, visual interest and amenity,*

- b) *Contributes to biodiversity by conserving existing wildlife habitats, creating new habitats and providing links to the green infrastructure network,*
- c) *Encourages adaptation to climate change, for instance by incorporating Sustainable Drainage Systems (SuDS), providing areas for flood mitigation, green roofs, green walls, tree planting for shade, shelter and cooling and a balance of hard and soft elements,*
- d) *Does not result in loss of, or damage to, trees and hedgerows that are, or are capable of, making a significant contribution to the character or amenity of the area, unless in exceptional circumstances the benefits would outweigh the loss,*
- e) *Adequately protects existing trees including their root systems prior to, during and after the construction process,*
- f) *Would not result in the loss or deterioration of irreplaceable habitats including ancient woodland and ancient or veteran trees, unless in exceptional circumstances the benefits would outweigh the loss, and*
- g) *Includes proposals for the successful implementation, maintenance and management of landscape and tree planting schemes.*

In considering consent for works to trees protected by TPO, the Council will:

- i. Assess the amenity value of the tree or woodland and the likely impact of the proposal on the amenity of the area, and*
- ii. In the light of this assessment consider whether or not the proposal is justified, having regard to the reasons put forward in support of it.'*

6.39 RfR 2 specifically addresses point a) of Policy DM6 specifically. Point a) requires development proposals to include a planting scheme that 'reflects, conserves or enhances' the existing landscape and integrates the development into the surroundings. However, RfR 2 states that the proposal is unacceptable because it would "fail to enhance the existing landscape". Based on the wording of Policy DM6 which is quoted within the reason for refusal, there is no mandatory requirement for development proposals to enhance the existing landscape. If a proposal is not considered to achieve this, then either reflecting or conserving the existing landscape would also meet the requirements of the policy. On this basis, the RfR is unjustified in this instance. Moreover the existing 'landscape' at the appeal site comprises domestic gardens that are tended to and have paraphernalia associated with such. **Figure 6.9** below provides an extract of the submitted landscaping masterplan.

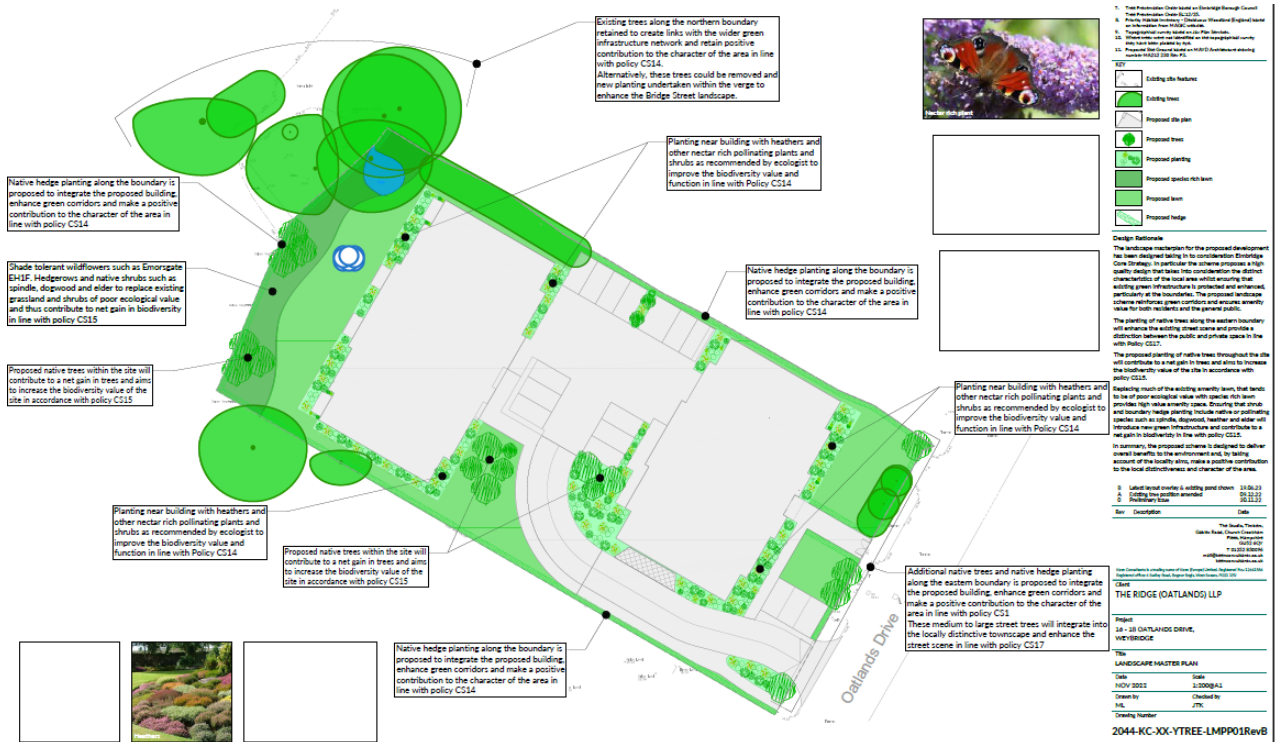


Figure 6.9 Extract of the submitted Landscape Masterplan

- 6.40 Despite the RfR being unjustified, the appellant contends that the proposals do in fact enhance the landscape and coherently integrates the development into the surrounding Cowey Sale and Engine River. The proposals include a betterment from the existing situation on the site due to the high-quality landscaping which is proposed. The proposed development includes 560sqm of rear gardens that are set back up to 14m from the rear boundary. Therefore it is submitted that the proposals will provide an improved setting and view from the Engine River at the rear of the site. A generous well landscaped garden would sit between the rear block and Cowey Sale. In addition as noted earlier the immediate backdrop to the appeal site is very heavily wooded and this site does not back onto the Engine Pond.
- 6.41 A pleasant and well landscaped communal garden with a wooded backdrop behind will provide a soft transition between Building B and the Cowey Sale open space, as illustrated in the CGI at **Figure 6.10** below and at **Appendix 2**.



Figure 6.10 CGI's of the proposed landscaped rear gardens

6.42 Moreover, during the determination period, there were no objections from the Council's Tree Officer with regards to the visual impact of the development when viewed from the Engine River. The Council's Tree Officer has reviewed the scheme and has raised no objection to the development subject to the use of Arboricultural conditions. These conditions would include a Tree Planting & Maintenance condition to ensure there is sufficient replanting at the site. The type of planting should pay regard to the recently published DM Advice note on supporting biodiversity and encouraging nature in development.

6.43 Fundamentally, professional Officers at EBC concluded in their committee report that *"it is considered that the proposal would comply with Policy DM6 of the Development Management Plan 2015"*. Again, the Council's reason for refusal which refers to Policy DM6 is contrary to the assessment by Officers and their considered recommendation.

Other Material Considerations

6.44 Table 6.1 below provides a summary of the consultee comments received during the application's determination period.

Table 6.1. Summary of Consultee Comments

Consultee	Summary of comment
Environmental Services (JWS)	Initially requested further information, once this was provided, raised no objection.
EBC Greenspaces	Objected to the scheme based on the impact of the development on the restored large pond small, mammals, trees and drainage in the adjacent area of Biodiversity Opportunity Area due to the proximity and height of the development resulting in reduced levels of sunlight reaching the pond.
EBC Trees	No objection subject to conditions.
EBC Heritage & Conservation (Design)	No objection.
Environment Agency	Initially objected to the scheme identifying that the FRA was insufficient. After further details were submitted, the EA have considered the FRA to be sufficient subject to the use of conditions.
Surrey Wildlife Trust (SWT)	Initially commented that the application required additional information prior to determination. Following a site visit and further ecological information, no objection is raised subject to necessary conditions.
Surrey Bat Group	Support comments from SWT
SCC Transport Development Planning	No objection, subject to conditions
SCC Conservation and Archaeology	No objection, subject to conditions
SCC Sustainable Urban Drainage	No objection, subject to conditions
Surrey Police	No objection, subject to conditions
Affinity Water	No response
Spelthorne BC	No objection
Natural England	Standing advice offered. LPA should consider the impact on veteran trees and any local wildlife sites.

6.45 It is clear from the above table that when the application was recommended for approval, there was only one single objection from a consultee – the Council’s own ‘Greenspaces’ Officer. Whilst the Greenspaces Officer did object for the reasons given, the Appellant argues that this objection should be given very little weight because, the remit of the consultee is unclear but moreover, the Council’s appointed ecology and wildlife consultee, the Surrey Wildlife Trust, considered the proposals to be acceptable and raised no objection. As did the Council’s Tree Officer and the Surrey Bat Group. The Appellant’s response to the objection from the Greenspaces Officer is provided at **Appendix 4** of this Statement. It is also relevant to highlight that, aside from referencing the Greenspace Officer objection at paragraph 13 of the planning committee report amongst the list of consultee responses, the objection is not referred to at all subsequently in the planning committee report. This likely illustrates the weight given by Officers to the points made in the objection.

6.46 The Planning Statement submitted as part of the original planning application provides a summary of all the submitted technical reports and documents and concludes that the development proposals are technically sound and in accordance with policy. In addition, EBC's committee report concludes that the development proposal is considered acceptable with regard to technical considerations including highways, flooding, ecology, trees and noise.

Titled Balance

6.47 The appellants case is that the development wholly accords with the development plan and that the presumption in favour at paragraph 11(c) is engaged. However, if the Inspector disagrees, it is demonstrated in this appeal statement that the tilted balance is engaged due to the housing land supply position. Officers at EBC agree with this position and concluded in their committee report recommending the application for approval that "*the adverse impacts of granting permission are not considered to significantly and demonstrably outweigh the benefits and therefore the application is recommended for approval*".

6.48 Should, however the Inspector find that there is conflict with the Development Plan, then given the Council's lack of a four year housing land supply, the tilted balance is engaged and so any harm must significantly and demonstrably outweigh the benefits of the scheme. The appellant contends that any harm is minimal and is more than outweigh by the benefits of the development, which are considerable as follows:

- Delivering 33 residential units that will clearly contribute in a significant way to the Council's housing land supply in a sustainable urban location. This should be given substantial weight given the Council's low housing land supply and very poor track record in housing delivery;
- Delivering the size and mix of smaller units sought in the Borough. This should be given substantial weight given the identified housing need for smaller units in the Borough;
- Making efficient use of a previously developed site in a sustainable location. This should be given moderate weight given the environmental constraints in the Borough which mean that the delivery of such numbers of residential units in these locations is infrequent;
- Delivering a net gain in Biodiversity. This should be given moderate weight as this is not a requirement of planning policy at the time the planning application was submitted and determined;
- Having direct and indirect economic benefits through the construction of the development and after through spending within the local economy. This should be given moderate weight, especially given the current economic climate and the need to boost the economy;

- Providing electric charging points to encourage the use of electric cars. This should be given a low degree of weight; and
- A notable contribution towards CIL, which will help fund wider infrastructure improvements in the Borough. This is given modest weight as this is a notable contribution towards the Council's CIL fund.

6.49 Overall, if harm is found, then this harm is limited and outweighed by the considerable benefits of the development. In applying the titled balance in their committee report, Officers noted para's 128 and 129 that

“The proposal would add thirty one net additional housing units which is of an acceptable unit mix, officers attribute significant weight to this. The proposal is also acceptable in terms of policy for design, impact on neighbouring properties, impact on future occupiers, highways, safety & parking, trees and ecology which are given moderate weight.

As such the adverse impacts of granting permission are not considered to significantly and demonstrably outweigh the benefits and therefore the application is recommended for approval.”

Summary

- 6.50 For the reasons set out within this Section, the reasons for refusal given by the Members of the Planning Committee are strongly refuted. The appeal proposals will deliver 33 high quality new homes in a well-designed, attractive development at a sustainable urban, brownfield location in a Borough significantly constrained by Green Belt without a four year housing land supply and failing on their housing delivery test.
- 6.51 The appellant maintains that that no harm will result to the character of the area and that the proposals will introduce an attractive, well-designed new building which would enhance the streetscene and surrounding landscape.
- 6.52 The application was recommended for approval by the Council's professional Officers. Overall the Appellant submits that the appeal proposal accords with the Development Plan and should be approved without delay with the presumption in favour of sustainable development engaged. Moreover the “tilted balance” is also engaged due to the lack of a four year housing land supply. Were the Inspector to find some harm resulting from the appeal proposals then such harm must significantly and demonstrably outweigh the benefits of the development, when the resulting benefits are significant and so should be afforded such weight.
- 6.53 For these reasons the Appellant respectfully requests that the appeal be allowed and planning permission be granted.

7. Planning Conditions, Planning Obligations and Community Infrastructure Levy

Planning Conditions

7.1 The planning conditions and informatives proposed by the Council should the appeal be allowed are re-provided below along with the Appellant's comments (where relevant).

#	Suggested Planning Condition / Informative	Appellant Comment
Conditions		
1	<p><u>Time Limit</u></p> <p>The development hereby permitted shall be begun before the expiration of three years from the date of this permission.</p> <p>Reason: To comply with Section 51 of Part 4 of the Planning and Compulsory Purchase Act 2004</p>	No Comments
2	<p><u>List of approved plans</u></p> <p>The development hereby permitted shall be carried out in strict accordance with the following list of approved plans and documents:</p> <p>MA212 350 Rev P4 Existing and Proposed Street Scenes MA212 351 Rev P1 Proposed Street Scenes MA212 352 Rev P3 Front Building – Proposed Inner Courtyard Streetscene MA212 353 Rev P2 Rear Building – Proposed Front Street Scene MA212 354 Rev P1 Rear Building – Proposed Rear Street Scene MA212 370 Rev P1 Front Building – Proposed Elevations MA212 371 Rev P1 Rear Building – Proposed Elevations Received on 19/12/2022 MA212 001 Rev P3 Location Plan and Block Plan Received on 19/01/2023 MA212 360 Rev P2 Proposed Side Elevation and Section A-A MA212 361 Rev P2 Proposed Side Elevation and Section B-B received on 05/07/2023 and MA212 230 Rev P6 Proposed Site Plan MA212 231 Rev P6 Proposed Site Context Plan MA212 250 Rev P10 Proposed Site Basement Plan MA212 251 Rev P10 Proposed Site Lower Ground Floor Plan MA212 252 Rev P11 Proposed Site Ground Floor Plan MA212 253 Rev P9 Proposed Site First Floor Plan MA212 254 Rev P9 Proposed Site Second Floor Plan MA212 255 Rev P10 Proposed Site Roof Plan MA212 400 Rev P2 Front Building – Proposed Floor Plans MA212 410 Rev P2 Rear Building – Proposed Floor Plans MA212 260 Rev P3 Proposed Bin and Bike Store Plans Received on 19/10/2023.</p>	No Comments

	Reason: To ensure that the development is carried out in a satisfactory manner.	
3	<p><u>Materials – approved</u></p> <p>The development shall not be erected other than in the following materials</p> <p>Brickwork – heritage stock facing brick – yellow buff tone Render – Through- colour off-white ashlar render Windows – Timber double glazed vertical sliding sash window Stone detailing- Wetcast reconstituted stone banding Roof – Slate roof tiles Dormers – Dark Grey GRP dormer with profiled fascia to be located as per the approved elevation plans or such other materials as have been approved in writing by the borough council.</p> <p>Reason: To ensure that a satisfactory external appearance is achieved of the development in accordance with policy DM2 of the Elmbridge Development Management Plan.</p>	No Comments
4	<p><u>Obscure glazing</u></p> <p>Prior to the first occupation of the development hereby permitted the side facing windows on the southwest and northeast elevations of the development hereby permitted shall be glazed with obscure glass that accords with level three obscurity as shown on the 60rboricult textured glass privacy levels (other glass suppliers are available) and only openable above a height of 1.7m above the internal floor level of the room to which it serves. The window shall be permanently retained in that condition thereafter.</p> <p>Reason: To preserve the reasonable privacy of neighbouring residents in accordance with policy DM2 of the Elmbridge Development Management Plan.</p>	No Comments
5	<p><u>Flat roof – no other use</u></p> <p>The flat roof to the development hereby permitted shall not at any time be altered or adapted to form a balcony, roof garden or similar amenity area without the grant of a further specific permission from the borough council.</p> <p>Reason: To prevent undue loss of privacy to adjacent properties contrary to policy DM2 of the Elmbridge Development Management Plan and the Elmbridge Design and Character Supplementary Planning Document.</p>	No Comments
6	<p><u>Obscure balcony screen details</u></p> <p>Prior to the first occupation of the development hereby permitted details shall be submitted to and agreed by the Local Planning Authority for an obscure glass screen at 1.8m minimum from relevant floor level that accords with level three obscurity as shown on the Pilkington textured glass privacy levels (or similar) on the southwest edge of the balconies nearest the southwest elevation and on the northeast edge of the balconies nearest the northeastern elevation. The screens shall installed prior to occupation and be permanently maintained in that condition thereafter.</p> <p>Reason: To preserve the privacy of neighbouring residents in accordance with policy DM2 of the Elmbridge Development Management Plan.</p>	No Comments
7	<p><u>Landscaping scheme</u></p>	No Comments

	<p>Prior to first occupation [being brought into use] written details and plans of the following landscaping works shall be submitted to and approved in writing by the local planning authority and these works shall be carried out as approved. This scheme shall include:</p> <ul style="list-style-type: none"> h) positions, height, species, design, materials and type of boundary treatment(s) b) hard surfacing materials <p>Development shall be carried out in accordance with the approved details and shall be maintained.</p> <p>Reason: To ensure the provision, establishment and maintenance of an appropriate landscape scheme in the interests of the visual amenities of the locality.</p>	
8	<p><u>New access</u></p> <p>No part of the development shall be first occupied unless and until the proposed vehicular access to the site has been constructed and provided with visibility zones in accordance with the approved plans and thereafter the visibility zones shall be kept permanently clear of any obstruction over 1.05m high.</p> <p>Reason: The condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users and in order to meet the objectives of the NPPF, and to satisfy policy CS25 of the Elmbridge Core Strategy (2011), and policy DM7 of the Elmbridge Development Management Plan (2015).</p>	No Comments
9	<p><u>Closure of existing access</u></p> <p>The development hereby approved shall not be first occupied unless and until existing accesses from the site to Oatlands Drive have been permanently closed and any kerbs, verge, footway, fully reinstated.</p> <p>Reason: The condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users and in order to meet the objectives of the NPPF, and to satisfy policy CS25 of the Elmbridge Core Strategy (2011), and policy DM7 of the Elmbridge Development Management Plan (2015).</p>	No Comments
10	<p><u>Construction Transport Management Plan</u></p> <p>No development shall commence until a Construction Transport Management Plan, to include details of:</p> <ul style="list-style-type: none"> (a) parking for vehicles of site personnel, operatives and visitors (b) loading and unloading of plant and materials € storage of plant and materials (d) programme of works (including measures for traffic management) € provision of boundary hoarding behind any visibility zones (f) measures to prevent the deposit of materials on the highway (g) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused (h) on-site turning for construction vehicles <p>has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.</p>	No Comments

	Reason: The condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users and in order to meet the objectives of the NPPF, and to satisfy policy CS25 of the Elmbridge Core Strategy (2011), and policy DM7 of the Elmbridge Development Management Plan (2015).	
11	<p><u>Electric vehicle charging</u></p> <p>The development hereby approved shall not be occupied unless and until each of the proposed parking spaces are provided with a fast charge socket (current minimum requirements – 7 kw Mode 3 with Type 2 connector – 230v AC 32 Amp single phase dedicated supply) and thereafter retained and maintained to the satisfaction of the Local Planning Authority.</p> <p>Reason: The condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users and in order to meet the objectives of the NPPF, and to satisfy policy CS25 of the Elmbridge Core Strategy (2011), and policy DM7 of the Elmbridge Development Management Plan (2015).</p>	No Comments
12	<p><u>Parking and turning areas</u></p> <p>The development hereby approved shall not be first occupied unless and until space has been laid out within the site in accordance with the approved plans for vehicles and cycles to be parked and for vehicles to turn so that they may enter and leave the site in forward gear. All cycle parking shall be secure, covered and lit. Thereafter the parking and turning areas shall be retained and maintained for their designated purposes.</p> <p>Reason: The condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users and in order to meet the objectives of the NPPF, and to satisfy policy CS25 of the Elmbridge Core Strategy (2011), and policy DM7 of the Elmbridge Development Management Plan (2015).</p>	No Comments
13	<p><u>Programme of Archaeological Work</u></p> <p>No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work, to be conducted in accordance with a written scheme of investigation which has been submitted to and approved, in writing, by the Local Planning Authority.</p> <p>Reason: The site lies in an area of archaeological potential, particularly for, but not limited to, Prehistoric and Medieval remains. The potential impacts of the development can be mitigated through a programme of archaeological work. This is in accordance with Policy DM12 of the Development Management Plan 2015 and the NPPF.</p>	No Comments
14	<p><u>Tree Pre-commencement Meeting (With tree protection)</u></p> <p>No development including groundworks and demolition shall take place and no equipment, machinery or materials shall be brought onto the site for the purposes of the development until a pre-commencement meeting has been held on site and attended by a suitable qualified arboriculturist, representative from the Local Planning Authority and the site manager/foreman.</p> <p>The site visit is required to ensure operatives are aware of the agreed working procedures and the precise position of the approved tree protection measures that remain installed in accordance with the approved tree protection plan(s) until all development works are finished and building materials have been removed</p> <p>CONSULTANT: KEEN/SITE: 16-18 Oatlands Drive Weybridge Surrey KT13</p>	No Comments

	<p>9JL/TPP: 2044-KC-XX-YTREE-TPP01RevA/DATE: 2022 To arrange a pre-commencement meeting please email cspringett@elmbridge.gov.uk with the application reference and contact details.</p> <p>Reason: To protect and enhance the appearance and character of the site and locality, reduce the risk to protected and retained trees in accordance with the approved details pursuant to section 197 of the Town and Country Planning Act 1990, and in accordance with policies CS14, DM6 of the Councils Core Strategy 2011 and Development Management Plan 2015. This is required to be a pre-commencement condition as the details go to the heart of the planning permission.</p>	
15	<p><u>Tree Protection Measures (With Pre-Commencement Meeting)</u></p> <p>After the agreed tree protection measures (BS5837 2012 fig.2) have been installed in accordance with the tree protection footprint on approved plans, all tree protection measures shall be maintained for the course of the development works. The development thereafter shall be implemented in strict accordance with the approved details and method statements contained in:</p> <p>CONSULTANT: KEEN/SITE: 16-18 Oatlands Drive Weybridge Surrey KT13 9JL/REPORT: 2044?KC?XX?YTREE/DATE: 2022</p> <p>Reason: To protect and enhance the appearance and character of the site and locality, reduce the risk to protected and retained trees in accordance with the approved details pursuant to section 197 of the Town and Country Planning Act 1990, and in accordance with policies CS14 of the Councils Core Strategy 2011 and Policy DM6 of the Development Management Plan 2015.</p>	No Comments
16	<p><u>Site Supervision</u></p> <p>The completion schedule/report of all the agreed 63rboricultural site supervision and monitoring as approved in the 63rboricultural information</p> <p>CONSULTANT: KEEN/SITE: 16-18 Oatlands Drive Weybridge Surrey KT13 9JL/REPORT: 2044?KC?XX?YTREE SECTION 6.4/DATE: 2022</p> <p>shall be submitted to and approved in writing by the Local Planning Authority within 20 working days of the substantial completion of the development hereby approved. This shall include evidence of compliance through supervision and monitoring of the agreed activities by a suitably qualified arboriculturist.</p> <p>Reason: To protect and enhance the appearance and character of the site and locality, reduce the risk to protected and retained trees in accordance with the approved details pursuant to section 197 of the Town and Country Planning Act 1990, and in accordance with policy CS14 of the Core Strategy 2011 and Policy DM6 of the Development Management Plan 2015.</p>	No Comments
17	<p><u>Tree Retention</u></p> <p>All existing trees, hedges or hedgerows inside the identified site boundary shall be retained, unless shown on the approved drawings as being removed and paragraphs (a) and (b) below shall have effect until the expiration of 5 years from the first occupation of the proposed development.</p>	No Comments

	<p>No retained tree, hedge or hedgerow providing a screen shall be cut down, uprooted or destroyed, other than in accordance with the approved plans and particulars.</p> <p>If any retained tree, hedge or hedgerow is removed, uprooted or destroyed or dies, another tree, hedge or hedgerow of similar size and species shall be planted at the same place, in the next available planting season or sooner.</p> <p>Reason: To protect and enhance the appearance and character of the site and locality, reduce the risk to protected and retained trees in accordance with the approved details pursuant to section 197 of the Town and Country Planning Act 1990, and in accordance with policies CS14, CS15, of the Core Strategy 2011 and DM6 of the Development Management Plan 2015.</p>	
18	<p><u>Tree Planting & Maintenance.</u></p> <p>No development including groundworks and demolition shall take place until full details of all proposed tree planting are submitted to and approved in writing by the Local Planning Authority. Serious consideration needs to given to a significant landscaping scheme that may require engineering solutions in order to work with the amount of hard standing required for parking. More emphasis is required on landscaping to the front of site, consideration should be given to removing low grade trees in order to enhance visual quality with significant replacements. All new planting areas should be protected during construction shown on the tree protection plan.</p> <p>Details are to include.</p> <ul style="list-style-type: none"> “ species, sizes, locations, planting pit design / engineering, supports, and guards or other protective measures to be used. “ planting times and maintenance schedules for aftercare to ensure good establishment. “ size of the site and anticipated area for new planting, the Council expects a minimum of 30x heavy standard – semi mature trees that will be significant at maturity and thrive in their given locations (engineered planting pits may be required for certain areas) to be planted to maintain future 64rboricultural amenity. <p>All tree planting will be carried out in accordance with BS 8545:2014 prior to the occupation of any part of the development.</p> <p>If within a period of 5 years from the date of the planting of any tree, that tree, or any planted in replacement for it, is removed, uprooted, destroyed, or dies, another tree of same size and species shall be planted at the same place.</p> <p>Reason: To protect and enhance the appearance and character of the site and locality, reduce the risk to protected and retained trees in accordance with the approved details pursuant to section 197 of the Town and Country Planning Act 1990, and in accordance with policies CS14, CS15, of the Councils Core Strategy 2011 and DM6 of the Councils Development Management.</p>	No Comments
19	<p><u>Sensitive Lighting Management Plan</u></p> <p>Prior to the commencement of the works, a Sensitive Lighting Management Plan shall be submitted to and approved by the Local Planning Authority. The Sensitive Lighting Management Plan shall be written in accordance with the recommendations of the Bat Conservation Trust's document entitled "Bats and Lighting in the UK - Bats and The Built Environment Series". The proposed development shall be carried out in accordance with the approved details and thereafter maintained.</p>	No Comments

	Reason: To ensure that the proposed development does not cause harm to protected species in accordance with the Wildlife and Countryside Act 1981 and policy CS15 of the Elmbridge Core Strategy 2011.	
20	<p><u>Landscape and Ecological Management Plan (LEMP)</u></p> <p>A detailed Landscape and Ecological Management Plan should be submitted to and approved in writing by the Local Planning prior to the commencement of development. The LEMP should include details of proposed impact avoidance and mitigation for the protected species. In addition, the LEMP should include details of enhancement measures and adequate details of the following:</p> <ul style="list-style-type: none"> a) Description and evaluation of ecological features to be managed and created b) Specifications, number and location of proposed ecological features, where appropriate c) Aims and objectives of management d) Appropriate management options to achieve aims and objectives e) Prescriptions for management actions f) Preparation of a work schedule for securing biodiversity enhancements in perpetuity g) Details of the body or organisation responsible for implementation of the LEMP h) Ongoing monitoring and remedial measures. i) Legal and funding mechanisms by which the long-term implementation of the plan will be secured by the applicant with the management body(ies) responsible for its delivery. j) Monitoring strategy, including details of how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. k) Recommended enhancements, including those for bats, birds, hedgehogs, grass snakes, reptiles and stag beetle to be included within the final design l) Methods to eradicate/ prevent the spread of Schedule 9 invasive plant species, particularly Indian balsam, as set out in the Wildlife and Countryside Act 1981 (as amended). m) Details and confirmation of the biodiversity net gain, identified in the AAE document dated 14/06/2023 titled Technical Note: Biodiversity Net Gain Assessment, received on 27/09/2023, to be secured. <p>The approved details shall be implemented in full to the satisfaction of the LPA prior to the first occupation of the development and maintained as agreed.</p> <p>Reason: To ensure that the development does not result in any adverse impact upon protected species or biodiversity in accordance with Policy CS15 of the Core Strategy 2011, Policy DM21 of the Development Management Plan 2015 and the National Planning Policy Framework 2023.</p>	No Comments
21	<p><u>Construction Environmental Management Plan (CEMP)</u></p> <p>The development hereby permitted shall not commence, including any demolition until a CEMP has been submitted and approved in writing by the Local Authority. The CEMP should include, but not be limited to:</p> <ul style="list-style-type: none"> a. Map showing the location of the ecological features, specifically the watercourse. b. Risk assessment of the potentially damaging construction activities. c. Practical measures to avoid and reduce impacts during construction. d. Location and timing of works to avoid harm to biodiversity features. e. Responsible persons and lines of communication. 	No Comments

	<p>f. Use of protected fences, exclusion barriers and warning signs where necessary.</p> <p>g. Ensure precautionary measures are followed during demolition, site clearance, and tree removal, to avoid harm to terrestrial mammals, bat species and reptiles</p> <p>h. Methods to eradicate/ prevent the spread of Schedule 9 invasive plant species as set out in the Wildlife and Countryside Act 1981 (as amended).</p> <p>i. Details of ecologist supervision during demolition and site clearance</p> <p>j. Detailed protection measures for HPI woodland</p> <p>The CEMP must additionally incorporate the recommendations for bats, birds, Other species and invasive species. The development must be carried out in accordance with the approved detail.</p> <p>Reason: To ensure that the development does not result in any adverse impact upon protected species or biodiversity in accordance with Policy CS15 of the Core Strategy 2011, Policy DM21 of the Development Management Plan 2015 and the National Planning Policy Framework 2023.</p>	
22	<p><u>Biodiversity mitigation</u></p> <p>The development shall be carried out in accordance with the conclusions and recommendations by AAe Environmental including all biodiversity enhancements in their reports and letters received on 27/06/2023 and 19/12/2022.</p> <p>Reason: In the interest of preserving and enhancing protected species and biodiversity in compliance with policy DM21 of the Elmbridge Development Management Plan and the National Planning Policy Framework.</p>	No Comments
23	<p><u>SUDS Design</u></p> <p>The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the planning authority. The design must satisfy the SuDS Hierarchy and be compliant with the national NonStatutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:</p> <p>a) The results of infiltration testing completed in accordance with BRE Digest: 365 and confirmation of groundwater levels.</p> <p>b) Evidence that the proposed final solution will effectively manage the 1 in 30 (+35% allowance for climate change) & 1 in 100 (+40% allowance for climate change) storm events, during all stages of the development. If infiltration is deemed unfeasible, associated discharge rates and storage volumes shall be provided using a maximum discharge rate equivalent to the pre-development Greenfield run-off.</p> <p>c) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.).</p> <p>d) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk.</p> <p>e) Details of drainage management responsibilities and maintenance regimes for the drainage system.</p> <p>f) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.</p>	No Comments

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	Reason: To ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site.	
24	<p><u>SUDS Verification Report</u></p> <p>Prior to the first occupation of the development, a verification report carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority. This must demonstrate that the surface water drainage system has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls), and confirm any defects have been rectified.</p> <p>Reason: To ensure the Drainage System is designed to the National Non-Statutory Technical Standards for SuDS.</p>	No Comments
25	<p><u>Flood Risk Assessment Implementation</u></p> <p>The development shall be carried out in accordance with the submitted flood risk assessment (ref 221584/FRA/MK/RS/01) and the following mitigation measures it details:</p> <ul style="list-style-type: none"> - Finished floor levels shall be set no lower than 11.925 metres above Ordnance Datum (AOD). -There shall be no built development within the 1% annual exceedance probability plus 47% climate change flood extent in accordance with Drawing MA212-250-255 - Proposed Site Plan. <p>These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.</p> <p>Reason: This condition is in accordance with paragraph 167 of the NPPF and seeks to reduce the risk of flooding to the proposed development and future occupants.</p>	No Comments
26	<p><u>Secured by Design</u></p> <p>Prior to the first occupation of development, a full and detailed application for the Secured by Design award scheme shall be submitted to and approved in writing by the local planning authority in consultation with the Surrey Police Designing Out Crime Officers, setting out how the principles and practices of the Secured by Design Scheme are to be incorporated. The development shall be carried out in accordance with the agreed details.</p> <p>Reason: To ensure the safety of the public and occupants of the proposed development in accordance with the NPPF.</p>	No Comments
Informatives		
1	<p><u>SUDS</u></p> <p>If proposed site works affect an Ordinary Watercourse, Surrey County Council as the Lead Local Flood Authority should be contacted to obtain prior written Consent.</p> <p>More details are available on our website.</p>	No Comments

	<p>If proposed works result in infiltration of surface water to ground within a Source Protection Zone the Environment Agency will require proof of surface water treatment to achieve water quality standards. Sub ground structures should be designed so they do not have an adverse effect on groundwater.</p>	
2	<p><u>Water Efficiency</u></p> <p>Developers are encouraged to construct any new dwelling to meet as a minimum the higher Building Regulation standard Part G for water consumption limited to 110 litres per person per day using the fittings approach. The site is in an area of serious water stress requiring water efficiency opportunities to be maximised; to mitigate the impacts of climate change; in the interests of sustainability; and to use natural resources prudently in accordance with the NPPF. Thames Water offer environmental discounts for water efficient development which reduce the connection charges for new residential properties. Further information on these discounts can be found at: https://www.thameswater.co.uk/developers/charges</p>	No Comments
3	<p><u>Construction phase only – Noise and Pollution</u></p> <p>To control noise and pollution during the construction phase where sensitive premises are nearby it is advised that:</p> <p>(a) Work which is audible beyond the site boundary should only be carried out between the following hours: Monday to Friday 08:00 hrs to 18:00 hrs Saturday 08:00 hrs to 13:00 hrs and not at all on Sundays or Bank Holidays.</p> <p>(b) The quietest available items of plant and machinery should be used on site. Where permanently sited equipment such as generators are necessary, they should be enclosed to reduce noise levels.</p> <p>(c) Deliveries and collections should only be received within the hours detailed above.</p> <p>(d) Adequate steps should be taken to prevent dust causing nuisance beyond the site boundary. These could include the use of hoses to damp down stockpiles of materials which are likely to generate airborne dust, to damp down during stone/slab cutting; and the use of bowsers and wheel washes.</p> <p>(e) There should be no burning on site that causes nuisance to local residents.</p> <p>(f) Only minimal security lighting shall be used outside the hours stated above.</p>	No Comments
4	<p><u>Highways Informatives</u></p> <p>New Vehicle Crossovers and Dropped Kerbs The permission hereby granted shall not be construed as authority to carry out any works on the highway. The applicant is advised that prior approval must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, or verge to form a vehicle crossover or to install dropped kerbs. Please see www.surreycc.gov.uk/roads-andtransport/ road-permits-and-licences/vehicle-crossovers-or-dropped-kerbs.</p> <p>Other Works to the Highway The permission hereby granted shall not be construed as authority to carry out any works on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a permit and, potentially, a Section 278 agreement must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. All works on the highway will require a permit and an application will need to be submitted to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road. Please see http://www.surreycc.gov.uk/roads-andtransport/</p>	No Comments

	<p>road-permits-and-licences/the-traffic-management -permit-scheme.</p> <p>The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see www.surreycc.gov.uk/people-andcommunity/emergency-planning-and-community-safety/flooding advice. Closure and reinstatement of existing accesses/footway</p> <p>When a temporary access is approved or an access is to be closed as a condition of planning permission an agreement with, or licence issued by, the Highway Authority Local Highways Service will require that the redundant dropped kerb be raised and any verge or footway crossing be reinstated to conform with the existing adjoining surfaces at the developers expense</p>	
5	<p><u>Electric vehicle charging</u></p> <p>It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. Please refer to: http://www.beama.org.uk/resourceLibrary/beama-guide-to-electric-vehicleinfrastructure.html for guidance and further information on charging modes and connector types.</p> <p>Section 278 Agreement A Section 278 Agreement under the Highways Act 1980 will be required to provide the necessary vehicular access to the site and this may require additional works, such as 'Keep Clear' markings or other works in order to tie in to the current Section 278 scheme for the development at 8-14 Oatlands Drive.</p>	No Comments
6	<p><u>Community Infrastructure Levy (CIL)</u></p> <p>The development permitted is subject to a CIL liability for which a Liability Notice will be issued as soon as practical after the day on which planning permission first permits development.</p> <p>To avoid breaching the CIL regulations and the potential financial penalties involved, it is essential a prior commencement notice be submitted. The notice is available at planningportal.co.uk/cil For the avoidance of doubt commencement of demolition of existing structure(s) covering any part of the footprint of the proposed structure(s) would be considered as commencement for the purpose of the CIL regulations.</p>	No Comments

Section 106 Community Infrastructure Levy

- 7.2 As confirmed within the Officer's report to Planning Committee no S106 Legal Agreement is required because there are no obligations or financial payments that need to be secured to make the development acceptable.
- 7.3 CIL Form 1 was submitted as part of the planning application and the Appellant will pay the required Community Infrastructure Levy (CIL) payments in line with the CIL Regulations 2010.

8. Conclusion and Summary

8.1 This Appeal Statement has been prepared to support the appeal made by Savills on behalf of The Ridge (Oatlands) LLP, following the refusal of planning application 2022/3796, which sought planning permission for:

“Development of 2 detached blocks comprising 33 flats with new vehicular access, associated parking, cycle storage, refuse storage and amenity areas with hard and soft landscaping, and associated engineering and infrastructure works, following demolition of existing houses”

8.2 The application was refused for the following two reasons:

1. The proposed development, by reason of its mass and scale would be out of keeping and detrimental to the character of the area when viewed from both Oatlands Drive and the Engine River in conflict with Policy DM2 of the Development Management Plan 2015 and the NPPF.
2. The proposed development fails to enhance the existing landscape or integrate with the surrounding Cowey Sale and Engine River, in conflict with Policy DM6 of the Development Management Plan 2015.

8.3 This Appeal Statement has demonstrated why the reasons for refusal are unjustified and why the application accords with the Development Plan. Therefore, the appellant contends that the appeal should be allowed.

8.4 The application was supported by a full suite of technical reports which demonstrate that there are no technical reasons as to why planning permission should not be granted. In addition, the application received no objections from Statutory Consultees and was recommended for approval by Officers at the Council. Should the Inspector consider that there would be harm caused, it must be recognised that the tilted balance is engaged and the Local Planning Authority agrees this is the case (see paragraph 126 of the committee report). Therefore permission should be granted unless any adverse impacts of doing so *would significantly and demonstrably* outweigh the benefits, when assessed against the policies in the Framework taken as a whole. The committee report at paragraph 129 confirmed that in the view of the Council’s professional Officers, the harms did not outweigh the benefits.

8.5 The proposals represent a high-quality, sustainable and contextual development. The proposed mix of residential accommodation is in accordance with the Council’s housing requirements. In this respect the proposals would make a strong contribution to the Borough’s short-term housing supply and this should be given substantial weight, given the council’s acute shortage of available development land, which it recognises.

8.6 On the basis of the above it is respectfully requested that the appeal is allowed, and planning permission is granted.

Oatlands Drive

The properties that lie to the northwest of Oatlands Drive are characterised by an eclectic mix of houses and apartment buildings. This document demonstrates the existing context and the architectural form, massing and articulation that has formed our proposal.



Aerial photograph of site and surrounding context of Oatlands Drive



Riverside Gardens, 8-14 Oatlands Drive - Oatlands Drive elevation (under construction)

Oatlands Drive - northwest context



Riverside Gardens, 8-14 Oatlands Drive - Oatlands Drive elevation (under construction)



Riverside Gardens, 8-14 Oatlands Drive - Oatlands Drive elevation (under construction)



Chaseley Court, 42 Oatlands Drive - Oatlands Drive elevation

Oatlands Drive - northwest context



Chaseley Court, 42 Oatlands Drive - Oatlands Drive elevation



Chaseley Court, 42 Oatlands Drive - Rear elevation



Anarth Court, Treglos, Albany Court, 44, 46 & 48 Oatlands Drive - Oatlands Drive elevation

Oatlands Drive - northwest context



Anarth Court, Treglos, Albany Court, 44, 46 & 48 Oatlands Drive - Oatlands Drive elevation



Anarth Court - Rear elevation



Oakhill Gardens - Oatlands Drive elevation

Oatlands Drive - northwest context



Ridge Mount - Oatlands Drive elevation (back land development)



Oakhill Gardens - Rear elevation



Broad Water Place - Oatlands Drive elevation

Oatlands Drive - northwest context



Berkeley Court elevation



Broad Water Place - Rear elevation



Austin Place - Oatlands Drive elevation

Oatlands Drive - northwest context



Berkeley Court elevation



Berkeley Court - Rear elevation

- Single family detached dwelling
- Terraced housing
- Apartments

Oatlands Drive - Typology Assessment



Appendix 2: CGI's and Photomontage



Appendix 2: CGI's and Photomontage



Appendix 2: CGI's and Photomontage



Appendix 2: CGI's and Photomontage



Appendix 2: CGI's and Photomontage



Authority Monitoring Report 2022/23

Elmbridge Local Plan



December 2023

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Acronyms

- Affordable Housing Enabling Fund (AHEF)
- Air Quality Management Area (AQMA)
- Authority Monitoring Report (AMR)
- Biodiversity Opportunity Area (BOA)
- Community Infrastructure Levy (CIL)
- Conservation Area Management Plans (CAMPs)
- Department for Transport (DfT)
- Dwellings Per Annum (dpa)
- Housing Delivery Test (HDT)
- Indices of Multiple Deprivation (IMD)
- Land Availability Assessment (LAA)
- Local Development Documents (LDDs)
- Local Development Scheme (LDS)
- Local Planning Authority (LPA)
- National Planning Policy Framework (NPPF)
- Planning Practice Guidance (PPG)
- Site of Nature Conservation Interest (SNCI)
- Site of Special Scientific Interest (SSSI)
- Special Protection Area (SPA)
- Standard Methodology (SM)
- Statement of Community Involvement (SCI)
- Strategic Access Management & Monitoring (SAMM)
- Strategic Employment Land (SEL)
- Strategic Housing Market Assessment (SHMA)
- Supplementary Planning Document (SPD)
- Waste Local Plan (WLP)
- Written Ministerial Statement (WMS)

1.0 Introduction

Purpose

- 1.1 The purpose of this Authority Monitoring Report (AMR) is to assess the implementation of the Local Development Scheme and the extent to which policies in adopted Development Plan are being achieved.
- 1.2 Every Local Planning Authority (LPA) must publish an AMR at least annually as required by [Section 35 of the Planning and Compulsory Purchase Act 2004](#) as amended by [Section 113 of the Localism Act 2011](#). This enables the council to share the performance and achievements of the planning service with the local community at least once every 12 months. Authorities can largely choose for themselves which targets and indicators to include in the report provided they are in line with the relevant regulations. These regulations are summarised in [Paragraph 073 \(Reference ID: 61-073-20190315\)](#) of National Planning Guidance that states:

“Local Planning Authorities must publish information at least annually that shows progress with Local Plan preparation, reports any activity relating to the duty to cooperate, any information collected which relates to the indicators in the plan, and any policies which are not being implemented. Local planning authorities can also use the Authority Monitoring Report to provide up-to-date information on the implementation of any neighbourhood plans that have been brought into force and monitor the provision of housing for older and disabled people. It can help inform if there is a need to undertake a partial or full update of the local plan, when carrying out a review every 5 years from the adoption date.

This information should be made available publicly. Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out what information the reports must contain. The reports can include other information, for example, the reports can draw on Infrastructure Funding Statements to highlight the contributions made by development, including section 106 planning obligations, Community Infrastructure Levy and New Home Bonus payments, and how these have been used”.

Adopted Development Plan

- 1.3 The Monitoring Indicators reported against in this AMR are adopted as part of the following monitoring frameworks:
- The Core Strategy 2011
 - Development Management Document 2015
 - Council Plan for the reporting year

- 1.4 The data presented in this AMR relates to the development, projects and activities undertaken between 1 April 2022 and 31 March 2023. If such time specific data is unavailable, the most up-to-date information has been used instead.

The Council Vision 2030

- 1.5 As set out in the [Council Vision 2030](#), the borough council is working towards achieving the Vision of what we would like Elmbridge to be in 2030 – ‘A sustainable, thriving Elmbridge driven by the power of our community’. In delivering this Vision the Council is striving to be a ‘high performing, environmentally and financially sustainable organisation’.
- 1.6 To help achieve the vision the council has set out priorities for the first three years, which includes:
- Maximising our open spaces
 - Adoption of the new Local Plan for the borough.

Monitoring Indicators

- 1.7 The monitoring of individual Core Strategy and Development Management Plan policies, including data collection and analysis, has therefore been categorised using key indicators / topic areas. These are:
- Performance of Planning Services
 - Delivering the right homes
 - Housing land supply
 - Supporting the local economy and employment
 - Protecting and enhancing the natural environment
 - Sustainable lifestyles
 - Conserving the historic environment
 - Quality of life
- 1.8 Where appropriate, the format includes signposting to other sources, publications and monitoring reports, many produced by the council. This reduces duplication and increases the accuracy and consistency of reporting.
- 1.9 As the collection and reporting of Community Infrastructure Levy (CIL) spending is governed by its own statutory process, this AMR contains an overview of key activities. Full details of planning obligations (Section 106) and CIL monies collected and spent are included in the Annual Infrastructure

Funding Statement. This statement also includes the infrastructure list, which sets out the infrastructure projects or types of infrastructure which the council intends will be, or may be, wholly or partly funded by CIL. These details are reported in the Annual Infrastructure Funding Statement 2023 which is published every December.

2.0 Performance of Planning Services

Progress on the Local Plan

2.1 Monitoring of the council’s plan-making progress is against the Local Development Scheme (LDS). An updated [Local Development Scheme 2023-2026](#) was published in July 2023 and sets out the timetable for key milestones in the plan making process. Although it is outside of the monitoring period for this AMR it is considered the most appropriate as it is up-to-date and supersedes the LDS that was in place for this monitoring period. Table 1 below highlights the key dates relating to the draft Elmbridge Local Plan as well as details of supplementary planning documents and associated projects.

Table 1: Local Development Scheme 2023-26

Item	Coverage	Status	Commenced?	Consultation/ Representation	Consultation period	Submission	Examination	Adoption
Elmbridge Local Plan	Borough wide Local Plan		Yes	Reg.19 draft plan (Representation): Summer 2022	6 wk	Summer 2023	Winter 2023/ Spring 2024	Autumn 2024

Item	Coverage	Status	Commenced?	Consultation/ Representation	Consultation period	Submission	Examination	Adoption
Review of the Community Infrastructure Levy Charging Schedule	Borough wide	The charging schedule for the Community Infrastructure Levy will go through an examination and payment will be a legal requirement as set out in the Planning and Compulsory Purchase Act 2008 and CIL Regulations 2010 (as amended).	Yes	Draft Schedule: Autumn 2023	6 wk	Winter 2023	Spring 2024	Autumn 2024
Elmbridge Design Code	Borough wide	The document will provide more detailed guidance on the implementation policies set out in the Local Plan.	Yes	Various throughout 2022/23	4wk	N/A	N/A	Spring 2024
Climate change and Renewables SPD	Borough wide	The document is a Supplementary Planning Document and will provide more detailed guidance on the implementation of policies set out in the Local Plan.	Autumn 2023	Summer 2024	4wk	N/A	N/A	Spring 2025

Item	Coverage	Status	Commenced?	Consultation/ Representation	Consultation period	Submission	Examination	Adoption
Biodiversity and nature SPD	Borough wide	The document is a Supplementary Planning Document and will provide more detailed guidance on the implementation of policies set out in the Local Plan.	Autumn 2023	Summer 2024	4wk	N/A	N/A	Spring 2025
Thames Basin Heath SPA SPD	Thames Basin Heath SPA Zone of influence	The document is a Supplementary Planning Document and will provide more detailed guidance on the implementation of policies set out in the Local Plan and the Thames Basin Heaths SPA delivery Framework.	Autumn 2023	Summer 2024	4wk	N/A	N/A	Spring 2025
Affordable Housing SPD	Borough wide	The document is a Supplementary Planning Document and will provide more detailed guidance on the implementation of	Summer 2024	Winter 2024	4wk	N/A	N/A	Summer 2025

Item	Coverage	Status	Commenced?	Consultation/ Representation	Consultation period	Submission	Examination	Adoption
		policies set out in the Local Plan.						
Review of Flood Risk SPD	Borough wide	The document is a Supplementary Planning Document and will provide more detailed guidance on the implementation of policies set out in the Local Plan.	Spring 2024	Autumn 2024	4wk	N/A	N/A	Summer 2025
Review of Parking SPD	Borough wide	The document is a Supplementary Planning Document and will provide more detailed guidance on the implementation of policies set out in the Local Plan.	Autumn 2024	Spring 2025	4wk	N/A	N/A	Autumn 2025
Healthy Environment SPD	Borough wide	The document is a Supplementary Planning Document and will provide more detailed guidance on the implementation of	Autumn 2024	Spring 2025	4wk	N/A	N/A	Autumn 2025

Item	Coverage	Status	Commenced?	Consultation/ Representation	Consultation period	Submission	Examination	Adoption
	policies set out in the Local Plan.							

- 2.2 Since the publication of the previous LDS 2022 the council has undertaken a regulation 19 Representation period on the Local Plan, the regulation 19: Draft Elmbridge Local Plan 2037 was open from 17 June 2022 to 29 July 2022. This Regulation 19 representation period was the last stage of public engagement before submitting the draft Local Plan to the Planning Inspectorate for examination. This was a formal process with comments sought on the soundness and legal compliance of the draft Local Plan. Work around the publication of the Regulation 19 representations period included finalising key evidence base documents such as the sustainability appraisal, habitats regulation assessment, equalities report, viability assessment, transport assessment and an updated land availability assessment.
- 2.3 As part of the Government’s duty to cooperate, the team continued to work constructively with the neighbouring authorities and other prescribed bodies in accordance with its [Duty to Co-operate Scoping Statement \(2016\)](#). Please see [Duty to Co-operate Statement of compliance \(2022\)](#) for further information.
- 2.4 In this monitoring year, work progressed on the draft Design Code Supplementary Planning Document with several engagement events taking place. In October 2022 face-face events in each of the settlement areas took place to find out from the public what people liked/disliked about their area as well as producing a questionnaire for those who attended and those who were unable. In January 2023 a design code vision workshop was held to find out what should be the vision for each area and a questionnaire was available to support this engagement.

Delivering sustainable planning decisions

2.5 The delivery of appropriate sustainable planning decisions is monitored against two indicators in figure 1. Appeal performance is also included in this section.

Figure 1: Monitoring indicators for planning services

Indicators
The % of major, minor and other planning applications processed within the statutory timescales for each quarter and for the whole year
The total number of applications of other types (e.g. CCOs, Trees etc.) decided

Processing applications

2.6 Table 2 outlines the percentage of major, minor and all other applications that were decided within the statutory time-period. Major and minor applications continue to exceed both national and local targets with no change relating to last year's major applications and a slight decrease in minor applications from last year by 2%. Other applications decisions did not meet the local target, however there was an improvement on last year's figures as the figures were 1% higher than the previous year's results.

Table 2: Development Management proportions of applications decided within the statutory time period

	Major Applications (13 weeks)	Minor Applications (8 weeks)	Other Applications (Decisions issued)
April to June 2022 (Q1)	80%	82%	86%
July to September 2022 (Q2)	83%	79%	90%
October to December 2022 (Q3)	83%	86%	79%
January to March (Q4) 2022/2023	100%	85%	88%
2022/23	87%	83%	86%
National Target	60%	70%	70%
Difference	+27%	+13%	+16%
Local Target	83%	83%	92%
Difference	+4%	0%	-6%
2021/22	87%	85%	85%
Difference	0%	-2%	+1%

Appeal performance

2.7 Table 3 outlines the total number of appeals by quarter and Table 4 outlines the number of appeals decisions dismissed which has decreased from 64.5% to 62.2% in this monitoring period. This represents a 2.3% decrease on the previous year which is 2.8% below the local target of 65%.

Table 3: Appeal decisions (total) by quarter 2022/23

	Total	Minors Allowed	Minors Dismissed	Majors Allowed	Majors Dismissed
Q1	21	5	15	0	1
Q2	15	5	9	1	0
Q3	20	4	15	1	0
Q4	7	2	4	1	0

Table 4: Appeal decisions (%) by quarter 2022/23¹

	Appeals Allowed	Appeals Dismissed
April to June 2022 (Q1)	34%	66%
July to September 2022 (Q2)	40%	60%
October to December 2022 (Q3)	35%	65%
January to March 2023 (Q4)	42%	58%
2022/23	37.8%	62.2%

2.8 The appeal performance of individual Development Management and Core Strategy policies is provided in Table 5 and 6. It demonstrates that Policy DM2 Design and Amenity and Policy CS17 Local Character, Density and Design remain the policies most frequently appealed against with 32 and 27 appeals raised respectively.

2.9 There were also 26 policies which did not have any appeals raised against them. This is 8 more than the 14 reported for the previous year.

Table 5: Appeal performance by Development Management and Core Strategy Policies 2022/23

DM Policy	No of appeals by policy	% of total appeals	Number of appeals allowed	% of appeals allowed	No. of appeals dismissed	% of appeals dismissed
DM1 – Sustainable Development	0	0%		N/A		N/A
DM2 – Design and Amenity	32	28%	19	59%	13	41%
DM3 – Mixed Uses	0	0%	1	100%	0	0%

¹ Table 4 includes Minor, Major and 'Other' types of appeals (Householder applications, Changes of use, Adverts, Listed Building applications, Certificates of Lawfulness, Notifications and Permissions in Principle applications). Other types of appeal are not included in Table 3.

DM Policy	No of appeals by policy	% of total appeals	Number of appeals allowed	% of appeals allowed	No. of appeals dismissed	% of appeals dismissed
DM4 – Comprehensive Development	0	0%		N/A	0	N/A
DM5 – Pollution	1	1%	1	100%	0	0%
DM6 - Landscape and Trees	4	3%	2	50%	2	50%
DM7 – Access and Parking	4	3%	3	75%	1	25%
DM8 – Refuse, Recycling and External Plant	1	1%	1	100%	0	0%
DM9 – Social and Community Facilities	0	0%		N/A		N/A
DM10 – Housing	3	3%	1	33%	2	67%
DM11 – Employment	0	0%		N/A		N/A
DM12 – Heritage	9	8%	2	22%	7	78%
DM13 – Riverside Development and Uses	2	2%	0	0%	2	100%
DM14 – Evening Economy	0	0%		N/A		N/A
DM15 – Advertisements, Shopfronts and Signage	1	1%	1	100%	0	100%
DM16 - Telecommunications	1	1%	1	100%	0	0%
DM17 – Green Belt (Development of new buildings)	0	0%		N/A		N/A
DM18 – Green Belt (Development of existing buildings)	0	0%		N/A		N/A
DM19 – Horse Related Uses and Developments	0	0%		N/A		N/A
DM20 – Open Space and Views	0	0%		N/A		N/A
DM21 – Nature Conservation and Biodiversity	1	1%	1	100%	0	0%

Table 6: Appeal performance by Core Strategy policy 2022/23

Core Strategy Policy	No. of appeals by policy	% of total appeals	No. of appeals allowed	% of appeals allowed	No. of appeals dismissed	% of appeals dismissed
CS1 – Spatial Strategy	0	0%		N/A		N/A
CS2 – Housing Provision, Location and Distribution	1	1%	0	0%	1	100%
CS3 – Walton-On-Thames	3	3%	3	100%	0	0%
CS4 – Weybridge	3	3%	2	66%	1	34%
CS5 – Hersham	0	0%		N/A		N/A
CS6 – Whiteley Village	0	0%		N/A		N/A
CS7 – East and West Molesey	2	2%	1	50%	1	50%
CS8 – Thames Ditton, Long Ditton, Hinchley Wood and Weston Green	1	1%	1	100%	0	0%
CS9 – Esher	2	2%	0	0%	2	100%
CS10 – Cobham, Oxshott, Stoke D’Abernon and Downside	2	2%	0	0%	2	100%
CS11 - Claygate	0	0%		N/A		N/A
CS12 – The River Thames Corridor and its Tributaries	2	2%	0	0%	2	100%
CS13 – Thames Basin Heaths Special Protection Area	2	2%	2	100%	0	0%
CS14 – Green Infrastructure	0	0%		N/A		N/A
CS15 – Biodiversity	1	1%	1	100%	0	0%
CS16 – Social and Community Infrastructure	0	0%		N/A		N/A

CS17 – Local Character Density and Design	27	23%	14	52%	13	48%
CS18 – Town Centre Uses	0	0%		N/A		N/A
CS19 – Housing Type and Size		0%		N/A		N/A
CS20 – Older People	0	0%		N/A		N/A
CS21 – Affordable Housing	4	3%	0	0%	4	100%
CS22 – Gypsies, Travellers and Travelling Showpeople	0	0%		N/A		N/A
CS23 – Employment Land Provision	0	0%		N/A		N/A
CS24 – Hotels and Tourism	0	0%		N/A		N/A
CS25 – Travel and Accessibility	0	0%		N/A		N/A
CS26 – Flooding	0	0%		N/A		N/A
CS27 – Sustainable Buildings	0	0%		N/A		N/A
CS28 - Implementation and Delivery	0	0%		N/A		N/A
CS29 – Monitoring	0	0%		N/A		N/A

Community Infrastructure Levy

2.10 Monitoring the collection of CIL/S106 obligations continues with use of the system, Exacom. This provides full integration with the EBC Finance software for the generation of invoices and automatic updates in return when payments are received. This reduces manual duplication of data and adds robust financial reconciliation between systems.

Other activities and achievements of Planning Services

Development Management

- 2.11 The Development Management team continues to implement the Pre-application Advice Service, which aims to help improve the quality and speed of advice to developers in advance of the submission of a planning application. This is also intended to improve the quality of proposals submitted to the council. Planning Performance Agreements on larger pre-application enquiries and applications are also provided.
- 2.12 The current [Statement of Community Involvement](#) was published in September 2021. A public consultation was carried out from 27 January to 24 February 2023 regarding a change to the publication of representations. Following a review of consultation responses, it was agreed to review the proposals and officers are preparing alternative proposals which will be subject to public consultation.

Business Support Team

- 2.13 Within the 2022/23 monitoring period, The Business Support Team, undertook a substantial restructure. The team are now sub-divided in order to provide administrative and technical support to not only the various teams with planning (Development Management, Policy, Trees, Heritage and Compliance) but also the teams within Environmental Health (Licensing, Noise and Pollution and Food Safety).
- 2.14 The team continue to process, validate and register all planning applications submitted and provides support on Planning Performance Agreements and the Pre-application Advice Service alongside Development Management. During the 2022/23 monitoring period, the team processed and registered a total of 3611 planning applications, 410 compliance cases relating to planning breaches and 122 planning and enforcement appeals.

Compliance

- 2.15 During the period from 1 April 2022 to 31 March 2023, the Planning Compliance team opened 410 investigations into alleged breaches of planning control and closed 446 investigations. In addition, the team served 0 breach of condition notices, 0 stop notices, 0 temporary stop notice, 5 planning enforcement notices and 1 planning contravention notices in this monitoring year.

Infrastructure and CIL

- 2.16 The CIL regulations set out the requirements for collecting, administering and reporting, via the Infrastructure Funding Statement. The administration of the CIL programme is via the Strategic Priority Programme (SPP) which is administered through the Strategic CIL Working Group. The annual funding process for community-based applications is administered by the Local Spending Boards and Claygate Parish Council. The monitoring software package is being used for the collection of CIL and planning obligations (Section 106).

- 2.17 The council continues to engage with and respond to a number of Nationally Significant Infrastructure Project (NSIP) plans and consultations, including Heathrow Airport expansion, Gatwick Airport expansion, and the River Thames Scheme, as well as regional infrastructure project consultations from Surrey County Council, the Environment Agency and other agencies.

Trees

- 2.18 The Trees team have been working in collaboration with other departments to improve our record keeping by adding layers to Mapstack, including updated Tree Risk Layers, Oak Processionary Moth, New Tree Planting, Subsidence Risk and Tree Canopy Coverage. These will help provide valuable data and resources for all teams involved in future projects and reducing the risk of unmanaged trees on Elmbridge land.
- 2.19 The team is continuing to undertake tree inspections in accordance with the Council's tree risk management strategy. Part of the process has been identifying pieces of land with ownership and management disputes. The team have also been working with SCC Highways to confirm whether several sites are under SCC management. The results are due to be uploaded to Mapstack by the end of the year.
- 2.20 The team has worked to improve the Council's ordering and management of tree works and contractor liaison to keep better track of funding and ensure works are completed in a timely fashion.
- 2.21 Statistically in this monitoring year, the Tree team has responded to 644 arboricultural development management consultation responses, 315 tree work applications and 181 conservation area tree work notifications. Whilst also serving 41 Tree Preservation Orders to protect assets under threat.

Heritage

- 2.22 The Heritage and Design services continues to provide specialist advice on all applications that affect heritage assets and on major applications for substantial development. The service has been working closely with local residents and Councillors to improve and protect Elmbridge's built environment.
- 2.23 The Heritage Team has been working on an update to the Local List of heritage assets in partnership with Surrey County Council. This was consulted on between the 5th December 2022 – 13th January 2023 and an [updated local list](#) was taken to Cabinet and agreed on the 5th July 2023 outside of the monitoring year.

3.0 Delivering the right homes

- 3.1 The delivery of housing in the borough is monitored against a series of objectives (set out in figure 2) and indicators (set out in figure 3). The mix of homes and affordable housing delivery is also included in this section.

Figure 2: Council objectives to delivering the right homes in Elmbridge

Objectives
To provide sufficient housing to meet the local requirement of 3,375 units in the most sustainable locations in the urban area.
To supply homes and land that address local housing needs in terms of mix, size, design and tenure.
To meet the needs of an increasingly ageing population through a variety of measures, including lifetime homes, specialist accommodation and care and support services that respond to their needs.
To address inequalities, promote better integration and increase opportunities for people who live in less affluent areas of the borough.
To adopt a viable approach to contribute to increasing the supply of affordable housing as a key priority
To provide for the identified pitch requirements of Gypsies and Travellers in sustainable locations supported by good quality facilities

Figure 3: Council indicators to assess the delivering of the right homes

Indicators
Number of affordable homes from new-build and acquisitions (split between each type)
Percentage of affordable homes completed
Number of new homes on garden land
Percentage of affordable homes provided without a grant (covering all types of grant)
Proportion of new market dwellings that are 1, 2 and 3 bedrooms
Proportion of new affordable homes that are 1, 2 and 3 bedrooms (including the split between flats and houses)
Tenure mix of affordable housing provided (Social Rent, Affordable Rent and Shared Ownership) ²
Densities of completed housing developments
Densities of completed housing developments in Town, District and Local Centres
New Homes Bonus
Number of submitted forms to join the self-build register
Number of permissions and completions for starter homes
Number of people registering interest in starter homes
Private sheltered completions

² See the Glossary at Annex 2 of the [NPPF](#) for affordable housing tenure definitions.

Extra care completions
Delivery of Gypsy and Traveller pitches
Amount of development (Number of new homes) on previously developed land

Housing need

- 3.2 The target to deliver 225 homes per year, as set by the Core Strategy 2011, is out of date. Therefore, housing delivery and land supply is calculated against the borough's identified housing need figure. The Local Housing need figure for Elmbridge is calculated using the National Standard Methodology (SM) as set by the Government. Using the affordability ratio published on 23 March 2023, this version of the SM gives a figure of 650 dwellings per annum.
- 3.3 The [Assessment of Local Housing Needs \(2020\)](#) is a relevant and up to date source of qualitative information regarding the size, type and tenure of homes needed in Elmbridge. This supersedes the previously cited Strategic Housing Market Assessment [SHMA] (2016). The assessment concluded there is an overwhelming need for smaller new homes. Housing need can be broken down by size of homes required with 1 bed (20% needed), 2 beds (50% needed), 3 beds (20% needed) and plus 4 beds (10% needed). The delivery of smaller homes will provide much needed choice and balance to the supply in the housing market.
- 3.4 In terms of affordable housing, the [Assessment of Local Housing Needs \(2020\)](#) identified a net need of 269 Affordable Housing units per annum (which equates to 42% of our Local Housing Need Figure as calculated by the Standard Methodology). This is broken down as 71% Affordable Rental units and 29% Intermediate. The identified Affordable Housing needs, in terms of bedrooms is broken down as: 15% 1 beds, 34% 2 beds, 11% 3 beds and 40% 4+ beds.

Table 7: Housing need changes since the Core Strategy 2011

Source	Status	New Homes per year
Core Strategy 2011	Target – Out of date	225
Local Housing Needs Assessment	Local Housing Need Figure	626
Published Local Housing Need Figure (as of 31 March 2023) using the Standard Methodology	Local Housing Need Figure	650

Housing delivery

- 3.5 Table 8 demonstrates that housing delivery has continued to exceed the (out of date) Core Strategy target of 225 since its adoption in the 2010/2011 monitoring period. The number of completions delivered in 2022/23 was 236. This represents a decrease in completion compared to 768 in the previous

monitoring year. However in the previous monitoring year there were large site completions which included 375 units at Walton Court Station and at Rydens.

Table 8: Overall net housing completions

Monitoring Year	Additional Homes Completed
2010/11	355
2011/12	300
2012/13	264
2013/14	257
2014/15	273
2015/16	240
2016/17	267
2017/18	231
2018/19	353
2019/20	396
2020/21	302
2021/22	768
2022/23	236

3.6 Table 9 sets out the net delivery of new homes by settlement area per annum and sets out the variance against the target number of homes for each settlement. It should be noted that the target figures, as set out in Policy CS2 of the Core strategy, are based on the Core Strategy target of 225 net dwellings per annum. This is now out of date as it has been superseded by the standard methodology figure of 650 net dwellings per annum as the new standard. It is however a good indicator of the spatial distribution of development around the borough. There are only two settlements which are not delivering the Core Strategy target. All other settlements are exceeding the target.

Table 9: Net delivery of new homes by settlement area

Settlement	Net number of completions 2011-2023	Target 2011-2023	Variance against target (homes)	Variance against target (%)
Claygate	69	40	+29	+73
Cobham, Oxshott, Stoke D'Abernon and Downside	355	460	-105	-23
East and West Molesey	347	380	-33	-9
Esher	404	200	+204	+102
Hersham	433	278	+155	+56
Long Ditton, Thames Ditton, Hinchley Wood and Weston Green	521	312	+209	+67

Settlement	Net number of completions 2011-2023	Target 2011-2023	Variance against target (homes)	Variance against target (%)
Walton-On-Thames	1,220	558	+662	+119
Weybridge	563	500	+63	+13

- 3.7 In May 2013 a temporary permitted developed right for change of use from office (Class B1(a)) to residential (Class C3) was granted. This was to drive underused commercial properties and encourage the development of residential properties. This temporary right has since been made permanent in May 2016 and also expanded to allow the demolition of office buildings for new residential use.
- 3.8 The net increase in housing units through permitted development is set out in Table 10. In 2022/23, there were 92 net dwellings completed through permitted development rights with a further 6 currently under-construction. In addition, 320 net units have permission under Permitted Development legislation but are not yet under-construction. Where subsequent applications for the same site exist, previous applications have not been included to avoid double counting.

Table 10: Net units permitted through the lawful change of use from office to residential in 2022/23

Development Status in 2022/23	Net new homes
Extant	320
Under-Construction	6
Complete	92
Total	418

Optimisation of development land

- 3.9 The NPPF states that where there is a shortage of land for meeting identified need, it is especially important that planning decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. It further states that ‘Local Planning Authorities should refuse applications that fail to make efficient use of land, taking into account the policies within the NPPF’ (paragraph 125 part c).
- 3.10 Table 11 shows an increase in development density across Elmbridge from housing completions in 2022/23 of 35.5%. This is largely driven by higher density completions in Esher, East and West Molesey, Hersham and Thames Ditton, Long Ditton, Hinchley Wood and Weston Green. The density in the settlement areas is calculated by looking at each planning permission and dividing the number of units by the size of the plot. These are then grouped by settlement and an average taken of the completed developments

to arrive at the reported figure. Table 12 shows the densities of developments completed within town, district and local centres.

Table 11: Densities of new homes by settlement area

Settlement	2021/22 dph*	2022/23 dph*	Percentage change +/-
Claygate	No new homes	204.5	N/A
Cobham, Oxshott, Stoke D'Abernon and Downside	14.5	14.1	-2.8
East and West Molesey	44.1	102.2	+75.9
Esher	17.4	58.1	+234
Hersham	51.4	73.2	+42.41
Thames Ditton, Long Ditton, Hinchley Wood and Weston Green	53.5	71.4	+33.5
Walton-On-Thames	45.9	42.4	+7.6
Weybridge	50.8	35.5	-30.1
Borough- wide average	39.6	75.1	35.5

*Density per hectare

Table 12: Densities of new residential development within the borough's Town, District and Local Centres at the end of the monitoring year 2022/23

Town, District and Local Centres	2022/23 dph total
Claygate Local Centre	400
Cobham District Centre	-
East Molesey District Centre	166.1
Esher District Centre	161.2
Hersham District Centre	90.9
Thames Ditton and Hinchley Wood Local Centres	371.3
Walton-On-Thames Town Centre	-
Weybridge District Centre and Weybridge Queens Road Local Centre	97.3
Average	214.5

3.11 National policy gives 'substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs (paragraph 120-point c). The council's Core Strategy Policy CS1 states that new development will be directed toward previously developed land within the existing built-up area. In this monitoring year, 94% of completed residential development was on brownfield land.

Table 13: Net housing completions by land type

	No. of new homes	Percentage
Brownfield	221	94%
Greenfield	3	1%
Garden	12	5%
Total	236	100%

Delivering the right homes

3.12 The delivery of the right type homes is very important. The Local Plan evidence base indicates the need for smaller market homes, primarily 1, 2 and 3 bed homes. At the end of the monitoring year a gross total of 296 gross new dwellings (Table 14) were completed. Amongst these were 170 flats which represents 57% of the total completions, with the next largest housing type being detached properties. Additionally, 60% of the total housing completions were 1- and 2-bedroom homes which is a decrease from the 80% completed in the previous year.

Table 14: Housing completions by type and size (gross)³

House type	1 bed	2 bed	3 bed	4 bed	Total
Flat	81	81	8	0	170
Terrace	10	1	7	1	19
Semi-Detached	0	1	35	4	40
Detached	1	2	16	48	67
Total	92	85	66	53	296

Table 15: The number of replacement dwellings granted permission and completed in Elmbridge in the year 2022/23 (schemes resulting in zero net change)

2022/23	Net new homes
Granted Permission	15
Completed	41

3.13 As set out in section 1 of the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) each Local Planning Authority [LPA] must hold a Self-Build Register which is accessible for individuals to join in they have an interest in building their own home.

3.14 At the end of 2022/23, there were 25 individuals on the Self-Build register.

³ This includes replacement dwellings.

Table 16: The number of submissions of interest in self-build housing through the completion of the council’s online form

Monitoring Year	Number of submissions
2020/21	168
2021/22	80
2022/23	25
Total	273

3.15 The Town and Country Planning [Brownfield Land Register Regulations \(2017\)](#) is a statutory requirement for Local Planning Authorities to prepare and publish a Brownfield Land Register and update it on at least an annual basis. The purpose of the register is to support Local Planning Authorities with their delivery of housing more quickly and efficiently on utilised brownfield land. The register will also be used to monitor the government's commitment to the delivery of brownfield sites.

Table 17: The number of sites added to the Brownfield Register

Monitoring Year	Number of sites added to the Brownfield Register
2017/18	14
2018/19	0
2019/20	54
2020/21	11
2021/22	5
2022/23	44

Table 18: The grant to be received from the Governments ‘New Home Bonus’ Scheme

Monitoring Year	Grant Received
2017/18	£1,102,433
2018/19	£957,930
2019/20	£864,320
2020/21	£461,774
2021/22	£1,028,050
2022/23	£114,885

Affordable Housing

Affordable housing

3.16 The Written Ministerial Statement (November 2014) and the publication of the updated NPPF in 2019 introduced a conflict with the council’s approach to affordable housing provision as set out in Policy CS21. The NPPF set out that local planning authorities should not seek affordable housing contributions on

development sites of 10 dwellings or less ('small sites'). Following legal advice, the council decided to continue to apply Policy CS21 in the decision-making process and to consider on a case-by-case basis the weight to be given to conflicting local and national planning policy.

- 3.17 To support this decision, the council published a position Statement, the first of which was published in 2016. This was subsequently updated in February 2017 and then in November 2018. An update of the [Statement \(October 2021\)](#) was published the previous monitoring year and includes references to new applications and appeals and provides the latest data on house and rental prices, explains the affordability ratios in Elmbridge in comparison with other areas of England and sets out the delivery of affordable housing using the financial contributions collected.
- 3.18 In addition to this, a new [DM Advice Note 6: First Homes](#) was published in October 2021. The Government's policy on First Homes and how it should be implemented is set out in the Government's Written Ministerial Statement (24 May 2021) and Planning Practice Guidance (PPG). The purpose of this Advice Note is to set out the key information relating to First Homes and how this relates to the implementation of Policy CS21 (Affordable Housing) of the Elmbridge Core Strategy (2011).
- 3.19 During the 2022/23 monitoring period, the council has had success in defending its position of requiring affordable housing contributions on developments of 10 dwellings or less. In total 7 appeals were decided against the requirement to make such contributions. The appeal was dismissed by the inspector on 4 occasions with three being allowed.
- 3.20 The council is committed to the delivery of new affordable homes. Tables 19-23 outline the delivery in 2022/23 as well as financial contributions collected to enable the delivery of future affordable homes.
- 3.21 The council is continuing with its approach on seeking affordable housing contributions from small sites⁴. Small sites are a major source of new homes in Elmbridge. Without the ability to collect affordable housing contributions on small sites, the ability of the council to provide affordable homes will be highly restricted.
- 3.22 In relation to the delivery of new affordable homes, 2022/23 marked the completion of 13 new affordable homes compared with 111 the previous year. There was a total of 8 units completed as temporary accommodation for the homeless which is not included in the total as this does not fully meet the criteria of affordable housing. In addition to this, there were 210 new affordable homes under-construction at the years end with construction yet to begin on 149 more. Two additional affordable housing units were acquired in Elmbridge under the Next Steps scheme by Transform acquisitions (see Table 21).

⁴ [Statement on Affordable Housing provision on small sites \(updated October 2021\)](#)

3.23 In total £24,442,306.21 has now been received through planning obligations to the housing enabling fund (Table 22). This is an increase of £6,390,724.21 from the previous monitoring year.

Table 19: Affordable Housing Delivery 2022/23

	Social Rent*	Affordable Rent*	Intermediate Affordable (Including Shared Ownership*	Total
Need				
Developer Contributions SPD	70%	30%	0%	100%
LHMA 2020	68 (17%)	215 (54%)	116 (29%)	100%
Delivery				
2022/23 Completed	4 (31%)	2 (15%)	7 (54%)	13 (100%)
2022/23 Under Construction	29 (14%)	89 (42%)	92 (44%)	210 (100%)
2022/23 Unimplemented	19 (13%)	80 (54%)	50 (33%)	149 (100%)

*Definitions can be found in the glossary at Annex 2 of the [National Planning Policy Framework](#).

Table 20: Affordable Housing Financial Contributions 2022/23

Affordable Housing Contributions in 2022/23	Affordable Housing Collections Collected since 2011
£1,347,033.41	£21,744,677.10

Table 21: Affordable Housing units through acquisitions 2022/23

Scheme	Number of Affordable Homes
Elmbridge Homeownership Assistance Scheme	0
Elmbridge Property Acquisition Scheme	0
Transform Housing Support- Next Steps Acquisition Scheme	2
Total	2

Table 22: Monies received through planning obligations for the Councils Housing Enabling Fund

Monitoring Year	Amount cumulative
2016/17	£5,600,000
2017/18	£6,600,000
2018/19	£8,925,845
2019/20	£11,373,582
2020/21	£15,723,582
2021/22	£18,051,582
2022/23	£24,442,306.21

Table 23: Proposed Affordable Housing Schemes on Council owned sites

Site	Number of Units	Status	Anticipated Completion date
Ansell Hall	10	Permission Granted, work on site started in July 2021	2023/24

3.24 There were no submissions of interest for starter homes or applications received for permissions to build starter homes.

Housing for older people

3.25 In light of the competing pressures on development land in the borough, Use Class C2 (Residential Institutions) proposals are required to be supported by robust evidence to demonstrate that the proposal represents the most efficient use of the site. This is further explained in the council's Development Advice Note 3 Specialist accommodation need.

3.26 Within 2022/23 there were 0 net C2 units completed, 188 units under construction and 320 with planning permission that have yet to be implemented.

Table 24: Use Class C2 residential development 2022/23

Application number by status	Site Address	Gross Units	Net C2 Dwellings	Gross Bed Spaces	Net Recorded Units
Extant					
2019/0329	Site of Crow Gables 131 Fairmile Lane Cobham KT11 2BU	74	74	0	74

2020/1218	11 St Marys Long Ditton KT6 5EU	6	5	0	5
2020/0832	Homebase New Zealand Avenue Walton-On- Thames KT12 1XA	222	209	0	209
2019/1813	The Royal Cambridge Home, 82-84 Hurst Road, East Molesey	32	4	32	32
Under- Construction					
2020/1020	Upper Court, Portsmouth Road, Esher, KT10 9JH	112	111	112	111
2017/2534	St Georges House 24 Queens Road Weybridge KT13 9UX	43	43	0	43
2019/3370	Hillview Nursery Seven Hills Road Walton-On- Thames KT12 4DD	64	0	64	32
2020/3112	Former 10 Ashley Road Walton-On- Thames KT12 1HU	4	0	4	2
Complete – nil					

Table 25: Number of Sheltered Homes delivered

Monitoring Year	Net number of sheltered homes completed	Residual target remaining to be delivered by 31 March 2021
2016/17	2	141
2017/18	4	137
2018/19	0	137
2019/20	0	137

2020/21	0	137
2021/22	0	137
2022/23	0	n/a

Gypsy Roma, Travellers and Travelling Showpeople

3.27 In 2022/23, there was no change to the number of Gypsy, Roma and Traveller pitches in Elmbridge.

Table 26: Total number of Gypsy, Roma, and Traveller pitches

Type of site	No of sites	Total no of Pitches/Plots
Public	1	16
Private sites with permanent permission	7	29
Private site with temporary permission	0	0
Private Travelling Showperons Yard	1	1

Table 27: Net change in the number of Gypsy, Roma and Traveller pitches

	2018/19	2019/20	2020/21	2021/22	2022/23
Permissions Granted	0	0	4	0	0
Under-Construction	0	0	0	0	0
Completed	0	0	4	0	0

4.0 Housing land supply

- 4.1 This section sets out the council's housing land supply position and provides a housing trajectory for Elmbridge.

Indicators
Amount of developable land available in the next five years
Future housing land supply beyond five years
Housing trajectory and overview

Figure 4: Council indicators for housing land supply for Elmbridge

Housing Land Supply against the Local Housing Need Figure

- 4.2 The NPPF expects strategic policy-making authorities to follow the standard method (SM) for assessing local housing need. The SM uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. The Elmbridge Local Housing Need calculation is set out in full in the [Establishing Local Housing Need Paper 2022](#).
- 4.3 The Government's approach to calculating local housing need uses household projections and affordability ratio, adding an uplift for areas such as Elmbridge where average house prices are not affordable for those on an average wage. Regarding the household projections, the Government continues to use the 2014-based projections (as opposed to those more recently published). It is important to note that if the use of more up to date projections were applied, the local housing need for Elmbridge would reduce.
- 4.4 The resulting Local Housing Need (LHN) figure calculated by the SM is the baseline against which the council will assess its Housing Land Supply position. The Council's latest calculation of housing need (based on the standard method) uses the household projections for the period 2023 – 2033 (from the 2014 projections) and applies the affordability ratio published March 2023.
- 4.5 The Land Availability Assessment 2023 (LAA) identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. This was updated during the monitoring year and provides the evidence needed for the five-year housing land supply and the housing trajectory with the 31 March 2023 as its base date.
- 4.6 Table 28 sets out the land supply figures including a windfall site allowance. A non-implementation discount across sites with planning permission has also been highlighted. The table shows the land supply figures against the updated LHN figure, which results in a shortfall of 28% with the non-implementation

discount. The LAA 2023 provides the detailed evidence to support the windfall allowance figure and the non-implementation discount rate.

Table 28: Housing Land Supply 2023-2038 against the Local Housing Need Figure

Under Construction at March 31 2023	Planning Permissions not yet implemented at 31 March 2023	LAA sites (1-5 years)	LAA sites (6-10 years)	LAA sites (11-15 years)	Small Site Windfall Allowance	Total Estimated Capacity	Local Housing Need (LHN) Figure	Shortfall
966	1556	524	1489	1698	957	7,190	9,750	-2,560 -26%
966	1400*	524	1489	1698	957	7,034	9,750	-2,716 -28%

*10% non-implementation discount rate applied.

Five Year Housing Land Supply

4.7 Paragraph 74 of the NPPF requires LPAs to demonstrate a 5-year supply of deliverable housing land plus a 5, 10 or 20% buffer depending on circumstances that the local authority falls within. Elmbridge is required to add a 20% buffer as there has been significant under-delivery over the previous three years, to improve the prospect of achieving the planning supply. The council's 5-year housing land supply requirement is calculated as follows:

Calculation (650 units x 5 years) + 20% = 3,900 / 5 years = 780 units per annum

4.8 The 5-year land supply objective is therefore 3,900 units / 780 units per annum. Table 29 and Figure 5 provides a breakdown of the council's 5-year housing land supply calculations based on the LHN Figure.

Table 29: The Council's 5 Year Housing Land Supply

Column ID	Housing Requirement 31 March 2023- 1 April 2027	Result
a	Local Housing Need Figure (LHN)	650
b	LHN x 5 years - 1 April 2023- 1 April 2027	3250
	Buffer	
c	20% Buffer b x 20%	650
d	Total housing requirement b + c	3900
e	Annual requirement d/5	780
	Housing supply	
f	Commencements	966
g	Planning permissions*	1400
h	LAA 1-5	524
l	Windfalls in year 5	87
i	Expected supply for 2023-2027 (f+g+h+i)	2977
j	Expected supply surplus/deficit (i-d)	-923
k	Supply in years i/e	3.81

*A 10% discount has been applied for non-implementation



Figure 5: The Council’s 5 Year Housing Land Supply

Housing Trajectory

4.9 The housing trajectory for Elmbridge has been calculated based on the Government’s Standard Methodology (SM). The 15-year land supply requirement is therefore, 9,750/ 650 per annum.

4.10 Table 30 demonstrates the applied LHN figure for the forthcoming plan period against the current housing land supply. Combining the number of units under construction, unimplemented planning permissions, identified opportunity sites, as well as an estimated windfall allowance, there is potential for the delivery of 7,034, homes across the next plan period.

Table 30: Local Housing Need Figure 2023-2038 Housing Land Supply (Discount applied*)

Deliverable Housing Sites	Homes
Under Construction	966
Unimplemented Planning Permissions*	1400
Opportunity Sites 1-5 Years	524
Opportunity Sites 6-10 Years	1489
Opportunity Sites 11-15 Years	1698
Windfall Sites 5-10 Years	522
Windfall Sites 11-15 Years	435
Total	7034
Annualised Supply	468
Years of Supply (Total / 650)	10.8

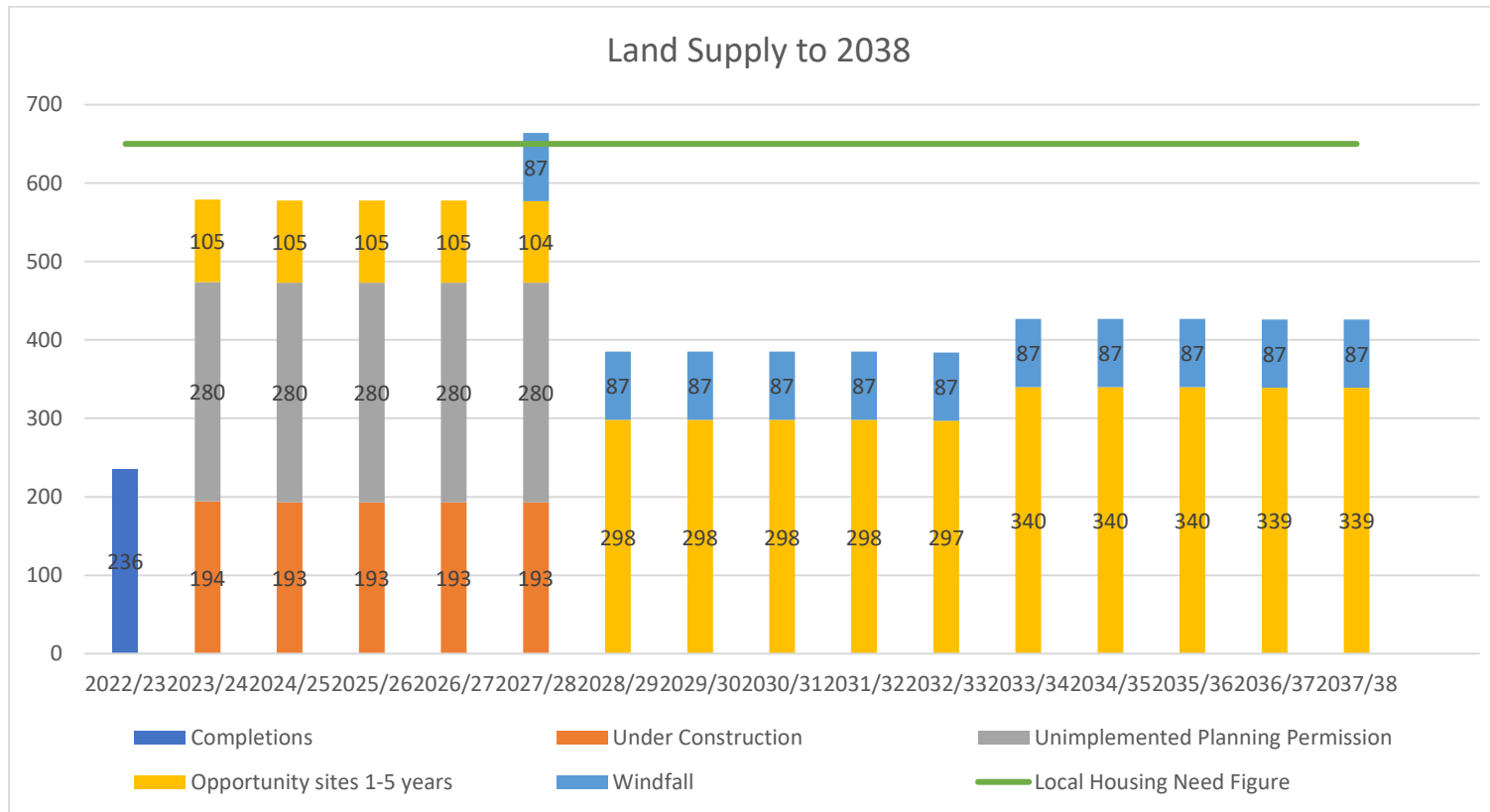


Figure 6: The Council's Housing Land Supply trajectory to 2038

Summary of Elmbridge’s Housing Land Supply Assumptions

4.11 Table 31 provides a summary of assumptions used to calculate the current land supply position. This includes the provision of C2 accommodation⁵.

Table 31: Summary of Housing Land Supply calculation assumptions

Assumption	Summary and rationale
Application of a 20% buffer to the supply of specific deliverable sites	Added as required by paragraph 74 of the NPPF which sets out that this level of buffer is required due to there being significant under delivery over the past 3 years.
Provision of C2 accommodation	Since the changes to Planning Practice Guidance in March 2014, C2 units are now able to be counted towards the supply of new homes. The council’s approach is that for developments that provide self-contained units these will be counted on a 1:1 basis towards the housing supply, whereas those that are part of a wider care home with shared facilities will be counted on a 2:1 basis (e.g. 2 units counting as 1 dwelling).
Application of a non-implementation discount rate	This takes account of the fact that not all sites granted permission will be implemented. Based on historical trends a figure of 10% is applied.
Windfall allowance	The method for this is to calculate the average level of delivery in windfall sites for the period between 20 July 2011 (the adoption date of the Core Strategy) and 31 March 2023. This is set out in the LAA 2023. To prevent double counting, 1 to 4 units under construction and with planning permission are subtracted and the remaining allowance split across years 5 to 15.
Phased delivery of large sites	The phased delivery of sites spreads the delivery of the number of units over a number of years to take account of the fact that there may be longer lead-in times due to various factors such as site clearance and preparation, pre-commencement conditions and the size of the site itself.

⁵ Please see Land Availability Assessment 2023 for detailed evidence on assumptions.

5.0 Supporting the local economy and employment

5.1 The supporting the local economy is monitored against the objectives in figure 7 and the indicators in figure 8.

Figure 7: The Council’s objectives for supporting the local economy and employment in Elmbridge

Objectives
To maintain a thriving economy by providing an adequate supply of land and buildings, in the right places, to support a diverse range of business and commercial activity
To support and develop the distinctive roles of our town and village centres to provide a strong focus for commercial and community development
To continue to support the borough’s variety of Tourist attractions whilst protecting the amenities of those who live close by and provide an adequate supply of visitor accommodation in appropriate and sustainable locations

Figure 8: The council’s indicators for supporting the local economy and employment in Elmbridge

Indicators
Population economically active, including unemployed
Number of jobs
Total amount of additional employment floor space - by type
Total amount of employment floor space on previously developed land (Including Strategic Employment Land) - by type
Amount of vacant floorspace - by type
Total amount of B1 floor space on town, district and local centres
Monitor, in each area, the change of floor space in town, district and local centres
Proportion of commercial units by class in each centre
Appeals dismissed for proposals detrimental to town centre vitality and viability
Number of planning permissions granted for major development in town centres with only one use
Number of planning applications for advertisement consent and number of those refused
Proportion of planning applications for inappropriate advertisements dismissed at appeal
Number of applications for telecommunications and the number of those refused
Proportion of planning applications for inappropriate telecoms development dismissed at appeal

Employment

5.2 This AMR chapter provides an overview of the employment market and employment status of the borough. As Table 32 shows, the population has not changed based on the previous monitoring year. This is due to the fact that further mid-year population estimates that have not yet been published. The number of those economically active has increased from previous monitoring years and the estimated number unemployed has reduced slightly. The number of jobs within Elmbridge has increased from last years figure of 62,000 to 64,000, with the number of full-time jobs within remaining the same as last years figure. The proportion of jobs within Elmbridge which are full-time has decreased slightly from last years figure.

Table 32: A summary of employment levels within Elmbridge in 2022/23

	Number of Individuals
Population	138,800
Economically Active	67,200
Estimated number unemployed	1,700

Data Source: ONS Census 2021 and Nomis Local Market Profile Elmbridge 2023

Table 33: The number of jobs within Elmbridge in 2022/23

	Jobs
Number of jobs within Elmbridge	64,000
Number of jobs within Elmbridge which are full time	42,000
Proportion of jobs within Elmbridge which are full-time	65.6%

Data Source: Nomis Local Market Profile Elmbridge 2022

- 5.3 On 1 September 2020, the Use Classes Order 1987 was significantly amended. A new national Permitted Development Right, Class MA, took effect on 1 August 2021, which permits a change of use of any land or buildings within Class E use (commercial, business and service) to residential use without the need for planning permission.
- 5.4 The change to the use class order makes it difficult to report the loss of offices because prior notification submissions do not provide floorspace areas. In addition to that, Class E includes a range of uses from restaurants, retail and leisure facilities. Therefore, this AMR presents the losses and gains of employment floorspace rather than just office space.
- 5.5 The amount of vacant floorspace in the borough's town, district, and local centres has been recorded following a retail site assessment during July and August 2023. Vacant floorspace in the borough's SEL designations is currently being reviewed.

- 5.6 As table 34 shows, the highest vacancy rates within the borough's town, district and local centres are found in Oxshott Local Centre, Esher District Centre and Walton Town Centre. The lowest vacancy rates are found in Hinchley Wood Local Centre, Thames Ditton Local Centre and Hersham District Centre. These centres contain units with a vacancy rate of under 5%. The average vacancy rate across the Borough is 8.64%. The overall high street vacancy rate across the UK during the first quarter of 2023 was 13.9%.⁶
- 5.7 There has been a reported loss of office space in the last monitoring years. Even though the use class for offices was revoked in the 2020 order, the commercial monitor has identified that 296sqm of office floorspace was lost this monitoring year where a full application was submitted. The figures are likely to be higher due to the prior notification applications. There was a loss the amount of floorspace in B8 but there was a gain to use class B2 light industrial.

Table 34: Vacant units within the borough's town, district and local centres

Retail Designation	Number of vacant units	Number of vacant units (%)
Claygate Local Centre	3	5.36%
East Molesey Bridge Road Local Centre	10	10.20%
Hinchley Wood Local Centre	1	2.8%
Oatlands Local Centre	3	10%
Oxshott Local Centre	4	16%
Thames Ditton Local Centre	2	2.9%
Walton Halfway Local Centre	3	5.88%
Walton Terrace Road Local Centre	4	11.43%
Weybridge Queens Road Local Centre	5	6.10%
Cobham District Centre	13	9.26%
East Molesey District Centre	7	6.09%
Esher District Centre	21	13.64%
Hersham District Centre	3	4.76%
Weybridge District Centre	22	9.95%
Walton Town Centre	36	13.79%

⁶ <https://brc.org.uk/news/corporate-affairs/britain-loses-6-000-storefronts-in-five-years/>

Table 35: Changes to Employment Floor Space (sqm) due to completed developments in 2022/23.

Type	Loss	Gain	Total
Class E	7764	9419.	+1655
B2- General Industrial	0	64	+64
B8- Storage or distribution	392	149	-243
F1- Provision of education	0	2124	+2124
Sui Generis- class of its own	598	524	-74

Table 36: Changes to Employment Floorspace (sqm) in Strategic employment Land designations due to completed developments in 2022/23

Completions 2022/23	Employment Floorspace
Loss	312
Gain	7133
Net	6821

5.8 There was an increase in employment land use in the boroughs SEL designations, due to the completion of flexible industrial units and warehouse units at Unit A400 Vickers Drive North, Brooklands Industrial Park and 14 Vickers Drive South, Brooklands Industrial Park.

5.9 In terms of appeal performance, there were no appeals relating to employment land provision or town centre uses.

Town Centres

5.10 A retail survey site assessment was conducted in 2023. In 2022/23, there was a rise in vacancy levels in four of the 15 retail centres within Elmbridge. The levels of vacancies in eight of the retail centres within Elmbridge were reduced, whilst there were three centres where the vacancy level remained static.

5.11 The largest concentration of Use Class E units is within Cobham District Centre, Walton Town Centre, Weybridge District Centre, Claygate Local Centre,

Oatlands Local Centre and Weybridge Queens Road Local Centre. Each of these has at least 75% units within this class. The lowest concentration of Use Class E units is in Oxshott Local Centre and Thames Ditton Local Centre. In each of these Local Centres the concentration of E Class units is below 40%.

- 5.12 As table 37 shows there are more Class E uses being lost than gained across the borough's town, district and local centres.

Table 37: The net change in available floorspace (sqm) for developments in use Class E town, district and local centres following completions in 2022/23

Completion 2022/23	Class E floorspace
Loss	2536
Gain	609
Net	-1927

Telecommunications

- 5.13 In 2022/23, 41 telecommunication applications were submitted of which 41 had been decided of which 23 were granted permission. This represents 56% of all applications received. Eighteen applications were refused representing 44%.

Table 38: Applications for telecommunications received, decided, granted and refused

Monitoring Year	Applications Received	Applications decided	Permissions Granted	Permissions Refused	Percentage of applications granted permission
2016/17	20	20	14	6	70%
2017/18	18	18	17	1	94%
2018/19	79	79	79	0	100%
2019/20	27	27	27	0	100%
2020/21	40	38	37	1	97%
2021/22	45	41	38	3	93%
2022/23	41	41	23	18	56%

Advertisements

- 5.14 There was an increase in the number applications for advertisement consent decided in 2022/23 compared with the previous year. There was a total of 37 applications decided with 35 (95%) being granted permission this up from the 81% percent of applications granted permission in the previous year. There were 2 applications that were refused.

Table 39: Applications for advertisements decided, granted and refused

Monitoring Year	Applications Decided	Permissions Granted	Permissions Part-Granted and Part-Refused	Permissions Refused
2017/18	75	47	23	5
2018/19	43	38	2	3
2019/20	33	29	0	4
2020/21	40	34	0	6
2021/22	31	25	1	5
2022/23	37	35	0	2

6.0 Protecting and enhancing the natural environment

Figure 9: The council’s objectives for protecting and enhancing the natural environment in Elmbridge

Objectives
To continue to protect the Green Belt to prevent the coalescence of the Borough’s towns and villages and retain the distinctiveness of our local communities
To enhance the distinctiveness and diversity of the landscapes within the Green Belt, and to promote improvements to our network of strategic and local open land and green corridors, balancing the desire to increase access to the open countryside with the need to protect and enhance biodiversity interests
To protect the unique character of the Borough, and to enhance the quality of the built, historic and natural environment
To take part in a coordinated approach to the management of the Borough’s waterways in a way that protects and enhances their distinct role and character and minimises their potential to flood.

Figure 10: The council’s indicators for protecting and enhancing the natural environment in Elmbridge

Indicators
Percentage of development built within the urban area
Planning appeals allowed for new buildings in the Green Belt (DM17)
Planning permissions allowed for replacement dwellings in the Green Belt
Planning appeals allowed for extensions in the Green Belt (DM18)
Proportion of planning appeals allowed above permitted volume and footprint limits (DM18)
The efficacy of Suitable Accessible Natural Greenspace (SANGs) as set out in the Thames Basin Heaths SPA Delivery Framework
Status of Annex 1 bird species of Thames Basin Heaths SPA
Visitor survey to the Thames Basin Heaths SPA
Number, area and condition of regionally or locally designated wildlife sites
Condition of SSSI’s
Condition of SNCI’S
Restoration and creation of Priority Habitats
Amount of open space accessible to the public
Number of environmental improvement schemes

Green Belt

- 6.1 The National Planning Policy Framework (NPPF) (2021) sets out the policy approach to considering development within the Green Belt. Amendments to Green Belt boundaries can only be made through the Local Plan process and where exceptional circumstances have been demonstrated. In 2021, the Green Belt boundary was slightly amended as result of a GIS mapping

accuracy exercise. This was so minor it does not impact on the proportion of Green Belt in table 40.

Table 40: The proportion of the borough within the Green Belt

Percentage of the Borough covered by Green Belt designation	Percentage of the Borough within the urban area
57%	43%

Table 41: The number of replacement dwellings granted permission within the Green Belt

Monitoring Year	Number of permissions granted for replacement dwellings in the Green Belt
2017/18	3
2018/19	2
2019/20	2
2020/21	9
2021/22	4
2022/23	1

Table 42: Number of replacement dwellings completed within the Green Belt

Monitoring Year	Number of Dwellings
2016/17	0
2017/18	3
2018/19	2
2019/20	0
2020/21	2
2021/22	0
2022/23	1

Table 43: Total number of housing completions within the Green Belt

Monitoring Year	Gross Units	Net Units
2017/18	14	11
2018/19	6	2
2019/20	0	0
2020/21	6	4
2021/22	60	60
2022/23	0	0

Thames Basin Heaths Special Protection Area

- 6.2 Any new residential development that is likely to have a significant impact on the ecological integrity of the Thames Basin Heath Special Protection Area

(SPA) will be required to demonstrate mitigation or how to avoid any impact. All measures will need to be agreed by Natural England.

- 6.3 There has been a significant rise in the number of breeding protected birds within the Thames Basin Heaths Special Protection Area [SPA] across all three species since the first surveys reported in table 44. The number of Woodlarks and Nightjars dropped slightly in 2022 with the drop in numbers concerning Nightjars related to heathland fires at Ash Ranges, however both numbers are doing well when compared to the baseline counts recorded in the late 1990's. The number of Dartford Warblers have increased significantly. This is due to the extremely mild winter of 2021/22, with no prolonged period of zero temperatures or day with deep lying snow. The record numbers of bird populations confirms that the Thames basin Heath protection measures are working.

Table 44: Breeding bird survey by year

Bird Species	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
Dartford Warbler	87	118	292	451	427	482	265	-	716	553	702
Nightjar	320	325	355	306	332	345	366	-	404	413	370
Woodlark	202	135	155	137	117	160	112	-	167	196	192

Source: Thames Basin Heath Partnership

<https://www.tbhpartnership.org.uk/news/breeding-bird-results-for-2022/>

Table 45: Monies collected from development within the Thames Basin Heaths SPA 2022/23

	Net units permitted in the SPA 5km mitigation zone 2022/23	Potential contributions from units permitted within the SPA 5km zone 2022/23	Payments received from invoices issued in 2022/23	Total amount collected to date to support mitigation
	60			
SANG		£279,050.00	£24,847.00	£1,438,511.88
SAMM		£142,837.00	£10,551.88	£614,656.93

- 6.4 There were 60 net residential units allowed within the Thames Basin Heaths SPA 5km buffer. This is based on information available and may contain some duplicates.

Table 46: Monies collected from Community Infrastructure Levy (CIL) payments 2022/23

Monies due from invoices issued in 2022/23	Total CIL monies collected to date
£4,294,418.14	£48,608,513.65

Sites of Special Scientific Interest

- 6.5 Natural England assesses the condition of Site of Special Scientific Interest (SSSI) in England against standard categories used across England, Scotland, Wales and Northern Ireland. There are three SSSIs within the borough: Esher Commons, Ockham and Wisley Commons and Knight and Bessborough Reservoirs.
- 6.6 The main focus for improvements is Esher Commons SSSI. The Esher Commons SSSI Restoration and Management Plan is concerned with the restoration of the Esher Commons SSSI to favourable status by recreating open areas such as heathland and grassland. The management plan detailed works to recreate much needed heathland by clearing 22.6 hectares of woodland. Subsequent Stewardship Schemes provided by the Council are ongoing to manage and bring the SSSI and other SSSIs back to favourable status. The condition percentage have not changed since last year for this SSSI.
- 6.7 The condition percentage for Ockham and Wisley Commons and Knight and Bessborough Reservoirs SSSI has not changed since the last monitoring year.

Table 47: The conditions of the areas covered by SSSI designations 2022/23

SSSI	Area (Ha)	Condition
Esher Commons	360.84	57.18% Favourable 42.82% Unfavourable – Recovering
Knight & Bessborough Reservoirs	63.43	100% Favourable
Ockham & Wisley Commons	267.41	54.01% Favourable 45.99% Unfavourable - Recovering

Source: Natural England: Report Condition Survey 2023
<https://designatedsites.naturalengland.org.uk/SiteSearch.aspx>

Sites of Nature Conservation Importance (SNCIs)

Table 48: SNCIs in positive conservation management

No. of SNCI's	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
22	11	11	13	13	13	13	10	10	10	10
%	(52%)	(52%)	(59%)	(59%)	(59%)	(59%)	(45%)	(45%)	(45%)	(45%)

6.8 There has been no results for the past three monitoring years on the positive management of sites of Nature Conservation Importance in the borough. The Countryside team have confirmed that there has been no significant change.

Biodiversity Opportunity Areas (BOA)

6.9 The following table sets out the projects for the restoration and creation of priority habitats within the borough. It has been confirmed by the Countryside team that the targets in column 2 have been met and these habitats are in good condition. The priority species in column 3 require monitoring to ensure their continued stabilisation and recovery.

Table 49: Restoration and creation of priority habitats.

BOA	Priority habitat restoration & creation targets	Priority species stabilisation and recovery
Wisley, Ockham and Walton Heaths	Heathland: 8.25ha Acid grassland: 7.25ha Wet woodland: 1.25ha	Annual Knawel Pillwork Heath tiger-beetle Nightjar Woodlark Sand lizard
Esher & Oxshott Commons	Heathland: 3.75ha Acid grassland: 3.5 Mixed deciduous woodland (restoration only; Ancient woodland prioritised): 75% by area Hedgerows: 0.8km Ponds: 0.75ha	Starfruit White-letter hairstreak Adder Nightjar Woodlark
Ashtead & Epsom Wood Pasture, Prince Coverts & Horton Country	Mixed deciduous woodland (restoration only; Ancient woodland prioritised): 75% by area. Wet woodland:1.5ha Wood pasture & parkland: 6ha Heathland:8.25ha Acid grassland: 7.75ha Hedgerows: 1.75ha	White-letter hairstreak Heart moth Adder Harvest mouse
Thorpe & Shepperton	Standing open water: 3ha Floodplain grazing marsh: 34.25ha Acid grassland: 4.25ha Reedbeds: 1.25ha Wet woodland: 3ha	Greater water-parsnip Marsh stitchwort Lapwing Water vole

Molesey & Hersham	Standing open water: 0.75ha Floodplain grazing-marsh:9.5ha Acid grassland: 4.25ha Reedbeds: 1.25ha	Lapwing Reed bunting Water vole
River Wey	Floodplain grazing-marsh: 22ha Wet woodland: 4.5ha Rivers (in-channel/bankside habitat creation): 10km Meadows: 11.75ha Reedbeds: 7.25ha	Marsh stitchwort White clawed crayfish Lapwing Harvest mouse Otter Water vole European eel
River Mole	Floodplain grazing-marsh: 22ha Wet woodland: 2.75ha Rivers (in-channel/bankside habitat creation): 5km Meadows: 7.25ha Reedbeds: 4.25ha	Marsh stitchwort Harvest mouse Water vole Otter Brown trout European eel
River Thames	Rivers (in-channel/bankside habitat creation): 3km Floodplain grazing-marsh: 2.75ha Wet woodland: 0.25ha	Greater water-parsnip Depressed river mussel European eel

Green spaces

Table 50: The amount of available, open public green space by monitoring year

Monitoring Year	Amount of publicly accessible open space (ha)
2016/17	793
2017/18	793
2018/19	793
2019/20	793
2020/21	793
2021/22	793
2022/23	793

Environmental Improvements

6.10 In 2022/23, there was no change in the amount of publicly available open space remaining at 793 hectares. The table below outlines the current improvement schemes that are ongoing throughout the borough.

Table 51: The number of environmental improvement schemes conducted by Elmbridge Borough Council in 2022/23

Location	Scheme	Status
River Rhythe	Modelling/works for flood resilience	Ongoing
Fairmile Ditch	Modelling/Works for flood resilience	Ongoing
Old Mole Channel, East and West Molesey	Removal of invasive floating Pennywort	Ongoing
River Mole	Flood alleviation scheme	Ongoing

7.0 Sustainable lifestyles

Figure 11: Council objectives for sustainable lifestyles in Elmbridge

Objectives
To promote sustainable lifestyles and reduce the Borough's ecological footprint through minimising and reducing the need to travel, minimising the use of natural resources and maximising the use of renewable energy
To respond to the social and physical infrastructure needs arising from new development in a way that delivers sustainable growth
To reduce people's reliance on driving, by directing new developments to sustainable locations, promoting attractive and convenient alternatives to using the private car and in doing so, reducing congestion and pollution caused by traffic

Figure 12: Council indicators for sustainable lifestyles in Elmbridge

Indicators
The number of permissions granted contrary to advice received from the Environment Agency
Percentage of household waste sent for reuse, recycling and composting
Appeals dismissed which are considered to contravene/fail to achieve pollution standards as set out in policy (DM5)
Appeals dismissed which do not accord with Elmbridge Parking Standards (DM7)
Number of school travel plans submitted and the CCO applications relating to travel plans
Length of new cycleways implemented
Length of new footways implemented
Number of train stations improved
Number of bus services improved

Waterways and Flooding

- 7.1 Mitigation to flood risk is reiterated in our [Flood Risk Supplementary Planning Document \(SPD\)](#) This SPD is structured to assist applicants and the public in understanding how the council will implement planning policies and consider flood risk as part of the planning application process.
- 7.2 The Environment Agency through the Thames Catchment Flood Management Plan recommends that all development in flood zones 2 and 3 be resistant and resilient to flooding, and this process is supported in the Core Strategy.
- 7.3 Elmbridge is a borough with a significant flood context with three rivers (the River Wey, Mole and Rythe). The [Strategic Flood Risk Assessment](#) 2019 assesses whether the Council are providing a holistic approach to its flood risk policies and with respect to development management decisions.

7.4 Similar to the year before there was not any permissions granted that would have been contrary to advice received from the Environment Agency.

Table 52: The number of permissions granted contrary to advice received from the Environment Agency

Monitoring Year	Number of Permissions Granted
2016/17	2
2017/18	0
2018/19	0
2019/20	0
2020/21	0
2021/22	0
2022/23	0

Household Waste and Pollution

7.5 Surrey Waste is dealt with by the County Authority (Surrey County Council) and is underpinned by the Surrey Waste Local Plan (WLP) 2019-2033.

7.6 In 2022/23, the percentage of household waste reused, recycled or composted continued to exceed the local target of 50%.

Table 53: The proportion of household waste reused, recycled or composed

Monitoring Year	Target figure for Elmbridge Borough Council	Percentage of household waste reused, recycled or composted	Difference
2016/17	56%	51.3%	-4.7%
2017/18	56%	54.5%	-1.5%
2018/19	56%	50.7%	-5.3%
2019/20	56%	51.5%	-4.5%
2020/21	50% ⁷	54.3%	+4.3%
2021/22	50%	51.2%	+1.2%
2022/23	50%	53.5%	+3.5%

⁷ Surrey Waste Local Plan 2019-2033, page 14, the government strategy is for 50% recycling of household waste by 2020

Table 54: The condition of the Air Quality Management Area (AQMA) 2022/23

Air Quality Management Area [AQMA]	Number of monitoring points	Number of monitoring points where air quality objective is exceeded	Highest level recorded ($\mu\text{g}/\text{m}^3$)
Esher High Street	8	0	38.9
Walton Road, Molesey	4	0	27.4
Weybridge High Street	10	0	32.8
Walton High Street	5	0	29.6
Hampton Court	5	0	27.6
Hinchley Wood	2	0	32.6

7.7 Table 54 reports an improvement to the condition of the borough’s air quality management areas overall with no AQMA’s exceeding air quality monitoring points.

Transport

7.9 In terms of appeals dismissed which did not accord with the Elmbridge Parking Standards (DM7- Access and Parking), three applications were dismissed in the monitoring year. This represents a 75% success rate as one other application was allowed at appeal.

Table 55: Number of School Travel Plans received

Monitoring Year	Number of School Travel Plans received	Number of plans approved	Number of plans rejected
2016/17	4	4	0
2017/18	2	2	0
2018/19	1	1	0
2019/20	0	0	0
2020/21	2	2	0
2021/22	2	2	0
2022/23	1	1	0

7.10 One school travel plan was received in the monitoring year. The site has been occupied since 1st September and as such the condition cannot be discharged, however the information supplied is satisfactory and confirms

compliance with the condition. Therefore, the plan has been confirmed as approved in the table.

- 7.11 The council are awaiting information from SCC regarding any substantial alterations or improvements to footpaths, cycle paths or bus networks in the reporting year 2022/23.

8.0 Conserving the historic environment

Figure 13: Council objectives for conserving the historic environment in Elmbridge

Objectives
To protect the unique character of the Borough, and to enhance the high quality of the built, historic and natural environment
To deliver high quality buildings and neighbourhoods that enhance character, improve people’s sense of safety and security and promote healthier lifestyles

Figure 14: Council indicators for conserving the historic environment in Elmbridge

Indicators
Number of listed buildings on the Buildings at Risk Register
Number of buildings on the HAR register
Number of agreed prioritised up-to-date Conservation Area Appraisals
Number of planning permissions granted involving significant harm to, or loss of a designated heritage asset
The number of listed buildings, locally listed buildings, conservation areas, historic parks and gardens, scheduled monuments and sites of high archaeological potential
Number of developments in Whiteley Village

- 8.1 There have been no additional designated heritage assets added. The number remains at 780 with no permissions granted for works which would reduce this number. Locally Listed Buildings have been reviewed and there are now over 300 non designated heritage assets. There has been no change in how many Conservation Area Management Plans (CAMPs) there are within the borough. There are 18 CAMPs and 26 designated Conservation Areas in Elmbridge, which is no change from 2021/22. This represents 69% coverage by a management plan.
- 8.2 The council has sought to enhance tourist assets to make them more accessible for public visiting whilst preserving the character of the heritage assets. There has also been further maintenance of protected trees whilst supporting biodiversity in the borough’s protected gardens and Conservation Areas.

Table 56: Number of heritage assets in Elmbridge

Type	Number of assets
Listed Buildings	780
Locally Listed Buildings	305
Conservation Areas	26

Type	Number of assets
Historic Park and Gardens	3
Scheduled Monuments	6
Sites of High Archaeological Potential	63

Table 57: The number of Conservation Areas and the proportion of which are covered by Conservation Appraisal and Management Plans (CAMPs)

Number of Conservation Areas	The number of these covered by Conservation Appraisal and Management Plans [CAMPS]	Percentage of Conservation Areas covered by CAMPs
26	18	69%

Table 58: Number of planning permissions granted which are likely to demolish heritage assets

Monitoring Year	Number of permissions granted causing the loss of listed buildings.
2016/17	0
2017/18	0
2018/19	1
2019/20	0
2020/21	0
2021/22	0
2022/23	0

Table 59: Listed Building Consents granted within Whiteley Village in 2021/22

Monitoring Year	Applications Decided	Applications Granted Permission	Applications Refused
2017/18	2	2	0
2018/19	0	0	0
2019/20	1	1	0
2020/21	0	0	0
2021/22	0	0	0

Monitoring Year	Applications Decided	Applications Granted Permission	Applications Refused
2022/23	3	3	0

9.0 Quality of Life

Figure 15: Council objectives to the quality of life in Elmbridge

Objective
To retain the high quality of life experienced by most Borough residents and share the benefits across all sections of the community
To address inequalities, promote better integration and increase opportunities for people who live in less affluent areas of the Borough

Figure 16: Council indicators to assess the quality of life in Elmbridge

Indicators
Resident satisfaction with Council services
Satisfaction with planning services
Resident satisfaction with the area as a place to live
Overall health of residents (life expectancy)
Adult participation in sport
Residents feeling of safety in the Borough
Number of Elmbridge super output areas in the bottom quartile for Surrey according to Indices of Multiple Deprivation [IMD] data.
Proportion of appeals dismissed for development that fails to achieve a high standard of design and layout and/or privacy and amenity (DM2)
Total number of permissions granted for horse related activity (DM19)
Proportion of developments for horse-related activities allowed at appeal (DM19)

Residents Satisfaction

- 9.1 In the monitoring year 2022/23, there was no resident satisfaction survey undertaken for Council services or Planning Services and therefore the data from 2019/20 remains the most up to date. In 2019/20, there was an increase of 9% satisfaction as it relates to all council provided services, whilst satisfaction with planning services is up 15% against the corresponding survey undertaken in 2018/19.

Table 60: Resident satisfaction 2019/20

	Percentage of satisfied residents by criteria
Resident satisfaction with Council services	80%
Resident satisfaction with the local area as a place to live.	84%
Satisfied with planning services	50%

Health, participation in sport and sense of safety

- 9.2 The residents of Elmbridge enjoy a good quality of life. The average life expectancy of a male resident is 82.7 years which exceeds the national average by 4 years⁸. A female resident in Elmbridge has an average life expectancy of 85.6 years which exceeds the national average for females by 2.2 years and also Elmbridge males by 3.3 years.
- 9.3 There is also a level of sporting participation with 74.9% of residents stating they engage in at least 150 minutes of sporting activity every week⁹. This exceeds the participation rates in Surrey, the Southeast and England. Elmbridge also has a very low level of sporting inactivity (16.7%). This falls below the inactivity of Surrey, the Southeast and England. These factors suggest the residents of Elmbridge live healthy lifestyles.

Table 61: Population Life Expectancy

	National Average (Years)	Elmbridge Average Surrey (Years)	Difference (Years)	Difference (%)
Men	78.7	82.7	+4	+5.1%
Women	82.7	85.6	+2.9	+3.5%

[Source: ONS, September 2021](#)

⁸ Surrey Life Expectancy, <https://www.surreyi.gov.uk/dataset/20krn/life-expectancy>, original data source: ONS, Life Expectancy, 2018-2020

⁹ Sport England, Active Lives data tables, <https://www.sportengland.org/research-and-data/data/active-lives/active-lives-data-tables>

Table 62: Adult engagement in sport 2021/22

Area	Highly Active (150+ minutes per week)	Fairly Active (30-150 minutes per week)	Inactive (0-30 minutes per week)
England ¹⁰	63.1%	11.1%	25.8%
Southeast	66.5%	11.4%	22.1%
Surrey	69.9%	10.6%	19.5%
Elmbridge ¹¹	74.9%	8.4%	16.7%

9.4 In the year 2022/23, there were 2 applications relating to equestrian activities and these were all refused planning permission.

Table 63: The number of determined applications relating to equestrian activities

Monitoring Year	Number of applications determined	Applications granted permission	Applications refused permission	Applications granted permission in part and refused in part
2016/17	2	2	0	0
2017/18	2	1	1	0
2018/19	4	2	1	1
2019/20	2	2	0	0
2020/21	2	2	0	0
2021/22	3	0	3	0
2022/23	2	0	2	0

¹⁰ Sport England, Active Lives data tables, November 2021 to November 2022.
<https://www.sportengland.org/research-and-data/data/active-lives/active-lives-data-tables>

¹¹ Sport England, Active Lives data tables, November 2021 to November 2022,
<https://www.sportengland.org/research-and-data/data/active-lives/active-lives-data-tables>

Sense of safety

9.5 Table 64 indicates the public's perception of their safety from a Community Safety Survey carried out in 2023. The survey showed that those that feel 'Very Safe' during the day has increased slightly from 50% to 54%. There was no change in the percentage of those that feel 'Very Safe' during the night which remains at 11% . Conversely there was an increase in those responding that they feel fairly unsafe in Elmbridge during the day now at 6% and a minor increase in those that feel fairly unsafe at night from 26% to 28%.

Table 64: Sense of safety

	Very Safe	Fairly Safe	Neither Safe or Unsafe	Fairly Unsafe	Very Unsafe	Don't Know
Day	54%	32%	7%	6%	1%	0%
Night	11%	37%	18%	28%	6%	1%

Data source: Community Safety Survey 2023

Deprivation

9.6 The Indices of Multiple Deprivation (IMD) figures relating to the borough demonstrate that Elmbridge is the 8th least deprived Borough in England out of 317 other Local Authorities. These were published in 2019 and the next statistical release is currently unknown.

10. Conclusions for 2022/23

10.1 The main updates, challenges and achievements arising from 2022/23 are set out as follows:

Performance of Planning Services

- Monitoring of the council's plan-making progress is against the Local Development Scheme (LDS) which was updated in July 2023.
- The Regulation 19 representation period was undertaken from 17 June to 29 July 2022
- Major applications decided exceeded both national and local targets, whilst minor applications exceeded national targets and met the local target. Major applications decided remained the same target as last year's total. Other applications decisions did not meet the local target; however they were 1% higher than last year's results.

Delivering the right homes

- Housing delivery has been higher than the Core Strategy (2011) target of 225 units for the last 12 monitoring years. However, this housing target is now out of date and has been replaced by the Standard Methodology, which sets the Local Housing Need figure at 650.
- The housing need can be broken down by size of homes required with 1 bed (20% needed), 2 beds (50% needed), 3 beds (20% needed) and plus 4 beds (10% needed).
- There is an acute need for affordable housing (primarily social rented tenure¹²). The housing need for affordable housing shows a requirement for larger homes, with an annualised need for 15% 1 beds, 34% 2 beds, 11% 3 beds and 40% 4+ beds.
- The number of net new homes built in the year was 236. The decrease compared to last years' figure of 768 was due to 375 units being completed at Walton Court Station.
- 13 affordable homes were completed in this monitoring year, which is down by 98 units from last year's total. This represents a significant fall in completions; however this can be attributed to the completion of 99 Affordable Homes on one large development in the previous monitoring year. Furthermore, there are 210 remaining affordable housing units which are still under construction and anticipated to be completed in the following monitoring year.

¹² See the Glossary at Annex 2 of the [NPPF](#) for affordable housing definitions.

- 170 of the 296 gross homes built were flats, principally one and two bedrooms.
- There has been an increase in the average density of new residential development reflecting greater optimisation of urban land.
- Development continues to be directed to brownfield land where 94% of development has been approved protecting greenfield land, environmental and policy designations such as the Green Belt.
- 44 new sites were added to the Brownfield Land Register this monitoring year compared to 5 in the previous year.

Housing land supply

- The introduction of the Government's 'Standard Methodology' has resulted in a change in the borough's housing need, this provides a Local Housing Need Figure of 650 homes per year.
- Including the 20% under delivery buffer, current data indicates that the borough has approximately 3.81 years of housing land supply when calculated against the Local Housing Need Figure. This is a combination of the number of units under construction, unimplemented planning permission and identified opportunity sites.
- The housing trajectory has indicated that there is a supply of 7,035 homes over the local housing need period 2023-2038 which is equivalent to 10.8 years of supply.

Supporting the local economy and employment

- There has been a decrease to people economically active, the figures for those unemployed and the number of jobs within Elmbridge has remained the same as this data has not been updated.
- The high street continues to experience changes to shopping behaviour. The data indicates further losses to class E uses in the borough's town, district and local shopping centres which include retail, restaurants and offices. The borough has an average vacancy rate of 8.64% across its retail centres which is below the 13.9% national average. However, Oxshott Local Centre vacancy rate exceeds the national average.
- Loss of office space continues due to permanent permitted development changes to C3 (residential) use.

Protecting and enhancing the natural environment

- The percentage of the borough covered by the Green Belt designation remains at 57%.
- There has been one replacement dwelling completed in the Green Belt compared to four in the previous year.
- There is no change in publicly available open space which remains at 793 hectares.

Sustainable lifestyles

- No permission has been granted in flood risk areas that would have been contrary to advice given by the Environment Agency.
- The levels of household waste reused, recycled or composted has exceeded the target figure for Elmbridge Borough Council and has improved from last years' figure by 2.3%.
- Pollution levels have improved and no AQMA's exceed air quality monitoring points.

Conserving the historic environment

- An updated local list has now been published which includes additional non-designated assets following consultation as well as a number that have been removed.

Quality of Life

- Surveys of resident satisfaction have currently not been updated.
- There is also a level of sporting participation with 74.9% of residents stating they engage in at least 150 minutes of sporting activity every week. This exceeds the participation rates in Surrey, the Southeast and England.
- The average life expectancy of Elmbridge residents exceeds the national average.

Appendix 4 Rebuttal to Greenspace Officer

14 April 2023



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Dear Clare,

16-18 Oatlands Drive, Weybridge, KT13 9JL

We write on behalf of our client, The Ridge (Oatlands) LLP, regarding the above planning application at 16-18 Oatlands Drive, Weybridge, KT13 9JL (LPA Reference 2022/3796). Having reviewed the comments received from the Council's 'Culture, Leisure and Environmental Services' officer dated 16th March 2023, we wish to provide a rebuttal to the comments.

Firstly, it is established by the relevant Acts¹ that applications for planning permission must be determined in accordance with the Development Plan, unless other material considerations indicate otherwise. The comments received contain a series of unsubstantiated claims which have no basis in planning policy.

Secondly, comments made relating to the adjacent development at 8–14 Oatlands Drive, are also irrelevant to the consideration of the current application. That site benefits from planning permission already and there is no relationship between the two development proposals. The current application must be considered on its own merits.

Below we provide a comprehensive response to each comment raised by the response.

Point 1

The area of Cowey Sale immediately adjacent to the application site is part of a Biodiversity Opportunity Area and as such should be protected as much as possible to provide habitats which will allow biodiversity net gain. The recently restored large pond adjacent to the application site offers wildlife and amenity benefits in this popular amenity location.

The Ecological Report concludes that there are no habitats of international, national, county or local importance that would be directly affected by the proposals. Similarly, it is concluded that the site is of limited ecological value, with the species recorded described as common or abundant and found in similar places across much of Britain.

¹ Section 38(6) of The Planning and Compulsory Purchase Act (2004); Section 70(2) of the Town and Country Planning Act (1990)



The submitted application is supported by an Ecological Report and associated Biodiversity Net Gain technical note. There are no statutory or non-statutory designated sites that would be directly or indirectly affected by the proposals. The site is of limited ecological value, with the species recorded described as common or abundant and are found in similar places across much of Britain, with no evidence of protected species recorded.

Overall the findings of this ecological appraisal indicate that there are no over-riding ecological constraints to the redevelopment proposals to preclude planning permission being granted at this stage, subject to suitably worded conditions. In addition, the proposal will result in a Biodiversity Net Gain of 5.64%. By providing a net gain on site the proposals comply with the national policy requirement at the present time contained within the NPPF and the requirements within the Development Plan under policies CS15 and DM21.

Therefore, it is evident that the proposed development results in a positive net gain in biodiversity terms, and is not harmful to the Cowey Sale greenspace.

Point 2

In the same way as the blocks currently being constructed at 8-14 Oatlands Drive (2020/3223), the proximity of the proposed flats and the size and bulk of the blocks, being less than 8 metres from the boundary to the south-east and considerably elevated, are having and will have a direct and detrimental effect on sunlight levels reaching the pond and vegetation especially in winter. See photo of the current situation and imagine the same to the right of shot.

This comment is both factually incorrect and, insofar as it relates to 8-14 Oatlands Drive, irrelevant. The officer states that the proximity of the built form at 8-14 Oatlands Drive is less than 8m from the rear site boundary. However, the distance is 10.5m at its shortest and 14m at its deepest. Regardless, the development at 8-14 Oatlands Drive is consented and has no relevance to the current proposals.

At 16-18 Oatlands Drive, the distance between the rear block and the rear site boundary is 12m at the shortest point and 15m at the longest point, e.g. greater than the consented arrangement at 8-14 Oatlands Drive. The rear building is orientated south-east of the Engine River, therefore at the proposed distance there is unlikely to be any appreciable impact on the levels of light received.

Point 3

Disturbance. This number of flats with windows overlooking the site at such proximity will have a detrimental effect on small mammal movements due to disturbance by light, noise and movement of people in the dwellings. I note the comments made in relation to 2020/3223 from The Surrey Bat Group regarding additional artificial light spill to this area, and the necessity of showing that the development can proceed without unacceptable artificial light spill. See photo taken at dusk during construction which clearly shows this is not the case. Can Building Control monitor this site to ensure that light spill does not occur during the construction phase? As before, imagine similar light spill to the right of shot

An Ecological Report was submitted with the planning application. In relation to light disturbance, the report concluded that *“Although the site currently experiences some light spillage from on-site sources and neighbouring properties and roads, in accordance with good practice, any new lighting to be introduced should be designed to minimise light spillage and pollution and not directed onto*

any bird/bat boxes installed or onto the adjacent waterbody and woodland beyond to the rear of the site, which should remain dark”.

It is also noted that Surrey Wildlife Trust, who are the Council’s ecological consultee have not raised any objection on this basis stating that the proposals are acceptable subject to a condition requiring the submission of a Sensitive Lighting Management Plan prior to construction, which the applicant is amenable to.

The photograph provided of the development which is under construction at 8-14 Oatlands Drive clearly shows a temporary condition and is not representative of the lighting impact of a residential development would have.

Point 4

Threat to trees within the application area. We are concerned that this proposal and future amendments for this site will have a negative impact on the trees as per 2020/3223.

The application is supported by a Tree Survey & Impact Assessment, a Tree Constraints Plan and a Tree Protection Plan and a Landscape Masterplan. The proposed development includes the loss of very few trees, all of which are of low quality and value and the proposed planting would result in a net gain of trees. The proposals are also located remote from the existing root protection areas. The development proposals comply with Policies CS14 and DM6 of the Development Plan and the Council’s tree officer has raised no objection, subject to compliance with the submitted reports.

Point 5

Regarding drainage, the speed of run off will surely increase, and lack of percolation due to the footprint of such a large development will put pressure on the Engine River. The likelihood of a pollution incident affecting Engine River is surely increased by the proximity of so many residential units.

A Drainage Strategy has been submitted to the Council. This describes the proposed approach which will utilise SuDS to deal with surface water runoff from the development. Due to the proposed use of SuDS very limited runoff will reach the Engine River from the rear landscaped area only, however this already occurs under the existing condition. Should the site conditions not allow for full infiltration of runoff from the development than the alternative would be to allow a discharge to the Engine River to deal with any runoff that cannot be discharged to ground.

In summary the flow of runoff to the river will be limited to the current greenfield rate of runoff from the existing site, therefore even in the fall back position that the development needs to partially discharge direct into the Engine River it will not exceed the current peak discharge rate from the existing site. Therefore, the risk of flooding will not be increased as a result of these proposals.

The development will use permeable paving for the parking and roads and these will treat the runoff from these areas removing suspended solids and hydrocarbons etc. Given the permeable paving and other green infrastructure proposed on site for the treatment of runoff from the development, the risk of pollution to the Engine River is very low. The proposed land use is the same as the existing land use (residential). This is not a land use that poses a significant risk of pollution.

Point 6

Regarding 8-14 Oatlands Drive, there are amendments currently proposed for example 2023/0370 to allow roof terraces to all 4 blocks of flats, and 2023/0485 to add lift extensions and smoke ventilation shafts to all four blocks which if approved will be even more detrimental to our site. This process of adding features on after initial decisions is likely to occur on this latest application site given this history.

This point is irrelevant and further illustrates the unsubstantiated nature of the comments.

Summary

The comments from the Council's 'Culture, Leisure and Environmental Services' officer dated 16th March 2023 have been reviewed. This rebuttal has demonstrated that notwithstanding the points raised, the development proposals are acceptable having regard to the Development Plan and any other material considerations.

Yours sincerely,

A handwritten signature in black ink that reads "Savills".

Joseph Daniels
Associate Director

Regulation 19

Draft Elmbridge Local Plan

2037



June 2022



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



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Foreword

The council, no doubt like you, places great importance on the special character and amenities of the borough, as well as wanting to support access to housing, jobs and services, all set within safe communities and attractive environments. This was evident in many of the comments received by the council through the Regulation 18 consultations.

Since then, we have reviewed those comments – and I thank people for taking the time and trouble to contribute – and we have undertaken further studies and other work in response to them, which has resulted in many refinements.

The council is committed to enabling Elmbridge to thrive – to have more affordable housing, more local jobs and better infrastructure to support the economy and community life, and to ensure that we play our part in tackling and responding positively to climate change. We also want to do this in a way that respects the natural and historic environments.

Climate change and sustainability is important to the council and to our residents. Climate change and good design principles outlined in the Draft Local Plan will help us live more sustainably through improved walking and cycling infrastructure, increased numbers of electric vehicle chargers and improved air quality. The Plan offers Elmbridge the opportunity to embrace sustainable living more than ever.

It also brings that sustainability to our high streets, acknowledging that our high streets are evolving beyond places to shop. To thrive, they will need to offer retail, entertainment and socialising experiences. More than ever our high streets will provide that community buzz, that sense of togetherness and socialisation that makes Elmbridge a place people want to live, work and visit.

The draft Plan not only supports a development future for the borough free from green belt release, but it also sets out a vision for a connected Elmbridge; one where we become a hub for an agile workforce, offering flexible workspace, fast connections, accessible transport options and welcoming hospitality.

Preparing a new Local Plan to meet these ambitions for the future of our borough has been challenging. I recognise that not all the outcomes will please everyone, but the council feels that it has got the overall balance right – to ensure the right sort of development in the right places, and with the infrastructure required to support it.

Draft Elmbridge Local Plan – Introduction

This is not the final decision though. You now have a further opportunity to contribute to the plan-making process. Full details of how and when to do this are set out on the council's website at: <https://consult.elmbridge.gov.uk/reg19/consultationHome>. They will also be advertised through the press and social media.

Thank you for your interest in the Local Plan and the future development of Elmbridge

Councillor Karen Randolph, Portfolio Holder for Planning

Details of the Regulation 19 Representation

This Regulation 19 representation period is the next step in the plan making process. The purpose of the Regulation 19 stage is to provide an opportunity for representations to be made on the draft the local plan before it is examined by a planning inspector. In accordance with the Planning and Compulsory Purchase Act 2004 (PCPA), the planning inspector will consider all duly made representations on the plan that are made within the representation period.

A full questions and answers on the Regulation 19 representation is available on [our website](#).

We have had numerous consultations through the last six years, asking about specific sites, specific development, green belt use etc, Regulation 19 is different:

- This is the last stage of public engagement before submitting the Draft Plan to the Planning Inspectorate for examination.
- This is a representation period on the finalised proposed Local Plan policies; earlier consultations sought views on different options and issues which had to be considered before the council finalised this draft Local Plan.
- All responses will be sent to the Planning Inspectorate
- Only representations on the soundness and legal compliance of the Plan can be made and it must be targeted to a specific policy or paragraph in the Draft Plan.

Your representations will need to focus on the following:

- Whether or not the plan is legally compliant (including Duty to Cooperate);
- Whether it has met the tests of soundness:
 - Positively prepared - being based on a strategy that aims to meet objectively assessed needs for development and infrastructure
 - Justified - being the most appropriate strategy n Effective - being deliverable over the plan period based on effective joint working
 - Consistent with national policy - enabling the delivery of sustainable development in accordance with the NPPF Representations should be supported by evidence if possible, and when making representations, please clearly indicate which policy, paragraph or page number you are referring to.

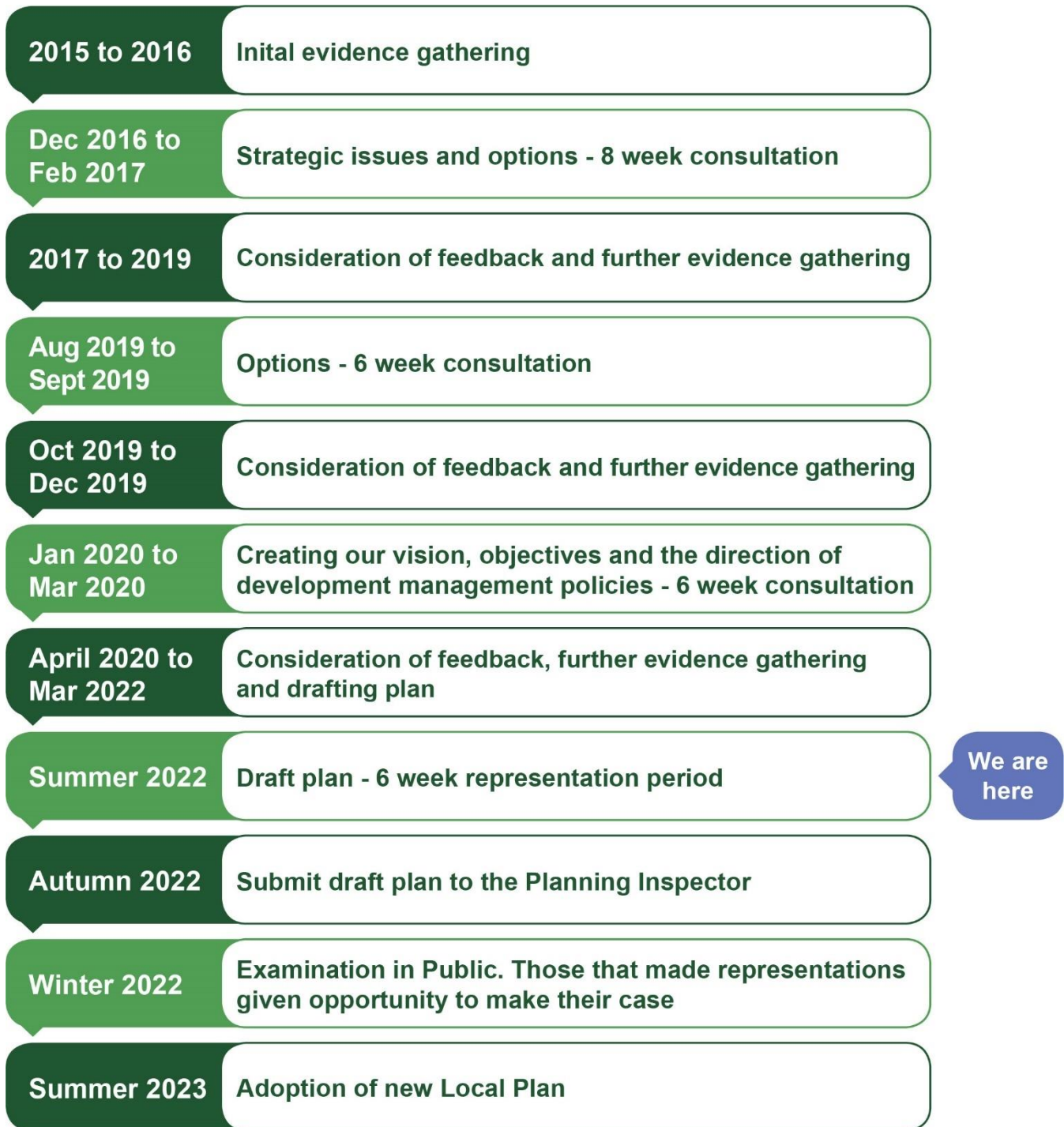
Starting on 17 June and running for 6 weeks until 29 July 2022. Should you wish to make representations on the legal compliance or soundness of this document you must do so within the six-week period. Please submit your representations using the on-line forms which can be found on the Local Plan pages at

<https://consult.elmbridge.gov.uk/reg19/consultationHome>.

Draft Elmbridge Local Plan – Introduction

Following the six week period any submitted representations will be collated and sent with the Proposed Submission Borough Local Plan and supporting evidence to the Planning Inspectorate for independent examination. Respondents will not receive individual responses from the Council.

It is intended to submit the Plan to the Inspectorate in Autumn 2022.



Chapter 1 - Introduction

Elmbridge Local Plan 2037

1.1 The Pre-submission draft Elmbridge Local Plan 2037 (Regulation 19) sets out how the communities and places of Elmbridge will develop over the next 15 years. It sets out policies and site allocations to guide the development and use of land, as well as defining the areas of the borough that will be protected and enhanced.

1.2 Once adopted, the Local Plan will be a statutory document and will form the basis on which planning applications in the borough will be determined replacing the 2011 Core Strategy and 2015 Development Management Plan¹.

Structure of the Local Plan

1.3 The Local Plan (the Plan) includes various parts that are to be read as a whole. This starts with a vision and principles setting out what the Plan is aiming to achieve.

1.4 The vision and principles were informed by national planning policy, the council's objectives, residents' and stakeholder views, as well as the challenges and opportunities for the borough which make up the spatial context for the Plan. These were explored in a series of early consultation documents prepared during the Plan's preparation. In Chapter 2 and Appendix A3, the Plan sets out in more detail the spatial context for Elmbridge and what makes it distinctive, as well as the challenges and opportunities we face.

1.5 To deliver the vision and principles, there is a suite of policies and land designations. These are divided into high-level policies called 'strategic policies' and 'site allocations', which set the strategy for the Plan and provide the high-level principles that development must adhere to. Specific land designations are detailed on the Policies Map which accompanies the Plan.

1.6 Then there are the detailed policies known as the 'development management policies'. These provide the detailed design and technical criteria and standards which, proposed development will be assessed against.

¹ A schedule setting out which Local Plan policies have replaced those of the Core Strategy and Development Management Plan is set out in Appendix A1.

Local Plan policy context

1.7 The Plan sits alongside national, regional and county planning policies and guidance and other Development Plan documents. This includes the saved Thames Basin Heaths Special Protection Area policy of the South East Plan 2009, the Surrey Minerals & Waste Plans, and forthcoming Supplementary Planning Documents (SPDs), which will include the Elmbridge Design Code, which will set out further guidance on the policies contained within the Plan. Where appropriate masterplans or design briefs will be undertaken for key sites.

1.8 Together, these policies and documents set out the framework for how new homes, jobs and infrastructure will be delivered in Elmbridge over the next 15 years.

Figure 1: the context for and the elements that inform, shape and guide the Local Plan



Why is a Local Plan needed?

1.9 Like the rest of Surrey and the South East, accommodating new growth and development is challenging. A Local Plan enables us to carefully plan for and proactively manage this to achieve ‘good growth’, that benefits our existing and future residents and builds on the prosperity of the borough. It provides certainty for communities, businesses and developers and ensures that new development and infrastructure comes forward in a coordinated way.

What is ‘good growth’?

1.10 ‘Good growth²’:

- Is proportionate and sustainable, focusing on the places where people both live and work.
- Supports overall improvements to the health and wellbeing of our residents.
- Is supported by the necessary infrastructure investment – including green and blue infrastructure.
- Delivers high quality design in our buildings and public realm.
- Increases resilience and flexibility in the local economy.
- Builds resilience to the impacts of climate change and flooding.
- Is planned and delivered at a local level while recognising that this will inevitably extend at times across administrative boundaries.

What are our development needs?

1.11 Local Plans must also be informed by evidence and the council has prepared a series of technical documents on a wide range of topics to help us understand what new development is needed and how to plan for it.

1.12 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. There is a need to reuse and intensify employment and commercial land to keep up with the demands of businesses especially for smaller and flexible units and workspaces to foster economic growth. There have also been significant changes in the retail sector and our shopping habits, requiring a greater flexibility of uses in our town and village centres as well as a need to maintain and enhance their vital roles as community hubs.

² Surrey 2050 Place Ambition 2019.

How are we going to respond to our needs?

1.13 A 'brownfield' approach has been taken seeking to make the best use of previously developed ('brownfield') land. The council has explored a number of different ways to increase the capacity of brownfield land in the borough including, reallocation and diversification of employment land, mixed use development and ensuring the potential of sites is optimised.

1.14 Reusing brownfield land and ensuring the efficient use of it will increase the capacity for new development in the borough, whilst balancing this with the need to continue to conserve and enhance the qualities and characteristics that make our existing communities attractive places to live, work and spend leisure time.

1.15 The council, whilst recognising that this efficient use of land will help to respond to demand, it will not meet all of it. The council has chosen this approach in response to the need to balance growth with protecting and continuing to conserve and enhance what is important to our residents and helps shape our places and communities. This includes the Green Belt and our open spaces, as well as safeguarding other areas of recognised importance such as ancient woodland, habitat sites and heritage assets of international and national importance and avoiding areas unsuitable for new development for example, where they are at high risk from flooding.

How will new development be supported?

1.16 Implementation and resourcing of the Plan will be critical to its success. It will be important that we continue to work collaboratively with partners across the private, public and voluntary sectors to deliver the Plan. Improvements to infrastructure will be required to support the development proposed in the Plan and this is set out in an Infrastructure Delivery Plan (IDP).

1.17 Infrastructure will be funded through a combination of existing public funding, developer-led provision and through the use of the Community Infrastructure Levy (CIL) (or future equivalent). The Plan's policies and proposals will also enable us to highlight the infrastructure needs and bid for additional resource funding opportunities that may arise from Government, regional and county funding initiatives.

How will we know if the Local Plan is successful?

1.18 We will carefully monitor the progress of the Plan and the performance of each policy. A key indicator as to the Plan's success will be whether development and infrastructure is delivered at the rate expected. This will include whether the number of homes built each year and the supply of housing land is keeping up with the targets set in the Plan.

1.19 Although the Plan is for 15 years, there are some matters such as retail and employment where it is difficult to predict trends and needs beyond ten years. Therefore, all policies are written to be flexible to respond to changing markets and unforeseen circumstances. The Plan, in accordance with national planning policy, must be reviewed every five years to ensure that it remains up to date and fit for purpose.

1.20 How we will monitor the Plan is set out in Chapter 10, the Monitoring Framework.



Chapter 2 - Elmbridge 2037

The challenges

2.1 The Local Plan needs to respond to a number of significant challenges over the plan period, including:

- Tackling climate change and moving towards a low / zero carbon economy;
- Protecting and enhancing the natural environment;
- Delivering more homes supported by the necessary infrastructure;
- Delivering more affordable homes;
- Supporting local recovery from Covid-19; and
- Supporting our town, local and district centres and employment areas.

2.2 Elmbridge is a highly desirable area due to its location and high-quality environment and unique character in part owing to the River Thames forming its northern boundary and its extensive green areas. However, as with any borough, Elmbridge is a collection of separate and distinctive places and local communities each with its own unique local identity, historic assets and attractive green and natural environment which are highly valued by our communities.

2.3 The borough, as a whole, benefits from good accessibility by rail and road to Central London and is within easy reach of Heathrow and Gatwick Airports, the M25 and the M3. The borough regularly features in best places to live and best quality of life polls.

2.4 However, that success brings consequences. The carbon footprint of the borough is high and must be addressed to help tackle the climate emergency and improve the borough's resilience to climate change, as well as improve biodiversity and issues of air quality and road congestion.

2.5 The borough has high-quality green and blue infrastructure that weaves its way through the urban areas and provides invaluable open spaces, highly treasured by local residents. Our urban open spaces play an important role within our green assets/natural capital and help to shape the character of our communities. However, we must continue to protect and enhance these spaces and work to improve accessibility and strengthen connectivity between them as movement corridors for the benefit of wildlife, climate change mitigation and adaptation as well as for the enjoyment and health and wellbeing of our residents and visitors.

Draft Elmbridge Local Plan – Elmbridge 2037

Figure 2: Elmbridge in the wider south east context

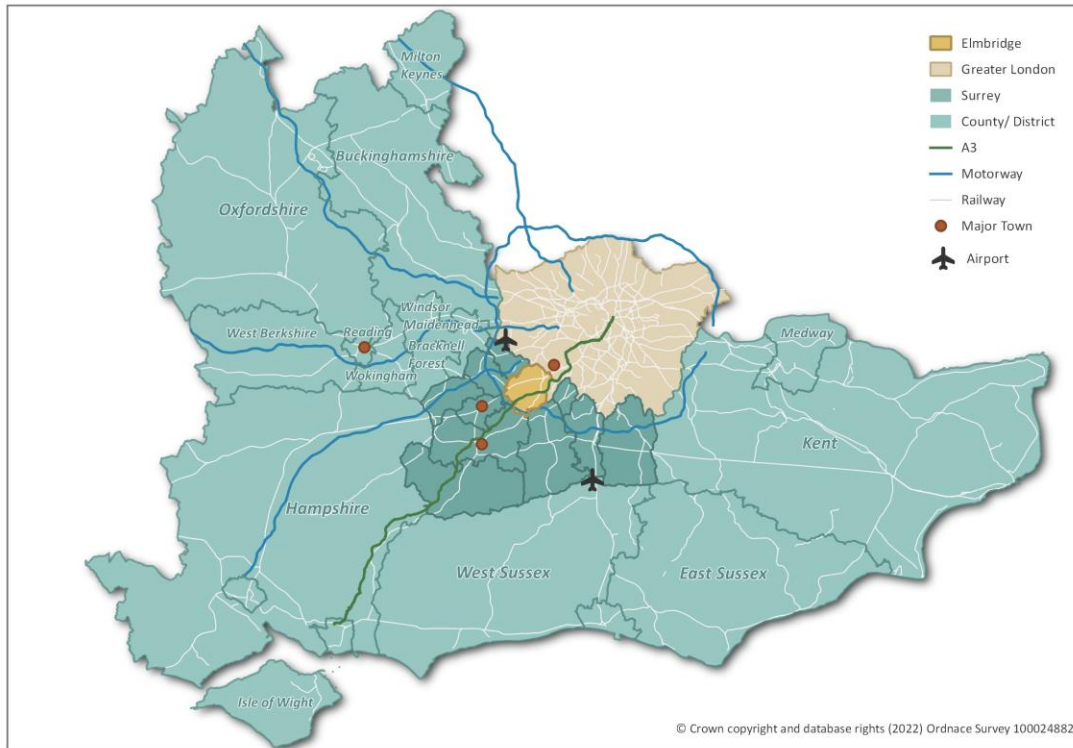
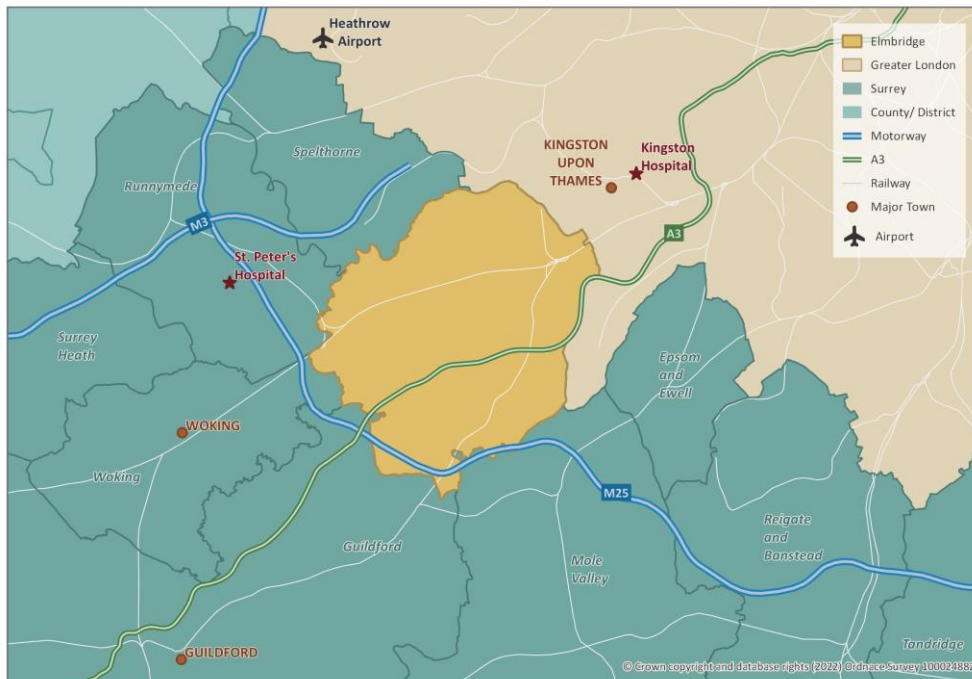


Figure 3: Elmbridge within the local context



2.6 Elmbridge has a rich historic environment that has evolved around historic estates, towns and villages and this helps to create the borough's local character and distinctiveness. This extensive historic environment and heritage provides a cultural reference to the past and has an important role in place-making and supporting health and wellbeing. These assets provide economic benefits as they bring visitors and provide jobs. We must support and make the most of these valued assets and carefully balance the need to preserve and enhance our historic environment with the need to deliver good growth.

2.7 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.

2.8 The needs of businesses are also changing, as well as how people shop and spend their leisure time. Our high streets need support to help them adapt to the changing retail market and become distinctive hubs for socialisation, community support, leisure and culture. The Plan seeks to positively respond to these issues and changes whilst protecting and enhancing the qualities and features that not only make Elmbridge a sought-after place to live, work and visit but also sustainable and fit for the future.

The vision for Elmbridge 2037

By 2037, Elmbridge will be more resilient to the impacts of climate change. The council accepts its responsibility to make a resilient environment, to reduce carbon emissions and to deliver positive outcomes for future generations. The council will positively lead on a commitment to ensure every decision is made with the achievement of low carbon and net zero in mind, with delivering sustainable growth and the use of renewables as standard.

The council will renew, enhance and protect green and blue spaces across the borough, with better connectivity for the benefit of both people and wildlife. Residents will benefit from improved air quality, minimised noise, flood risk and other polluting impacts, and a reduction in carbon and water demands by minimising detrimental impacts from development.

Building on the success of our existing communities, the built environment will be well designed, beautiful and will offer high quality public realms, contributing to the uniqueness of each settlement.

Excellent design will safeguard the built, historic and natural environment for the health and wellbeing of existing residents and future generations.

Residents, existing and new, will have the choice of a range of housing types that meet their needs. Our town, district and local centres will act as social, arts and commercial hubs, nurturing communities and businesses and allowing our culture and economy to flourish. There will be high quality digital connectivity enabling flexibility in the evolving patterns of working.

Good growth will be supported by the delivery of the right infrastructure in the right place, at the right time. Innovative solutions will be used to improve transport interchanges, to manage the highway network for all users, and foster a shift in travel behaviour towards more people walking and cycling, particularly for short journeys.

Principles

2.9 To achieve our vision, the Plan is led by five guiding principles which will drive ‘good growth’. The overall vision of the Plan and the five guiding principles will influence all aspects of development across the borough. Development proposals are expected to meet these principles to progress.

2.10 Each of the five principles are supported by finer grain objectives that are the stepping stones to create a sustainable borough, fit for the future.



Principle 1: Tackling Climate Change

To adapt to, and mitigate, the effects of climate change; to reduce carbon dioxide emissions, minimise energy use; improve air quality and protect and enhance our natural environment.

To improve the borough’s resilience to climate change.



Principle 2: Protecting and enhancing the quality of the environment

Promoting cleaner and greener living, in order to conserve and enhance biodiversity, whilst creating a sustainable environment to live, work and spend our leisure time.

Ensuring strong protection of the Green Belt from inappropriate development and protecting and enhancing green and blue spaces to improve biodiversity, connectivity and access.

Preserving and enhancing our recognised heritage assets. Ensuring they continue to be conserved in a manner appropriate to their significance.



Principle 3: Delivering homes

Improving housing choice and delivering well-designed high-quality homes that we need in a highly sustainable way.

Creating, strong and thriving communities.



Principle 4: Growing a prosperous economy

Providing the environment and opportunities to foster a prosperous economy with modern, flexible and well-connected workspaces where industries and businesses can thrive.

Supporting our town, district and local centres and managing their transition into distinctive places of socialisation, community support, events and culture which are less dependent on a retail offer.



Principle 5: Providing infrastructure and connectivity

Reducing reliance on the car, reducing issues of air quality and congestion and supporting modal shift in the way people live and access local services, workspaces and facilities.

Coordinating the delivery of the right infrastructure in the right place and at the right time for the benefit of residents, businesses, visitors and biodiversity and the natural environment.

Chapter 3 - Spatial Strategy and delivery

Spatial strategy for the borough

3.1 Elmbridge is a highly desirable area due to its location, high-quality environment and unique character. The previous plan was adopted in 2011 and it has been successful in delivering sustainable development in the borough. However, since then, the Government's national planning policy requirements have changed, as well as the environmental, social and the economic needs of the borough.

3.2 This new plan is essential to ensure that planning decisions, sustainable new development and regeneration takes place for the benefit of our borough and our residents and businesses now and in the future.

3.3 Going forward new development must respond to the changes in need and contribute towards achieving the vision and the principles of the Plan, set out in Chapter 2. This will mean a change to the type of development that is delivered in Elmbridge, meeting the needs of our communities.

3.4 The following strategic policies set out the Plan's spatial strategy. At its heart is a commitment to responding to the climate emergency and to deliver sustainable place-making, contributing towards the achievement of sustainable development. The scale and location of growth proposed has been informed by careful consideration of the evidence and the balancing of the social, economic and environmental positive and negative effects which could arise from growth and development in the borough. The strategy and policies respond to the National Planning Policy Framework (NPPF) requirement for Local Plans to set out the development priorities and the use of land within Elmbridge through strategic policies (SS1, SS2 and SS3).

3.5 We will work with our partners, local communities and developers to ensure the delivery of the spatial strategy. The delivery of the Plan will be monitored carefully through the monitoring framework detailed in Chapter 10.

Responding to the climate emergency

SS1 - Responding to the climate emergency

All development must respond to the climate emergency by:

1. Minimising carbon emissions:

- a) Directing development towards locations that minimise the need to travel and maximise the ability to make trips by sustainable modes of transport including cycling, walking and public transport.
- b) Delivering an efficient use of land especially on the most accessible sites.
- c) Providing more walkable and cyclable neighbourhoods that reduce demand for the use of private vehicles.
- d) Optimising the layout and design of buildings and landscape to reduce energy consumption, minimise waste and increase the re-use and recycling of materials.
- e) Maximising energy efficiency and integrating the use of renewable and low carbon energy.
- f) Avoiding demolition by repurposing existing structures.
- g) Promoting the retrofitting of existing buildings, including incorporating measures to reduce energy consumption.

2. Mitigating and adapting to the impacts of climate change:

- a) Conserving water resources and minimising vulnerability to flooding.
- b) Providing shade and green and blue infrastructure to reduce overheating of urban areas during warmer summers.
- c) Increasing the extent, connectivity and diversity of wildlife habitats to enable animals and plants to adjust.
- d) Reducing air pollution so as to minimise the potential for higher temperatures to worsen air quality.

3. Promoting renewable and low carbon energy schemes:

- a) Identifying and supporting opportunities for the delivery of renewable and low carbon energy schemes.

b) Ensuring the provision of renewable and low carbon energy generation infrastructure is located and designed to minimise potential adverse effects, with particular regard to protecting the natural, historic and built environment.

3.6 The Plan plays a central role in addressing the climate emergency by reducing carbon dioxide emissions, supporting the transition to a low carbon future and delivering improvements to flood risk, air quality, recycling and waste management.

3.7 Our climate is changing as a result of human activity and this will have substantial implications for society and our environment if we do not act. The council is committed to responding to climate change and declared a climate change emergency in July 2019, announcing its pledge to make the borough council carbon neutral by 2030, taking into account both production and consumption emissions. Working with other Surrey districts and boroughs, and Surrey County Council, Surrey's Greener Futures Climate Change Strategy (2020-2050) and Climate Change Delivery Plan (2021) have been produced. The Plan will play a central role in delivering a number of aims set out in both. A central thread of the Plan is to plan for a low-carbon future in which carbon emissions and other greenhouse gases are reduced and we tackle and adapt to the new climatic norms.

3.8 The council will take a proactive approach to mitigating the effects of, and adapting to, climate change to ensure the future resilience of both communities and infrastructure. This includes locating new development in locations that enable the use of active modes of travel as well as being designed and constructed in a way to achieve low or zero carbon buildings and that facilitates more sustainable lifestyles including, supporting the ability to work flexibly.

3.9 Some of the necessary actions for tackling climate change, such as improving energy efficiency and the provision of green and blue infrastructure, could also have direct benefits for biodiversity and residents, businesses and visitors by reducing energy bills and providing a higher quality environment.

3.10 New development will need to positively respond to the climate emergency and deliver a comprehensive and integrated approach to addressing the challenges of climate change as set out in policy SS1 Responding to the climate emergency.

3.11 In responding to this strategic policy, applicants will need to address each of these aims in their submission documents. Strategic Policy SS1 is supported by more detailed development management policies, in particular CC1, CC2, CC3, ENV1, and ENV8 and the forthcoming Climate Change and Renewables Supplementary Planning Document (SPD).

Presumption of sustainable place-making

SS2 - Sustainable place-making

1. The council will apply the presumption in favour of sustainable development, balancing the economic, social and environmental objectives.
2. All development proposals will be assessed taking into account the following criteria:
 - (a) Protecting and enhancing our natural, historic and built environment by:
 - i) Responding positively to the climate emergency, by mitigating and adapting and requiring the best use of resources and assets and minimise flood risk.
 - ii) Conserving and enhancing biodiversity
 - iii) Enhancing the character and qualities of places and contribute positively to local distinctiveness, identity and history.
 - iv) Creating attractive, safe and inviting environments and public spaces that encourage healthy lifestyles and that are free from unacceptable air and noise pollution.
 - v) Protecting the Green Belt as defined on the Policies Map from inappropriate development in accordance with national planning policy and the policies set out in the Plan.
 - (b) Delivering homes for all by:
 - i) Delivering the right mix of well-designed and adaptable homes, including affordable and smaller housing to meet local housing needs.
 - ii) Incorporating a range of amenities and facilities to meet local needs.
 - (c) Growing a prosperous economy by:
 - i) Providing a varied choice of business accommodation, including for start-ups and Small and Medium Enterprises (SMEs).
 - ii) Delivering vibrant and adaptable town, district and local centres to support the evolving needs of residents, businesses and visitors.
 - (d) Providing infrastructure and connectivity by:
 - i) Providing integrated and improved access to high quality green and blue infrastructure for the wellbeing of residents and visitors as well as contributing to a variety of important environmental functions and attracting inward investment.

- ii) Making it easy and attractive to walk, cycle and use public transport.
- iii) Offering excellent connections through sustainable transport links to reduce reliance on private motor vehicles.
- iv) Providing excellent integrated digital connectivity.

3.12 At the heart of national planning policy is a presumption in favour of sustainable development. This informs both plan-making and decision-taking. National policy provides a guide to what sustainable development is at a national level, but what does this mean for Elmbridge?

3.13 In applying the presumption in favour of sustainable development required by national policy, the Plan seeks opportunities to meet the development needs of Elmbridge in a positive way and builds into the policies sufficient flexibility to adapt and respond to change, whilst promoting a sustainable pattern of development.

3.14 As with any borough, Elmbridge is not a single homogenous place. Rather, it is a collection of separate and distinct places or neighbourhoods some of which have grown together over time to create larger urban areas. It will be important that new development builds on the success of our existing communities and places and responds to their individual identities and development needs. The allocation sites identified in Chapter 9 have been carefully considered against the individual identities of each area and the contribution they would make towards enhancing them. The Plan sets out in more detail what is distinctive about Elmbridge and the challenges and opportunities we face in Chapter 2 and Appendix A3.

3.15 The policy SS2 establishes what is meant by sustainable place-making development in Elmbridge and reflects the vision and principles of the Plan, as well as setting out the context for the detailed policies that follow. It is expected that all planning decisions will have regard to the overall principles of the Plan and contribute to achieving the vision for Elmbridge 2037.

3.16 When implementing Strategic Policy SS2, local circumstances will be taken into account to respond to different opportunities for achieving sustainable place-making. In accordance with national planning policies there will be protection of important natural and heritage assets, the presumption in favour of sustainable development will not apply to sites protected under the Habitats Regulations and/or designated Sites of Special Scientific Interest, land designated as Green Belt, Local Green Spaces, irreplaceable habitats, designated heritage assets and areas at high risk of flooding.

Quantum and spatial distribution of development

3.17 At the heart of the spatial strategy is the commitment to respond to the climate emergency and sustainable place-making. The scale and location of growth set out in the Plan has been informed by careful consideration of the evidence and the balancing of the social,

economic and environmental positive and negative effects which could arise from growth and development. The key principles behind the scale and location of growth in the borough include increasing the number of new and genuinely affordable homes in the borough and seeking out all opportunities to maximise the amount of development on previously developed land within the existing urban areas by proactively optimising sites.

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.

3.22 To assist in sustainable economic recovery following the Covid-19 pandemic and support economic growth, it is important that the Plan makes provision for and maintains a portfolio of employment sites that responds to businesses needs including the needs of Small and Medium Enterprises (SMEs) and business start-ups. This is particularly important in areas like Elmbridge where there are high land values and competing development pressures.

3.23 National and South East trends for offices show a demand for high quality space that is provided either as large space for corporates or as smaller flexible multi-let space for smaller businesses. There is an increasing level of demand for smaller, start-up space in the borough and there is a series of examples of smaller units, often outside of the designated Strategic Employment Land areas and town, district and local centres. This is not surprising as the business base within the borough is predominately SMEs with round 92% of all companies employing under 10 people.

3.24 Therefore, evidence recommends that an approach to maintain and intensify the existing employment offer is pursued. Protecting key employment locations from

redevelopment is particularly important for industrial and warehousing in the borough as there are high levels of utilisation, low vacancy rates and occupiers would have potential difficulties in finding alternative locations if existing ones were lost.

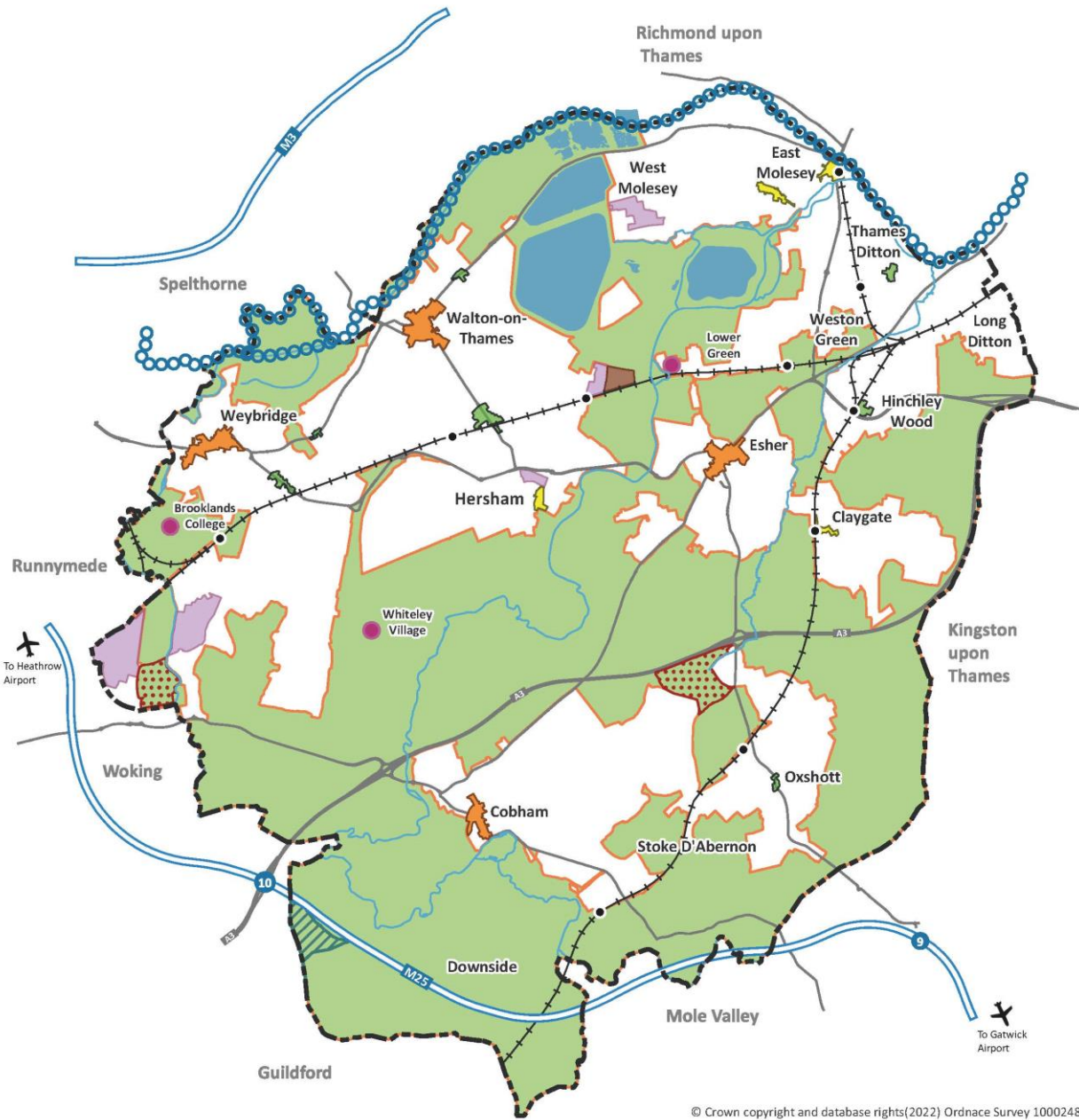
3.25 The 'traditional' high street continues to face a number of challenges stemming from the impacts of the recent economic downturn, the tightening of retail spending in recent years, the Covid-19 pandemic and continued significant changes in consumer shopping behaviour.

3.26 The evidence supports the careful repurposing of retail floorspace and this is most likely to be by converting excess retail space to create mixed-use destination schemes including with residential elements. Managing this change is likely to require temporary and flexible meantime/pop-up uses.

3.27 Forecasts of trends and demand in relation to employment, retail and our high streets are difficult to predict. As such, policies should be looking forward 10 years but be flexible to respond to changes in the economy. The policies within the Plan will be carefully monitored (as set out in Chapter 10) as we continue to support our business community's recovery following the Covid-19 pandemic.

3.28 The Key Diagram shown at Figure 1 has been produced to indicate the broad extent of the key locations, landscape and other designations relevant to the Plan. It does not provide the definitive identification of the boundaries of designations such as the Green Belt. However, a greater level of detail can be found on the Policies Map.

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- | | | |
|---------------------------|---------------------|---------------------------------|
| Green Belt | River Thames Scheme | Borough Boundary |
| Urban Areas | Rivers | Waste Sites |
| SANG | Motorways | Town Centre |
| Strategic Employment Land | A Roads | Local Centre |
| Thames Basin Heath (SPA) | Railway | District Centre |
| Open Water | Railway Station | Broad Locations for Development |

Figure 5: Key diagram

Scale and location of good growth

SS3 - Scale and location of good growth

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

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Esher	1215	17.9
Hersham	560	8.3
Long Ditton, Thames Ditton, Hinchley Wood & Weston Green	635	9.3
Walton-on-Thames	1255	18.5
Weybridge	1200	17.7
Total	6785	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.

3.29 In strategic policy SS3 the location of development in the borough has been driven by the principle of sustainable development as set out in national policy. With this in mind, planning for our housing needs builds on the existing pattern of development in the borough, taking a 'brownfield first' approach. In taking a 'brownfield first' approach, the Plan seeks to make as much use as possible of existing suitable brownfield sites, including all publicly owned assets and land holdings. The urban areas of the borough were assessed, identifying the amount of development that could sustainably be accommodated. However, this does not meet all of the identified need for market and affordable housing.

3.30 The council has therefore had to look at other options to meet housing need and has fully examined all reasonable options to responding positively to meeting the borough's local housing needs and the unmet need of neighbouring authorities. This has included discussions and correspondence with neighbouring authorities which extended to all authorities located in the South East of England exploring the potential for meeting the borough's local housing

needs outside of Elmbridge. However, it is clear that it is highly unlikely there will be any significant opportunities during the plan period to accommodate need outside of the borough boundary.

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).

3.33 Strategic Policy SS3 scale and location of growth, sets out the quantum and spatial distribution of development in the borough, including setting out the preferred location for growth, as required by national policy.



Chapter 4 - Tackling climate change

4.1 The natural, urban and historic environment in the borough makes Elmbridge a sought-after place to live, work and visit. Enhancing and protecting these environments at the same time as responding to climate change and creating sustainable places, is fundamental to the success of the Plan. Tackling climate change and its consequences is one of the priorities for the council and its Local Plan. The challenge for planning is providing much needed jobs and homes in a way that does not have a detrimental impact on our climate and environment.

4.2 A Special Report was published by the Intergovernmental Panel on Climate Change (IPCC) in 2018, which concluded that global greenhouse gas emissions need to reach net zero by 2050 in order to keep global temperature rise below 1.5°C and minimise damaging climate impacts on human and natural systems. In May 2019, the Committee on Climate Change (CCC) recommended a new long-term emissions target for the UK: net zero greenhouse gases by 2050. Following the adoption of the Climate Change Act 2008 (2050 Target Amendment) Order in 2019, the UK has a statutory requirement to reduce its greenhouse gas emissions by 100% by 2050 (based on 1990 levels).

4.3 In July 2019 the council declared a climate change emergency and made a pledge to make the borough council carbon neutral by 2030, taking into account both the production and consumption emissions, in line with the national targets mentioned above.

4.4 Working with other Surrey districts and boroughs, and Surrey County Council, Surrey's Greener Futures Climate Change Strategy (2020-2050) and Climate Change Delivery Plan (2021) have been produced. The Plan will play a central role in delivering a number of aims set out in both. A central thread of the Plan is to plan for a low-carbon future in which carbon emissions and other greenhouse gases are reduced and we tackle and adapt to the new climatic norms.

4.5 Our Local Plan will have a central role in reducing carbon dioxide emissions and supporting the transition to a low/zero carbon future, as well as delivering improvements to flood risk, air quality, recycling and waste management. New developments will need to prioritise sustainable design and construction to mitigate and adapt to the impacts of climate change with energy efficiency, low carbon energy generation and climate resilience on an equal footing with aesthetic appeal and demonstrate that it will not exacerbate any climate change impacts elsewhere.

Energy efficiency, renewable and low carbon energy

CC1 - Energy efficiency, renewable and low carbon energy

1. To help tackle climate change, developments will be expected to achieve the highest levels of energy efficiency to mitigate the effects of climate change.
2. Development proposals for new housing will be permitted where, as minimum, carbon dioxide emissions are reduced by the Target Emissions Rate (TER) set out in Building Regulations. This reduction should be achieved through the provision of on-site renewable and low-carbon technologies, or by increasing the energy efficiency of the proposed buildings using a 'Fabric First' approach. Where possible development should seek to exceed the TER.
3. The inclusion of localised decentralised energy sources in developments will be supported and local opportunities to contribute towards decentralised energy supply from renewable and low-carbon technologies will be encouraged.
4. The development of carbon neutral/zero carbon developments will be encouraged and supported where they meet the requirements of other policies in this Plan.
5. The highest standards of energy and water efficiency in existing developments will be supported through retrofitting.

4.6 Improving the quality of the built environment and energy performance of new and existing buildings is a fundamental aim of this Plan. The council seeks to promote the move towards a low carbon economy and remains committed to working towards zero carbon standards in all new developments. Future changes to energy efficiency standards will be kept under review and policy requirements will be updated with the prevailing standards if required.

4.7 Policy CC1 seeks to ensure that all new development and refurbishment is as sustainable as possible in order to mitigate the impact of development on the environment, taking forward the council's commitment to sustainable construction and design. All new buildings should be built to a standard which minimises the consumption of resources during construction and occupation, and where suitable the use of recycled or secondary aggregates in construction is encouraged.

4.8 The targets for reducing carbon dioxide emissions are expressed as a percentage improvement over the Target Emission Rate (TER) based on Part L of the 2013 Building Regulations (or any subsequent update).

4.9 To achieve a reduction in emissions, the energy hierarchy should be followed:

1. Be lean: use less energy
2. Be clean: supply energy efficiently

3. Be green: use renewable energy

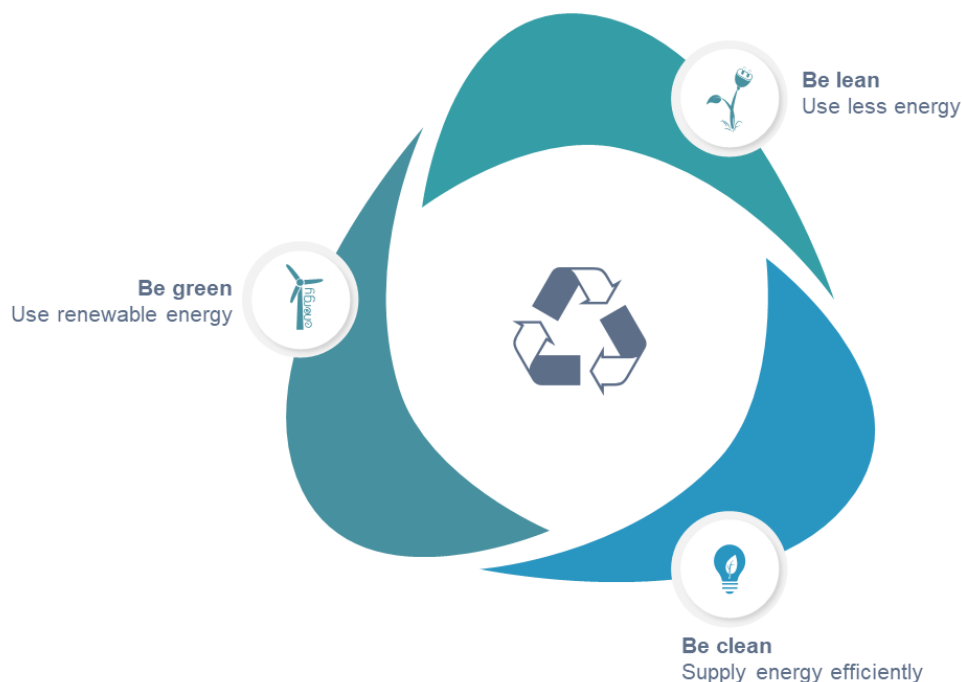


Figure 6: the energy hierarchy

4.10 The council's forthcoming Climate Change and Renewables Supplementary Planning Document (SPD) will be applied to development which involves the creation of one or more residential units, and commercial or other developments where an increase in floorspace is proposed.

4.11 For all development, applicants are required to submit an Energy Statement to show how the requirements of the policy have been met within the proposed new development. Householder applications will be required to submit a Sustainable Design Checklist in line with the requirements set out in the forthcoming Climate Change and Renewables SPD. For all developments the Council will require a proportionate response.

Minimising waste and promoting a circular economy

CC2 - Minimising waste and promoting a circular economy

1. All development proposals will be required to adopt a circular economy approach to building design and construction to reduce waste, to keep materials and products in use for as long as possible, and to minimise embodied carbon.

2. Developments will be expected to:

- a) Ensure resource efficiency and reduce embodied carbon emissions by sourcing and prioritising materials that can easily be maintained, repaired and renewed across the development lifetime.
- b) Minimise the environmental impact of materials by specifying sustainably sourced, low impact and re-used or recycled materials. This should include identifying opportunities for the retention and reuse of existing materials on site (e.g. re-using demolition material on site). Materials should be locally sourced wherever possible to minimise transport emissions.
- c) Be designed for durability and flexibility as well as easy disassembly and reuse to minimise waste during the ‘in-use’ and ‘end of life’ phases of the development. Building shape and form should be designed to minimise embodied carbon and limit the need for repair and replacement.

4.12 Policy CC2 supports the principles of a circular economy and promotes a more effective resource use, to ensure that resources are kept in use for as long as possible and to minimise waste. In minimising waste, the waste hierarchy should be followed:



Figure 7: the waste hierarchy

4.13 A circular economy is one that seeks to promote waste minimisation by moving from a more traditional linear model of resource use, consumption and disposal, to one that promotes long-term sustained use, reuse and recycling. Elmbridge is supportive of the move towards a more circular economy. As such, circular economy principles should be embedded across all facets of the development lifecycle, from concept and design to build-out and occupation/use, in order to increase resource efficiency, minimise operational and embodied carbon emissions, and minimise residual waste, in line with Section R2 of the National Design Codes ‘Careful selection of materials and construction techniques’.

4.14 Circular economy opportunities might include using materials with a lower embodied carbon (e.g. timber rather than concrete frame – using timber also provides an opportunity to

sequester carbon), using more recycled content in the materials and finding other ways to enhance recovery and recyclability (e.g. reinforcement free concrete). Mechanical and electrical services will typically need to be replaced every 20 years and should therefore be designed to allow easy recovery, reconditioning and reuse whilst also optimising for performance and carbon emissions. Encouraging a ‘fabric first’ approach to building design can also minimise mechanical plant and services in favour of natural ventilation.

4.15 All new build development will be expected to endeavour to minimise embodied carbon in line with best practice targets contained within the latest industry guidance.

Sustainable design standards

CC3 - Sustainable design standards

1. All developments must achieve high standards of sustainable design and construction from new development, change of use, conversions and refurbishments to ensure that all development makes effective use of resources and materials, minimises water use, and assists in meeting carbon reduction targets.

This will be achieved by:

- a) All development must demonstrate that the use of mains water has been minimised by incorporating measures such as smart metering, water saving and recycling measures, including retrofitting.
- b) All major developments and high-water use developments must include water saving measures such as rainwater harvesting and greywater recycling to reduce mains water consumption.
- c) All residential development must meet a minimum internal water efficiency standard of 110 litres per person per day, as set out in Building Regulations Part G or equivalent.
- d) All residential development of 10 or more dwellings must achieve a Home Quality Mark 4 star as a minimum and aim towards achieving a higher mark where possible, or any equivalent new standard.
- e) Proposals for conversion and changes of use to residential for 10 or more dwellings must meet BREEAM UK Domestic Refurbishment 'Excellent' standard or any equivalent new standard.
- f) All non-residential development must achieve a minimum of BREEAM 'Excellent' UK New Construction standard or equivalent, or any equivalent new standard. This standard should be achieved through the provision of on-site renewable and low-carbon technologies, and/or by increasing the energy efficiency of the proposed buildings.

4.16 The principles of sustainable design and construction are designed to be holistic and are more wide-ranging than energy performance alone. National sustainable design and construction standards such as BREEAM ensure that a development's full impact on the environment, including water use, transport and land use and ecology, as well as energy use and waste are considered and addressed. Using these standards or any subsequently adopted set of national sustainable construction standards, will assist in the delivery of a number of the policies covered in the Plan including the Climate Change, Transport, and Green and Blue Infrastructure policies.

4.17 The highest standards of sustainable design and construction should be applied to improve the environmental performance of new development. Development proposals must demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.

4.18 The BREEAM Domestic Refurbishment standard provides a recognised scheme and methodology by which conversions and change of use can demonstrate their adherence to sustainable design and construction methodologies. The council therefore requires all major schemes resulting in the creation of 10 or more new dwellings through the conversion or change of use of existing buildings to achieve a minimum BREEAM Domestic Refurbishment rating of 'Excellent' or equivalent. In particular, this scheme will help drive energy efficiency improvements across the borough's existing building stock through its post-refurbishment Energy Efficiency Rating requirements, using a 'Fabric First' approach.



Sustainable transport

CC4 - Sustainable transport

Improved sustainable transport in the borough will be achieved by:

1. New development must contribute to the delivery of an integrated, accessible and safe sustainable transport network, and maximise the use of sustainable transport modes; including walking, cycling and public transport.
2. Development proposals must take account of the following:

Cycling and Walking

- a) Promoting active living environments to include the provision of quality, safe and direct routes for cycling and walking that have priority over other forms of traffic;
- b) Improving existing cycle and walking routes to local facilities and public transport nodes;

Public Transport

- c) Provide and improve public and community transport services;

Other transport modes

- d) Provide opportunities to establish car clubs or other similar schemes; and
 - e) Provide electric vehicle charging facilities situated in convenient and easy to use locations.
3. New development will be required to provide and contribute towards suitable access, transport infrastructure and services that are necessary to make the development acceptable, including the mitigation of any adverse material impacts.
4. New development that will generate significant amounts of movement, such as educational establishments, large business premises or residential developments of 50 homes or more, will be required to prepare and keep up-to-date an on-site Travel Plan associated with the development which contains measures to reduce car use and promote sustainable transport modes.
5. All development proposals will be required to provide cycle and vehicle parking and associated facilities, including electric vehicle charging points in line with the standards set out in the Parking Supplementary Planning Document (SPD).
6. Car free development will be encouraged in appropriate locations and where supported by evidence demonstrating that proposals would not lead to parking stress.

4.19 Reducing reliance on private motor vehicles, reducing issues of air quality and congestion and supporting a modal shift in the way people live and access local services and facilities, is a key principle of the Plan.

4.20 The council works with the local highway authority, neighbouring authorities and other key transport bodies to develop strategies for the provision of transport infrastructure necessary to support sustainable development. This includes planning for development that facilitates more sustainable modes of transport, such as walking and cycling and mobility as a service.

4.21 Sustainable transport modes are defined in national planning policy as any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultralow emission vehicles, car sharing and public transport. Car sharing includes car clubs, whereby club members (usually residents living in the same neighbourhood or development) hire a car for short periods.

4.22 To make new developments acceptable in transport terms, the development will provide, or contribute towards, suitable access and transport infrastructure. In assessing whether development proposals will generate significant amounts of movement, the council will consider the current land use, the condition of the strategic and local road network and the net number of trips generated by the development.

4.23 As the local highway authority, Surrey County Council will be consulted at planning application stage on transport matters. Early engagement through the county council's pre-application services is strongly encouraged. Surrey County Council will also advise on the contents of travel plans and other proposed sustainable transport measures.

4.24 Implementation of travel plans and other transport measures will be secured through the use of planning conditions and/or legal agreements, as appropriate.

4.25 While the primary responsibility for the delivery of transport provision in the borough lies with Surrey County Council as the local highway authority, the council has involvement in some aspects, mainly via the planning system, community transport, and the management and enforcement of parking.

4.26 Relevant design and parking standards for vehicles and cycling parking within development proposals are set out in the Parking SPD.

Managing flood risk

CC5 - Managing flood risk

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.

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

guidance included within the Elmbridge SFRA and Flood Risk Supplementary Planning Document (SPD).

4. 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.
5. All new development is required to ensure that sustainable drainage systems are used for the management of surface water.

4.27 Elmbridge is a borough with a significant flood context, with the River Thames forming its northern boundary, and the Rivers Mole, Wey and Rytte and the Dead River all running through it. Flooding is one of the most immediate and visible consequences of extreme weather conditions and climate change. Large parts of the borough are at risk from flooding and there has been a long history of flood events which have caused significant damage, distress and disruption to communities, businesses and the borough's infrastructure network.

4.28 As such, a robust policy is required to ensure effective flood risk management through the planning system and steer vulnerable development away from areas affected by flooding. Consideration in development proposals needs to be given to all forms of flooding, including fluvial flooding, groundwater, sewer, surface water and reservoir. Where there is no alternative to development being located in an area at risk, Policy INF7 sets specific requirements to minimise the risk over the lifetime of the development and to increase resilience to flooding events. This includes ensuring occupants are empowered to take measures to prevent or minimise damage or threat to life through personal flood plans.

4.29 The Elmbridge Strategic Flood Risk Assessment (SFRA) contains detailed information on the types of flooding that has or could impact on different parts of the borough. Where there is a need for a site-specific flood risk assessment at the application stage the independent scrutiny of the assessment will be funded by the applicant. Applications should refer to the information contained in the SFRA and the Flood Risk SPD during the preparation of a planning application and site-specific flood risk assessment.





Chapter 5 - Principle 2 - Protecting and enhancing our environment

5.1 The natural, urban and historic environment in the borough makes Elmbridge a sought-after place to live, work and visit. Enhancing and protecting these environments at the same time as responding to climate change and creating sustainable places is fundamental to the success of the Plan.

5.2 The following policies cover a range of environmental issues with the common aim of ensuring that the environment of Elmbridge continues to be a pleasant place to live, work and enjoy leisure time, and that new development contributes to a net environmental gain across the borough.

Green and blue infrastructure

ENV1 - Green and blue infrastructure

1. The council will protect, maintain and enhance the network of accessible, multifunctional green and blue infrastructure across the borough for the biodiversity, recreational, connectivity, and health and wellbeing value it provides and for the contribution it makes towards combating and mitigating climate change impacts.
2. The council will support proposals which meet the identified needs of local communities or provide new connections between existing green and blue infrastructure assets.
3. Opportunities to provide public access to existing or new green and blue spaces will be supported, where this would not result in an unacceptable impact on biodiversity.
3. Development proposals must be designed with green and/or blue infrastructure as an integral component, whether this be by enhancing existing features or providing new assets. Planning applications will be refused where this is not clearly demonstrated.
4. Existing green and blue infrastructure will be safeguarded from development and protected from harm. Development will not be permitted where it causes harm to existing assets, unless it can be demonstrated that the harm arising from the impact on these assets is clearly outweighed by other factors. This will include considering:
 - a) Any ecological benefit of the feature;
 - b) Whether the Green and Blue Infrastructure asset provides essential social, community or recreational use; and

c) The extent to which the asset makes a contribution to the environmental quality and distinctive characteristics of the site and wider area.

In such cases, replacement provision of an equivalent or better quality in a suitable location will be required.

5. Development proposals will be refused unless the council is satisfied that the provision of green and/or blue infrastructure cannot be achieved on the site, it will seek to negotiate suitable alternative provision.

6. Landscaping schemes are expected to provide enhancements to green and/or blue infrastructure and should utilise disease-resistant native and/or climate change-resilient species.

7. The provision of new green and/or blue infrastructure features, or the enhancement of existing features, must include provision for their long-term maintenance.

8. There will be a presumption against granting permission for proposals to develop areas of existing open space, but such applications will be determined in accordance with national planning policy and guidance.

5.3 Elmbridge hosts an extensive well-used, valued and high-quality green and blue infrastructure network. The blue infrastructure includes the River Thames, River Mole, River Wey, The Rythe, River Ember, Dead River and their corridors, and large reservoirs as well as smaller waterbodies. The green infrastructure includes natural and semi-natural rural and urban green spaces, parks and gardens, amenity green space, allotments, orchards and farmland, green corridors, nature conservation sites, built structures and functional green space. Trees, woodlands and hedgerows also form an important part of the borough's character and the setting of buildings and settlements.

5.4 This series of green and blue spaces make an important contribution to the borough's natural capital, providing valuable habitats for wildlife. Green and blue infrastructure also contributes to cleaning and cooling the air, preventing flooding, providing habitats and networks for wildlife, and for recreational and cultural activity enhancing health and wellbeing.

5.5 Crucial to the continued enjoyment of the benefits provided by green and blue infrastructure is a positive approach to provision, maintenance and enhancement, as set out in the policy below.

5.6 Policy ENV1 sets out the council's expectation that green and blue infrastructure will be incorporated into development schemes at the earliest stages of design in order to make the most of existing features and ensure the feasibility of new provision. This can include suitable landscaping and planting as well as more innovative solutions such as living walls and roofs.

5.7 Opportunities to maximise the gains provided by each new feature should be pursued where possible, by making them beneficial for both people and wildlife and addressing multiple issues including environmental quality, biodiversity, amenity and drainage.

5.8 The Green and Blue Infrastructure Study (2020) sets out both borough-wide and settlement-specific opportunities to contribute towards Elmbridge's network of green and blue spaces. Development will also need to have regard to the requirements set out in the forthcoming Elmbridge Design Code.

Landscape, trees and woodlands

ENV2 – Landscape, trees and woodlands

1. Development proposals must protect and enhance valued landscapes through reflecting, conserving or enhancing existing landscapes and integrating the development into its surroundings.
2. Development must not result in the loss of, or damage to, ancient trees, trees, woodlands and hedgerows that make or are capable of making a significant contribution to the character or amenities of an area, unless the benefits would clearly outweigh the loss and replacement planting is provided.
3. Proposals will be expected to provide for the protection of existing trees and their root systems prior to, during and after the construction period.
4. Development should make provision for new streets to be tree lined and new trees, which should be sited so as to avoid any negative impacts on highway safety or disruption to underground utilities.
5. Provision should be made for the successful implementation, maintenance and management of planting schemes.

5.9 The presence of trees within, or adjacent to, a development site will necessitate the submission of supporting arboricultural information prepared by a suitably qualified person. To ensure that existing trees are protected for the important contribution they make to Elmbridge's verdant environment, the council will use conditions to secure tree retention and protective measures. Conditions will also be used to secure full details of tree planting and maintenance, where these are not available at the application stage.

5.10 In accordance with Policy ENV1, where new planting is proposed this should be disease-resistant native, or climate-resilient, species. Planting schemes should not rely on the use of fast-growing coniferous or evergreen hedges for screening purposes.

5.11 Where a tree has a particularly high amenity value, the council will consider making a Tree Preservation Order under Section 198 of the Town and Country Planning Act 1990.

Local Green Spaces

ENV3 - Local Green Spaces

1. Areas designated as Local Green Space on the Policies Map will be protected from development, other than in very special circumstances, where the potential harm to the Local Green Space and the purposes of including land within it is clearly outweighed by other considerations.

2. Limited improvements to access, outdoor recreation and wildlife, or community functions associated with the Local Green Space may be allowed where it would maintain or enhance the characteristics for which the Local Green Space was designated.

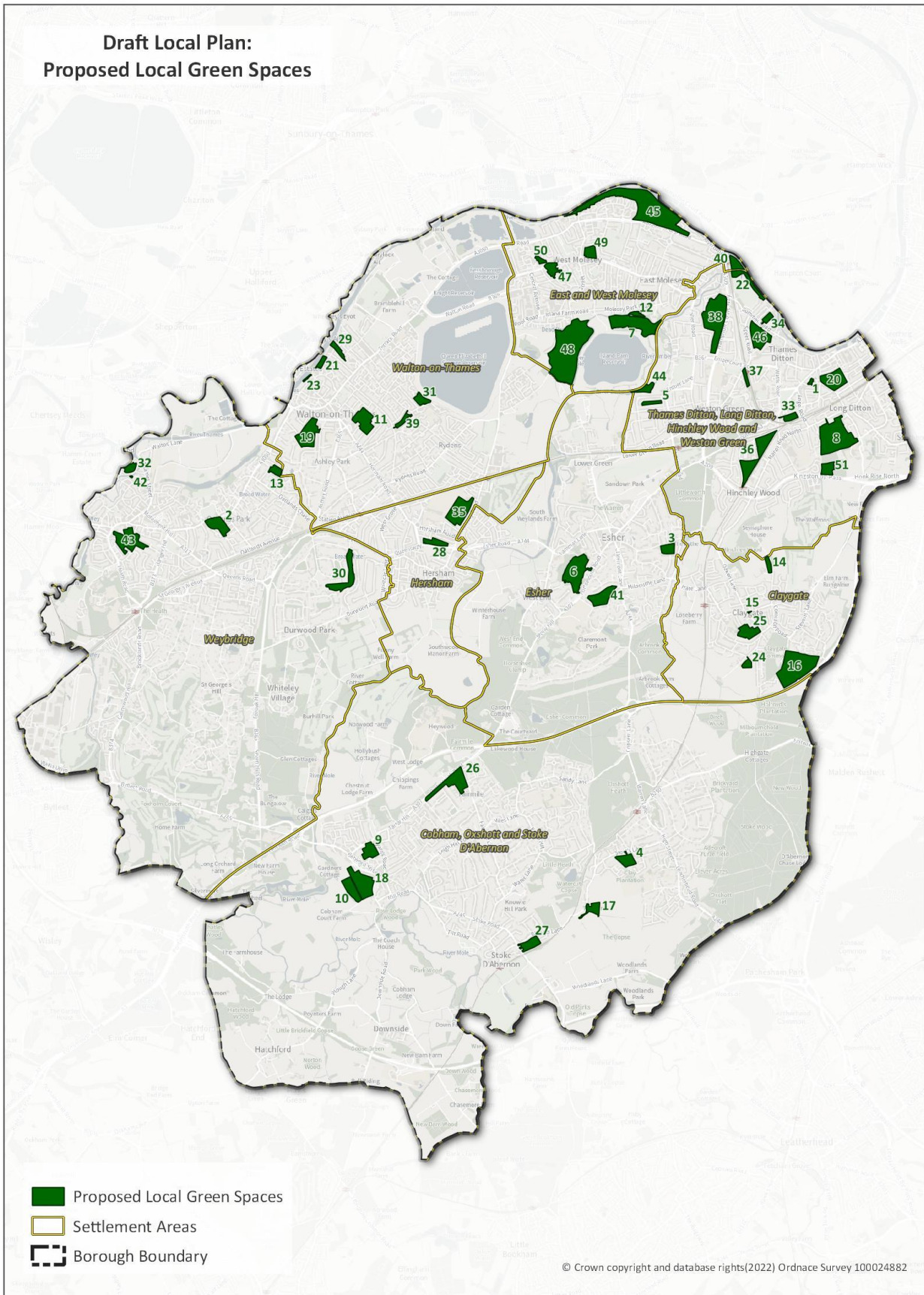
3. Proposals to enhance an existing community facility associated with or within the boundary of a Local Green Space will be supported, subject to maintaining or enhancing the characteristics for which the Local Green Space was designated and other relevant planning policies.

5.12 High quality green space has a positive impact on the urban environment and is a vital part of a vibrant and healthy community. Green or open space of different types and sizes can provide tangible health and wellbeing benefits such as promoting healthier lifestyles through recreation uses and encouraging social interaction within a community. As well as these health and wellbeing benefits, green spaces can also improve the visual amenity of a particular area, provide opportunities for biodiversity, and help alleviate and mitigate against the impacts of climate change, such as flooding.

5.13 National policy recognises the importance of particular green areas to local communities and allows for their designation through the preparation of a new Local Plan, provided they meet certain criteria. Through assessment in the Local Green Space Study (update 2022) 51 areas have been designated and are identified on the Policies Map and are listed in Appendix A4. These spaces are demonstrably special to the local community because of the wildlife they are home to, their beauty, their cultural or heritage significance, the tranquility they provide or their recreation value.

5.14 Applications for development which enhance the use or function of the Local Green Space may include improvements to access, outdoor recreation facilities and wildlife, or community functions associated with the Local Green Space.

Figure 8: map of proposed Local Green Spaces



Protecting Green Belt

ENV4 - Development in the Green Belt

1. Land which is designated as Green Belt on the Policies Map will be protected against inappropriate development.
2. Exceptions to inappropriate development in the Green Belt are set out in national planning policy. Where development does not fall within one of these exceptions and is therefore inappropriate, permission will not be granted unless very special circumstances, which clearly outweigh the harm to the Green Belt by reason of inappropriateness and any other harm, are demonstrated.

5.15 The council places great importance on protecting the designated Green Belt. Most of the open space and countryside in Elmbridge is designated as Green Belt and the designation covers 57% (approximately 5,490ha) of the borough. It functions as a buffer to the outward growth of London, preserving the open countryside between the edge of London and the settlements in Surrey as well as between the settlements in the borough themselves and with those in neighbouring authorities.

5.16 National planning policy advises that most forms of development in the Green Belt are 'inappropriate development'. National policy lists out those developments which are considered to be not inappropriate. For the purposes of interpreting those exceptions which result in alteration, extension or replacement of an existing building in the same use, the 'original building' refers to the building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally after this date. In assessing how a proposal relates to the original building, a comparative assessment of footprint and volume will be made. Where a proposed basement would be wholly subterranean; does not exceed the footprint of the building and is served only by discreet lightwells; ventilation systems or means of escape; its footprint and volume will not contribute towards this assessment.

5.17 Applicants are encouraged to take opportunities to improve the openness of, and access to, the Green Belt where this is possible. This could involve focusing development in a less conspicuous or open part of the site or removing a sprawl of buildings in favour of a single mass which leaves the remainder of the site open. The provision of public access to Green Belt land is also encouraged.

5.18 Where weight is to be given to the benefits of a proposal advanced as a case for very special circumstances, the council will expect that the delivery of these benefits is shown to be viable and is secured by a legally enforceable mechanism.

Thames Basin Heaths Special Protection Area

ENV5 — Thames Basin Heaths Special Protection Area

1. Development proposals which are likely to have a significant effect on the Thames Basin Heaths Special Protection Area will be subject to an appropriate assessment. Applicants will be expected to submit sufficient information to enable such an assessment to be undertaken.

2. Where a development proposal is subject to appropriate assessment, the Council will only grant planning permission if either:

(a) it is satisfied, having taken into account any relevant mitigation or avoidance measures, that the proposal will not adversely affect the integrity of the Thames Basin Heaths Special Protection Areas; or

(b) if the proposal will adversely affect the integrity of the Thames Basin Heaths Special Protection Area, it is satisfied that there are imperative reasons of overriding public interest in favour of granting permission in accordance with the relevant legal requirements.

3. The following zones of influence will apply.

Zone of Influence	Distance from the SPA
A	From 0m to 400m straight line distance from the SPA
B	From 400m to 5km straight line distance from the SPA
C	From 5km to 7km straight line distance from the SPA

These zones of influence are depicted on the policies map. The distances are measured as the crow flies, from the SPA perimeter to the nearest part of the curtilage of the proposed dwelling.

4. The following principles will be applied when the Council is assessing relevant development proposals within these zones of influence under this policy:

(a) Within Zone A, there will be a presumption against the grant of planning permission for development proposals that will result in a net increase in residential units. That presumption will be rebutted only if it can be demonstrated through a site-specific appropriate assessment that there will be no adverse impact on the integrity of the Thames Basin Heaths Special Protection Area.

(b) Within Zone B, development proposals that will result in a net increase in residential units will be required to deliver suitable mitigation and / or avoidance measures in order to address

potential adverse effects arising from increased recreational disturbance. Such mitigation measures will consist of:

- (i) the provision, improvement and / or maintenance of Suitable Alternative Natural Greenspace (SANG) (or a suitable financial contribution towards the same) and / or
- (ii) suitable financial contributions towards Strategic Access Management Monitoring (SAMM)

delivered and secured in accordance with the latest version of the Thames Basin Heaths Special Protection Area Avoidance and Mitigation Strategy and the updated Development Contributions SPD.

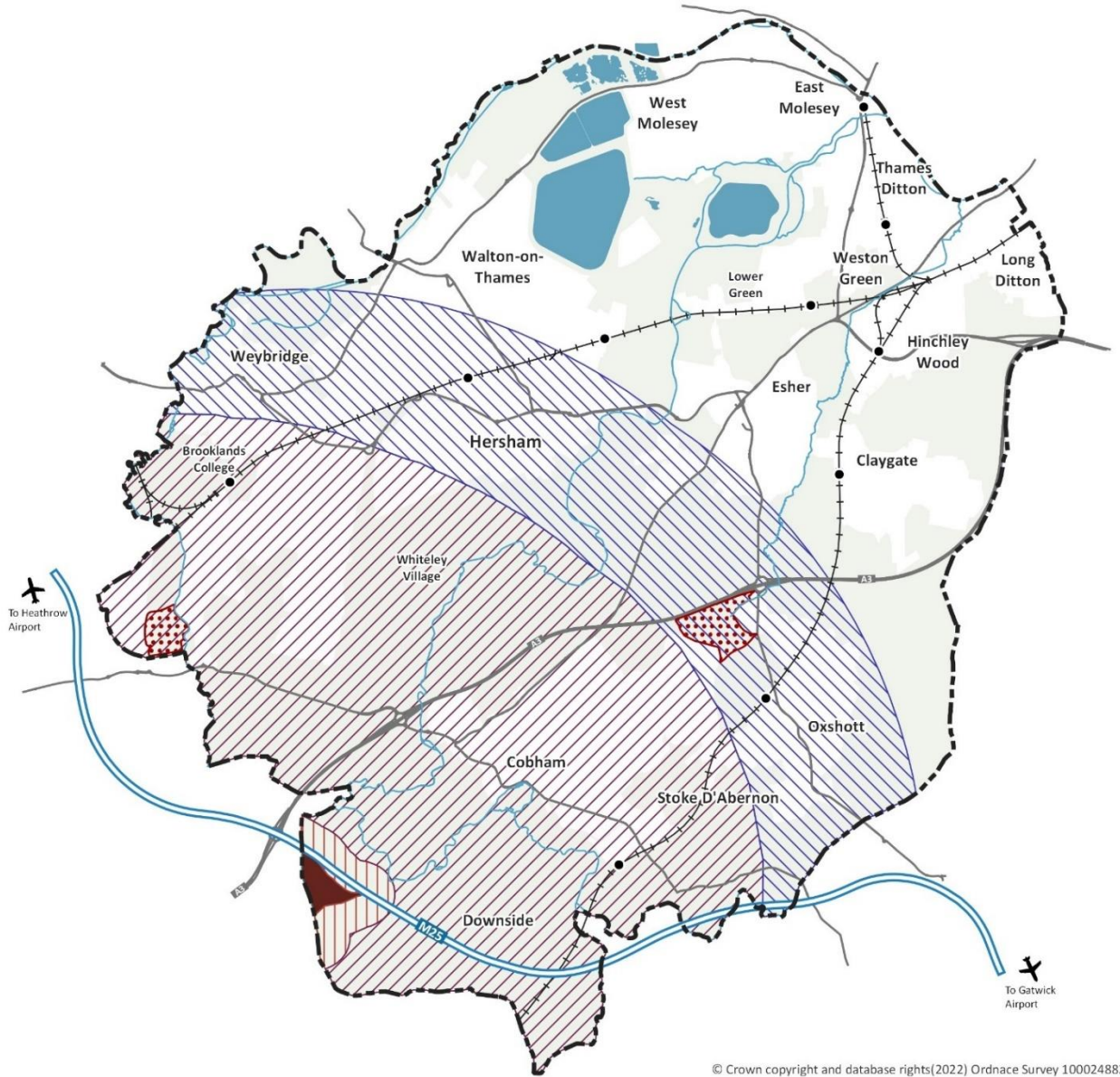
- (c) Within Zone C, development proposals that will result in a net increase of fifty or more residential units will be assessed on a case by case basis.

5.19 The Thames Basin Heaths Special Protection Area (TBH SPA) was designated on 9 March 2005, as part of the Europe-wide Natura 2000 network. The heathland lies to the south of the borough, in an area located between the M25, the A3 and the borough boundary. It is comprised predominantly of lowland heathland and woodland, a characteristic landscape that supports distinctive rare and threatened flora and fauna.

5.20 Its designation as a SPA is required under Habitats Regulations on the conservation of wild birds, owing to the presence of breeding populations of three bird species: Dartford Warbler, Woodlark and Nightjar. These birds' nest on or near the ground and as a result are vulnerable to predators, as well as to disturbance from informal recreational use. Many parts of the SPA are open to the public, enabling dog walking, rambling and biking, all of which could have an adverse impact on reproduction of these endangered bird species.

5.21 The council is under a legal obligation to ensure that there is no adverse impact on the integrity of the TBH SPA arising from new development. Policy ENV5 sets out the council's approach to mitigation over the period of the Plan.

5.22 Further details are set out within the TBH SPA Delivery Framework and the council's most up-to-date mitigation strategy. Practical application of Policy ENV5 will be set out in the future update to the Development Contributions Supplementary Planning Document (SPD).



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- Thames Basin Heath (SPA)
- TBH 400m Zone
- TBH 400m - 5km Zone
- TBH 5km - 7km Zone
- SANG
- Green Belt
- Open Water
- Borough Boundary
- Rivers
- Motorways
- A Roads
- Railway
- Railway Station

Figure 9: Thames Basin Heath SPA and buffer zones map

Biodiversity

ENV6 - Protecting, enhancing and recovering biodiversity

1. The council will work with the Surrey Nature Partnership, statutory and voluntary bodies and specialist advisers to conserve and enhance the borough's biodiversity value, contributing towards a national network of wildlife-rich habitats and wider ecological networks to restore nature.
2. Proposals must ensure the conservation and enhancement of internationally, nationally and locally designated sites will be supported. Proposals with the potential to adversely affect these sites will be refused unless clearly justified, in which case a satisfactory mitigation and management strategy will be required. Proposals affecting Special Protection Areas will be considered under policy ENV5.
3. Development proposals must seek to protect, enhance and conserve wildlife habitats and species by creating new natural areas or restoring and enhancing existing habitats.
4. Development proposals must:
 - a) Lead to a net gain in biodiversity of a minimum of 10% on all sites, unless an exemption applies. The achievement of net gain should be informed by an ecological assessment of the site's existing features and development impacts and demonstrated using a net-gain calculator and biodiversity gain plan;
 - b) Protect, conserve and enhance existing biodiversity features and secure their long-term management and maintenance;
 - c) Demonstrate that the proposals have adopted a strict approach to the mitigation hierarchy (i.e. avoid, mitigate, compensate) and are able to justify all unavoidable impacts on biodiversity.
5. Where it is not possible to retain existing biodiversity features, mitigation measures should be identified and secured on-site. In exceptional circumstances where provision of mitigation measures is not possible on-site, compensatory measures involving biodiversity off-setting will be considered.
6. Where development would result in harm to biodiversity, permission will not be granted unless it has been demonstrated that the need for, and the public benefits arising from, the development clearly outweigh the harm. The need to account for a net gain overall will remain.

5.23 Biodiversity describes all species of animals, plants and everything else that is alive on our planet. Habitats are the places in which species live. These species and their habitats contribute to the ecosystems service which provide substantial benefits to people and the

Draft Elmbridge Local Plan – Protecting and enhancing our environment

economy. The UK is amongst the most nature-depleted countries in the world. Decline in biodiversity is a concern not just for the loss of species, but also the impact this can have on the loss of ecosystem services such as clean air, clean water and soil quality, which are essential for human health and supporting economic activity.

5.24 The borough has varied natural environments, many of which are identified as of international, national and local importance. The Plan has a key role in conserving, restoring and enhancing sites of biodiversity importance, as well as priority habitats and ecological networks. The council's development strategy, and the specific sites selected, take account of the need to allocate land with the least environmental value. Sites of international, national and local importance are identified and designated on the Policies Map. These designations in the borough are:

International/ European – Sites of Conservation Importance	<p>Chatley Heath forms part of the wider Thames Basin Heaths SPA which is designated for its importance as a habitat for three rare species of ground nesting bird.</p> <p>Knight and Bessborough Reservoirs form part of the South West London Waterbodies SPA and RAMSAR site recognised for their importance in supporting wintering populations of Gadwall and Shoveler.</p>
National –	<p>Esher Common SSSI – comprising parts of Esher Common, West End Common, Fairmile Common and Oxshott Heath.</p> <p>Ockham and Wisley SSSI – situated mainly in Guildford Borough, with only a relatively small area in Elmbridge.</p> <p>Knight and Bessborough Reservoirs SSSI, Hurst Road, Molesey.</p>
Local -	<p>Prince Coverts Complex SNCI Ditton Common Golf Course SNCI Littleworth Common SNCI Fairmile Common north of A3 SNCI Birch Wood & Limekiln Wood SNCI St George's Hill Golf Course SNCI Molesey Reservoir SNCI Desborough Island SNCI River Wey – Elmbridge SNCI (the entire stretch of the river in Elmbridge) River Thames SNCI (the entire stretch in Elmbridge) The Heath SNCI Whiteley Village SNCI Woodland Park SNCI Queen Elizabeth II Reservoir SNCI Island Barn Reservoir SNCI</p>

	Field Common/ Hersham Pits SSCI Old Common, Cobham SSCI Cobham Park SSCI Field West of Old Common SSCI Brooklands SSCI Molesey Heath LNR Claygate Common LNR Esher Common LNR West End Common LNR Stoke's Field LNR
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5.25 Policy ENV6 expects all new development to contribute to biodiversity net gain within a minimum gain of 10% on all sites. Where it is achievable, a higher net gain will be encouraged.

5.26 Biodiversity net gain aims to leave the natural environment in a measurably better state than before development. It seeks a demonstrable increase in habitat value compared to the pre-development baseline, prior to an application being submitted. Where there is evidence that deliberate harm has occurred to the site's pre-development baseline before an application is made, this will be discounted in assessing the site's underlying value in order to ensure that a genuine gain is achieved.

5.27 By measuring the value of existing habitats, the Net Gain approach encourages developments affecting habitats of high biodiversity value to be avoided, given the difficulty and cost in compensating for them. It also leads to new developments integrating wildlife enhancing features into plans in order to boost their score of biodiversity units. Net gain must be quantified using an appropriate metric applied by a suitably qualified professional. The biodiversity metric calculation tool produced by Natural England must be used.

5.28 In addition to providing a measurable net gain, development will be expected to follow the mitigation hierarchy set out in national policy.

5.29 Measures to enhance biodiversity and mitigate any harm should be provided on-site. Off-site compensatory measures will be acceptable only in exceptional circumstances. In such cases, the measures will be secured by legal agreement.

5.30 Some types of development are exempt from the requirement to demonstrate a 10% net gain, but the remainder of Policy ENV6 will continue to apply. Exempt development types are those set out in the Environment Act and any subsequent regulations made by the Secretary of State.

5.31 The council will use the District Level Licensing Approach and follow Natural England's current guidance to assess planning applications that affect great crested newts.

Environmental quality

ENV7 - Environmental quality

1. Development must minimise exposure to, and the emission of, pollutants including noise, odour, light, contamination and water quality. Proposals must:
 - a) Incorporate site zoning of pollution sources and receptors to ensure that existing and future occupiers are not subject to unacceptable level of odour pollution, noise, vibration or light disturbance, both within buildings and externally;
 - b) Avoid locating noise-sensitive uses close to existing sources of pollutants, unless the impact can be acceptably mitigated; and
 - c) Avoid any other adverse site-specific or environmental impacts on humans or wildlife that arise as a consequence of the development. Where these impacts cannot be avoided, appropriate mitigation will be required.
2. Proposals for external lighting will be permitted provided that there would not be an unacceptable impact on biodiversity (including the achievement of net gain) or to the local amenities of the area. Improvements to existing lighting to reduce its environmental impact or to improve energy efficiency will be supported.
3. The re-use of land suspected to be contaminated will be supported where the land can be made safe for the proposed use. Proposals should:
 - a) Investigate the nature of the contamination, taking care to avoid the escape of contaminants which could present an environmental risk;
 - b) Make provision for remediation measures; and
 - c) Take account of ground conditions and land instability.
4. Proposals should seek to improve the quality of watercourses, groundwater and drinking water supplies, and should ensure that any contaminated run-off is prevented. Development proposals must be designed and/ or located to prevent the input of pollutants into water bodies and groundwater.
5. Schemes where adverse impacts cannot be overcome by mitigation will be refused permission.

5.32 The control of pollution is critical to achieving the Plan's principles of promoting healthy lifestyles and an enhanced quality of life for residents and visitors to the borough. Pollution control through development also plays a significant role in planning for climate change and working in harmony with the environment to conserve natural resources and increase

biodiversity. The re-use of land suspected to be contaminated not only makes efficient use of the borough's limited land resource, but also provides the opportunity for remediation to ensure that it is suitable for its proposed use, enhancing Elmbridge's overall environmental quality.

5.33 The council will seek to ensure that local environmental impacts arising from development proposals do not lead to detrimental effects on the health, safety and the amenity of existing and future occupiers on the development sites or the surrounding land. These potential impacts include, but are not limited to, noise and vibration, light pollution, odours and fumes, solar glare and solar dazzle as well as land contamination. Development proposal should consider these impacts from the initial design of the proposal ensuring appropriate measures as considered from the outset.

5.34 Sensitive uses should be located away from existing adverse impacts on the environment, amenity or living conditions due to pollution. However, given the limited availability of land for development in the borough, this will not always be possible. Development proposals should therefore identify and mitigate any adverse impacts resulting from light pollution, noise, vibration and odour to acceptable levels.

5.35 Development proposals should follow any guidance provided by the council on local environmental impacts and pollution. During the construction phase of development, including any demolition, it may be necessary to require protection of the local environment from impacts such as dust, fumes, noise, construction traffic and hazardous materials. To minimise these temporary impacts the council will use planning conditions to ensure implementation of Construction Management Plans or Construction Environmental Management Plans where appropriate. Other planning conditions may be used to reduce local environmental impacts to an acceptable level and to secure mitigation measures.

Air quality

ENV8 - Air quality

1. The design and location of new development must take account of the need to improve air quality in accordance with the borough's latest Air Quality Action Plan, local Air Quality Strategies and Local Transport Plans, as well as national air quality policy and guidance.
2. Development in areas of existing poor air quality, or proposals that might lead to a deterioration in air quality or to an exceedance of the national air quality objectives, either by itself, or in combination with other development, will require the submission of an Air Quality Assessment to be carried out in accordance with industry best practice. This should address:
 - a) The cumulative effect of further emissions;

b) The proposed measures of mitigation, using good design, technical solutions and offsetting measures that prevent the deterioration of air quality and ensure that National Air Quality Objectives are not exceeded; and

c) The identification of measures to secure the safety and satisfactory quality of life for the future occupiers. Development must not result in an increased exposure to poor air quality, including odour, fumes and dust, particularly where developments might be occupied or used by vulnerable people.

3. All development proposals should promote a shift to the use of sustainable low emission transport modes, to minimise the impact of vehicle emissions on air quality. In doing so, they should provide on-site infrastructure to support these types of transport, including vehicle charging points and adequate cycle storage in accordance with the requirements set out in the update to the Parking Supplementary Planning Document (SPD).

5.36 Clean air is critical to health, wellbeing and quality of life and is also important to support habitats and biodiversity. The nature of the borough with poor inter-connectivity by public transport, relative affluence and mobility, high car-ownership and close proximity to London and other larger towns, all contribute to high levels of nitrogen dioxide and particulates emissions in some locations.

5.37 Planning is an effective tool to improve air quality. It can be used to locate development to reduce emissions overall, or to reduce the direct impacts of new development through policy requirements. Air quality is a particular problem in several of the borough's centres and Air Quality Management Areas have been established in these locations.

5.38 As set out in the Strategic Policies (SS1, SS2 and SS3) of this Plan, proposed development allocations have been located to minimise the need to travel, thereby reducing emissions from road traffic. Measures to improve air quality include reducing the need to travel, providing electric vehicle charging points and promoting alternative modes of transport to private motor vehicles, including cycling, walking and public transport. The secondary effects of these actions are improvements to general health and wellbeing. Chapter 8: Providing Infrastructure and Connectivity includes policies which seek to achieve this.

5.39 New vehicle technology, such as hybrid and electric engines, has significant potential to improve air quality by reducing the use of traditional fuel vehicles, which are a main source of air pollutants within the borough. New technology takes time to establish and the lack of electric charging points is cited as one of the main deterrents for individuals considering switching to such vehicles. Policy INF6 and the forthcoming update to the Parking SPD require all new development to incorporate electric vehicle charging points.

Design Quality

ENV9 – Urban design quality

1. All new buildings and places are required to be of a high quality, beautiful and sustainable, and respond positively and enhances the local context to create a visually attractive, distinctive environment that will endure over its lifetime.
2. Development should be consistent with the design principles set out in the National Design Guide and National Model Design Code, on which the forthcoming Elmbridge Design Code will be based. Development that is not well designed will be refused where it fails to reflect government guidance on design and local design policies and the code.
2. The council will pursue a co-ordinated, comprehensive approach to improving the borough's existing public realm. Development will need to demonstrate how it will contribute positively to the public realm and natural environment including the provision of trees in new streets and open spaces.
4. Development must:
 - a) Encourage and enable sustainable and healthy lifestyles by incorporating public realm, including streets and open spaces, which facilitate the use of active modes of travel such as walking and cycling;
 - b) Promote community cohesion and wellbeing by creating sustainable spaces and environments that are safe, inclusive and accessible, provide for multi-generational needs and are well-managed and maintained; and
 - c) Preserve and enhance Elmbridge's special qualities and distinctive character, townscape and landscape and create a strong sense of place by applying the design principles set out in the forthcoming Elmbridge Design Code and the Conservation Area Character Appraisals and Management Plans.
4. Within the allocated sites identified by policies in this Plan, development should take into account the character of the area, and may include innovative designs provided that it is of excellent design quality, raising the standard of design, is visually attractive, promotes high levels of sustainability, and would integrate sensitively into the locality.
5. In assessing the design quality of proposals, particular attention will be paid to the following:
 - a) Layout (or masterplan);
 - b) Scale of buildings;
 - c) Built form and massing;

- d) Building height;
- e) Character and appearance
- f) Public realm and amenity spaces;
- g) Landscaping including hard and soft landscaping features
- h) Materials
- l) Detailing;
- i) Accessibility, connectivity and permeability; and
- k) Security and crime prevention measures.

6. All development proposals will be assessed against the further guidance set out in the forthcoming Elmbridge Design Code that will reflect local aspirations.

7. Public and private accessible amenity space must be distinct, safe, inclusive, secure and provide opportunities for social interaction and recreation that contributes to the health and wellbeing of communities. Natural surveillance should be provided for public amenity spaces where practical should to enhance security.

8. Development proposals must include a soft and hard landscaping scheme which effectively integrates the built form into its surroundings and contributes towards the aims of Policies ENV1, ENV2 and ENV6.

9. Development must demonstrate that it is fully adaptable and resilient to the impacts of a changing climate, including overheating, flooding, water shortages/drought and subsidence, and must not exacerbate the impacts of climate change elsewhere.

10. To protect the amenities of existing residents and future occupiers, development proposals must be designed to prevent:

- a) Overlooking, resulting in a loss of privacy;
- b) Lack of outlook or sense of enclosure;
- c) Loss of daylight and sunlight, or overshadowing; and
- d) Disturbance arising from traffic movements.

5.40 Well-designed places reflect local distinctiveness, promote a strong sense of place and community and provide a high-quality environment for living and working.

5.41 The purpose of the policy is to maintain, reinforce and enhance the local character and features that give the area its distinctive and clear identity. Opportunities should be taken to improve the general level of urban design quality of an area.

5.42 Schemes should be based on a sound understanding of the site and its wider context and following the locally specific guidance set out in the forthcoming Elmbridge Design Code in addition to the well-established urban design principles set out in national policy and guidance set out in the NPPF, National Design Guide and National Model Design Code.

5.43 All development affects the public realm: larger developments create new streets and public spaces, whilst smaller proposals affect the appearance of existing spaces. They should do so in a way that achieves a positive impact and reinforces a strong sense of place.

5.44 The council will use conditions to secure details of materials, screening and boundary treatments, as well as the implementation and maintenance of landscaping schemes.

Preserving and enhancing our heritage assets

ENV10 - Heritage assets

1. The council will give great weight to the conservation of designated heritage assets, assets at risk and non-designated heritage assets and will pursue suitable opportunities for the conservation and enjoyment of the historic environment, recognising its role and contribution in achieving sustainable development.
2. Development proposals should be designed to sustain and, where possible, enhance the significance of these assets and their settings. They should do this by describing the significance of the affected heritage assets and explaining how the proposal has been formed to take this into account. Any negative impact on the significance of a designated heritage asset (whether arising through harm or total loss) must have a clear and convincing justification. The impact of development proposals on the significance of heritage assets and their settings will be considered in accordance with case law, legislation and national planning policy and guidance.
3. Opportunities to remove buildings or structures which detract from the significance of a heritage asset will be supported.
4. Proposals which would result in the partial or total demolition of buildings or structures within a conservation area will be permitted only where the proposed development would contribute positively to the character and appearance of the conservation area, taking into account any harm which would arise from the loss. In such cases, the proposals for the re-development of the site should be appropriately detailed and shown to be viable.

5. Development proposals should take into account the potential for heritage assets of archaeological importance being present on the site. A desk-based assessment, at a minimum, will be required for sites which are located within Areas of High Archaeological Potential, and for any site outside of these which is greater in area than 0.4ha.

5.45 The historic environment in Elmbridge includes statutorily and locally listed buildings, Conservation Areas, Historic Parks and Gardens, Scheduled Monuments and Sites of Archaeological Potential which make an important contribution to the borough's attractive environment as well as its economic and social vitality.

5.46 Heritage assets are irreplaceable resources and the planning system plays a key role in protecting and enhancing the historic environment as part of achieving sustainable development. The Plan's spatial strategy sets out a brownfield first approach, optimising the use of previously developed land, and as such development will be located in the urban area which includes many of Elmbridge's heritage assets. It is therefore imperative that development is respectful of the historic environment and that opportunities are taken to enhance the significance and enjoyment of heritage assets through a high standard of design.

5.47 Heritage assets should be conserved in a manner proportionate to their significance. In applying policy ENV10, the council will require development proposals which are likely to affect heritage assets or their settings to be accompanied by a statement describing the significance of any heritage assets affected. For the purposes of policy ENV10, the definitions of 'heritage asset' and 'significance' used in the National Planning Policy Framework will apply. In considering the setting of assets, consideration will extend to the contribution made by trees and other soft landscaping features which may be affected by the proposal.

5.48 In demonstrating that the significance of a heritage asset has been understood and that a proposal has been sensitively designed to take account of the asset's significance, applicants will be expected to draw on a range of evidence and supporting documents including the Conservation Area Character Appraisals and Management Plans, the Surrey Historic Environment Record, the Local Design Code and the expertise of a suitably-qualified heritage professional. Where a desk-based assessment has identified the potential for assets of archaeological importance to be present, a field-based evaluation may be necessary. Planning conditions may be used to secure compliance with a programme of works agreed prior to commencement.

5.49 Though such cases will be exceptional, where the total or partial loss of a heritage asset is approved, conditions will be used to secure the recording of the asset's archaeological, architectural, artistic, cultural or historic significance and this information should be made publicly available.

5.50 Historic fabric and features of special architectural or historic interest should be retained and repaired insitu wherever possible. The Plan encourages high quality development that reflects the identity of local surroundings and materials but supports appropriate innovation.

5.51 Applicants should engage with the local community and consult with local heritage and conservation groups, which may be able to offer valuable local insight and knowledge. The Local Design Code will provide key design guidelines and should be used in association with more specialist heritage advice and information.

5.52 Environmental improvements and adaptation to climate change will be supported, but sensitive design and siting is required to prevent any undue harm to the historic asset.

Strategic Views

ENV11 – Strategic views

1. Development within Strategic Views will be permitted provided that it has been well-designed to take account of the setting, character and amenity value of the view. Proposals must not obscure or adversely affect these views.

2. Proposals to create new views, or reinstate obscured views, will be supported.

5.53 There are two strategic views indicated on the Policies Map, both of which contribute to variety and interest in the landscape. The first of these is Dorking Gap from Oxshott Heath, which is a panoramic view due south and south-east of the North Downs. It is bisected by the Dorking Gap and includes the spire of Ranmore Church, which is approximately 10 miles away within the neighbouring district of Mole Valley. The view in the foreground is of the open heathland and woodland of Oxshott Heath, with limited visibility of Oxshott's residential properties. The view forms part of the setting of the Surrey Hills Area of Outstanding Natural Beauty (AONB) due to the physical and visual relationship. The setting of AONBs is material to their protection, and the designation of this view contributes to the duty to conserve and enhance the AONB and its scenic beauty.

5.54 The second strategic view is The River Thames Meadowlands from Hurst Park. The view takes in the Arcadian landscape of the Thames from Hurst Park and includes Garrick's Temple to Shakespeare (within the neighbouring London Borough of Richmond-upon-Thames). It also extends across open riverside lands including areas of vegetation within Hurst Meadows, Garrick's Ait, the River Thames and Hampton Riverside beyond. The Thames Landscape Strategy sets out recommendations in respect of vegetation management.



Chapter 6 - Principle 3 - Delivering homes

6.1 At the heart of the Plan is sustainable place-making and responding to the climate change emergency. In delivering homes for our residents, the Plan seeks to optimise opportunities to increase the supply of new homes in the borough sustainably and with careful consideration of our natural resources.

6.2 The following policies will deliver a range of housing and support a mixture of housing tenures and unit sizes.

6.3 All new homes will be well-designed and of a high-quality meeting amenity and space standards and providing choice to existing and future residents by responding to evolving lifestyles, meeting their needs over the course of their lifetime and changing circumstances.

Housing delivery

HOU1 - Housing delivery

Opportunities for housing growth in Elmbridge will be optimised to deliver a minimum of 452 homes per annum over the plan period.

To achieve this the council will:

1. Adopt a requirement in line with the Elmbridge Housing Trajectory.
2. Deliver a minimum of 30% affordable homes across the plan period.
3. Deliver homes through site allocations as detailed in Chapter 9 and as shown on the Policies Map.
4. Maximise opportunities to increase the supply of additional homes on unallocated suitable and available land.
5. Ensure the efficient use of land by requiring all new residential and mixed-use development to demonstrate that it represents the optimal use of land and density, positively responding to the location and the appearance of the surrounding area. This may include the sub-division and/or redevelopment of large single homes into apartments or redevelopment of those sites to form smaller homes. The council will support infill* housing developments that engage innovative approaches and are compliant with other relevant policies of this Plan.
6. Ensure that new homes are well designed, address different housing needs and provide a variety of housing choices, taking account of the requirements of other policies in this Plan.

7. Work with partners to support the regeneration and renewal of communities and their wider areas.

8. Resisting any developments that involve a net loss of housing, unless it can be demonstrated that the benefits of the development outweigh the harm.

*inclusive of development proposals involving the complete or partial redevelopment of backland and/or residential garden land.

6.4 To support the Government's commitment to significantly boost the delivery of new homes, the council is required to determine the minimum number of homes needed locally and to set out in the Local Plan how this will be delivered; ensuring a sufficient supply of land to meet the housing target going forward.

6.5 The scale and location of housing growth has been informed by careful consideration of the evidence and the balancing of the social, economic and environmental positive and negative effects which could arise from development.

6.6 The Plan seeks to respond positively to the housing needs of the borough over the fifteen-year plan period from 2021- 2037. The local housing need figure is calculated using the standard methodology set out in national planning policy and guidance. It is based on demographic trends (population projections) and market signals (affordability of homes). However, this is not automatically transposed to be the housing target for the borough.

6.7 Rather, the housing target for the Plan has been informed by the calculation of housing need using the standard methodology, our assessment of local housing needs and our understanding of the borough's environmental constraints as set out in national policy.

6.8 The anticipated number of homes to be delivered by each site allocation is set in the Site Allocations policies in Chapter 4.

6.9 The housing trajectory includes a windfall allowance which will contribute to the delivery of new homes in the plan period. Windfall sites are defined in national planning policy as sites not specifically identified in the Plan. These are sites which are expected to become available during the plan period but are currently unidentified. These include sites with the capacity of up to five (net) homes and where buildings or land in other uses becomes available for development.

6.10 Whilst they cannot be included in the housing trajectory as windfalls, larger sites (5 net homes or more) which come forward for development unexpectedly across the plan period, will upon the grant of planning permission, be counted towards meeting the council's housing target as set out in Policy HOU1.

6.11 The expected delivery of housing development over the plan period is set out in appendix A5.

6.12 The council is required to ensure a rolling five-year supply of housing land to fulfill the housing target and ensure choice in the market. The supply includes homes under construction, with planning permission but not started, and allocations where there is confidence that they will be delivered within the five-year timeframe. A windfall allowance is also added to the supply figures.

Optimisation of sites

HOU2 - Optimisation of sites

1. Development must make efficient use of land and optimise sites within the urban area of the borough.

2. Sites within or on the edge of* town, district and local centres and sites adjacent to train stations will deliver additional homes by:

a) Provision of higher density housing such as flats and terraced homes rather than semi-detached and detached homes;

b) Infill and backland developments to the rear of existing frontage property(ies);

c) Promoting mixed use development and increased building heights; and

d) Seeking comprehensive development that leads to more efficient and effective site layouts.

* edge of centre as defined by national policy.

3. Within town, district and local centres as defined on the Policies Map and near train stations (as identified in 2 above), development shall be predominantly one- and two- bedroom homes.

6.13 One of the key aims of the Plan's growth strategy is to boost the supply of new homes by responding to local housing need through a 'brownfield first' approach and by ensuring the efficient use of land within the most sustainable locations of the borough.

6.14 To avoid piecemeal development, proposals for a site adjacent to another site with development potential (as identified in the latest LAA or equivalent land supply evidence base document) should demonstrate that all reasonable attempts to develop the sites comprehensively have been exhausted. Development proposals that impede the potential for developing an adjoining site will not be supported. Developers and landowners of adjoining sites will be encouraged to work together with key partners to deliver comprehensive development.

6.15 Further guidance on the optimisation of sites can be found in the forthcoming Elmbridge Design Code.

Delivering the right homes

HOU3 - Housing mix

The delivery of the right homes to address local housing need will be achieved by:

1. All housing development has to take into account and reflect local housing needs in terms of the tenure, size and type of dwellings, as set out in the most recent assessment of local housing need.
2. Emphasis in residential development proposals is placed on the provision of one-, two- and three- bedroom homes suitable for occupation by, for example, newly forming households, young couples, expanding families and older people looking to move to a smaller property.
3. Where the internal layout of a one-, two- or three- bedroom home appears designed to circumvent Policy HOU3 by facilitating subsequent subdivision of large rooms, planning permission may be refused on the grounds that the proposal would be contrary to Policy HOU3.
4. Proposals for alternative forms of housing (e.g. purpose-built housing of multiple occupation (HMOs), live work units or other less conventional housing types), will be considered on their merits, taking into account evidence of how they would help to meet local housing needs and how they would be managed to safeguard the character and amenities of the area in accordance with other Plan policies.
5. Where housing appears to be designed to circumvent policy HOU4 and the provision of affordable housing, planning permission may be refused

6.16 To ensure that a wide choice of high-quality homes can be delivered to provide more opportunities for home ownership and to enable the creation of sustainable, inclusive and mixed communities, it is necessary to plan for a mix of housing that is informed by the needs of different groups within the community.

6.17 To provide a balanced housing market and to deliver the right homes addressing our local need, Policy HOU3 will be applied to all housing developments.

6.18 Based on the latest evidence in the Local Housing Needs Assessment (2020) it is important that new housing development focuses on providing smaller dwellings. The evidence shows that 90% of new market housing will need to be one- (20%), two- (50%) and three- (20%) bedroom homes, and only 10% of homes will need to be of four or more bedrooms.

6.19 When the Local Housing Needs Assessment, or equivalent assessment, is updated, development proposals will be expected under HOU3 (1) to take into account the most recent housing need for the borough.

6.20 The existing housing stock in Elmbridge and past delivery of new homes has been dominated by four-bed plus sized homes. This has restricted housing choice and exacerbated affordability issues in the borough. Policy HOU3 seeks to ensure that future housing stock reflects local need and provides housing choice.

6.21 Policy HOU3 prioritises the provision of one-, two- and three- bedroom homes as these are currently of greatest need. However, the locational delivery of one- bedroom homes will be predominately in sustainable locations in town, village and local centres and near train stations, as part of higher density developments.

6.22 Development in these locations is a key part of the strategy to respond to local housing need through a 'brownfield first' approach and through the requirement of making efficient use of land in the most sustainable locations in the borough.

6.23 This approach is consistent with evidence in the Local Housing Needs Assessment, responding to the particular needs of younger and older people seeking suitable properties to downsize without moving away from their community.

Delivering affordable homes

HOU4 - Affordable housing

1. The council will require proposals to provide affordable homes on all residential developments comprising self-contained units, including but not limited to where housing for older people, age-restricted market housing, retirement living/sheltered housing or extra care is provided, as follows:

- a) On brownfield sites of 10 or more new units, on-site provision of 30% affordable housing of the gross number of dwellings;
- b) On greenfield sites of 10 or more new units, on-site provision of 40% affordable housing of the gross number of dwellings; and
- c) On sites of 9 or less units, a financial contribution equivalent to the provision of 20% affordable housing of the gross number of dwellings.

2. The provision of affordable housing will be required on-site. Only in exceptional circumstances, and subject to applicants providing a full justification for example, where it would secure better outcomes in meeting the borough's affordable housing needs, will an alternative to on-site provision be considered.

3. Affordable housing provision will be expected to incorporate a mix of dwelling types, sizes and tenure, and should reflect the type of housing required in the most up-to-date evidence of housing need for the borough, having regard to the form and type of development appropriate for the site. 25% of all affordable housing will be First Homes. The rest (75%) of the affordable housing will provide affordable housing in line with the identified need in the council's latest housing need assessment. All affordable housing should be genuinely affordable, with the cost substantially lower than 30% below local market prices and rents.

4. Judgements about the level, tenure and mix of affordable housing will have regard to:

a) The identified need in the council's latest housing need assessment and the council's Housing Strategy; and

b) The overall viability of the scheme and any site-specific abnormal costs.

5. Where a site has been sub-divided or is not being developed to its full potential, so as to circumvent the affordable housing threshold for on-site provision, the council will seek a level of affordable housing provision that would have been achieved on the site as a whole had it come forward as a single scheme.

6. The affordable homes should be designed to be fully integrated into the open market housing on a tenure blind basis and comply with other policies in the Plan.

7. Self and custom build residential developments are subject to the policy requirements of HOU4 in relation to affordable housing contributions. However, on schemes relating to 1 net gain, a self-build exemption can be applied for.

8. Where the council agrees a lower affordable housing provision, it reserves the right through a legal agreement to require a review mechanism to reassess the viability of a site at different stages of the development.

9. Affordable housing is not required where a residential scheme relates wholly to Gypsy, Roma, Traveller or Travelling Showpeople accommodation, mobile home sites, ancillary accommodation used incidentally to a main dwelling, staff accommodation used ancillary to the main use of the premises, river boat moorings or student accommodation.

6.24 Housing affordability is a significant issue for Elmbridge and is a key priority for the council. The ratio of average wages to average house prices is amongst the highest in England, leading to people working in Elmbridge having difficulty in affording a home in the same area.

6.25 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 struggle to

downsize affordably in a way that enables them to continue to live independently or with care packages, and to remain in their communities.

6.26 The cost of housing and reliance on people travelling into the borough is also making it difficult for local business and valued services to attract and retain employees, including essential key workers, such as teachers and health care providers. In-commuting also places added pressure on the road network impacting on congestion and air quality, the causes of climate change.

6.27 The most recent Local Housing Needs Assessment identified 269 affordable homes per annum are needed in the borough. The majority of affordable housing will come forward in market schemes, and Policy HOU4 seeks to maximise the amount of affordable housing on each qualifying site whilst making sure that residential schemes remain deliverable and viable.

6.28 To meet the overall affordable housing target and respond to the acute need for genuinely affordable homes all residential developments are required to meet the requirements of Policy HOU4.

6.29 Policy HOU4 will apply to all types of residential development where self-contained units are provided, including for example private retirement homes, sheltered accommodation, extra care schemes and other self-contained housing for older people. Self and custom build residential developments are also subject to the policy requirements of HOU4 in relation to affordable housing contributions. However, to assist residents bringing forward their own homes in the borough, a self-build exemption from the affordable housing contribution is available subject to occupation conditions. Further information will be found in the updated Development Contributions SPD.

6.30 Many of the new homes in Elmbridge are delivered on small sites and sites of less than 10 dwellings. With the affordable housing need so acute in the borough, Policy HOU4 expects these sites to support the provision of affordable housing in the borough via a financial contribution.

6.31 On larger sites of 10 or more new homes, provision of affordable housing will be required to be made on-site. Only in exceptional circumstances will an alternative to on-site provision be considered and only where it would secure better outcomes in meeting the borough's housing needs. Such exceptions could include larger self and custom build residential schemes.

6.32 The forms of housing which fall within the definition of affordable housing are defined in the glossary. On development sites owned by the council, affordable housing provision may be required to respond to the needs of current local housing nominations.

6.33 In cases where it appears to the council that a site has been subdivided or will be brought forward in phases, each phase will be expected to contribute proportionally towards

the affordable housing requirement of the whole site. The affordable housing is expected to be delivered alongside the market housing of any scheme.

6.34 The affordable housing requirements and thresholds of this policy are achievable. This has been confirmed by the viability assessment of the Local Plan. Unless there are particular circumstances that have arisen post adoption of the Plan, there should be no need for a further viability assessment at the decision-making stage.

6.35 Developers and site promoters are expected to take account of costs arising from affordable housing and other requirements when negotiating to purchase land for development. The price paid for land is not a justification for failing to comply with the relevant policies in the Plan.

6.36 Where unique circumstances justify the need for a viability assessment at the application stage, it will be up to the applicant to demonstrate how those circumstances differ from the viability assessment carried out to inform the Plan, having regard to the specific grounds set out in national planning guidance. Viability assessments submitted at the application stage should be prepared in line with national planning guidance. They will be made publicly available unless exceptionally agreed with the council otherwise.

6.37 Independent scrutiny of the viability assessment will be funded by the applicant.

6.38 Vacant building credit, as described in national planning guidance, will be applied to developments where a vacant building is either converted or replaced. The credit does not apply when a building has been abandoned.

6.39 Planning obligations will be used to ensure that the affordable housing remains available at an affordable price for future eligible households, or for the subsidy to be recycled to alternative affordable housing provision.

6.40 Further details on the practical application of Policy HOU4, including legal agreements and early and late review mechanisms, are set out in the Development Contributions Supplementary Planning Document (SPD).

Delivering quality homes

HOU5 - Housing technical standards

Liveable, functional, adaptable and accessible new homes, including those resulting from changes of use and conversions, will be delivered by meeting the following requirements:

1. All new homes must provide sufficient internal space and ceiling heights to cater for future occupants. The gross internal floor area for each new home should meet or exceed the Nationally Described Space Standard, or any subsequent equivalent standard.

2. All new homes must have rooms, layouts and storage areas which are functional and fit for their purpose, meeting the changing needs of occupiers over their lifetimes and supporting more sustainable lifestyles including homeworking.
3. Proposals will demonstrate how all habitable rooms are provided with an adequate level of visual and acoustic privacy in relation to neighbouring properties and uses, the street and other public spaces.
4. All new homes should be dual aspect, unless there are exceptional circumstances that justify the inclusion of any single-aspect homes. Single aspect homes that are north facing or are exposed to noise levels that would lead to significant adverse impact on health and quality of life will not be permitted.
5. New homes should achieve a minimum average daylight factor (ADF) target of 1 per cent for a bedroom and 1.5 per cent for a living room.
6. All new homes, including flatted developments, should have access to an element of private outdoor amenity space of quality, proportionate to the size of home and which maximises the availability of sunlight and natural light. Balconies will count towards private amenity space.
7. A minimum of 10% of new homes will be required to meet Building Regulations standard M4 (2) 'accessible and adaptable dwellings' on sites of 10 or more new homes. Additionally, a minimum of 5% of new homes will be required to meet Building Regulations standard M4 (3) 'wheelchair user dwellings' to help meet the specific needs of older people and those with mobility, accessibility and support needs on sites of 20 or more new homes. The number of homes provided to meet the specified standards should be rounded up to the nearest whole home.

6.41 The delivery of quality homes and living environments is one of the key aspirations of the Plan. Developments which consider matters of inclusive design, accessibility and technical requirements at an early stage of and throughout the development process are the most successful at achieving quality homes and living environments.

6.42 National planning policy specifies that local policies relating to the sustainability of buildings should reflect the optional technical requirements set out by the Government. The Plan therefore includes the technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water; as well as the nationally described space standards.

6.43 All new homes are required to be designed to provide high-quality living environments and sufficient internal space to cater for a variety of different household needs with the aim of promoting ease of liveability, accessibility and quality of life. Providing a sufficient level of internal space can also help facilitate home-working and minimise the need to travel, assisting in the council's aim to tackle climate change.

6.44 The provision of external amenity space has a significant positive impact on people's physical and mental health and wellbeing and contributes to providing high-quality living environments. In addition, outdoor amenity spaces such as gardens and green roofs help to adapt to climate change, have biodiversity benefits as well as have an important role in the borough's Green Infrastructure network. Balconies are often of greater value in terms of privacy and usability than communal areas and will count towards private amenity space. They should be suitably located and alternatives to balconies may need to be considered in areas such as Air Quality Management Areas.

6.45 It is important to ensure that new homes are accessible to all and are adaptable to the changing needs of residents throughout their lives. This will become increasingly more significant with a projected growth in the number of older people. It will be important to enable residents to stay within their own homes wherever possible as their needs change, rather than having to move to more specialist accommodation. Designing new homes to meet the national standard for accessible and adaptable dwellings will enable easier future alterations and adjustments.

6.46 The requirement for accessible and adaptable homes will apply to all new residential developments as outlined in Policy HOU5.

6.47 Elmbridge is located within an area of water-stress and the evidence requires the inclusion of the higher Building Regulations water efficiency standard to be applied to new developments. Water consumption must become as sustainable as possible and resilience measures will be required in all new residential developments.

6.48 Further details and guidance on the practical application of Policy HOU5, as well as the private amenity standards, are set out in the forthcoming Climate Change & Renewables Supplementary Planning Document (SPD) and the forthcoming Elmbridge Design Code.



Delivering specialist homes

HOU6 - Specialist accommodation

To deliver housing choice in the borough and specialist forms of accommodation that meet local needs:

1. Development for specialist accommodation, including older person's housing, will only be permitted where there is clear and robust evidence that demonstrates a local need for the new accommodation, the type and level of care it offers, and does not result in an over provision of that particular type of accommodation and care within the borough.
2. Developments providing older persons' accommodation shall deliver the level of affordable housing required by Policy HOU4.
3. All new developments shall achieve the standards of accessibility set out on Policy HOU5 as a minimum.
4. The council will support the long-term ambition to expand the almshouses and care provision in Whiteley Village. A long-term development aspiration shall be delivered via a masterplan through working in partnership with the Trust.

6.49 It is important for the Plan to deliver suitable specialist forms of accommodation to cater for the needs of more vulnerable members of society inclusive of people with disabilities, mental health problems and long-term conditions, including those who have developed or may develop care needs as they become older.

6.50 By 2037 the number of those aged 65 or over in Elmbridge is projected to be 35,500. This represents a 37% increase on 2020 figures, with the expected rate of increase of the 75 or over and 85 or over groups in the population projected to be higher, at 46% and 80% respectively. The Plan seeks to ensure that additions to the future housing stock reflect local need and provide housing choice. However, it is important that the housing stock is able to adapt to meeting the requirements of an ageing population as set out in Policy HOU5.

6.51 Some older residents may wish to downsize, move closer to family and friends or be closer to services and facilities but they may not want to live (purchase or rent) specialist older person's accommodation. The Plan recognises the important role that new non-specialist developments play in providing suitable and attractive accommodation options for older residents to support independent living.

6.52 Therefore, new development specifically designed to provide older persons accommodation including specialist retirement accommodation and registered care homes both market and affordable will only be supported where they meet an identified local need. Careful consideration will be given to the type of accommodation and level of care being

provided. Proposals will be required to include a level of genuinely affordable care, sufficient to distinguish that the accommodation offer is care-led.

6.53 The existing supply and pipeline of specialist accommodation will also be taken into account to ensure that there is not an over provision of an accommodation type. The delivery of specialist accommodation is closely monitored in the council's Authority Monitoring Report (AMR).

Gypsy, Roma, Traveller and Travelling Showpeople accommodation

HOU7 - Gypsy, Roma, Traveller and Travelling Showpeople accommodation

1. Proposals for the delivery of Gypsy, Roma and Traveller pitches and Travelling Showpeople's plots will be required to meet the following criteria:

- a) The location of the site provides a safe living environment free from the risk of flooding and risks to health through contamination, noise, vibration, odour and pollution;
- b) The site is in a sustainable location with access to local services and facilitates such as shops, public transport, and schools;
- c) There is easy and safe access to the strategic road network and safe and convenient vehicle and pedestrian access to the site and, should not lead to an adverse impact on the road network or endanger highway safety;
- d) The site is capable of being provided with on-site services such as water supply, sewage disposal and power supply;
- e) The layout of the site provides an acceptable living environment for occupants, including sufficient space to meet fire safety standards as well as allowing for parking and vehicle maneuvering on-site and the provision of private and communal amenity space; and
- f) The site is laid out and landscaped in a manner which is compatible with the visual character of the area and amenities of neighboring uses.

2. Existing authorised sites will be safeguarded unless no longer required to meet identified needs.

6.54 Members of the Gypsy, Roma, Traveller and Travelling Showpeople communities have a range of accommodation needs. Some will choose to live in permanent bricks and mortar accommodation and do not participate in a nomadic lifestyle and their housing needs will be met through the delivery of market and affordable homes.

6.55 Policy HOU7 responds to the needs of those who maintain a nomadic lifestyle and/or are members of protected ethnic groups with strong cultural preferences for caravan-based homes.

6.56 The Elmbridge Gypsy and Traveller Accommodation Assessment (GTAA) 2020 sets out the evidence on the current and future accommodation needs of the Gypsy, Roma, Traveller and Travelling Showpeople population in Elmbridge.

6.57 The assessment looks at the needs of Travellers that meet the planning definition as set out in the Government's Planning Policy for Traveller Sites 2015. It also assesses those that are undetermined in terms of the definition and those that do not meet the definition. Currently there are low numbers required across the 15 years for all above groups. Additionally, there is no identified need for sites for Travelling Showpeople in the borough.

6.58 The Gypsy, Roma and Traveller Site Assessment Study 2022 sets out options considered for meeting the borough's needs for Travellers as set out in the GTAA. Taking into account the recommendations in the GTAA and the provision of a site with 8-pitches in 2020, the council has not allocated sites for this group but will permit alternatives such as additional pitches on existing sites and windfall pitches, provided these meet the criteria set out in the policy.

6.59 There are no sites proposed in this Plan for transit or short-term site provision within the borough. Surrey County Council has been working closely with Surrey Police and other district and borough councils to identify a transit or short-term site and reduce the impact of unauthorised encampments across the county. A site has been identified in Tandridge and work is progressing on its delivery.

Self and custom build housing

HOU8 - Self and custom build housing

1. The council will support proposals for self and custom build housing on residential development sites in locations where there is a demonstrable demand for plots and other relevant planning policies are satisfied.
2. Proposals shall deliver the level of affordable housing required by Policy HOU4.
3. All self and custom build housing developments shall achieve the technical standards as set out in Policy HOU5 as a minimum.

6.60 The council supports the principle of self-build and custom build development as an opportunity to bring choice to the local housing market as well as enabling local people to design and build their own home that will meet their bespoke needs, in a more affordable way.

6.61 National planning policy encourages local planning authorities to widen opportunities for home ownership by identifying the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.

6.62 The Self-build and Custom Housebuilding Act 2015 requires local authorities to keep a register of those who are seeking to acquire serviced plots of land in their area for self or custom build projects. A Self Build Register has been established to provide evidence of demand for plots in Elmbridge.

6.63 Based on evidence of demand through the Self Build Register, the Local Housing Need Assessment and past delivery trends, it is expected that the necessary number of serviced plots to satisfy the demand in Elmbridge is minimal compared to the need for market and affordable homes, and provision for self-build and custom plots will come forward on small sites, single plots on infill sites and other windfall sites. It is anticipated that small windfall sites will play a key role in meeting this demand.



Chapter 7 - Principle 4 - Growing a prosperous economy

7.1 The borough has a strong local economy, with over 60,000 jobs and 8,275 businesses including Amazon, Glaxo Smith Klein, Samsung, Cargill and Air Products. In recent years the borough has seen employment and business growth above the national average, as well as a significant number of new start-ups.

7.2 This is not surprising given the borough's location close to London, with excellent access to national and international transport links. However, workspace requirements are dependent on the nature and size of a business and demand has changed over time. It is important that our workspace offer responds to these changes to prevent valued businesses and jobs leaving the borough.

7.3 The traditional shopping function of the high street continues to face a number of challenges stemming from the impacts of the recent economic downturn, the tightening of retail spending in recent years, the impact of the Covid-19 pandemic and continued significant shift in consumer behaviour to more online shopping. Our high streets need support to help them adapt to the changing retail market and become distinctive hubs for shopping, socialisation, community support, leisure and culture.

7.4 Forecasts of trends and demand in relation to employment, retail and our high streets are difficult to predict. As such, the policies in this Plan are flexible so that changes to the economy can be effectively responded to.

7.5 The policies in this section of the Plan will be carefully monitored as we continue to support our businesses and community's recovery following the Covid-19 pandemic. The monitoring framework for the Plan can be found in Chapter 10.

Supporting the economy

ECO1 - Supporting the economy

1. Opportunities for economic growth in Elmbridge will be taken by maintaining and optimising the use of the borough's employment floorspace offer. This will be done by protecting employment land and encouraging its innovative re-use in ways that better meet the needs of the market.

2. Development proposals for the provision of smaller and incubator office space, flexible workspaces for co-working, and Small and Medium Enterprises (SMEs) will be supported in

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the most sustainable locations, in particular in town, district and local centres. Development proposals will be permitted where they:

a) Deliver high quality, well-designed flexible and adaptable spaces of different unit sizes and types for a range of uses and occupants as part of mixed-use development; and

b) speculative developments for which there is no identified end user will be expected to be supported by a marketing strategy for the use and occupation of the employment spaces to be delivered.

3. Outside of Strategic Employment Land (SEL) (as defined on the Policies Map) the loss of floorspace occupied by employment-generating uses will only be permitted where it is demonstrated that:

a) There is no reasonable prospect of the site being retained in employment use;

b) The site is no longer suitable for its existing use or other employment uses;

c) The existing use creates (or any other employment use would create) significant amenity issues for neighbouring occupiers, best remedied by encouraging a replacement with a non-employment use; and

d) The development provides opportunities for sustainable co-location with other non-employment uses.

4. Proposals on sites which provide mixed-use opportunities will be expected to optimise the use of the land to meet the needs of the economy, to support job creation and business growth, and to meet other development needs which support the community.

5. Ensuring that the development of up to date vocational training facilities is encouraged to enable local people to train to obtain the skills necessary to support employers with premises within the borough.

7.6 The borough benefits from a strong local economy, but we cannot be complacent, and we need to continue to plan and invest to maintain our competitive edge, support local jobs and realise our growth potential. The Plan proactively promotes sustainable economic recovery and growth. Through the Elmbridge Economic Strategy 2019-2023, we are already seeking to be the premier location to start, invest and grow a knowledge business. We also want to enable the most productive use of space, place and technology to balance enterprise, the environment and quality of life.

7.7 To assist in sustainable economic recovery following the Covid-19 pandemic and to support economic growth and local jobs, the Plan seeks to maintain a range employment sites in the borough, helping to respond to business needs, including the needs of Small and Medium Enterprises (SMEs) and business start-ups. This is particularly important in areas like

Elmbridge where there are high land values and competing development pressures, particularly for residential development.

7.8 National and South East trends for offices show a demand for high quality space that is provided either as large space for corporates or as smaller flexible multi-let space for smaller businesses. There is an increasing level of demand for smaller, start-up space in the borough. This is not surprising as the local business base within the borough is predominately SMEs with round 92% of all companies employing under 10 people.

7.9 The evidence supports a safeguarding policy approach, to maintain the existing employment offer in the borough and allowing space and opportunities for existing companies to grow and for new ones to start. Maintaining employment opportunities and sites is particularly important for industrial and warehousing in the borough as there are high levels of utilisation, low vacancy rates and occupiers would have potential difficulties in finding alternative locations if existing ones were lost to other uses.

7.10 The sub-division and re-configuration of larger units to produce smaller units and shared or co-working space is an example of creating a more flexible employment floorspace. These smaller, more affordable spaces will be able to quickly respond to the changing needs of the borough's office market.

7.11 To ensure that the loss of employment land and of local jobs is not a result of short-term decisions, marketing periods of up to three years will be required when seeking to demonstrate that there is no reasonable prospect of the site being retained in employment use(s). The required marketing period will depend on the location, use and quality of the unit. A reasonable marketing period will be no less than 12 months.

Strategic Employment Land

ECO2 - Strategic Employment Land

1. Strategic Employment Land (SEL - as indicated on the Policies Map) will be safeguarded for employment uses to support and retain employment opportunities in locations attractive to businesses. Development in SEL will be supported if it would be occupied by the following uses:

- a) Office and work space
- b) Light industry
- c) General industry
- d) Storage and distribution

Ancillary uses to the above, hybrid and flexible uses that lever in investment and improvements to the SEL will be supported, provided they reinforce and supplement the function, role and operations of employment uses.

2. Development in SEL will be supported where:

- a) There would be no net loss in employment floorspace capacity;
- b) It is of high-quality design, modern, fit for purpose and results in improvements to the quality of buildings and infrastructure;
- c) There would be efficient use of space, through innovative design which allows for flexible floorspace for different types of uses to meet future needs; and
- d) It does not lead to an unacceptable impact on the surrounding highway network or local amenity.

3. Increases in employment floorspace capacity will be supported where they are achieved through the supply of new multi-storey units, the sub-division of larger units and new smaller units.

4. Residential accommodation in SELs will only be acceptable if it forms part of a larger redevelopment proposal and:

- a) It would bring investment to floorspace which has been demonstrated to be redundant for employment uses; and
- b) The proposal would comprise a mix of flexible uses.

7.12 The assessment of existing employment land shows that there is currently a significant range of employment areas within the Borough offering a range of floorspace from the highest quality office space occupied by multinational corporations through to small industrial units for local businesses. However, what is evident is that there are a limited number of employment areas that are strategic in scale.

7.13 A review of the borough's current 13 Strategic Employment Land (SEL) designations and other non-designated employment sites. All of the sites were assessed by taking into account market signals, their suitability and whether the site could provide opportunities for future growth.

7.14 Strategic Employment Land in the borough provides important locations across the borough for a mixture of employment uses. Five SELs are allocated on the policies map to which policy ECO2 applies:

- The Heights, Weybridge
- Hersham Place Technology Park, Hersham

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- Brooklands Industrial Estate, Weybridge
- Hershams Trading Estate, Walton-on-Thames
- Molesey Industrial Estate, West Molesey

7.15 The NPPF is clear that in achieving sustainable development, the planning system needs to help build a strong and responsive economy. A key part of this is about ensuring there is sufficient land of the right types in the right places to deliver this. The Borough's employment sites will make a major contribution towards the growth, strength and diversity of the local and wider functional economic area economy. The Borough's SEL sites form an integral part of this and provide a strategic function. The SEL sites provide a mixture of Grade A offices, distribution and flexible modern industrial units.

Supporting our town, district and local centres

ECO3 - Supporting our town, district and local centres

1. A range of retail, office, residential, community, cultural and leisure uses in the borough's town, district and local centres (as identified on the Policies Map) will be supported.
2. The core activity areas within the town centres, as defined on the Policies Map, will comprise retail, office, community, cultural and leisure uses that maintain an active frontage and enhance the resilience and attraction of the centre.
3. The loss of retail, office, leisure and community uses at ground floor level to residential in the core activity area will be resisted.
4. Positive consideration will be given to temporary, flexible meantime and pop-up uses within vacant units which can attract footfall to the centre.
5. Mixed-use developments which contribute to increasing footfall and vibrancy, and proposals to bring under-used upper floors into more effective use will be supported, subject to their compliance with the requirements of Policies HOU2 (where residential use is proposed) and ECO1.
7. New uses that contribute to the vitality of the evening economy will be supported, unless they result in a harmful impact on residential amenity or on the health of our communities.

7.16 Elmbridge's town, district and local centres serve a wide range of people and purposes and will be supported to be attractive and distinctive places at the heart of their communities. The borough's network of centres, as set out below, is well-established and their location and extent is shown on the Policies Map.

Town Centre – Walton-on-Thames, Cobham, Esher and Weybridge.

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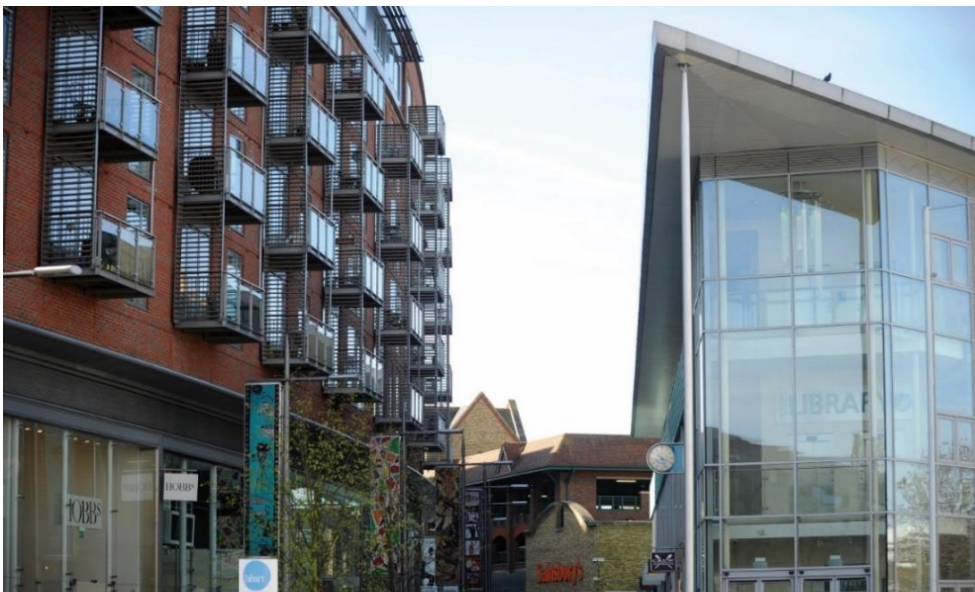
District Centre - Claygate, East Molesey, East Molesey Bridge Road, Hersham, and Thames Ditton.

Local Centre - Hinchley Wood, Oatlands, Oxshott, Walton Halfway, Walton Terrace Road and Weybridge Queens Road.

7.17 Policy ECO3 provides for a flexible and pragmatic approach to support the transition of the high street to service centres and community hubs. With the changing role of our high streets and a reduced retail focus, a move away from traditional retail uses within our centres will be required. The introduction of new uses including leisure, cultural, health and wellness and community facilities and services will be encouraged and will deliver sustainable economic recovery following the Covid-19 pandemic.

7.18 Local evidence indicates that there is no need to plan for an increase in retail floor space in the short to medium term. That said, Policy ECO3 encourages local development opportunities for retail and other town centre uses in individual centres where they are able to maintain and enhance the overall health, vitality and offer of a centre.

7.19 The role of a well-designed and multi-functional public realm is also increasingly important, contributing to visual interest and climate change adaptation but also allowing for valuable outdoor events and meeting spaces. Improvements to the existing public realm, and the provision of new streets and spaces is addressed within Policy ENV9.



Visitor, arts and culture

ECO4 - Promoting visitor attractions and arts and cultural venues

1. The loss of visitor attractions or arts and cultural venues will be resisted unless it is demonstrated that the facility is no longer needed for its existing purpose. In such cases, first consideration should be given to whether the attraction or venue could be used for a leisure, social or community purpose.
2. Support will be given to proposals that demonstrate that the attraction or venue can be re-provided in a facility of better quality on the same site, or in an alternative location that is equally accessible to the community it serves.
3. New attractions and venues will be supported within the borough in the following ways:
 - a) New arts, cultural, entertainment and visitor facilities will be directed to town, district and local centre locations and areas accessible by public transport or safe active travel routes;
 - b) The use of outdoor space and the public realm for art, culture, sports and entertainment will be encouraged and supported in accessible areas and town, district and local centres; and
 - c) Where appropriate, social and community facilities will be encouraged to use the space for arts and cultural events.
4. Development proposals for visitor accommodation should be located in sustainable locations and be accessible by public transport.

7.20 Elmbridge has a wealth of well-established visitor attractions, including Brooklands Museum, Painshill Park, Sandown Racecourse and Claremont Landscape Gardens.

7.21 The loss of visitor attractions or arts and cultural venues could occur through their physical loss (such as demolition) or through changes of use. Regardless of the method by which the loss is proposed, it will be resisted by the council as specified within the policy wording.

7.22 Policy ECO4 supports the continued enhancement of the borough's visitor, arts and cultural facilities and activities. Growth of the borough's visitor and cultural economy will provide employment, as well as creative and leisure opportunities for local residents supporting the community's health and wellbeing.

Equestrian-related development

ECO5 – Equestrian-related development

1. Equestrian-related development will be permitted providing:

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- a) It is of a scale and intensity compatible with the location and satisfactorily relates to existing vehicular and field accesses, tracks and bridleways;
 - b) The proposal includes the re-use of existing building(s) wherever practicable and viable;
 - c) The design responds to local identity and distinctiveness, including location and siting, any subdivision of field(s) and earthworks; and
 - d) The location of new buildings, stables, yard areas and associated facilities respect the amenities of surrounding occupiers.
2. Where a site is located in the Green Belt, the proposal will be expected to accord with Policy ENV4.

7.23 Equestrian activities are popular in Elmbridge, offering opportunities for outdoor recreation and promoting healthy communities. As well as licensed riding establishments, there are also livery yards, stables and associated facilities for public, private or domestic use.

7.24 Factors influencing the layout of the scheme will include natural surveillance, site security and animal welfare, and the applicant should indicate how these have informed the proposal. The council's Environmental Health team is responsible for issuing licenses to riding centres and can provide advice on requirements relating to equine welfare standards. This will prevent the need to re-apply for a revised proposal if the approved design does not meet the standards necessary to acquire a license.



Chapter 8 - Principle 5 - Providing infrastructure and connectivity

8.1 To support the growth of the borough, it is essential that an adequate level of appropriate strategic and local infrastructure is delivered to avoid placing undue pressure on existing infrastructure networks and services. New or enhanced infrastructure should be delivered in a timely manner to ensure the needs of our growing communities and businesses are met.

8.2 National planning policy requires the council to set out how these infrastructure requirements will be met, as well as what infrastructure contributions are expected from development. The council is committed to working with infrastructure providers throughout the lifetime of the Plan to identify, plan and ensure that infrastructure is brought forward to meet the needs of new development as it is delivered.

8.3 Where there is spare capacity or opportunities for multiple uses to share facilities, existing infrastructure assets will also play a vital role in helping to meet development and infrastructure demands. Therefore, the council will seek to safeguard and make best use of existing infrastructure assets.

8.4 The provision of infrastructure includes, but is not limited to:

- Education provision including primary and secondary school, SEN/SEND provision, pre-schools, and further and higher education.
- Health facilities including GP surgeries, health centres, hospitals, dentists and specialist care facilities.
- Transport provision including roads, rail and bus networks, walking and cycling and parking facilities.
- Flood risk and water management.
- Community, art and cultural facilities, including community centres, village halls, sports facilities and leisure centres, cemeteries, theatres and libraries.
- Utilities, including gas, electric, water and wastewater, waste and minerals and telecommunications.
- Green and Blue Infrastructure.

Infrastructure delivery

INF1 - Infrastructure delivery

1. The council will work in partnership with providers of infrastructure and services to facilitate the timely provision of infrastructure necessary to support sustainable development in the borough, and in addressing pressures from cross boundary development.
2. The council will engage proactively with partners and relevant authorities to support strategic infrastructure projects to deliver benefits to the borough's environment, residents and businesses and which assist to achieve the principles of the Plan.
3. The council will maintain an up to date Infrastructure Delivery Plan (IDP) and will support infrastructure development proposals identified in the IDP where they comply with other policies in the Plan.
4. The council will use the Local Plan, IDP and the Strategic Priority Programme to bid for funding necessary to support development, working in partnership with Surrey County Council, the Local Economic Partnership (LEP), the Local Nature Partnership (LNP), and other bodies as appropriate.
5. All new developments must contribute towards the provision of infrastructure and services. The infrastructure necessary to support new development should either be provided on-site, integral to the development, or be secured off-site through other mechanisms. In the case of major development, phased delivery may be required, and later phases may be dependent on the infrastructure provision being in place.
6. New development will be expected to demonstrate capacity in existing infrastructure where no improvements are proposed as part of the development, either on-site or through a financial mechanism.

8.5 Development in the borough must be supported by appropriate infrastructure, proportionate to the development, which is delivered in a timely manner. Policy INF1 confirms the council's role in proactively working with partners and developers to deliver infrastructure improvements for the benefit of the borough and to ensure that regard is had by development proposals to the presence of existing infrastructure, as well as considering the need to reinforce existing provision or provide new infrastructure to cater for new development.

8.6 An Infrastructure Delivery Plan (IDP) has been prepared to support and inform development delivery. The IDP identifies the types and scale of infrastructure that is needed to help facilitate the delivery of the development needs identified in the Plan. The IDP also provides details of existing capacity and methods for forecasting any additional need for capacity.

8.7 The delivery of infrastructure will be funded through a combination of existing public funding, developer-led provision, and through the use of the Community Infrastructure Levy (CIL). The council's Charging Schedule and updated Development Contributions Supplementary Planning Document (SPD) should also be referred to.

Social and community infrastructure

INF2 - Social and community infrastructure

1. The council will support the provision of new social and community infrastructure particularly where they make an efficient use of land and promote the dual use and/or co-location of facilities.
2. New social and community infrastructure must be of a high quality and inclusive design providing access for all, and where practicable is provided in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses which increases public access.
3. Development proposals that would result in the unnecessary loss of community facilities will not be permitted unless it can be demonstrated that:
 - a) that there is no longer an identified community need for the facilities or they no longer meet the needs of users and cannot be adapted; or
 - b) they will be replaced by alternative and well-located facilities that will continue to serve the similar needs of the neighbourhood and wider community; and
 - c) the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use for which there is a local need has been fully assessed.

8.8 Social and community infrastructure plays an important role in providing good quality of life, stimulating and supporting social cohesion and interaction, as well as developing strong and inclusive communities. They provide opportunities to bring different groups of people together, contributing to social integration and the desirability of a place. These places also need to promote social interaction, be safe and accessible and support healthy lifestyles.

8.9 National planning policy promotes healthy and safe communities, and that the social, recreational and cultural facilities and services the community needs are provided. Policy INF2 seeks to ensure that existing social and community infrastructure provision and services in the borough are protected and only lost in exceptional circumstances. Where the loss of existing social and community infrastructure is proposed the applicant will need to show evidence that opportunities have been explored to accommodate an alternative community use which would better meet local needs, in line with relevant strategies.

8.10 The loss of social infrastructure can have a detrimental effect on a community. The Council seeks to protect its existing community facilities. Where a development proposal leads to the loss of a facility, a replacement that continues to meet the needs of the neighbourhood it serves will be required

8.11 The Council will work collaboratively with service providers, developers and relevant stakeholders, including the local community, to fully understand existing and future social infrastructure needs and plan appropriately for these, including through the Community Infrastructure Levy.

Health and wellbeing of communities

INF3 – Health and wellbeing of communities

1. Developments must contribute to healthy and active lifestyles through the provision of:
 - a) Active design principles which support wellbeing and greater physical movement, and an inclusive development layout and public realm that considers the needs of all, including the older population and people with disabilities;
 - b) Access to sustainable modes of travel, including safe, well-designed, and attractive cycling and walking routes and easy access to public transport to reduce car dependency;
 - c) Access to safe and accessible green infrastructure, including to blue corridors, open spaces and leisure, recreation and play facilities to encourage physical activity; and
 - d) Access to local community facilities, services and shops, which encourage opportunities for social interaction and active living.
2. The council will require a Health Impact Assessment (HIA) setting out the expected effects on health, wellbeing and safety, from all major development.
3. All development subject to HIA (in 2 above) must demonstrate how the positive health impacts it can deliver are maximised, and reduce and/or mitigate negative health impacts, with a particular regard to removing health inequalities. Where unavoidable negative impacts on health, wellbeing and safety are identified, mitigation measures must be incorporated into the proposal.

8.12 The health and wellbeing of the communities of Elmbridge is important in delivering sustainable development and placemaking. The Health and Social Care Act (2012) gave local authorities new duties and responsibilities for health improvement and health protection. The Act requires every local authority to use all the levers at its disposal to improve health and wellbeing. National Policy and Guidance clearly establishes that the design and use of the built and natural environments, including green and blue infrastructure, are key determinants of

health and wellbeing, and that Local Plans have an important function in the delivery of healthy places.

8.13 The planning process can help to promote the health and wellbeing of residents, workers, and visitors in the Borough through its role in shaping the built and natural environment. This can influence people's ability to follow healthy behaviours and can have positive impacts on reducing inequalities.

8.14 Public Health England has noted that "Some of the UK's most pressing health challenges - such as obesity, mental health issues, physical activity and the needs of an ageing population – can all be influenced by the quality of our built and natural environment...the considerate design of spaces and places can help to promote good health; access to goods and services; and alleviate, and in some cases even prevent, poor health and thereby have a positive impact on reducing health inequalities"³.

8.15 Planning for health involves thinking about the interrelated factors that affect health, including social and psychological elements, such as wellbeing and fulfilment. The wider determinants of health are the conditions in which people are born, grow, work, live and age, and the wider set of forces and systems shaping the conditions of daily life. A healthy place is one that can contribute to the prevention of ill health and provide the environmental conditions to support positive health and wellbeing.

8.16 When considering the health impact of individual developments, it is important that its surroundings are taken into account as well as its intended purpose. This includes uses involving vulnerable communities and sensitive uses, such as residential care homes, supported housing, schools, hospitals and health centres.

8.17 There are two aspects in supporting the health and wellbeing of our communities. The first is the creation of spaces, places, housing and environments that encourage healthy lifestyles, and secondly the facilities needed to support the health and care system are provided. The Plan plays an important role and planning policies and decisions should aim to achieve healthy, inclusive and safe places that promote social interaction, are safe and accessible, and enable and support healthy lifestyles. Planning should also provide the social, recreational and cultural facilities and services the community needs.

8.18 Policy INF3 requires a Health Impact Assessment (HIA) from all major development. An HIA is a process that identifies the health and wellbeing impacts (benefits and harms) of any plan or development project. A properly conducted HIA recommends measures to maximise positive impacts; minimise negative impacts; and reduce health inequalities.

³ 'Building Better Places'. Report of Session 2015-16. Written evidence (BEN0186) by Public Health England. House of Lords Select Committee on National Policy for the Built Environment Camden Planning Guidance: Planning for health and wellbeing

8.19 The inclusion of a HIA as part of the application process enables developers to ensure the creation of sustainable developments which support communities by:

- Demonstrating that health impacts have been properly considered when preparing, evaluating and determining development proposals.
- Ensuring developments contribute to the creation of a strong, healthy and just society.
- Helping applicants to demonstrate that they have worked closely with those directly affected by their proposals to evolve designs that take account of the views of the community.
- Identifying and highlighting any beneficial impacts on health and wellbeing of a particular development scheme.
- Identifying and taking action to minimise any negative impacts on health and wellbeing of a particular development scheme.

8.20 Health should not be seen as an isolated topic when assessing planning applications, and many measures set out in other parts of the Plan play a part in promoting health and wellbeing and addressing health inequalities and should be addressed, where appropriate, including housing quality, access to open space and nature, air quality, noise and amenity, accessible and active travel, community safety, social cohesion and climate change and minimising the use of resources.

Play and informal recreation space

INF4 - Play and informal recreation space

1. New residential development that is likely to be used by children and young people must take account of the need to provide space and/or access to suitable play and informal recreation space. The council will seek additional or enhanced play facilities or space by:

- a) Promoting opportunities for informal play within open spaces where it is not possible to secure formal play areas.
- b) Requiring external play space and facilities on site as part of new residential developments which include 50 or more family units (those with 2 or more bedrooms); and
- c) Protecting existing play areas and facilities and, on redevelopment, requiring the replacement of facilities either on-site or nearby to an equivalent or better standard;
- d) Where the creation of new play facilities is not feasible, requiring developers to work with the council to deliver enhanced provision nearby.

2. Play and informal recreation space designed in new residential developments should incorporate good-quality, accessible play provision for all ages and physical abilities, that:

- a) Provides a stimulating environment;
- b) Can be accessed safely from the street by children and young people independently;
- c) Forms an integral part of the development and surrounding area;
- d) Is overlooked to enable passive surveillance; and
- e) Is not segregated by tenure.

3. Where access to existing space is proposed, new development schemes should incorporate accessible routes for children and young people, that enable them to play and move around safely and independently.

4. Major housing developments of over 50 units are expected to make appropriate provision of play space. In determining the amount of play space required the council will consider the type of development, amount, quality, and use of existing accessible provision of play space, as well as the anticipated child yield of the development.

8.21 Play and informal recreation space for children and young people within their local area is an important part of their mental and physical development. In order to facilitate greater physical activity, it is important that children and young people continue to have safe access to good quality, well designed, secure and stimulating play and informal recreation provision in the borough.

8.22 Play provision must be inclusive and suitable for children and young people of all abilities, employing the principles of inclusive play. Increased physical activity contributes to healthy growth and development in children and young people, as well as improved psychological wellbeing and social interaction.

8.23 Play space can include communal outdoor space, private outdoor space, and gardens suitable for play. Communal gardens and other outdoor spaces suitable for play, including communal amenity space, may be considered to contribute towards play space provision where they have distinct playable elements; however, developments must provide publicly accessible play space where possible, rather than provision being entirely from private space.

8.24 Where formal play space is provided it must be free, accessible, and integrated into any wider networks of open space. Where possible, minor developments are also required to provide informal play space. Such proposals must be accompanied by detailed plans which include a detailed design for play provision. Reference should be made to best practice

standards and any relevant guidance or strategies, in particular the Elmbridge Play Strategy. Proposals must also include information detailing proposed future management and maintenance arrangements for any play space secured. This plan will be conditioned by the council as part of any permission.

8.25 Where improvements to the quality and access of existing play and informal recreation space is proposed as part of a development, detailed design proposals of the improvements should be submitted and agreement sought with the relevant bodies, such as the highway authority. These proposals should also take account of the details in the Elmbridge Play Strategy.

Improving communications

INF5 - Communications

1. All new build residential and commercial developments must include full fibre broad band connections to each property.
2. The council will support the roll out of the 5G network across the borough and the enhancement of existing connectivity infrastructure.
3. Telecommunications proposals will be supported where they are accompanied by evidence that there are no alternative suitable infrastructure sites that can be shared or replaced, and the visual and amenity impact is minimised by the considered siting and design of the development.

8.26 The role technology now plays in our economic and social lives is changing. The availability, reliability and speed of broadband provision is a key consideration for households and many view it as essential as the standard utilities. Similarly, it is a key concern for businesses.

8.27 Policy INF5 supports improvements to essential telecom infrastructure, which is vital to the delivery of sustainable development, including the roll out of 5G across the borough. It also requires full fibre to the premises for new residential and commercial developments. Policy INF5 assists in delivering the Plan's objective to reduce the need to travel and reduce the reliance on private motor vehicles, reducing issues of air quality and congestion and supporting a modal shift in the way people live, including supporting increased home working.

8.28 Applicants will need to ensure they undertake early dialogue with telecom providers to ensure they understand the infrastructure specification and requirements, so they can be incorporated into the design of new development at an early stage.

8.29 Relevant applications must be supported by a Fibre to the Premises (FTTP) statement, detailing the dialogue with the telecom provider and establishing how FTTP will be provided to

serve the development and be operational upon first occupation. Statements supporting outline planning applications should be proportionate.

8.30 Applicants of telecommunications proposals are encouraged to undertake meaningful community engagement prior to submitting a planning application.

Rivers

INF6 - Rivers

1. The special character and setting of the River Thames will be conserved and enhanced, and appropriate development proposals associated with river related activities and employment will be supported, provided they accord with other policies in this Plan.
2. The council will support and promote new links across the river which support active and sustainable travel and leisure uses of the river.
3. The council supports proposals for the wider River Thames Scheme and will work proactively with partners to deliver improvements. Land at Desborough Island will be safeguarded for the creation of new habitat.
4. Opportunities to increase the use of the river for tourism and improving river-based and riverside recreation and leisure activities will be supported where appropriate and they meet other policies in the Plan.
5. Proposals for riverside development and improved facilities will need to demonstrate that there will be no unacceptable impact upon navigation, biodiversity, flood risk and the riverbank and landscape setting.
6. Development proposals on the riverside must preserve or enhance the waterside character, heritage value and setting, and provide physical and visual links with the surrounding areas (including views along the river).
7. Development proposals that are contain or are adjacent to watercourses should consider the impact that development can have on them and provide a buffer from the river bank.
8. New moorings or other floating structures will be supported if it complies with the following criteria:
 - a) It does not harm the character, openness and views of the river, by virtue of its design and height;
 - b) The visitor mooring allows use for a period of less than 24 hours;
 - c) There is no interference with the recreational use of the river, riverside and navigation; and

d) The proposal is of wider benefit to the community.

8.31 The River Thames is a strategically important and iconic feature of Elmbridge. It is an important natural and cultural asset providing leisure, ecological, environmental, landscape and economic benefits, this role will be protected and promoted.

8.32 The River Thames between Datchet and Teddington has the largest area of developed flood plain in England without flood defenses. Over 15,000 homes and numerous businesses are at risk from flooding. The council is working with the Environment Agency and other partners to bring forward the River Thames Scheme. This is a programme of projects and investments with the aim of reducing flood risk in communities.

8.33 The rivers and watercourses in the borough provide an important habitat and natural corridor to allow the movement of species between suitable habitats and promote the expansion of biodiversity. Through the provision of movement may help wildlife adapt to climate change by providing a migration corridor.

8.34 Sites that contain or are adjacent to watercourses should consider the impact that development can have on them, negative or positive. A 10 metre minimum undeveloped buffer zone, measure from the top of the river bank, protects watercourses from the impact of development, as well as providing net gains in biodiversity. A buffer zone also produces strong and resilient ecosystems, improved water quality and human health benefits through pleasant amenity space. River side buffer zones must be free from built development including lighting, domestic gardens and formal landscaping.



Chapter 9 - Site Allocations

9.1 The purpose of these site allocations is to allocate land for a range of uses to support the vision and principles of the Local Plan. The allocations consider sites within the whole of the borough, and allocate land for development including for housing, employment, retail, community uses and infrastructure.

9.2 Each allocation lists the land uses that are acceptable on the identified land, alongside any specific requirements and opportunities for future development proposals. Each site is identified on the Local Plan Policies Map. Detailed information about the infrastructure required to support development, including delivery time periods, is listed in the latest Infrastructure Delivery Plan (IDP), with the Land Availability Assessment (LAA) also providing further information about the deliverability of sites and potential timescales.

9.3 Allocated sites are encouraged to progress development proposals as soon as possible, to help provide housing in the earlier stages of the plan period, to help boost housing supply. Equally, where allocated sites have been identified as likely to be delivered in the later years of the plan period due to constraints, if these are resolved sooner, development proposals are encouraged.

9.4 All site allocations require planning permission prior to development. Allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses. Pre-application advice prior to the submission of a planning application is encouraged as well as engagement with infrastructure providers at the earliest opportunity.

9.5 Further detailed information about these sites is available in the LAA, which forms part of the Local Plan evidence base. The LAA site reference number is shown on the site allocation policy, for ease of cross referencing.

Draft Elmbridge Local Plan – Site Allocations

Site Allocations

Claygate

Site allocation reference	Site LAA reference	Site name	Delivery period (years)	Allocated for
CL1	US3	Torrington Lodge Car Park, Hare Lane, Claygate panellist	1-5	8 residential units
CL2	US156	Garages to the rear of Foxwarren, Claygate	1-5	5 residential units
CL3	US155	Garages to the rear of Holroyd Road, Claygate	1-5	3 residential units
CL4	US2	Hare Lane Car Park, Hare Lane, Claygate	6-10	7 residential units
CL5	US175	Claygate Centre, Elm Road, Claygate, KT10 0EH	6-10	14 residential units and re-provision of community use
CL6	US6	Crown House, Church Road, Claygate, KT10 0BF	11-15	12 residential units
CL7	US169	Claygate Station Car Park, The Parade	11-15	15 residential units

Cobham, Oxshott and Stoke D'Abernon

Site allocation reference	Site LAA reference	Site name	Delivery period (years)	Allocated for
COS1	US492	Cedar House, Mill Road, Cobham, KT11 3AL	1-5	7 residential units
COS2	US497	Cedar Road Car Park, Cedar Road, Cobham, KT11 2AA	1-5	5 residential units
COS3	US162	Site B Garages at Wyndham Avenue, Cobham	1-5	4 residential units
COS4	US159	Garages to the rear of 6-24 Lockhart Road, Cobham	1-5	4 residential units
COS5	US165	Garages at Waverley Road, Oxshott	1-5	6 residential units
COS6	US472	40 Fairmile Lane, Cobham, KT11 2DQ	1-5	13 residential units
COS7	US521	4 Fernhill, Oxshott, KT22 0JH	1-5	5 residential units

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Site allocation reference	Site LAA reference	Site name	Delivery period (years)	Allocated for
COS8	US522	52 Fairmile Lane, Cobham, KT11 2DF	1-5	7 residential units
COS9	US523	Pineview, Fairmile Park Road, Cobham, Kt11 2PG	1-5	6 residential units
COS10	US530	Garage block, Middleton Road, Downside	1-5	3 residential units
COS11	US160	Garages at Bennett Close, Cobham	6-10	4 residential units
COS12	US193	Glenelm and 160 Anyard Roads, Conham, KT11 2LH	6-10	34 residential units
COS13	US460	1, 3 and 5 Goldrings Road, Oxshott, Leatherhead, KT22 0QP	6-10	32 residential units
COS14	US195	Cobham Village Hall and Centre for the Community, Lushington Drive, Cobham, KT11 2LU	6-10	37 residential units and re-provision of community use
COS15	US187	87 Portsmouth Road, Cobham, KT11 1JH	6-10	10 residential units
COS16	US164	Cobham Health Centre and Garages off Tartar Road	6-10	11 residential units and re-provision of community use
COS17	US493	Selden Cottage and Ronmar, Leatherhead Road, KT22 0EX	6-10	18 residential units
COS18	US191	73 Between Streets, Cobham, KT11 1AA	6-10	40 residential units
COS19	US124	St Andrew's Church, Oakshade Road, Oxshott, KT22 0LE	11-15	127 sqm of community use
COS20	US467	Ambleside, 3 The Spinney, Queens Drive, KT22 0PL	11-15	8 residential units
COS21	US218	Coveham House, Downside Bridge Road and The Royal British Legion, Hollyhedge Road, Cobham	11-15	14 residential units
COS22	US190	Shell Fairmile, 270 Portsmouth Road, Cobham KT11 1HU	11-15	10 residential units
COS23	US217	68 Between Streets and 7-11 White Lion Gate, Cobham	11-15	6 residential units
COS24	US214	Above Waitrose, 16-18 Between Streets, Cobham KT11 1AF	11-15	20 residential units
COS25	US221	Garages and parking to the rear of Cobham Gate, Cobham	11-15	8 residential units

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Site allocation reference	Site LAA reference	Site name	Delivery period (years)	Allocated for
COS26	US201	Tiltwood Care Home, Hogshill Lane, Cobham, KT11 2AQ	11-15	24 care home units
COS27	US188	Ford Garage, 97 Portsmouth Road, Cobham, KT11 1JJ	11-15	21 residential units
COS28	US189	Premier Service Station, 101 Portsmouth Road, Cobham, KT11 1JN	11-15	7 residential units
COS29	US194	Protech House, Copse Road, Cobham KT11 2TW	11-15	28 residential units
COS30	US215	38 Copse Road, Cobham, KT11 2TW	11-15	7 residential units
COS31	US7	20 Stoke Road, Cobham	11-15	8 residential units
COS32	US178	Sainsbury's car park, Bridge Way, Cobham, KT11 1HW	11-15	58 residential units
COS33	US183	BMW Cobham, 18-22 Portsmouth Road, Cobham	11-15	27 residential units
COS34	US121	Oxshott Medical Practice and Village Centre Hall, Holtwood Road	11-15	10 residential units and 1395 sqm floorspace
COS35	US186	78 Portsmouth Road, Cobham	11-15	30 residential units

Thames Ditton, Long Ditton, Hinchley Wood and Weston Green

Site allocation reference	Site LAA reference	Site name	Delivery period (years)	Allocated for
D1	US245	Brook House, Portsmouth Road, Thames Ditton, KT7 0EG	1-5	8 residential units
D2	US230	Car Park south of Southbank, Thorkhill Road, Thames Ditton	1-5	7 residential units
D3	US254	4-6 Manor Road South and 4 Greenways, Hinchley Wood	1-5	33 residential units
D4	US506	Land to the rear of 5 Hinchley Way, Esher, KT10 0BD	1-5	6 residential units
D5	US503	89-90 Woodfield Road, Thames Ditton, KT7 0DS	1-5	7 residential units

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Site allocation reference	Site LAA reference	Site name	Delivery period (years)	Allocated for
D6	US462	Sundial House, The Molesey Venture, Orchard Lane, East Molesey, KT8 0BN	1-5	61 residential units
D7	US443	47 Portsmouth Road, Thames Ditton, KT7 0TA	1-5	25 residential units
D8	US524	Torrington, 18-20 St Mary's Road, Long Ditton	1-5	9 residential units
D9	US495	Corner Cottage, Portsmouth Road, KT7 0TQ	1-5	5 residential units
D10	US516	Bransby Lodge, St Leonard's Road, Thames Ditton	1-5	5 residential units
D11	US158	Garages to the rear of Blair Avenue, Weston Green	1-5	4 residential units
D12	US226	Sandpiper, Newlands Avenue, Thames Ditton, KT7 0HF	6-10	21 residential units
D13	US518	Thames Ditton Centre for the Community, Mercer Close, Thames Ditton, KT7 0BS	6-10	18 residential units and re-provision of community use
D14	US18	British Legion, Betts Way, Long Ditton, KT6 5HT	11-15	9 residential units/mixed-use
D15	US24	Flats 9-41 and Garages on Longmead Road, Thames Ditton, KT7 0JF	11-15	37 residential units
D16	US237	Ashley Road Car Park, Thames Ditton	11-15	14 residential units
D17	US232	Nuffield Health Club, Simpson Way, Long Ditton	11-15	16 residential units
D18	US271	118-120 Bridge Road East Molesey KT8 9HW	11-15	6 residential units
D19	US272	Industrial units at 67 Summer Road East Molesey KT8 9LX	11-15	12 residential units
D20	US248	School Bungalow, Mercer Close, Thames Ditton, KT7 0BS	11-15	10 residential units
D21	US233	Nuffield Health car park, Simpson Way, Long Ditton	11-15	10 residential units
D22	US260	46 St Marys Road, Long Ditton, KT6 5EY	11-15	5 residential units
D23	US251	Old Pauline Sports Ground Car Park	11-15	35 residential units
D24	US250	Community centres at the junction of Mercer Close and Watts Road, Thames Ditton	11-15	29 residential units and re-provision of community use
D25	US265	5A-6A Station Road, Esher, KT10 8DY	11-15	5 residential units

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Esher

Site allocation reference	Site LAA reference	Site name	Delivery period (years)	Allocated for
ESH1	US279	Esher Place, 30 Esher Place Avenue, Esher, KT10 8PZ	1-5	22 residential units
ESH2	US127	30 Copsem Lane, Esher, KT10 9HE	1-5	21 residential units
ESH3	US283	1-5 Millbourne Lane, Esher, KT10 9DU	1-5	25 residential units
ESH4	US134	Hanover Cottage 6 Claremont Lane Esher KT10 9DW	1-5	12 residential units
ESH5	US146	35 New Road, Esher, KT10 9DW	1-5	5 residential units
ESH6	US481	6 Bracondale and 43 Claremont Lane, KT10 9EN	1-5	16 residential units
ESH7	US475	Willow House, Mayfair House and Amberhurst, Claremont Lane, Esher, KT10 9DW	1-5	57 residential units
ESH8	US286	Highwaymans Cottage Car Park, Portsmouth Road, Esher	1-5	9 residential units
ESH9	US276	Cafe Rouge, Portsmouth Road, Esher, KT10 9AD	1-5	20 residential units/mixed-use 117 sqm floorspace
ESH10	US526	40 New Road, Esher, KT10 9NU	1-5	6 residential units
ESH11	US278	45 More Lane, Esher, KT10 8AP	1-5	25 residential units
ESH12	US157	Garages at Farm Road, Esher, KT10 8AX	6-10	3 residential units
ESH13	US282	42 New Road Esher KT10 9NU	6-10	6 residential units
ESH14	US274	Two Furlongs and Wren House, Portsmouth Road, Esher, KT10 9AA	6-10	10 residential units
ESH15	US39	Unit A & B Sandown Industrial Park, Esher, KT10 8BL	6-10	40 residential units
ESH16	US33	River Mole Business Park, Mill Road, Esher, KT10 8BJ	6-10	200 residential units
ESH17	US38	Units C and D, Sandown Industrial Park, Mill Road, Esher	6-10	60 residential units
ESH18	US32	Windsor Houses 34-40 High Street	6-10	8 residential units/mixed-use
ESH19	US288	Hawkshill Place Portsmouth Road Esher KT10 9HY	6-10	12 residential units
ESH20	US27	81 High Street, Esher, KT10 9QA	6-10	8 residential units

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ESH21	US519	Esher Library and land adjoining, Church Street, Esher, KT10 9NS	6-10	15 residential units and re-provision of community use
ESH22	US287	15 Clare Hill Esher KT10 9NB	11-15	55 residential units
ESH23	US280	St Andrews and Hillbrow House, Portsmouth Road, Esher, KT10 9SA	11-15	30 residential units
ESH24	US531	Civic Centre, High Street, Esher	11-15	400 residential units

Hersham

Site allocation reference	Site LAA reference	Site name	Delivery period (years)	Allocated for
H1	US441	63 Queens Road, Hersham, KT12 5LA	1-5	5 residential units/mixed-use
H2	US489	19 Old Esher Road, Hersham, KT12 4LA	1-5	5 residential units
H3	US379	Hersham Shopping Centre, Molesey Road, Hersham	1-5	200 residential units
H4	US517	Park House, Pratts Lane, Hersham, KT12 4RR	1-5	5 residential units
H5	US45	Car park to the south of Mayfield Road, Hersham	6-10	9 residential units
H6	US40	Hersham Day Centre and Village Hall, Queens Road, Hersham, KT12- 5LU	6-10	15 residential units/mixed-use
H7	US380	New Berry Lane car park, Hersham	6-10	7 residential units
H8	US389	Hersham sports and social club 128 Hersham Road Hersham KT12 5QL	11-15	8 residential units
H9	US375	Volkswagen Ltd Esher Road Hersham KT12 4JY	11-15	27 residential units
H10	US390	The Royal George 130-132 Hersham Road Hersham KT12 5QJ	11-15	15 residential units
H11	US376	Trinity Hall and 63-67 Molesey Road, Hersham	11-15	47 residential units and re-provision of community use
H12	US435	Car Park next to Waterloo Court	11-15	62 residential units
H13	US378	All Saints Catholic Church hall Queens Road Hersham KT12 5LU	11-15	8 residential units/mixed-use

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Site allocation reference	Site LAA reference	Site name	Delivery period (years)	Allocated for
H14	US43	Hersham Technology Park (Air Products)	11-15	4350 sqm of employment floorspace
H15	US374	Hersham Library, Molesey Road, Hersham, KT12 4RF	11-15	13 residential units and re-provision of community use

Molesey

Site allocation reference	Site LAA reference	Site name	Delivery period (years)	Allocated for
MOL1	US509	2 Beauchamp Road, East Molesey, KT8 0PA	1-5	9 residential units
MOL2	US507	133-135 Walton Road, East Molesey, KT8 0DT	1-5	8 residential units/mixed-use
MOL 3	US529	Garage block west of 14 and north of 15 Brende Gardens, West Molesey	1-5	4 residential units
MOL4	US299	East Molesey Car Park, Walton Road, East Molesey	1-5	23 residential units
MOL5	US151	Garages to the rear of Belvedere Gardens, West Molesey	1-5	4 residential units
MOL6	US152	Garages to the rear of Island Farm Road, West Molesey	1-5	4 residential units
MOL8	US498	7 Seymour Close and Land to rear of 103-113 Seymour Close, East Molesey, KT8 0JY	6-10	5 residential units
MOL9	US153	11-27 Down Street, West Molesey, KT8 2TG	6-10	7 residential units
MOL10	US318	Vine Medical Centre 69 Pemberton Road East Molesey KT8 9LJ	6-10	7 residential units/mixed-use
MOL11	US456	Molesey Hospital, High Street, KT8 2LU	6-10	70 residential units
MOL12	US312	Henrietta Parker Centre, Ray Road, West Molesey	11-15	13 residential units and re-provision of community use
MOL13	US315	Parking/garages at Grove Court Walton Road East Molesey KT8 0DG	11-15	7 residential units

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Site allocation reference	Site LAA reference	Site name	Delivery period (years)	Allocated for
MOL14	US302	43 Palace Road East Molesey KT8 9DN	11-15	18 residential units
MOL15	US319	Pavilion Sports Club car park Hurst Lane East Molesey KT8 9DX	11-15	9 residential units
MOL16	US317	Tesco Metro car park, Walton Road, East Molesey	11-15	11 residential units
MOL17	US309	Water Works south of Hurst Road, West Molesey	11-15	14 residential units
MOL18	US306	Molesey Clinic and library, Walton Road, West Molesey, KT8 2HZ	11-15	10 residential units and re-provision of community use
MOL19	US296	5 Matham Road East Molesey KT8 0SX	11-15	23 residential units
MOL20	US56	Joseph Palmer Centre, 319a Walton Road	11-15	60 care homes units

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Walton-on-Thames

Site allocation reference	Site LAA reference	Site name	Delivery period (years)	Allocated for
WOT1	US135	12-16a High Street, Walton-on-Thames, KT12 1DA	1-5	24 residential units/mixed-use
WOT2	US350	Leylands House, Molesey Road, Walton-on-Thames	1-5	56 residential units
WOT3	US528	Garages to the rear of 84-92and 94-96 Rodney Road, Walton-on-Thames	1-5	4 residential units
WOT4	US326	9-21a High Street, Walton-on-Thames	1-5	71 residential units/mixed-use
WOT5	US464	63-69 High Street, Walton-on-Thames, KT12 1DJ	1-5	28 residential units/mixed-use
WOT6	US166	Garages to the rear of 17-27 Field Common Lane Walton-On-Thames KT12 3QH	1-5	3 residential units
WOT7	US339	Walton Park Car Park, Walton Park, KT12 3ET	1-5	17 residential units
WOT8	US487	16-18 Sandy Lane, KT10 9PG	1-5	7 residential units
WOT9	US361	Garages adjacent to 1 Tumbling Bay Walton-On-Thames	1-5	2 residential units
WOT10	US168	Garages at Sunnyside, Walton-on-Thames	6-10	4 residential units
WOT11	US532	The Playhouse, Hurst Grove, Walton-on-Thames	6-10	20 residential units
WOT12	US471	147 Sidney Road, KT12 3SA	6-10	8 residential units
WOT13	US59	Halfway Car Park, Hersham Road, Walton-on-Thames	6-10	8 residential units
WOT14	US112	20 Sandy Lane, Walton-on-Thames, KT12 2EQ	6-10	7 residential units
WOT15	US323	Bradshaw House Bishops Hill and Walton Centre for the Community, Manor Road, Walton-On-Thames KT12 2PB	6-10	18 care home units
WOT16	US84	Elm Grove, 1 Hersham Road, Walton-on-Thames, KT12 1LH	6-10	70 residential units/mixed-use
WOT17	US357	Rylton House, Hersham Road, Walton-On-Thames	11-15	8 residential units
WOT18	US348	Cornerstone Church, 38 Station Avenue, Walton- On-Thames, KT12 1NU	11-15	30 residential units

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Site allocation reference	Site LAA reference	Site name	Delivery period (years)	Allocated for
WOT19	US360	Walton Comrades Club 7 Franklyn Road Walton-On-Thames KT12 2LF	11-15	16 residential units
WOT20	US354	P G S Court, Halfway Green, Walton-on-Thames, KT12 1FJ	11-15	23 residential units/mixed-use
WOT21	US352	Fire/Ambulance station Hersham Road Walton-On-Thames KT12 1RZ	11-15	21 residential units/mixed-use
WOT22	US331	Land to the rear of 60-70 Sandy Lane, Walton-on-Thames	11-15	8 residential units
WOT23	US363	Unit Rear of and 12-14 Sandy Lane Walton-On-Thames KT12 2EQ	11-15	9 residential units
WOT24	US366	Garages off Copenhagen Way, Walton-on-Thames	11-15	7 residential units
WOT25	US79	Regnolruf Court, Church Street, Walton-on-Thames, KT12 2QT	11-15	7 residential units
WOT26	US353	Fernleigh Day Centre Fernleigh Close Walton-On-Thames KT12 1RD	11-15	19 residential units and re-provision of community use
WOT27	US325	Garages to the rear of 8 Sidney Road, Walton-on-Thames	11-15	8 residential units
WOT28	US346	Garages at Collingwood Place, Walton-on-Thames	11-15	9 residential units
WOT29	US335	Garages at Home Farm Gardens, Walton-on-Thames	11-15	6 residential units
WOT30	US321	Case House 85-89 High Street Walton On Thames KT12 1DZ	11-15	28 residential units
WOT31	US356	Station Avenue Car Park, Station Avenue, Walton-on-Thames	11-15	50 residential units
WOT32	US372	1 Cleveland Close Walton-On-Thames KT12 1RB	11-15	8 residential units
WOT33	US324	Manor Road Car Park, Manor Road, Walton-on-Thames, KT12 2QN	11-15	31 residential units
WOT34	US72	Courtlands & 1-5 Terrace Road, Walton-on-Thames	11-15	63 residential units
WOT35	US370	The Heath Centre, Rodney Road, Walton-on-Thames, KT12 3LB	11-15	36 residential units/mixed-use

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Site allocation reference	Site LAA reference	Site name	Delivery period (years)	Allocated for
WOT36	US327	Bridge Motor Works, New Zealand Avenue, Walton-On-Thames, KT12 1AU	11-15	35 residential units
WOT37	US351	35 to 38 and land north of Mellor Close, Walton-on-Thames, KT12-3RX	11-15	5 residential units

Weybridge

Site allocation reference	Site LAA reference	Site name	Delivery period (years)	Allocated for
WEY1	US505	75 Oatlands Drive, Weybridge, KT13 9LN	1-5	9 residential units
WEY2	US117	9 and rear of 11 and 13 Hall Place Drive	1-5	7 residential units
WEY3	US482	24-26 Church Street, Weybridge, KT13 3DX	1-5	15 residential units
WEY4	US496	Quadrant Courtyard, Weybridge, KT13 8DR	1-5	15 residential units
WEY5	US395	Weybridge Hospital and car park, 22 Church Street Weybridge KT13 8DW	1-5	30 residential units/mixed-use
WEY6	US520	Weybridge Centre for the Community, Churchfield Place, Weybridge, KT13 8BZ	1-5	8 residential units and re-provision of community use
WEY7	US470	Oak House, 19 Queens Road, Weybridge	1-5	10 residential units
WEY8	US416	Garages to the west of 17 Grenside Road Weybridge KT13 8PY	1-5	5 residential units
WEY9	US469	Heath Lodge, St Georges Avenue	1-5	6 residential units
WEY10	US525	8 Sopwith Drive, Brooklands Industrial Park	1-5	1404sqm commercial
WEY11	US527	9 Cricket Way, Weybridge	1-5	5 residential units
WEY12	US94	Locke King House, 2 Balfour Road, Weybridge	6-10	12 residential units
WEY13	US411	York Road Car Park, Weybridge	6-10	8 residential units

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Site allocation reference	Site LAA reference	Site name	Delivery period (years)	Allocated for
WEY14	US403	HFMC House, New Road and 51 Prince's Road Weybridge KT13 9BN	6-10	6 residential units
WEY15	US397	Floors above Waitrose, 62 High Street, Weybridge KT13 8BL	6-10	9 residential units
WEY16	US108	Weybridge Library, Church Street, Weybridge	6-10	30 residential units/mixed-use
WEY17	US417	Garages to the rear of Broadwater House Grendside Road Weybridge KT13 8PZ	11-15	20 residential units
WEY18	US420	59-65 Baker St, Weybridge KT13 8AH	11-15	14 residential units/mixed-use
WEY19	US431	Shell Petrol Filling Station 95 Brooklands Road Weybridge KT13 0RP	11-15	5 residential units
WEY20	US429	Garages at Brockley Combe, Weybridge	11-15	7 residential units
WEY21	US419	35-47 Monument Hill, Weybridge KT13 8RN	11-15	20 residential units/mixed-use
WEY22	US404	2-8 Princes Road Weybridge KT13 9BQ	11-15	10 residential units/mixed-use
WEY23	US424	Weybridge Bowling Club 19 Springfield Lane Weybridge KT13 8AW	11-15	11 residential units
WEY24	US421	181 Oatlands Drive, Weybridge KT13 9DJ	11-15	12 residential units
WEY25	US393	The Old Warehouse, 37A Church Street, Weybridge KT13 8DG	11-15	5 residential units
WEY26	US110	The Heights, Weybridge	11-15	9500 sqm of employment floorspace
WEY27	US410	Oatlands car park, Oatlands Drive, Weybridge	11-15	8 residential units
WEY28	US406	179 Queens Road Weybridge KT13 0AH	11-15	9 residential units
WEY29	US402	1 Princes Road Weybridge KT13 9TU	11-15	19 residential units
WEY30	US394	NHS North West, 58 Church Street, Weybridge KT13 8DP	11-15	19 residential units/mixed-use
WEY31	US107	Weybridge Delivery Office, Elmgrove Road	11-15	5 residential units/mixed-use
WEY32	US125	Baker Street car park, Weybridge	11-15	7 residential units/mixed-use
WEY33	US92	GlaxoSmithKline, St. Georges Avenue	11-15	100 residential units

Draft Elmbridge Local Plan – Site Allocations

Site allocation reference	Site LAA reference	Site name	Delivery period (years)	Allocated for
WEY34	US391	Woodlawn, Hanger Hill and 2 Churchfields Avenue, Weybridge, KT13 9XU	11-15	11 residential units
WEY35	US93	Horizon Business Village, Brooklands Road, Weybridge, KT13 0TJ	11-15	6000 sqm of employment floorspace
WEY36	US398	1-8 Dovecote Close, Weybridge, KT13 8PW	11-15	7 residential units
WEY37	US407	Foxholes, Weybridge KT13 0BN	11-15	78 residential units

Chapter 10 - Monitoring framework

10.1 The Plan will be monitored to assess its effectiveness and whether it is achieving the principles of the Plan and the individual policy requirements. This chapter of the Plan sets out the indicators that will be used by the council to monitor the performance of the policies in the Plan. These indicators are reported on an annual basis through the Authority's Monitoring Report (AMR).

10.2 The AMR will monitor these indicators, alongside a range of other contextual indicators. Monitoring can indicate areas where intervention may be needed to achieve the principles of the Plan. Where the AMR indicates that principles and policy requirements are not being met, the council may need to take remedial action which could include a review of the Plan or parts of the Plan.

Draft Elmbridge Local Plan – Monitoring framework

Principle	Policies	Indicators
<p>Principle 1 - Tackling Climate Change</p>	<p>SS1 – Responding to the Climate Emergency</p> <p>SS2 – Sustainable place-making</p> <p>CC1 – Energy efficiency, renewable and low carbon energy</p> <p>CC2 – Minimising waste and promoting a circular economy</p> <p>CC3 – Sustainable design standards</p> <p>CC4 – Sustainable transport</p> <p>CC5 – Managing flood risk</p>	<ul style="list-style-type: none"> • Number of properties permitted with Flood Zone 2 and 3. • Per capita reductions in carbon dioxide (CO2). • Installed capacity of renewable energy generating development, by type. • Per capita consumption of water • Percentage of household waste sent for reuse, recycling and composting • Number of school travel plans submitted and the CCO applications relating to travel plans • Congestion levels (from DfT) • Length of new cycleways implemented • Length of new footways implemented • Number of train stations improved • Number of bus services improved • The number of permissions granted contrary to advice received from the Environment Agency.
<p>Principle 2- Protecting and enhancing the quality of the environment</p>	<p>SS2 – Sustainable place-making</p> <p>ENV1 – Green and Blue infrastructure</p> <p>ENV2 – Trees and hedgerows</p> <p>ENV3 – Local Green Spaces</p> <p>ENV4 – Development in the Green Belt</p> <p>ENV5 – Thames Basin Heath Special Protection Area</p>	<ul style="list-style-type: none"> • Pollution levels in Air Quality Management Areas (AQMAs) • Appeals dismissed which are considered to contravene/fail to achieve pollution standards as set out in policy. • The volume of pollutants [CO2] emitted by source • Amount of contaminated land. • The efficacy of Suitable Accessible Natural Greenspace (SANGs) as set out in the Thames Basin Heaths SPA Delivery Framework • Status of Annex 1 bird species of Thames Basin Heaths SPA • Visitor survey to the Thames Basin Heaths SPA • Number, area and condition of regionally or locally designated wildlife sites • Condition of SSSI's • Condition of SNCI'S

Draft Elmbridge Local Plan – Monitoring framework

Principle	Policies	Indicators
	<p>ENV6 – Protecting, enhancing and recovering biodiversity</p> <p>ENV7 – Environment quality</p> <p>ENV8 – Air quality</p> <p>ENV9 – Urban design quality</p> <p>ENV10 – Heritage Assets</p> <p>ENV11 – Strategic Views</p>	<ul style="list-style-type: none"> • Restoration and creation of Priority Habitats • Number of listed buildings on the Buildings at Risk Register • Number of buildings on the HAR register • Number of agreed prioritised up-to-date Conservation Area Appraisals • Number of planning permissions granted involving significant harm to, or loss of a designated heritage asset • Percentage of development built within the urban area • Percentage of development built in the Green Belt.
<p>Principle 3 - Delivering Homes</p>	<p>SS2 – Sustainable place-making</p> <p>SS3 – Scale and location of growth</p> <p>HOU1 – Housing Delivery</p> <p>HOU2 Optimisation</p> <p>HOU3 – Housing mix</p> <p>HOU4 – Affordable housing</p> <p>HOU5 – Housing – technical standards</p> <p>HOU6 – Specialist accommodation</p>	<ul style="list-style-type: none"> • Number of affordable homes from new build and acquisitions. • Number of affordable homes completed. • Net additional homes delivered. • Densities of completed housing developments. • Housing completions by type and size (market and affordable) • Tenure mix of affordable housing provided (social rent, affordable rent and shared ownership) • Number of C2 residential developments with planning permission and under construction. • Number of sheltered homes delivered. • Delivery of Gypsy and Traveller pitches. • Net housing completions by land type.

Draft Elmbridge Local Plan – Monitoring framework

Principle	Policies	Indicators
	<p>HOU7 – Gypsy, Roma, Traveller and Travelling Showpeople accommodation</p> <p>HOU8 – Self and custom build housing</p>	
<p>Principle 4 – Growing a prosperous economy</p>	<p>SS2 – sustainable place-making</p> <p>SS3 – Scale and location of growth</p> <p>ECO1 – Supporting the economy</p> <p>ECO2 – Strategic Employment Land</p> <p>ECO3 – Supporting our town, district and local centres</p> <p>ECO4 – Promoting visitor attractions and arts and cultural venues</p> <p>ECO5 – Equestrian related development</p>	<ul style="list-style-type: none"> • Population economically active, including unemployed • Working age people on out of work benefits • Number of jobs • Total amount of additional employment floor space - by type • Total amount of employment floor space on previously developed land (including Strategic Employment Land) - by type • Amount of vacant floorspace - by type • Total amount of B1 floor space on town, district and local centres • Changes of floor space in town, district and local centres • Proportion of commercial units by class in each centre • Appeals dismissed for proposals detrimental to town centre vitality and viability • Number of planning permissions granted for major development in town centres with only one use.
<p>Principle 5 – Providing infrastructure and connectivity</p>	<p>SS2 – Sustainable place-making</p> <p>SS3 – Scale and location of growth</p> <p>INF1 – Infrastructure delivery</p> <p>INF2 – Social and community uses</p> <p>INF3 – Health and wellbeing of communities</p>	<ul style="list-style-type: none"> • Health dimension of the index of multiple deprivation. • Projects in the infrastructure schedule delivered • Percentage rivers in plan area whose biological quality is rated as “good”.

Draft Elmbridge Local Plan – Monitoring framework

Principle	Policies	Indicators
	INF4 – Play and informal recreation space INF5 – Connectivity INF8 – River usage	

Appendices

A1 Replacement Policies

A2 Glossary

A3 Spatial Portrait of the Borough

A4 Local Green Spaces

A5 Housing Trajectory

A6 Nationally Prescribed Space Standards

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A1 Replacement Policies

Core Strategy policies (adopted 2011)	Replacement policy
CS1 Spatial strategy	SS2 Sustainable place-making & SS3 Scale and location of growth
CS2 Housing provision, location and distribution	SS3 Scale and location of growth
CS3 Walton on Thames	SS2 Sustainable place-making & SS3 Scale and location of growth
CS4 Weybridge	
CS5 Hersham	
CS6 Whiteley Village	
CS7 East and West Molesey	
CS8 Thames Ditton, Long Ditton, Hinchley Wood and Weston Green	
CS9 Esher	
CS10 Cobham, Oxshott, Stoke D'Abernon and Downside	
CS11 Claygate	
CS12 The River Thames Corridor and its tributaries	INF8 River usage
CS13 Thames Basin Heaths Special Protection Area	ENV5 Thames Basin Heaths Special Protection Area
CS14 Green Infrastructure	ENV1 Green and blue infrastructure
CS15 Biodiversity	ENV6 Protecting, enhancing and recovering biodiversity
CS16 Social and Community Infrastructure	INF2 social and community uses
CS17 Local Character, Density and Design	SS2 Sustainable place-making and ENV9 Urban Design Quality
CS18 Town Centre uses	ECO3 Supporting our town, district and local centres
CS19 Housing type and size	HOU3 Housing mix
CS20 Older people	HOU6 Specialist housing
CS21 Affordable housing	HOU4 Affordable housing
CS22 Gypsies, Travellers and Travelling showpeople	HOU7 Gypsy, Roma, Traveller and Travelling showpeople accommodation
CS23 Employment land provision	SS3 Scale and location of growth
CS24 Hotels and tourism	ECO4 Promoting visitor attractions and arts and cultural venues
CS25 Travel and accessibility	INF6 sustainable travel & Parking SPD (updated)
CS26 Flooding	INF7 managing flood risk
CS27 Sustainable buildings	CC3 Sustainable design standards
CS28 Implementation and Delivery	Chapter 10 monitoring framework SS1 Responding to the climate emergency

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	SS2 Sustainable place-making SS3 Scale and location of growth
CS29 Monitoring	Chapter 10 monitoring framework

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A2 Glossary

This glossary does not provide legal definitions but acts as a guide to key planning terms.

Accessibility - The ability of people to move around an area and reach places and facilities, including elderly and disabled people, those with young children and those encumbered with luggage or shopping.

Active Frontage - A frontage to the public realm which is characterised by multiple entrances and windows (domestic, commercial or retail), allowing an interaction of people between the public realm and the premises facing the street.

Affordability - A measure of whether households can access or sustain the costs of private sector housing.

Affordable Housing - Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following: affordable housing for rent; starter homes; discounted market sales housing; other affordable routes to home ownership.

Air Quality Management Areas - Areas established by borough and district councils following local assessment of air quality where individual pollutants are forecast to exceed standards defined in the National Air Quality Strategy.

Allocated site - Land that is allocated in the Local Plan for a particular use and identified on the proposals map.

Allotment - A plot of land rented by an individual for growing vegetables or flowers.

Ancient or Veteran Tree - A tree which, because of its age, size and condition, is of exceptional biodiversity cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient but are old relative to other trees of the same species. Very few trees of any species reach the ancient-life stage.

Ancient Woodland - An area that has been wooded continuously since at least 1600 AD.

Appropriate Assessment - Required under the European Habitats Directive to assess the impact of plans on 'European Sites' of nature conservation importance. The Appropriate Assessment of the Elmbridge Local Plan has been published as a background document.

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Article 4 Direction - An Article 4 Direction is issued by a local planning authority to remove permitted development rights. The Council has a number of Article 4 Directions in place to require planning permissions to limit Office-to Residential conversions.

Authority Monitoring Report (AMR) A report prepared by local planning authorities assessing progress with and the effectiveness of a Local Plan.

Biodiversity (or short for 'biological diversity') - The whole variety of life on Earth encompassing variations of all genetic, species and ecosystems, including plants, animals, microorganisms and fungi.

Biodiversity Action Plan (BAP) - A strategy prepared for a local area aimed at conserving and enhancing biological diversity.

Biodiversity Opportunity Area (BOA) - An area that consists of a spatial concentration of already recognised and protected sites for wildlife conservation, inside a boundary that also includes further but as yet un-designated 'Priority habitat' types (plus some other essentially undeveloped land uses); all of which have common and contiguous geological, soil, hydrological and topographic characteristics to those of the already recognised and protected sites.

Brownfield Land / Previously Developed Land - Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

Building Regulations - Building Regulations are minimum standards for design, construction and alterations that are required for most building work in the UK. Building Regulations ensure that the policies set out in legislation regarding building standards are carried out.

Building Research Establishments Environmental Assessment Method (BREEAM) - Used to assess the environmental performance of both new and existing buildings.

Caravan - As defined in the Caravan Sites and Control of Development Act 1960, modified 1968 and 2006. In summary, caravans must be capable of being moved in

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one or two pieces, either on their own wheels or by being towed or transported by another vehicle, and must not be more than 20 metres in length, 6.8 metres in width, and 3.05 metres from floor to the ceiling internally. Caravans may also be referred to as Mobile Homes or Park Homes, which are covered by the same definition.

Carbon Dioxide (CO₂) - A gas found naturally in the Earth's atmosphere and also produced as a result of the burning of wood and fossil fuels.

Carbon Footprint - A measure of the impact human activities have on the environment in terms of the amount of greenhouse gases produced, measured in units of carbon dioxide.

Climate Change - Long-term changes in temperature, precipitation, wind and all other aspects of the Earth's climate. Often regarded as a result of human activity and fossil fuel consumption.

Climate Emergency - A situation in which urgent action is required to reduce or halt climate change and avoid potentially irreversible environmental damage resulting from it.

Combined Heat and Power (CHP) - A system which generates electricity and utilises the heat produced as a by-product in a cost effective and environmentally responsible way.

Community Facilities (also see **Social and Community Infrastructure**) - These can include, but are not limited to, community / village halls or buildings, cultural facilities, places of worship, pubs and statutory services such as health and education.

Community Infrastructure Levy (CIL) - A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.

Conservation Area - Areas of special architectural or historic interest, the character or appearance of which is desirable to conserve and, where possible, enhance. They are normally designated by a district/borough council. Stricter planning controls operate within conservation areas, including works to trees. New development will be expected to conserve, and, where possible, enhance the character or appearance of the area.

Contaminated Land - Land that has been polluted or harmed in some way making it unfit for safe development and usage unless cleaned.

The Council – Elmbridge Borough Council.

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Cumulative Effect - A number of developments in a locality or a continuous activity over time that together may have an increased impact on the environment, local infrastructure and services, or the economy.

Curtilage - A legal term relating to an area of land associated with a building. Defining the extent of a building's curtilage can be a complex matter and is considered on a case by case basis.

Deliverable - To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.

Density - In the case of residential development, a measurement of either the number of habitable rooms per hectare or the number of dwellings per hectare.

Developable - To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

Development - Development is defined under the 1990 Town and Country Planning Act as 'the carrying out of building, engineering, mining or other operation in, on, over or under land, or the making of any material change in the use of any building or other land.'

Development Management Policies - The matters relating to site specific design issues including, but not limited to, access, layout and amenity of neighbours.

Development Plan - A document setting out the local planning authority's policies and proposals for the development and use of land and buildings in the authority's area. This is defined in section 38 of the Planning and Compulsory Purchase Act 2004 and includes adopted Local Plans and neighbourhood plans.

Dwelling - A self-contained building or part of a building used as a residential accommodation and usually housing a single household.

Employment Land - Land in use or last used by a trade or business. This includes office, industrial, storage and distribution (warehousing) uses. Retail, food and beverage uses are employers but are usually referred to as town centre uses.

Environment Agency - A Government body that aims to prevent or minimise the effects of pollution on the environment and issues permits to monitor and control activities that handle or produce waste. It also provides up-to-date information on waste management matters and deals with other matters such as water issues including flood protection advice.

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Evidence Base - The information and data gathered by local authorities to justify the 'soundness' of the policy approach set out in Local Development Documents, including physical, economic, and social characteristics of an area.

Extra Care Housing - Housing designed with the needs of older people in mind and with varying levels of care and support available on site. People who live in Extra Care housing have their own self-contained homes and benefit from communal facilities being available on site. Properties can be rented, owned or part owned/part rented. Extra Care is also known as assisted living or 'housing with care'.

Fabric First - A 'fabric first' approach to building design involves maximising the performance of the components and materials that make up the building fabric itself, before considering the use of mechanical or electrical building services systems.

Flood Risk Assessment (FRA) - A site-specific assessment of all forms of flood risk associated with the development site and the impact of proposed development in terms of flooding both on and off site.

Green Belt (GB) - A national designation of land around certain cities and large built-up areas, which aims to prevent urban sprawl by keeping land permanently open and it is not an environmental designation. Green Belts are defined in a local planning authority's development plan. The purpose of designating the land as Green Belt is to:

1. Check the unrestricted sprawl of large built up areas
2. Prevent neighbouring towns from merging
3. Safeguard the countryside from encroachment
4. Preserve the setting and special character of historic towns
5. Assist urban regeneration by encouraging the recycling of derelict and other urban land.

Green Infrastructure - A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

Greenfield Land or Site - Greenfield land is land which has never been previously developed. This could be both within and outside built-up areas.

Greenhouse Gas Emissions - The production of gases which naturally form in the atmosphere and serve to insulate the earth including water vapour, Carbon Dioxide (CO₂), methane, nitrous oxide and ozone.

Gypsies and Travellers - Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or

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dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

Habitable Room - Habitable rooms include all rooms normally used for living or sleeping in and kitchens that have a floor area over 13 sqm. Habitable rooms over 20 sqm will be counted as two rooms. Bed sitting rooms will be counted as 1.5 habitable rooms. Small kitchens (13 sqm or less), utility rooms, halls, bathrooms, balconies, toilets, landings and garages are excluded. Any room above the ground floor level with an external window and with a floor area of 6.5 sqm or more capable of future conversion to a bedroom will be counted as a habitable room.

Heritage Asset - A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

Historic Environment - All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped, planted or managed flora.

Historic Parks and Gardens - A park or garden of special historic interest. Graded I (highest quality), II* or II. Designated by Historic England.

Home Quality Mark - An independently assessed certification scheme for new homes. It awards certificates with a simple star rating for the standard of a home's design, construction and sustainability.

Household - One person living alone; or a group of people (not necessarily related) living at the same address who share cooking facilities and share a living room or sitting room or dining area.

Housing Mix - The provision of housing, including affordable and market homes of the type, size and tenure needed by residents and in demand in the market.

Housing Trajectory - A chart showing the indicative amount of housing to be delivered in each year of the plan period.

Infill development - The development of a small gap in an otherwise continuous built-up frontage, or the small-scale redevelopment of existing properties within such a frontage. Infilling does not include built development within back gardens or other similar land that does not form part of an established built-up frontage.

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Infrastructure - Basic services necessary for development to take place, for example roads, electricity, sewerage, water, education, open space, health facilities and other community facilities.

Infrastructure Delivery Plan (IDP) - The Infrastructure Delivery Plan identifies the key infrastructure required to support development within the Borough over the Plan period and how it will be delivered.

Intensification - More frequent usage, e.g. a tennis court at a school could be used by other community groups outside school hours.

Knowledge-based business - High technology industries (such as computers and office equipment and pharmaceuticals) and knowledge-based services (for example telecommunications, information technology, finance, insurance and business services), which are important to economic development.

Land Availability Assessment - identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period.

Listed Building - A building that is included on the List of Buildings of Special Architectural or Historic Interest administered by Historic England on behalf of the Secretary of State for Digital, Culture, Media and Sport. Listed buildings are graded I, II* or II with grade, I being the highest. Buildings within the curtilage of a listed building constructed before 1948 are also protected. The significance of a listed building may be external and/or internal.

Local Development Scheme (LDS) - The Council's published plan for the preparation of Local Development Documents. It sets out a 3-year programme and includes information on consultation dates.

Local Distinctiveness - The particular positive feature of a locality that contributes to its special character and sense of place. Distinguishes one local area from another.

Local Nature Reserve (LNR) - An area designated by local authorities, in consultation with English Nature, under the National Parks and Access to the Countryside Act 1949, to provide opportunities for educational use and public enjoyment, in addition to protecting wildlife or geological and physiographical features of special interest.

Local Green Space (LGS) - Green areas or open spaces which are demonstrably special to a local community and hold particular local significance. This can be because of beauty, historic significance, recreational value (including as a playing

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field), tranquillity or richness of wildlife. They are in close proximity to the communities that they serve, are local in character and do not consist of extensive tracts of land.

Local Housing Need - The number of homes identified as being needed through the application of the standard method set out in Planning Practice Guidance.

Local Plan - The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.

Local Planning Authority (LPA) - The public authority whose duty it is to carry out specific planning functions for a particular area. All references to local planning authority apply to the borough or district council, London borough council, county council, Broads Authority, National Park Authority and the Greater London Authority, to the extent appropriate to their responsibilities.

M4 (2) Accessible and Adaptable Dwellings - An optional requirement as defined in the Building Regulations. M4 (2) will be met where a new dwelling makes reasonable provision for most people to access the dwelling and incorporates features that make it suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users.

M4 (3) Wheelchair User Dwellings - An optional requirement as defined in the Building Regulations. M4 (3) 'Wheelchair User Dwellings' include two different types of dwelling as follows:

1. Wheelchair adaptable dwellings which must be designed to allow simple adaptation of the dwelling to meet the needs of occupants who use wheelchairs (M4 (3)(2)(a)); and
2. Wheelchair accessible dwellings which must be designed and built with the necessary features/adaptations included to enable it to meet the needs of occupants who use wheelchairs at the point of completion (M4 (3) (2)(b)).

Major Development - For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000sqm or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

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Market Housing - Private housing for rent or for sale, where the price is set in the open market.

Material Consideration - A matter that should be taken into account in deciding a planning application or on an appeal against a planning decision.

Maximum Parking Standards - A maximum number of off-street car parking spaces permitted for a development by land use type and its scale.

Mean-time (Pop-up) Use – Usually a shop or a store that is deliberately temporary.

Minimum Space Standards - A nationally described space standard introduced by the Government, setting out detailed guidance on the minimum size of new homes.

Mitigation Measures - Those which are put into place to reduce or eliminate any harm caused, for example contributions to the provision of Suitable Accessible Natural Green Space (SANG) or towards the Strategic Access Management and Monitoring (SAMM) with regards to Thames Basin Heaths.

Mixed Use Development - Provision of a mix of complementary uses, such as residential, community and/or leisure uses, on a site or within a particular area.

Multi-Use Games Area (MUGA) - An enclosed area, using a synthetic grass or hard surface for playing sports, for example five-a-side football or netball.

Natural England - Government advisors on nature conservation issues in England.

Older People - People over retirement age, including the active, newly-retired through to the very frail elderly, whose housing needs can encompass accessible, adaptable general needs housing for those looking to downsize from family housing and the full range of retirement and specialised housing for those with support or care needs.

Open Space - All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Parking Stress - A pressure on local highway network negatively affecting amenities of local residents caused by limited capacity of on-street parking provision in the area. Factors to take into account when considering whether an area experiences on-street parking stress will be the levels of parking on nearby roads, the availability of spaces in public car parks and whether there are any particular pressures caused by existing uses or developments in the area.

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People with Disabilities - People have a disability if they have a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs.

Permitted Development (PD) - Permission to carry out certain limited forms of development without the need to make an application to a local planning authority, as granted under the terms of the Town and Country Planning (General Permitted Development) Order.

Pitch (Gypsy and Traveller) - Area accommodating a single household on a gypsy and traveller site, normally accommodating one static and one travelling caravan, utility block and space for parking and ancillary residential uses. The number of permitted caravans may be defined through planning conditions and/or the caravan site licensing.

Plan Period - The period for which the Local Plan covers: 2022-2037.

Planning Obligations and Agreements - Legal agreements between a local planning authority and a developer (also known as "Section 106" agreements), or undertakings offered unilaterally by a developer ("Unilateral Undertakings"), that ensure that certain extra works related to a development are undertaken or appropriate contributions are made.

Plot (Travelling Showpeople) - Area accommodating a single household on a travelling showpeople site (often called a 'yard'), normally accommodating living accommodation (including one or more caravans) and areas for storage and maintenance of fairground rides and equipment.

Pop-up Use – please see the definition of **Mean-time (Pop-up) Use** above.

Previously Developed Land (PDL) – please see the definition of **Brownfield Land** above.

Rainwater Harvesting - Rainwater harvesting is the accumulation and storage of rainwater for re-use on site, rather than allowing it to run off the site.

Scheduled Ancient Monument - Nationally important monuments, usually archaeological remains, which enjoy greater protection against inappropriate development through the Ancient Monuments and Archaeological Areas Act 1979.

Self-build and Custom-build Housing - Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual.

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Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.

Shared Ownership - A scheme aimed at providing first time buyers, who cannot afford to buy a home suited to their needs outright. The buyer purchases a part of the equity, paying rent on the remainder, which is usually retained by an RSL.

Sheltered Housing - Housing specifically for older and/or disabled people. Includes a block or group of houses with resident or visiting warden, and individual houses, bungalows and flats, which receive support from a mobile warden or pendant (emergency) alarm service.

Site of Nature Conservation Importance (SNCI) - Locally important sites for nature conservation selected by the Surrey Local Sites Partnership, a sub-group of the Surrey Nature Partnership. It is an area that has been designated (non-statutory) as being of county or regional wildlife value.

Site of Special Scientific Interest (SSSI) - A site designated in the UK to be of importance for nature conservation due to the presence of a rare or good example of fauna and flora.

Social Rented Housing - Affordable housing provided for rent at below market levels to eligible groups on housing waiting lists.

Special Area of Conservation (SAC) - SACs are areas which have been given special protection under the European Union's Habitats Directive. They provide increased protection to a variety of wild animals, plants and habitats and are a vital part of global efforts to conserve the world's biodiversity.

Special Protection Area (SPA) - Areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. They are European designated sites, classified under the Birds Directive.

Specialist housing - Suitable specialist forms of accommodation to cater for more vulnerable members of society – people with disabilities, mental health problems and long term conditions, including people who have developed or may develop care needs as they become older.

Strategic Employment Land - Designated as protected land in employment uses in the Borough.

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Strategic Flood Risk Assessment (SFRA) - An assessment of flood risk for the Borough. The objective is to collate all sources of flooding, to delineate flood zones, including the functional floodplain, to help apply the Sequential Test and advise on the Exception Test and site specific Flood Risk Assessments.

Strategic Housing Land Availability Assessment (SHLAA) – An assessment that identifies sites with potential for housing. The assessment is an important evidence source to inform plan making but does not in itself determine whether a site should be allocated for housing development.

Strategic Housing Market Assessment (SHMA) - An assessment of the estimated demand for market housing and need for affordable housing in a defined geographical area, in terms of distribution, house types and sizes and the specific requirements of particular groups and which considers future demographic trends.

Suitable Alternative Natural Greenspace (SANG) - An open space designed to provide an enjoyable natural environment for recreation as an alternative to a Special Protection Area.

Supplementary Planning Document (SPD) - Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

Sustainable development - The objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs, ensuring a better quality of life for everyone now and for generations to come. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure
- social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

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- environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Sustainable Drainage System (SuDS) - Methods of management practices and control structures that are designed to drain surface water in a more sustainable manner than some conventional techniques.

Sustainable Transport Modes - Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport.

Target Emission Rate - A minimum allowable standard, set out in Building Regulations (see above), for the energy performance of a building in terms of its carbon dioxide emissions.

Travelling Showpeople - Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.

Tree Preservation Order (TPO) - A mechanism for securing the preservation of single or groups of trees of acknowledged amenity value. A tree subject to a tree preservation order may not normally be topped, lopped or felled without the consent of the local planning authority.

Use Class Order - The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories.

Viability Assessment – A financial viability assessment that looks at the scale of obligations and policy requirements applied to development demonstrating that the proposal provides competitive returns to a willing landowner and developer to enable the development to be deliverable/come forward.

Windfall site - A site not specifically identified in the development plan that unexpectedly becomes available for development.

A3 Spatial Portrait of the Borough

Elmbridge is a Surrey borough located in the South East region, approximately 17 miles south west of Central London. Located almost entirely within the bounds of the M25 motorway, the River Thames forms the northern boundary of the borough separating Elmbridge from the London Borough of Richmond-upon-Thames. To the east is the Royal Borough of Kingston upon-Thames. The remainder of the borough's boundary is shared with the Surrey boroughs of Guildford, Runnymede, Spelthorne and Woking and the district of Mole Valley.

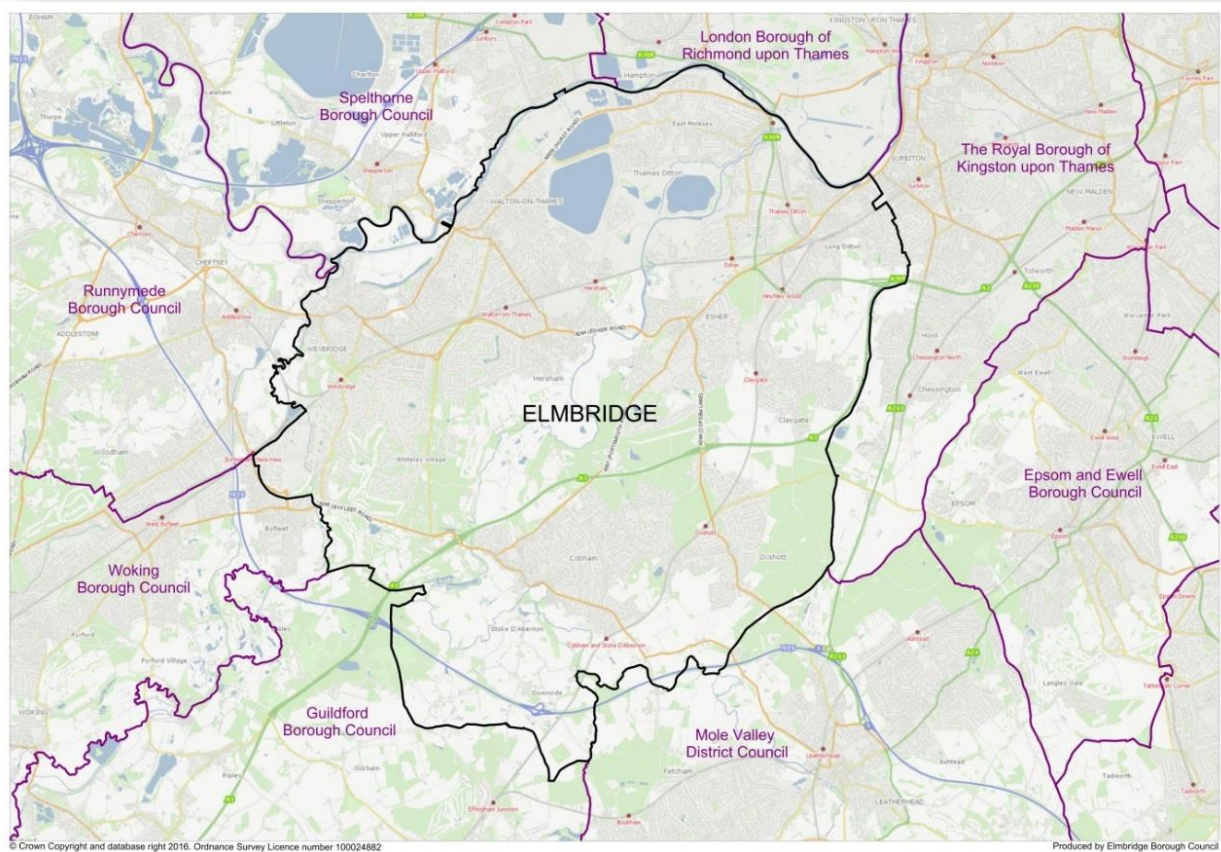


Figure 10: Elmbridge Borough and neighbouring boroughs and districts

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Due to its location and proximity to, Elmbridge benefits from good accessibility to Central London via the M25/A3 and the rail and is also situated within easy reach of both Heathrow and Gatwick airports. The M3 is located to the north west of the borough. Coupled with good passenger rail links to central London, the borough's transportation network has proved attractive to a wide variety of individuals and businesses. Thus, the local economy is comparatively strong, and unemployment low. Until the Covid-19 pandemic, commuting played a significant part for much of the workforce, with both radial and orbital journeys into London and around the region.



Figure 11: Elmbridge Borough transport link

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Covering just over 9,634 hectares (37.2 square miles), Elmbridge is home to approximately 130,000 residents living across the vibrant towns of Walton-on-Thames and Weybridge; and the suburban settlements of Esher, Hersham, East and West Molesey, Hinchley Wood and the Dittons, Cobham, Oxshott, Stoke D’Abernon and Downside, and Claygate. Elmbridge has only one civil parish, Claygate, with the remainder of the area being under two rather than three tiers of local government. Surrey County Council providing public services such as education, highways and social services.

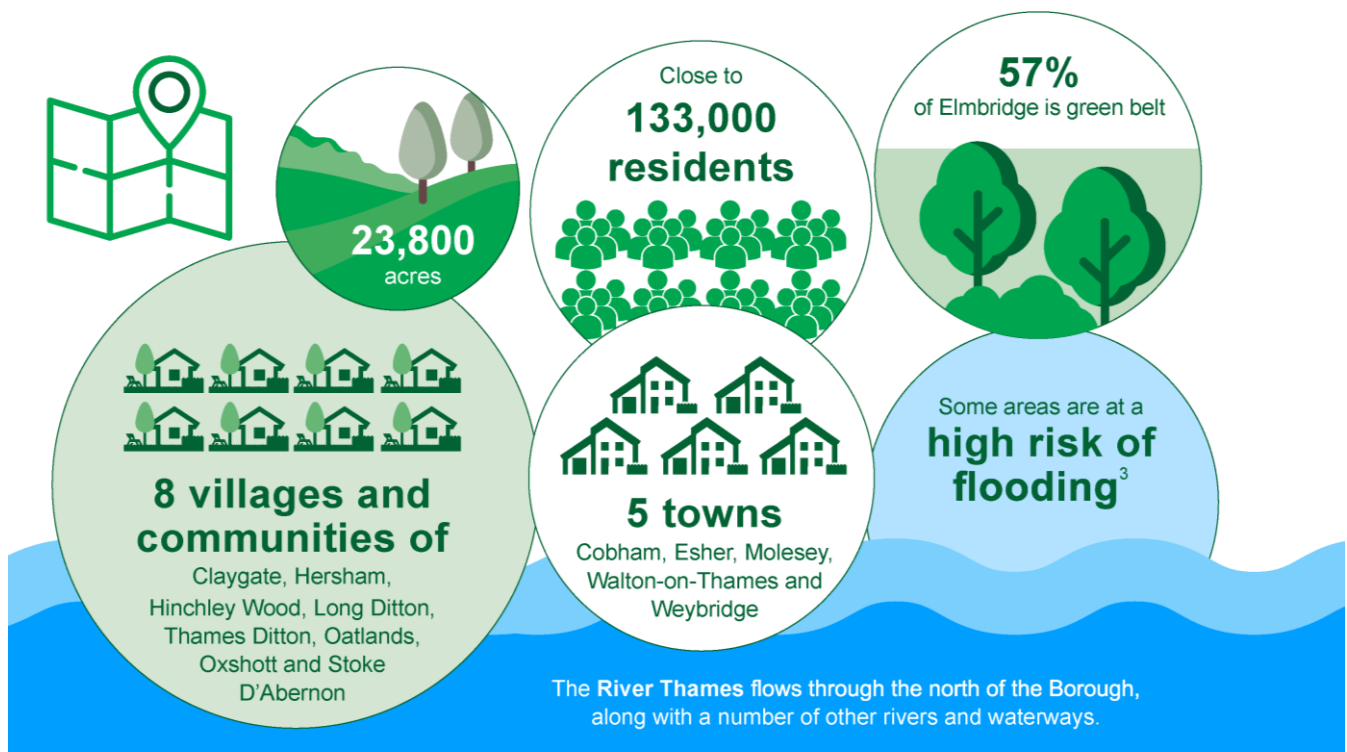


Figure 12: Elmbridge Location and Geography

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Elmbridge's urban areas are surrounded by the Metropolitan Green Belt covering 57% of the land in the Borough that contributes to the area's more spacious and less urban character. A limited area to the southwest of the Borough is designated as the Thames Basin Heaths Special Protection Area (SPA) and the borough is committed to protect it and to deliver a strategic package of measures to mitigate the potential adverse effects of new development on the SPA in order to protect its ecological integrity.

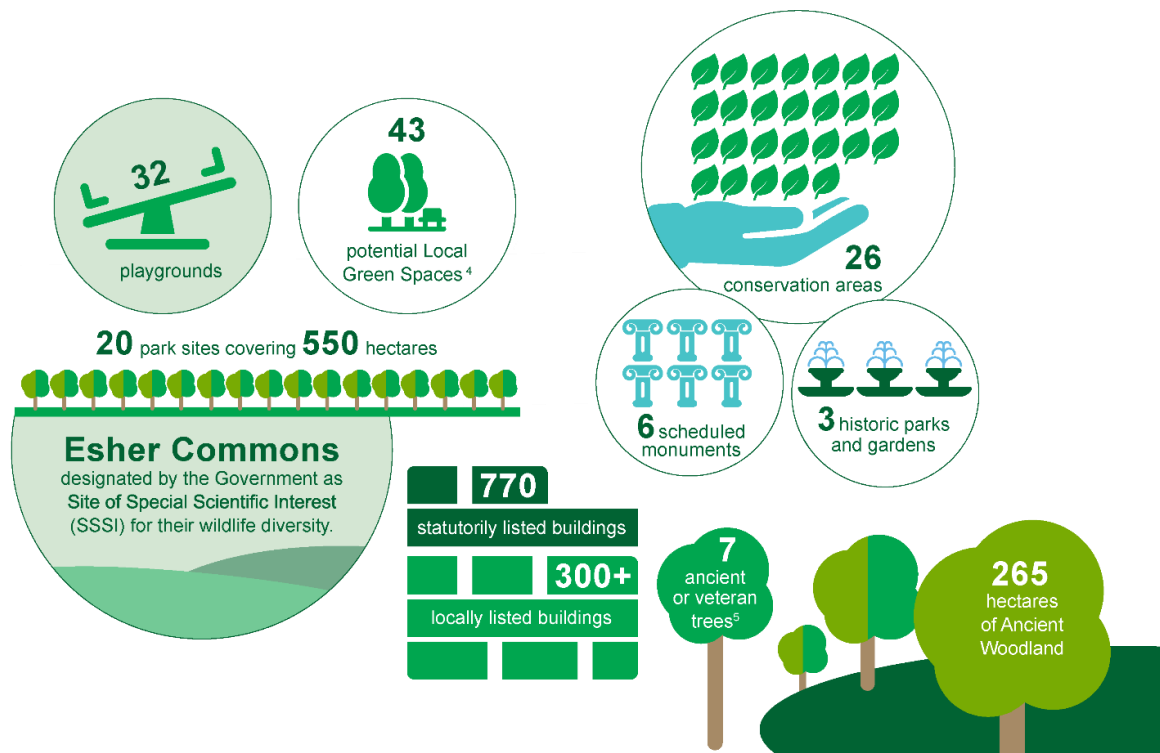
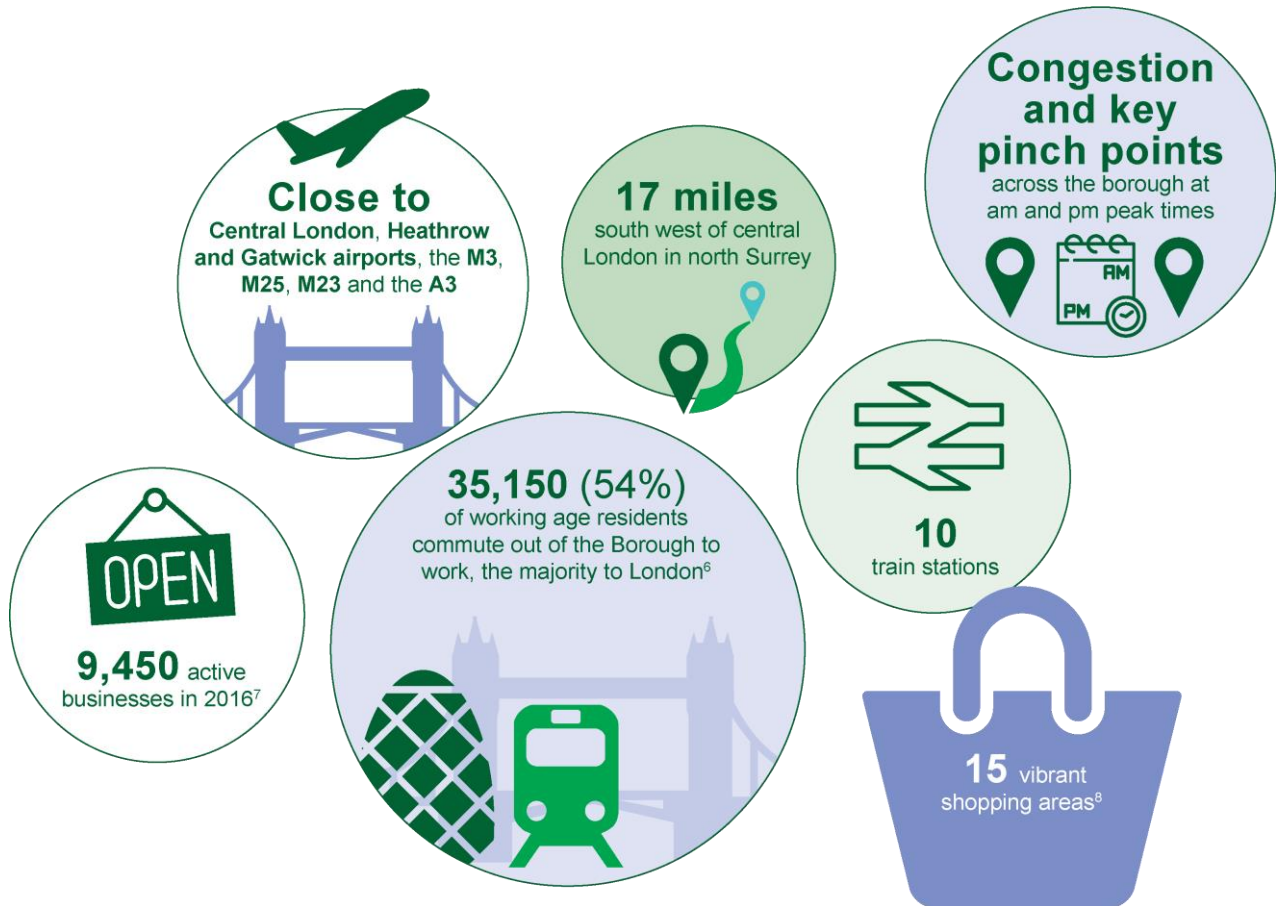


Figure 13: Elmbridge Character and Environment

Elmbridge Borough offers visitor attractions including Mercedes-Benz World in Brooklands, which is nested within the world's first of its kind purpose built motor racing circuit, Sandown Park Racecourse, Claremont and Painshill Parks.

The borough is a home to internationally renowned businesses such as Sony, Procter & Gamble, Samsung, Toshiba, Amazon, JTI, Cargill, Air Products or GlaxoSmithKline. The average median gross weekly pay of Elmbridge residents is higher than of those who work in Elmbridge, indicating that a considerable proportion of residents commute to highly paid jobs within Greater London. The population of the area is relatively affluent and highly skilled and this, alongside the quality of the environment and ease of access to London, has resulted in property prices that reflect those of London rather than those of the rest of Surrey. Excluding the Greater London region, Elmbridge has the highest average house prices in the country by Local Authority and is noted for its very high quality of life.



⁴Figure 14: Elmbridge economy and connectivity

⁴ 2011 Census

⁴ Interdepartmental Business Register, 2016, Office of National Statistics

⁴ Elmbridge Annual Monitoring Report 2017/18

A4 Local Green Spaces

(see Policy ENV3 – Local Green Spaces)

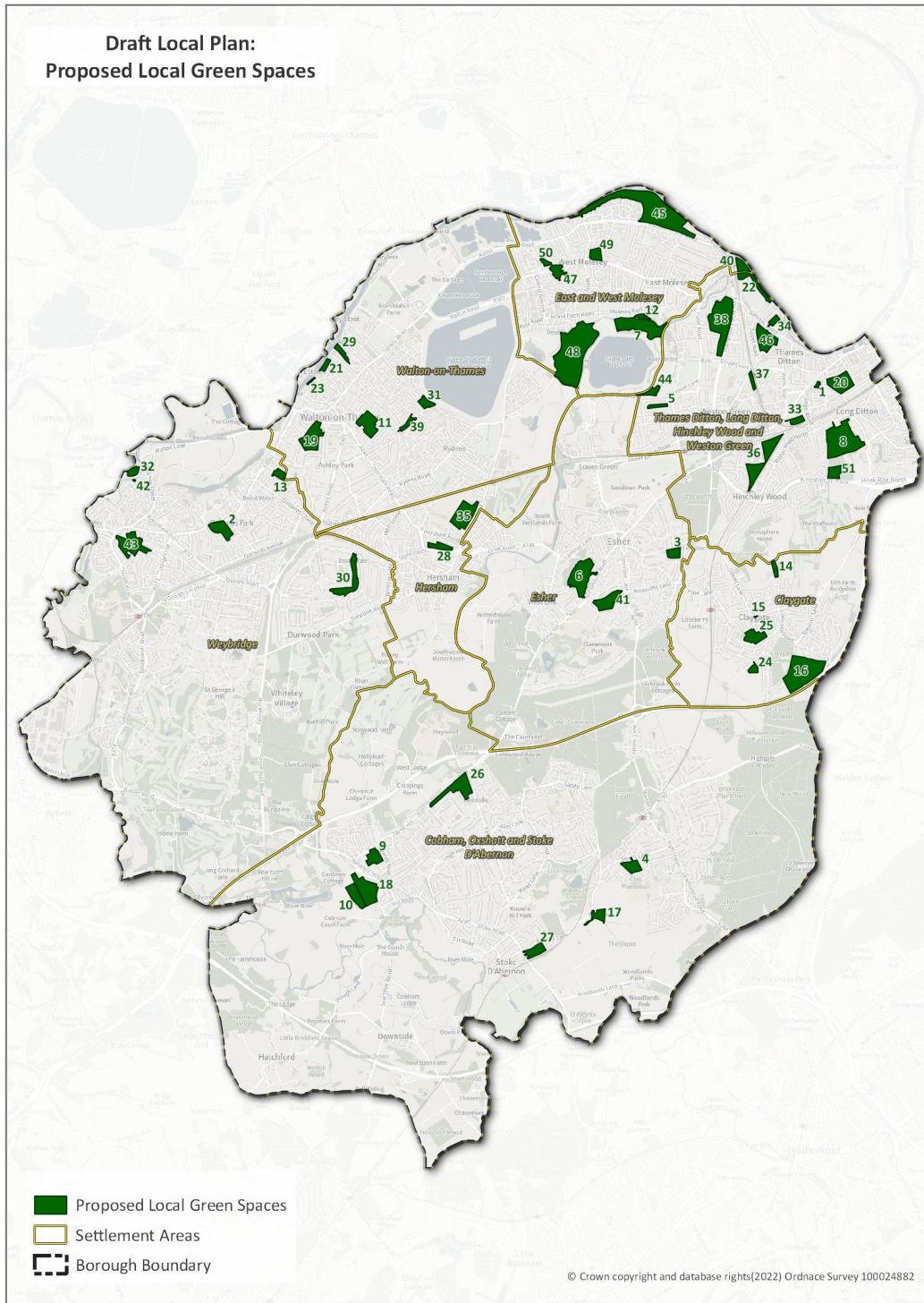


Figure 15: Proposed Local Green Spaces

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List of proposed Local Green Spaces

Label ID	Site Name	Settlement Area
1	Rythe Court Open Space	Thames Ditton, Long Ditton, Hinchley Wood and Weston Green
2	Oatlands Recreation Ground	Weybridge
3	Esher Cricket Club	Esher
4	Oxshott Village Sports Club	Cobham, Oxshott and Stoke D'Abernon
5	Ember Sports Club	Thames Ditton, Long Ditton, Hinchley Wood and Weston Green
6	Moore Place Golf Club	Esher
7	The Wilderness - B	East and West Molesey
8	Stokes Field and surrounding community uses	Thames Ditton, Long Ditton, Hinchley Wood and Weston Green
9	Cobham Recreation Ground	Cobham, Oxshott and Stoke D'Abernon
10	South side of Anvil Lane	Cobham, Oxshott and Stoke D'Abernon
11	Elm Grove Recreation Ground	Walton on Thames
12	The Wilderness - A	East and West Molesey
13	Cricket Way	Weybridge
14	Telegraph Lane Allotments	Claygate
15	The Green	Claygate
16	Barwell	Claygate
17	The Furze	Cobham, Oxshott and Stoke D'Abernon
18	Leg of Mutton Field	Cobham, Oxshott and Stoke D'Abernon
19	Walton on Thames Cricket Club	Walton on Thames
20	Long Ditton Recreation Ground	Thames Ditton, Long Ditton, Hinchley Wood and Weston Green
21	Riverhouse Gardens	Walton on Thames
22	Albany Reach	Thames Ditton, Long Ditton, Hinchley Wood and Weston Green
23	Land north of Hillrise flats	Walton on Thames
24	Vale Road Allotments	Claygate
25	Claygate Recreation Ground	Claygate
26	Land fronting Portsmouth Road	Cobham, Oxshott and Stoke D'Abernon
27	Stoke D'Abernon Recreation Ground	Cobham, Oxshott and Stoke D'Abernon
28	Hersham Recreation Ground - A	Hersham
29	Felix Road Recreation Ground	Walton on Thames
30	Wooded areas in Burwood Park - D	Weybridge
31	Shaw Drive Green	Walton on Thames
32	Whittets Ait	Weybridge
33	Willowbank - Malden DMSE & Scout hut environs	Thames Ditton, Long Ditton, Hinchley Wood and Weston Green
34	Summer Road Recreation Ground	Thames Ditton, Long Ditton, Hinchley Wood and Weston Green

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35	Coronation Recreation Ground	Hersham
36	Lynwood Road Recreation Ground	Thames Ditton, Long Ditton, Hinchley Wood and Weston Green
37	The Dell	Thames Ditton, Long Ditton, Hinchley Wood and Weston Green
38	Old Tiffinians Association Sports Ground and Hampton Court Way Allotments	Thames Ditton, Long Ditton, Hinchley Wood and Weston Green
39	George Froude Park	Walton on Thames
40	Cigarette Island	East and West Molesey
41	Clare Hill Golf Club	Esher
42	Church Walk Open Space	Weybridge
43	Churchfield Road Allotments, Sports Ground & play area	Weybridge
44	Emberside recreation ground	Thames Ditton, Long Ditton, Hinchley Wood and Weston Green
45	Hurst Meadow and Hurst Park Open Space	East and West Molesey
46	Old Pauline Sports Ground	Thames Ditton, Long Ditton, Hinchley Wood and Weston Green
47	Grovelands Recreation Ground	East and West Molesey
48	Molesey Heath	East and West Molesey
49	West Molesey Recreation Ground	East and West Molesey
50	Bishop Fox Area A	Molesey East and West
51	One Tree Hill	Dittons

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A5 Housing Trajectory

Housing Land Supply 2022-2037 (Indicative Trajectory)

Approach	Under Construction at March 31 2022	Planning Permissions not yet implemented at 31 March 2022	LAA sites August 2022-2027 (1-5 years)	LAA sites August 2027- 2032 (6-10 years)	LAA sites August 2032- 2037 (11-15 years)	Small Site Windfall* Allowance	Total Estimated Capacity	Local Housing Need (LHN)	Surplus / Shortfall
1	868	1582	1067	935	2125	987	7,564	9,705	-2,141 -22%
2**	868	1424	907	795	1806	987	6,787	9,705	-2,918 -30%

* Windfall figure - refer to paragraph 3.28 of the Land Availability Assessment 2022 for calculation and assumptions

** Non-implementation discount rates applied - refer to paragraph 3.41 of the Land Availability Assessment 2022 for assumption

A6 Nationally Prescribed Space Standards

1. This standard deals with internal space within new dwellings and is suitable for application across all tenures. It sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height.
2. The requirements of this standard for bedrooms, storage and internal areas are relevant only in determining compliance with this standard in new dwellings and have no other statutory meaning or use.
3. The standard Gross Internal Areas set out in Table 1 are organised by storey height to take account of the extra circulation space needed for stairs to upper floors and deal separately with one storey dwellings (typically flats) and two and three storey dwellings (typically houses).
4. Individual dwelling types are expressed with reference to the number of bedrooms (denoted as 'b') and the number of bedspaces (or people) that can be accommodated within these bedrooms (denoted as 'p'). A three bedroom (3b) home with one double bedroom (providing two bed spaces) and two single bedrooms (each providing one bed space) is therefore described as 3b4p.
5. This allows for different combinations of single and double/twin bedrooms to be reflected in the minimum Gross Internal Area. The breakdown of the minimum Gross Internal Area therefore allows not only for the different combinations of bedroom size, but also for varying amounts of additional living, dining, kitchen and storage space; all of which are related to the potential occupancy.
6. Relating internal space to the number of bedspaces is a means of classification for assessment purposes only when designing new homes and seeking planning approval (if a local authority has adopted the space standard in its Local Plan). It does not imply actual occupancy or define the minimum for any room in a dwelling to be used for a specific purpose other than in complying with this standard.
7. Minimum floor areas and room widths for bedrooms and minimum floor areas for storage are also an integral part of the space standard. They cannot be used in isolation from other parts of the design standard or removed from it.
8. The Gross Internal Area of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls⁵ that enclose the dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. The Gross Internal Area should be measured and denoted in square metres (sqm).

⁵ The internal face of a perimeter wall is the finished surface of the wall. For a detached house, the perimeter walls are the external walls that enclose the dwelling, and for other houses or apartments they are the external walls and party walls.

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9. The Gross Internal Areas in this standard will not be adequate for wheelchair housing (Category 3 homes in Part M of the Building Regulations) where additional internal area is required to accommodate increased circulation and functionality to meet the needs of wheelchair households.
10. The standard requires that:
 - a. the dwelling provides at least the gross internal floor area and built-in storage area set out in Table 1 below
 - b. a dwelling with two or more bedspaces has at least one double (or twin) bedroom
 - c. in order to provide one bedspace, a single bedroom has a floor area of at least 7.5sqm and is at least 2.15m wide
 - d. in order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5sqm
 - e. one double (or twin bedroom) is at least 2.75m wide and every other double (or twin) bedroom is at least 2.55m wide
 - f. any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1sqm within the Gross Internal Area)
 - g. any other area that is used solely for storage and has a headroom of 900-1500mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900mm is not counted at all
 - h. a built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements but should not reduce the effective width of the room below the minimum widths set out above. The built-in area in excess of 0.72sqm in a double bedroom and 0.36sqm in a single bedroom counts towards the built-in storage requirement
 - i. the minimum floor to ceiling height is 2.3m for at least 75% of the Gross Internal Area

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Minimum gross internal floor areas and storage (sqm)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

* Notes:

1. Built-in storage areas are included within the overall GIAs and include an allowance of 0.5m for fixed services or equipment such as a hot water cylinder, boiler or heat exchanger.
2. GIAs for one storey dwellings include enough space for one bathroom and one additional WC (or shower room) in dwellings with 5 or more bedspaces. GIAs for two and three storey dwellings include enough space for one bathroom and one additional WC (or shower room). Additional sanitary facilities may be included without increasing the GIA provided that all aspects of the space standard have been met.
3. Where a 1b1p has a shower room instead of a bathroom, the floor area may be reduced from 39m to 37m, as shown bracketed.
4. Furnished layouts are not required to demonstrate compliance.

Shaping Elmbridge A New Local Plan



Establishing Local Housing Need

May 2022



Elmbridge

Borough Council

... bridging the communities ...



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1 Introduction

Purpose of this paper

- 1.1 This paper is one in a series of papers that set out the rationale and background to the spatial strategy and other policy directions for the borough as set out in the draft Elmbridge Local Plan 2021 to 2037. This paper covers the issue of housing and the basis for the local housing need figure for the borough as set through the Government's [standard method](#).
- 1.2 The purpose of the paper is to explain how the local housing need figure for the borough has been established including, national planning policy and guidance that directs this issue, in addition to information; evidence and feedback that have informed the choices made in regard to following the approach of the standard method.
- 1.3 This paper was first produced in May 2021, to support Councillors in their consideration of the borough's housing requirement and what the starting point for this should be. Since then, the Government has published a revised National Planning Policy Framework (NPPF) (July 2021) and the borough's local housing need as calculated by the standard method changed. As such, the Council has updated the paper insofar as these two points. All other references to data e.g. other local plans, is set at March 2021.

2 Policy Context

National policy & guidance

- 2.1 The [National Planning Policy Framework \(NPPF\)](#) was revised by the Government on 20 July 2021. It sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development should be produced.
- 2.2 As required by the NPPF (paragraph 11) the council is required to prepare a Local Plan that positively seeks opportunities to meet the development needs of the area, and that the strategic policies within the plan should, as a minimum, provide for objectively assessed needs for housing, as well as needs that cannot be met within neighbouring areas.
- 2.3 The need to plan for our development needs is set within the context of the Government's objective of seeking to significantly boost the supply of homes (paragraph 60 of the NPPF).
- 2.4 In regard to housing need, the NPPF (paragraph 61) states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in [national planning guidance](#). It continues that only in **exceptional circumstance** would an alternative approach which also reflects current and future demographic trends and markets signals, be justified. In addition to the local housing need figure, the NPPF also requires that any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
- 2.5 Applying the standard method (2021) the local housing need for Elmbridge is 647 dwellings per annum (9,705 dwellings over a 15-year period). Full details of how the figure is calculated are set out in Section 3 of this paper.

The relationship between local housing need and the Local Plan housing requirement

- 2.6 In regard to the standard method and its relationship with the housing target for the borough (as determined by the Local Plan process), it is important to understand that there is a clear distinction.
- 2.7 Paragraph 66 of the NPPF states that a local authority should establish a housing requirement figure for their whole area, which shows the extent to

which their own housing need figure can be met over the plan period, as well as any additional needs that cannot be within neighbouring areas.

- 2.8 As set out in [Planning Practice Guidance](#) (hereon referred to as 'Guidance') it is also stated that:

“Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations...” (paragraph: 001 Reference ID: 2a-001-20190220).

and,

“The National Planning Policy Framework expects strategic policy-making authorities to follow the standard method in this guidance for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for in a way which addresses projected household growth and historic under-supply. The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement figure”. (paragraph: 001 Reference ID: 2a-002-20190220).

- 2.9 The Government has therefore made it clear both in the NPPF and Guidance that the local housing need figure as calculated by the standard method is not automatically transposed into a Local Plan to be the housing requirement for the authority. Government recognises that there are constraints to meeting needs and sets out in Guidance whether or not plan-makers should override constraints such as Green Belt, when carrying out the assessment (land availability) to meet identified need. Guidance states:

“Plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations. For example, assessments should reflect the policies in footnote 6 of the National Planning Policy Framework, which sets out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in the plan areas (such as Green Bet and other protected areas)”. (paragraph: 002 Reference ID: 3-002-20190772).

An alternative approach to establishing local housing need

- 2.10 In support of paragraph 61 of the NPPF and Government's expectation that Local Planning Authorities (LPAs) would use the standard method to establish the local housing need figure for their area is Guidance (Paragraph: 002 Reference ID: 2a-002-20190220). The Guidance also reiterates that the use of the standard method is not mandatory and that an alternative approach could be applied only in exceptional circumstances. Nevertheless, it is stated (Paragraph: 003 Reference ID: 2a-003-20190220) that LPAs can expect the application of an alternative approach to be scrutinised more closely at examination.
- 2.11 Guidance does not set out what is considered to constitute the exceptional circumstances whereby an alternative approach to calculating local housing need can be applied. However, it does set out situations whereby an alternative might be considered appropriate.
- 2.12 Principally, this applies in circumstances where it is appropriate to consider whether actual housing need is **higher** than the standard method indicates. Circumstances where this may be appropriate are set out in Guidance to include (but are not limited to), situations where increases in housing need are likely to exceed past trends because of:
- Growth strategies for the area that are likely to be deliverable, for example, where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
 - Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
 - An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.
- 2.13 Guidance also references the need to consider whether assessment of previous levels of housing delivery in an area or needs assessment (such as a Strategic Housing Market Assessment (SHMA)) indicate a higher level of local housing need is required than the standard method.
- 2.14 Turning back to the use of an alternative model for assessing local housing need, Guidance sets out instances whereby this might be considered acceptable. This includes in the preparation of joint-plans and where Local Authorities have re-organised. In each of these circumstances however, it is clear that the expectation is that the standard method will feature in those calculation. The only deviation from the standard method that Guidance is clear on, is where strategic policy-making authority boundaries do not align with local authority boundaries or where data is not available. Examples of

where this might be applicable are given as National Parks and the Broads Authority.

3 The borough's changing housing need

Changes in national policy & our housing need figure

- 3.1 As set out in Section 2 of this paper, the Local Housing Need for Elmbridge as derived using the standard method is 647 dwellings per annum (9,705 dwellings over a 15-year period). Using the steps within the standard method, the full details of the calculation and the current local housing need figure for the borough are set out in Section 4.
- 3.2 It is important to note however, that this figure is not 'fixed' and that throughout the preparation of the draft Local Plan this figure has evolved. Throughout the early stages of the preparation of the draft Local Plan, various housing need figures have been referred to at the Regulation 18 Stages (2016/17, 2019 and 2020).
- 3.3 The following sub-sections set out in detail how the assessment of housing need has evolved from 2012 including, the resultant local housing need figures for the borough.

Objectively Assessed Housing Need & Strategic Housing Market Assessments

- 3.4 When the council first embarked on preparing a new Local Plan, the standard method was not in place. Rather, the NPPF as published in 2012 required LPAs to undertake an assessment of their Objectively Assessed Housing Need (OAHN) informed by the preparation of a Strategic Housing Market Assessment (SHMA).
- 3.5 The purpose of a SHMA was to develop a clear understanding of housing needs in an area, with neighbouring planning authorities working together where Housing Market Areas (HMAs) crossed their boundaries. The SHMA was required to provide a full assessment of the need for both market housing and affordable housing, which would provide the basis for local plan policies relating to future housing supply and to the proportion of affordable housing in new developments. Where it was not practicable to meet need, local authorities were required to work in partnership with neighbouring authorities to ensure that their need was met elsewhere. This requirement replaced strategic planning for housing left by the abolition in 2010 of the system of Regional Spatial Strategies, except in London where the London Plan fulfilled this function.
- 3.6 Online Planning Practice Guidance ('Guidance') followed the publication of the

first NPPF (2012) in 2014, replacing previous published guidance (Planning Practice Guidance (PPGs) and Planning Practice Statements (PPSs)). The new Guidance was intended to be lighter touch. It specified that an SHMA should cover the relevant Housing Market Area (HMA), 'a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work'. HMA boundaries were not set by the government or in Guidance, so their identification formed an important part of any SHMA.

- 3.7 The SHMA was required to include an OAHN based on robust evidence. The OAHN was not to take account of constraints such as land availability, as these would be addressed when developing policies to meet need, at a subsequent stage. SHMAs were required to be thorough but proportionate, and to build where possible on secondary information sources rather than primary surveys. LPAs were recommended to use the method set out in Guidance to calculate OAHN, with any departures fully explained and justified.

As part of its Local Plan preparation, the council prepared a SHMA alongside the Royal Borough of Kingston upon Thames and the Surrey authorities of Epsom & Ewell and Mole Valley.

For Elmbridge, the Kingston & North East Surrey SHMA, identified an OAHN of **474 dwellings per annum** over a 20-year period (2015 – 2035).

This figure formed the basis of the council's Local Plan: Strategic Options Consultation (2016/17).

- 3.8 Guidance was updated at intervals, but few changes were made to the section on housing need. However, there was a considerable volume of additional practice on Examination in Public (EiP) of Local Plans; appeals against the refusal of individual planning applications; and the development of Neighbourhood Plans. In addition, a body of case law emerged where applicants, local authorities and / or the Secretary of State sought clarification through the Courts of the definition of OAHN, and the process of its calculation.
- 3.9 As a result, by 2017, the assessment of the OAHN within an SHMA had become a complex and time-consuming process. The starting point was projected future household growth, but Guidance and EiP Inspectors' reports, and legal judgments created a series of adjustments to OAHN to take account of factors such as suppressed household formation, the contribution of housing to economic growth, the need to provide affordable housing, and the need to take account of market signals.

- 3.10 Taking 'market signals' as one example, there was no precise Guidance over the calculation of an appropriate adjustment to OAHN. Reports were prepared by practitioner groups suggesting percentage adjustments to demographic growth, but these were not necessarily supported by clear evidence, and were interpreted in different ways by local authorities, developers and planning inspectors.

The introduction of the standard method

- 3.11 The increasing concern at the cost of preparing a SHMA and the extended timetable for public examination of planning policies setting out future housing requirements, was one of the factors which led the Government to make revisions to the NPPF, published in 2018.
- 3.12 The Government considered that delays in the preparation and revision of development plans were partly caused by the complexity of the process of deriving OAHN which, had become a 'dark-art' and had a significant negative impact on the level of new supply and delivery.
- 3.13 In addition, the Government considered that some local authorities were arriving at policies for future housing provision which did not meet their needs fully, and that, in aggregate, local authority assessments did not provide for the level of housing which the Government considered was necessary (a minimum of 300,00 homes per annum across the Country).
- 3.14 To address this concern, in February 2017 the Government published a [Housing White Paper: Fixing our broken housing market](#). The Paper set out that there was a significant housing shortage and that in order to help address the housing crisis, a new standard methodology for calculating objectively assessed need would be consulted upon. Councils would be encouraged to plan on this basis.
- 3.15 The calculation to be followed as part of the standard method was first published as part of the Government's [Planning for the right homes in the right places: consultation proposals](#) (September 2017). The existing term, OAHN was not employed to describe the assessment. Rather, a calculation of 'local housing need' was referred to.
- 3.16 After consultation on the proposed standard method, a new NPPF, published in July 2018, included the requirement for local authorities to use this approach to calculate housing need in all cases, other than in exceptional circumstances. The detail of the standard methodology was set out in a subsequent amended version of Guidance in September 2018.
- 3.17 When first introduced, the standard method utilised the latest household

projections within its calculation. At this time the latest dataset was the 2014-based household projections.

- 3.18 Shortly following however, was the publication of the 2016-based household projections. These showed a slower household formation rate which led to a lower overall housing need calculation across England, including for Elmbridge Borough.
- 3.19 The NPPF was then revised again in February 2019, accompanied by a revised version of Guidance, to state that the older 2014-based projections should continue to be used. In regard to the continued use of the 2014-based projections, Guidance states that their use provides stability for planning authorities and communities, ensuring that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes.
- 3.20 In addition, the NPPF no longer refers to HMAs, or even to the need to carry out a SHMA. Although, it is still expected that local authorities will develop a good understanding of their local housing market or markets as the basis for developing policy.

When first published in September 2017, the standard method identified a local housing need figure of **623 dwelling per annum** for Elmbridge Borough. This equated to 9,345 dwellings across a 15-year plan period.

The need to seek to provide for 623 dwellings per annum / 9,345 dwellings across the plan-period featured as one of the options in the council's Local Plan: Options Consultation (2019).

Changes to the current planning system

- 3.21 In August 2020 the Government launched a consultation on [Changes to the current planning system](#). This consultation sets out proposals for measures to improve the effectiveness of the planning system. This included proposed amendments to the standard method including the introduction of a second affordability calculation / ratio and options.
- 3.22 In December 2020 the Government published its response to the consultation. Having taken the responses into account, the Government decided the most appropriate approach is to retain the standard method in its current form. However, in order to meet their principles of delivering more homes on brownfield land, a 35% uplift to the post-cap number generated by the

standard method to Greater London and to the local authorities which contain the largest proportion of the other 19 most populated cities and urban centres in England was applied (Step 4 of the calculation, see Section 4).

Alongside the Government's response to the Changes to the current planning system consultation, the latest standard method results were published.

For Elmbridge Borough, the local housing need figure was **633 dwellings per annum**. For a 15-year plan period (2021 – 2036) this equates to a need for 9,495 dwellings.

'Fixing' our local housing need

- 3.23 It is important to note that LPAs are regularly required to update their standard method figure. As part of the calculation, the Government publishes annually affordability ratio (Step 2 of the calculation, see Section 4) which must be factored in / re-run. Household projections which feature in Step 1 of the calculation (see Section 4) are also published biennially. Should the Government require that the latest projections be applied (as opposed to those from 2014), the calculation would again be re-run.
- 3.24 In addition to the above points, the standard method is re-run as the plan-period moves forward. For example, the local housing need figure of 633 dwellings published by the Government in December 2020, has a base date of 2020. Applying a plan-period of 2022 – 2037, it is therefore important that the council 'moves forward' the base date of the projections.
- 3.25 As such, the local housing need figure for the borough as set out in Section 4 differs from that published by Government in December 2021.
- 3.26 The need to continuously update the local housing need figure is one reason as to why it is important that the council progresses with its draft Local Plan and has this figure 'fixed' as the starting point for its Local Plan preparation. As set out by Government, the local housing need figure is only 'fixed' upon the submission of a draft Local Plan for examination.

Changes to the Planning System

- 3.27 In the Government's [White Paper: Planning for the Future](#) (August 2020) a series of proposals were set out that would seek to 'radically' reform the planning system; ensuring that it is 'fit for purpose'. The focus was on a system that is streamlined and modernised (fit for the 21st Century), with a

new focus on design and sustainability but which also ensured that more land is made available for development.

- 3.28 As part of the proposals the Government set out its intention to utilise the standard method for establishing housing requirement figures which ensure enough land is released in the areas where affordability is worst; to stop land supply being a barrier to enough homes being built. The Government stated that the housing requirement would factor in land constraints and opportunities to more effectively use land, including through densification where appropriate, to ensure that the land is identified in the most appropriate areas and housing targets are met.
- 3.29 The proposals outlined that the standard requirement would differ from the current system of local housing need in that it would be binding and so drive greater land release. It is proposed that the standard method would be a means of distributing the national housebuilding target of 300,000 new homes annually, and one million homes by the end of the Parliament, having regard to:
- the size of existing urban settlements (so that development is targeted at areas that can absorb the level of housing proposed);
 - the relative affordability of places (so that the least affordable places where historic under-supply has been most chronic take a greater share of future development)
 - the extent of land constraints in an area to ensure that the requirement figure takes into account the practical limitations that some areas might face, including the presence of designated areas of environmental and heritage value, the Green Belt and flood risk. For example, areas in National Parks are highly desirable and housing supply has not kept up with demand; however, the whole purpose of National Parks would be undermined by multiple large-scale housing developments, so a standard method should factor this in;
 - the opportunities to better use existing brownfield land for housing, including through greater densification. The requirement figure will expect these opportunities to have been utilised fully before land constraints are taken into account;
 - the need to make an allowance for land required for other (non-residential) development; and
 - inclusion of an appropriate buffer to ensure enough land is provided to account for the drop off rate between permissions and completions as well as offering sufficient choice to the market.
- 3.30 Since the publication of the White Paper the Government has published its response to the consultation as well as its [Levelling-Up White Paper](#)

(February 2022) and the [Levelling Up & Regeneration Bill](#) (May 2022). Whilst the Government continues to work on the details of regulations, policy and guidance, there have been no detailed announcements on changes to the standard method other than housing requirements are not to be made binding.

4 Elmbridge's local housing need

The standard method

- 4.1 The standard method to calculating local housing need is set out in Guidance on [housing and economic needs assessments](#). The standard method uses a formula to identify the minimum number of new homes expected to be planned for over a 10-year period. In accordance with the NPPF requiring strategic policies to look ahead over a minimum 15-year period from adopted, Guidance states that the annual number, based on a 10-year baseline, can be applied to the whole plan period.
- 4.2 The four steps of the standard method calculation are:
- Step 1 – Setting the baseline
 - Step 2 – An adjustment to take account of affordability
 - Step 3 – Capping the level of any increase
 - Step 4 – Cities and urban centres uplift

Step 1 – Setting the baseline

- 4.3 Step 1 sets the baseline using national [household growth projections \(2014-based household projections in England, table 406 unitary authorities and districts in England\)](#) for the borough. Using these projections, the council has calculated the projected average annual household growth over a 10-year period (this is 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period).

Step 1 – Setting the baseline

Estimated households in Elmbridge in:

2022: 56,822

2032: 61,440

Projected household growth calculation: $61,440 - 56,822 = 4,618$ growth over a 10-year period

Projected annual growth = **461.8** ($4,618 / 10$).

Step 2 – An adjustment to take account of affordability

- 4.4 Step 2 is the application of an adjustment factor to the annual increase in the number of households (Step 1) based on the affordability ratio of the area. The affordability ratio is defined as the ratio of median house prices to median workplace earnings. The most recent [median workplace-based affordability ratios](#), published by the Office for National Statistics at a local authority level, should be used.
- 4.5 Where the ratio is 4 or below no adjustment is applied. However, for each 1% the ratio is above 4, the average household growth baseline is increased by a quarter of a percent. Therefore, an authority with a ratio of 8 will have a 25% increase on its annual average household growth baseline. Where an adjustment is to be made, the precise formula is as follows:

$$\text{Adjustment factor} = \left(\frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

- 4.6 The output of Step 2 is the uncapped local housing need.

Step 2 – An adjustment to take account of affordability

Elmbridge affordability ratio = 17.32 (2021)

Adjustment factors calculation:

$$17.32 - 4 = 13.32 / 4 = 3.33 \times 0.25 = 0.8325 + 1 = 1.83$$

The adjustment factor is therefore 1.83 and is used as follows:

Minimum annual local housing need figure = (adjustment factor) x projected household growth

$$\text{Minimum annual local housing need figure} = 1.83 \times 461.8$$

The resulting figure is **845.094 (uncapped local housing need)**

Step 3 – Capping the level of any increase

- 4.7 Step 3 applies a cap which limits the increase a local authority might face, depending on the status of current policy. Where relevant strategic policies for

housing were adopted within the last 5 years (at the point of making the calculation), the local housing need figure is capped at 40% above the average annual housing requirement figure set out in the existing policies. This also applies where the relevant strategic policies have been reviewed by the authority within the 5-year period and found to not require updating.

4.8 As the council's Local Plan: Core Strategy was adopted in 2011, it is the second part of Step 3 that applies to the calculation for Elmbridge borough. Guidance states that in these circumstances (where relevant strategic policies for housing were adopted more than 5 years ago), the local housing need figure is capped at 40% whichever is the higher of:

- a) the projected household growth for the area over the 10-year period identified in Step 1: or
- b) the average annual housing requirement figure set out in the most recently adopted strategic policies (if a figure exists).

4.9 For Elmbridge, the figure calculated under point (a) above, is 461.8 (step 1). Our current average annual housing requirement is 225 dpa as set out in the Core Strategy (2011).

Step 3 – Capping the level of any increase

The local housing need figure is capped at 40% above the average annual housing requirement figure (Step 1) (461.8)

$$\text{Cap} = 461.8 + (40\% \times 461.8) = 461.8 + 184.72 = 646.52$$

The annual local housing need in Elmbridge is therefore 647 dwellings per annum.

Step 4 - Cities and urban centres uplift

4.10 Guidance sets out that a 35% uplift is then applied for those urban local authorities in the 20 cities and urban centres list.

4.11 Elmbridge is not on the list, therefore an 35% uplift does not apply.

5 Exceptional Circumstances

What are exceptional circumstances?

- 5.1 As set out in Section 2 of this Paper, neither the NPPF nor Guidance sets out what are considered to be exceptional circumstances allowing local authorities to apply a different method to calculating local housing need than the standard method.
- 5.2 Nevertheless, it is generally accepted that demonstrating exceptional circumstances requires the presentation of a set of factors that come together to justify diverting from the normal application of national policy and guidance.
- 5.3 Whilst the NPPF refers to exceptional circumstances, Guidance refers to exceptional local circumstances. It is therefore reasonable to consider the meaning of exceptional circumstances to be locally specific through either being uncommon across local authorities or uncommon in terms of the scale of consequences.
- 5.4 Throughout the preparation of the draft Local Plan, the council has received comments from our residents and other stakeholders stating that the standard method should not apply to Elmbridge and that there are exceptional circumstances that justify an alternative approach.
- 5.5 This Section examines those arguments put forward as potential exceptional circumstances and considers whether they are sufficiently robust to justify an alternative approach to calculating the local housing need for the borough. In addition, by looking at other local authority examples in regard to their consideration of this issue, this Section sets out whether any of the points they have considered also apply to Elmbridge.

Household Projections

2014, 2016 & 2018 based household projections

- 5.6 Through engagement with our residents and other stakeholders on the preparation of the draft Local Plan, it has been suggested that the 2014-based household projections should not be applied to Elmbridge as they are historic and increasingly unreliable given the borough's demographic profile. It has been stated that they show usually large variations in comparison to the 2018-based projections and how this plays out in regard to our local housing need figure. It has also been argued that other authorities, including the neighbouring borough of Guildford Borough Council, have used the 2016-based projections.

5.7 Table 1 below, shows the variation to the projected number of households in the borough as set out in the 2014, 2016 and 2018 projections. From the table it is clear that the 2014 projections show the largest increase in households (circ. 20% more households than the 2016 projections and circ. 45% more than the 2018 projections).

2014 projections			2016 projections			2018 projections		
2021	2031	Increase in households	2021	2031	Increase in households	2021	2031	Increase in households
56,395	60,971	4,576	55,595	59,271	3,678	55,105	57,626	2,521

Table 1: Projected increases in households in Elmbridge between 2021 and 2031 calculated using the 2014, 2016 and 2018 household projections

5.8 The council does not disagree with concerns raised by our residents and other stakeholders regarding the continued use of the 2014 household projections in the standard method calculation of housing need. The council clearly set out its objection to their continued use in response to the Government’s consultations on the proposed changes to the methodology (August 2020) and in several earlier correspondence with the Secretary of State for Communities and Local Government and our Local MPs. These correspondence are available to view on our [website](#).

5.9 Regardless of these concerns, the Government continues to apply the use of the 2014-based household projections within the standard method. Guidance states that the 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensuring that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes.

5.10 As part of the [Local Housing Needs Assessment \(LHNA\) \(2020\)](#) the council’s appointed consultants considered the use of the varying projections (2014 & 2016) in a local housing needs assessment and the impact this would have on the need figure. This information was specifically requested to allow the council the opportunity to consider whether an alternative approach could be justified.

5.11 The LHNA sets out the following local needs assessment figures:

- 474 dwellings per annum (as calculated by the SHMA using the Government’s 2012-based household projections).

- 596 dwellings per annum (on the basis of the above but adding a 20%¹ uplift to take account of market signals as suggested by the Planning Inspector in the 'Drake Park' public inquiry).
- 373 dwellings per annum (using the most up to date data sources including the 2016-based household projections).
- 448 dwellings per annum (on the basis of the above but adding a 20% uplift to take account of market signals as suggested by the Planning Inspector in the 'Drake Park' public inquiry).
- 588 dwellings per annum (on the basis of the 2014-based projections, including allowances for backlog and market signals).

5.12 All of these scenarios present a lower level of local housing need than that of the standard method (647 dwellings per annum). Nevertheless, the consultants also looked at whether there was justification for the use of alternative projections. They concluded: *“whilst a case can be made that both the 2014-based MHCLG household projections and the more recent 2016-based ONS household projections diverge from the picture of static population since 2016 revealed by mid-year estimates, a longer period is needed to assess whether this is a firm trend. **There are thus no exceptional circumstances for diverging from the requirement in NPPF and PPG to use the 2014 based projections**”*.

5.13 Furthermore, in terms of the meaning of exceptional circumstances, it is important to turn back to whether the divergence in the projections is locally specific through either being uncommon across local authorities or uncommon in terms of the scale of consequences.

5.14 Building on the comparison of the 2014, 2016 and 2018 household projections for Elmbridge, Table 2 provides the data for all authorities in Surrey and for the adjoining London Boroughs – Royal Borough of Kingston upon Thames and the London Borough of Richmond.

¹ It is also important to note that the 20% uplift is only being used as an example upon the basis of the recommendation of the Planning Inspector in the Drake Park appeal. It is highly likely that this figure would be challenged by site promoters and their advocates given the levels of affordability and affordable housing need in the borough.

Local Authority	2014 projections			2016 projections			2018 projections		
	2021	2031	Increase in households	2021	2031	Increase in households	2021	2031	Increase in households
Elmbridge	56,395	60,971	4,576	55,595	59,271	3,676	55,105	57,626	2,521
Epsom and Ewell	33,845	37,967	4,122	32,034	34,786	2,752	31,513	33,087	1,574
Guildford	60,625	65,755	5,130	57,397	60,677	3,280	56,149	57,136	987
Mole Valley	38,495	41,754	3,259	37,761	40,084	2,323	37,298	38,718	1,420
Reigate and Banstead	63,820	71,917	8,097	60,465	65,899	5,434	59,848	64,009	4,161
Runnymede	36,996	40,896	3,900	35,423	37,949	2,526	34,904	35,979	1,075
Spelthorne	43,510	47,875	4,365	40,913	43,402	2,489	40,200	41,308	1,108
Surrey Heath	36,259	38,593	2,334	35,218	36,990	1,772	34,732	35,419	687
Tandridge	37,825	42,426	4,601	36,533	39,848	3,315	35,942	37,966	2,024
Waverley	52,569	56,492	3,923	51,089	53,614	2,525	51,013	53,003	1,990
Woking	41,908	45,001	3,093	40,056	42,159	2,103	39,333	40,107	774
Kingston upon Thames	75,616	86,393	10,777	70,507	78,127	7,620	69,011	74,024	5,013
Richmond upon Thames	91,198	103,103	11,905	84,842	92,303	7,461	83,855	89,948	6,093

Table 2 - Projected increases in households across Surrey Authorities and the two neighbouring London Boroughs between 2021 and 2031 calculated using the 2014, 2016 and 2018 household projections

- 5.15 As set out in paragraph 5.7, for Elmbridge the 2014 projections show the largest increase in households (circ. 20% more households than the 2016 projections and circ. 45% more than the 2018 projections). This trend continues for all Surrey authorities and the two London Boroughs. The average variance between the 2014 and 2016 projections is a 32%, the highest variation in Spelthorne i.e. the 2014 household projections show a 43% increase in households above those of the 2016 projections. The lowest variation between the 2014 and 2016 projections is in Elmbridge (20%).
- 5.16 In terms of the 2014 and 2018 projections, the average variance is 61%, the highest variation in Guildford i.e. the 2014 household projections show an 81% increase in households above the 2014 projections. The lowest variation between the 2014 and 2018 projections is in Elmbridge (45%).
- 5.17 Based on Table 2 and this analysis it is not considered that the difference in the 2014, 2016 and 2018 households is locally specific to Elmbridge. It is clear that the variance in the projections applies to several local authorities and, in those local authorities in Surrey and the two London Boroughs, the variation is higher e.g. the scale of the consequences is higher, than in Elmbridge.
- 5.18 Taking the point of the scale of the consequences further, Elmbridge is also not uncommon in being unable to meet the local housing need figure across the plan period within the existing settlement areas. Guildford; Reigate & Banstead; Runnymede; Tandridge; Waverley and Woking Borough / District Councils have all look to land within the Green Belt to meet development need. In addition, the remaining Surrey authorities either have, or are likely to need to, consider the option of Green Belt as part of their Local Plan preparation.

Greater London Authority (GLA) projections

- 5.19 During the preparation of the draft Local Plan and as part of the duty-to-cooperate, the council has engaged with the Greater London Authority (GLA) over the use of their household and population projections. As part of Elmbridge's Regulation 18 consultations, the GLA has stated that these could be applied to Elmbridge borough offering an alternative approach to the standard method; an approach that the GLA has successfully applied to the London Plan.
- 5.20 As part of the LHNA (2020), the council's consultants explored the possibility of applying the GLA projections. It was noted that to utilise the projections there were two parts to the process with, the GLA providing part 2. The first part of the GLA model is looking at backlog utilising at least 3-years' worth of data from the English Household Survey (EHS).

- 5.21 Data from the EHS is provided at a regional level. The GLA is therefore able to utilise this information for London; spreading the back-log across the Capital. However, in regard to Elmbridge, the consultants would need to take the South East region figures and apportion these i.e. redistributing the back-log across the South East.
- 5.22 The apportionment of back-log across the South East creates several issues. Firstly, that the South East is no longer covered by regional planning; the council is not afforded the opportunity of redistributing under delivery across local authorities in the South East as part of a higher-level planning strategy. Therefore, for this approach to work, as part of the Duty to Cooperate, the council would need to explore whether all other Local Authorities are meeting the 'calculated back-log'. This would be in addition to whether they are meeting future need. This could result in a higher / lower figure for some Local Authorities than that of the standard method.
- 5.23 In addition, there is no set methodology for apportioning back-log; the consultants would need to devise a method and apply this across the South East which could vary considerably taking into account different variable e.g. constraints to delivery; growth areas; meeting back-log where it arises.
- 5.24 At the Examination of the draft Local Plan, the council would therefore need to justify and defend the principle of the approach, the methodology; and its deliverability. Exploring this option and considering the risks / implications of this approach, the council does not consider it to be a credible option.

The approach of other Local Authorities

- 5.25 In regard to other authorities undertaking their own needs assessment / using the 2016 population projections, the council is unaware of any authority that has deviated from the standard method that did not submit their plan under the 'transitional arrangements' (which ended on 24 January 2019) or whereby they are a National Park / Broad Authority or covered by the London Plan and had their plan found sound.
- 5.26 Between 24 January 2019 and 1 March 2021, 38 Local Plans covering strategic issues have been submitted for examination. Of these:
- 8 were for London Boroughs - covered by the London Plan which redistributes housing back-log/need;
 - 4 for National Park / Broad Authorities – whereby Guidance permits an alternative to the standard method; and
 - 1 was a partial review.

5.27 Of the remaining 25 Local Plans, only 6 have been found sound (as at 1 March 2021). These are:

- Chesterfield Borough Council
- Durham City Council
- Isles of Scilly Council
- Oxford City Council
- South Oxfordshire District Council
- Suffolk Coastal District Council

5.28 In the case of the Isle of Scilly; Oxford City Council; and South Oxfordshire District Council, all planned for a higher housing number than set out in the standard method. In accordance with the NPPF and Guidance, these authorities chose to use their SHMA to set higher housing targets. In the case of the City of Oxford, this was largely driven the high need for affordable housing (678 dwellings per annum (dpa) of the 1,400 dpa).

5.29 In the case of Durham City Council, they submitted their Local Plan in accordance with the standard method whereas through the Modifications Consultation, both Chesterfield Borough and East Suffolk were required to amend their housing needs figures in accordance with the standard method and the use of the 2014 projections. In the case of [Suffolk Coastal the Inspector stated in the report:](#)

“Whilst some representors have argued that the Council should have employed an alternative method to determine the minimum number of homes and have disputed, amongst other things, future job growth forecasts, I have not been convinced that there are exceptional circumstances to justify deviation away from the standard method for this Plan” (paragraph 52).

5.30 In light of the above, the council does not consider that exceptional circumstance exist which would justify the use of the 2016 or 2018 household projections and the move away from the standard method. The council considers that if it were to pursue this approach, this would be at significant risk to the soundness of the plan.

The affordability adjustment

5.31 Through engagement with our residents and other stakeholders on the preparation of the draft Local Plan, it has been suggested that the affordability adjustment (Step 2) has no relationship with the housing market within Elmbridge and therefore is considered as an exceptional circumstance to allow an alternative approach to calculating local housing need.

5.32 As part of the preparation of this Paper, the council has reviewed that of Wokingham Borough Council (WBC). Published January 2020, their [Topic Paper](#) explores the relationship of house prices and the standard method. The Paper tests the role of the affordability ratio in that the over delivery of housing leads to improvements in affordability (through reduced house prices) and a lower local housing. The reserve is then stated in that, under delivery will see affordability worsen through increased house prices and a higher local housing need).

5.33 WBC's Paper references Guidance in that under the standard method it is not necessary to factor in previous under delivery in the calculation of local housing need since any such under delivery will be reflected in the affordability adjustment. Two references are made to Guidance:

"The affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately." (paragraph: [011 Reference ID: 2a-011-20190220](#))

"Where the standard method for assessing local housing, need is used as the starting point in forming the planned requirement for housing, Step 2 of the standard method factors in past under-delivery as part of the affordability ratio, so there is no requirement to specifically address under-delivery separately when establishing the minimum annual local housing need figure." (paragraph: [031 Reference ID: 68-031-20190722](#))

5.34 WBC's Paper proceeds to set out their level of housing delivery over 3 reporting years and house price date (sold and number of transactions) from HM Land Registry for January 2014 and July 2019. The conclusion of their evidence is that there is a market premium placed on the price of new homes when compared to the equivalent older house and that the number of new homes built, even when above local housing need, does not reduce affordability issues.

5.35 The council has undertaken a similar exercise with the data set out below. Table 3 shows the number of net additional homes completed in the borough over the last seven reporting years (2014/15 – 2020/21) alongside the annual variance against the standard method and affordability ratio. Table 4 sets out data from the Land Registry showing sales volumes and prices paid for all, new and existing semi-detached properties in the borough over the last seven reporting years.

5.36 Similar to WBC, Table 4 shows that there is a premium for new build properties in the borough; approximately 25% increase in price. With the exception of

2016/17 (where there were no new semi-detached properties sold / recorded), the price paid data is consistency higher for new build properties that the existing housing stock.

Reporting period	No. of net completions	Variation against the local housing need (641)	Affordability Ratio
2014/15	273	-368	14.28
2015/16	240	-401	14.81
2016/17	267	-374	15.26
2017/18	231	-410	16.53
2018/19	353	-288	15.83
2019/20	396	-245	15.86
2020/21	294	-347	16.38

Table 3: Net additional homes completed in the borough per annum between 2014/15 and 2020/21 alongside the annual variance against the standard method and affordability ratio

	Overall (£)	Sales	New Build (£)	Sales	Existing (£)	Sales
2014/15	581,539	563	1,017,086	21	564,663	542
2015/16	630,211	636	798,776	19	625,921	617
2016/17	668,711	470	N/A	0	668,711	470
2017/18	676,235	501	987,500	2	674,988	499
2018/19	673,159	509	888,688	16	666,164	493
2019/20	660,672	546	794,840	25	654,235	521
2020/21	689,996	434	738,750	2	689,542	430

Table 4: Sales volumes and prices paid for all, new and existing semi-detached properties in the borough over the last seven reporting years (2014/15 – 2020/21)

5.37 Unlike WBC however, the council over the last seven reporting years has never delivered a net increase in dwellings per annum above the standard method figure (see Table 3). The council is therefore unable to draw the same comparison so easily.

5.38 Nevertheless, the council agrees with the principle of the point being made by WBC and was strongly made by the council in response to the Government's Planning for the right homes in the right places consultation (September 2017). Within the council's response it was clearly stated that it had been incorrectly assumed (by the Government) via an unproven / outdated causality that simply boosting housing supply will improve affordability in the market.

5.39 The council quoted research prepared for the Government by the University of Reading that stated: *'it may be difficult, or impossible, to achieve affordability targets at sub-regional levels. This is because local authorities, for example,*

may be close substitutes in terms of location for many households, so that increasing construction in a small number of areas generates strong population inflows, offsetting any improvement in affordability' (Meen, 2011, page 17)².

- 5.40 The council's response to the consultation also highlighted that the University of Reading research noted that, even at regional level, increases in construction produce only modest improvements in affordability and would need to be long-lasting. For an increase in housing supply to reduce prices, there would thus need to be a large uplift in supply rates across London and the South East. However, the required level of supply is unlikely to be realistic given land constraints.
- 5.41 Despite the objections of the council and other local authorities to the Government's use of affordability ratios in the standard method, their application in Step 2 still applies. The council therefore considers it extremely unlikely the lack of relationship between the number of homes built and the affordability ratio would be accepted as an exceptional circumstance to deviate from the standard method. Furthermore, as the evidence from the University of Reading goes some way to demonstrating (with reference to the South East), the lack of relationship between these two factors is neither uncommon nor locally specific to Elmbridge.
- 5.42 In addition, the council is mindful that if it were to pursue an alternative approach to assessing housing need, the NPPF and Guidance both make clear that any alternative calculation must reflect current and future demographic trends and market signals. The application of an uplift to reflect market signals is intrinsically linked to affordability. With Elmbridge having the 10th highest affordability ratio (16.38 in 2020) it is extremely likely that an uplift of some significance would be applied. For example, at the Land East of Weylands House and Molesey Road and south of Field Common Lane, Walton-on-Thames, Surrey (Application ref: 2016/2217) appeal, it was considered by the Planning Inspector that an addition of 20% was appropriate. The appellants' advocated for an uplift of between 40 and 64%.

Earnings and the standard method

- 5.43 As part of the preparation of this Paper and the review of the Topic Paper prepared by Wokingham Borough Council (WBC) it is noted that they explored the use of median workplace earnings in the calculation of the standard method. By using workplace earning, WBC argues that the standard method

² A long-run model of housing affordability, by Geoffrey Mean, University of Reading, School of Economics, published by the Department for Communities and Local Government, 2011. ISBN: 978 1 4098 3174 7

fails to recognise the geographical and functional relationship between their borough and key employment centres or, the nature of increasing home-working.

5.44 Exploring this issues, the same can be said of Elmbridge Borough in that a large proportion of our working residents commute into London for higher-paid jobs than those available within the borough. The table below provides information on median earnings on both a workplace-based method and a residence-based method.

Year	Workplace-based	Residence-base	Difference
2015	£33,413	£38,394	+ £4,981
2016	£34,507	£37,997	+ £3,490
2017	£34,523	£38,230	+ £3,707
2018	£36,002	£42,311	+ £5,750
2019	£36,561	£43,110	+ £6,549
2020	£36,638	£42,332	+ £5,694

Table 5: Median earnings on both a workplace-based and a residence-based method

5.45 From Table 5, it is evident from the ONS data that the earnings of people who live in Elmbridge Borough are higher than people who work in the area; demonstrating the functional cross boundary relationship between the borough and London.

5.46 WBC has made the case that the data used in the standard method (workplace-based earnings) is not reflective of place and thus is part of the exceptional circumstances case that they have put forward to deviate from the standard method.

5.47 The council does not disagree as to the lack of relationship between the data and the standard method. The council set out its objection to the application of workplace-based earnings as part of the standard method to the Government's consultations on the proposed methodology when first introduced (August 2020) and in several correspondence with the Secretary of State for Communities and Local Government and our Local MPs since. These correspondence are available to view on our [website](#).

5.48 Whilst the application of residence-based earnings would alter the affordability ratio and potentially reduce the local housing need figure for the borough, consideration needs to be given as to whether Elmbridge is uncommon in this situation and also in terms of the scale of the consequence.

5.49 As set out above, WBC is in the same situation as Elmbridge in regard to

median residence-base earnings being higher than workplace-based earnings. As shown in Table 6, this is a similar situation for eight of the other authorities in Surrey and the two neighbouring London Boroughs on the basis of the 2020 data.

Local Authority	Workplace-based earnings	Residence-base earnings	Difference
Elmbridge	£36,638	£42,332	+ £5,694
Epsom and Ewell	£27,905	£36,579	£5,694
Guildford	£36,862	£41,668	£8,674
Mole Valley	£35,045	£30,666	£4,806
Reigate and Banstead	£34,660	£40,229	-£4,379
Runnymede	£42,077	£37,451	£5,569
Spelthorne	£32,323	£34,645	-£4,626
Surrey Heath	£38,985	£39,675	£2,322
Tandridge	£31,558	£37,478	£690
Waverley	£28,802	£41,237	£5,920
Woking	£39,325	£40,708	£12,435
Kingston upon Thames	£35,279	£41,264	£1,383
Richmond upon Thames	£36,177	£50,006	£5,985

Table 6: Median earnings on both a workplace-based and a residence-based method for all Surrey Authorities and the two neighbouring London Boroughs

- 5.50 Based on Table 6 and this analysis it is not considered that the variance experienced between workplace-based earning and residence-based earnings is uncommon or locally specific to Elmbridge. It is clear that the trend applies to several local authorities, particularly those on the edge of London.
- 5.51 In light of the above, the council does not consider that the variation between workplace-based earning and residence-based earnings is an exceptional circumstances that justifies a move away from the standard method. The council considers that if it were to pursue this approach, this would be at significant risk to the soundness of the plan.

Statutory Duty to Cooperate with other boroughs has not been carried out robustly

- 5.52 Through engagement with our residents and other stakeholders on the preparation of the draft Local Plan, attention has been drawn to Guildford Borough Council and the claim made that the council has failed to engage with them robustly to secure the oversupply (between their housing need and allocations) and, any allowance to meeting our own housing need from the garden village development at the Former Wisley Airfield site (located in

Guildford Borough).

- 5.53 In regard to the allocation at Wisley the council did raise through Guildford's Local Plan consultation that, given the proximity to the Borough boundary, any future development would be meeting the development needs of Elmbridge and not necessarily that of Guildford or their wider Housing Market Area (HMA) which includes Waverley and Woking Boroughs. Unfortunately, these objections were not agreed with and the site has been allocated with no 'allowance' for the development being attributed to meeting the housing needs of Elmbridge.
- 5.54 In terms of the Duty to Cooperate, the council has worked tirelessly with other neighbouring authorities, exploring whether the housing needs of Elmbridge could be met by other LPAs. For example, in the 2016/17 Options Consultation, the council stated that if it could not meet its housing needs in full then it would look to other neighbouring authorities as part of the Duty.
- 5.55 Focusing on Guildford, in a joint response with Waverley and Woking Borough Councils, concern was raised as to Elmbridge's unmet need. It was stated that there was also unmet need within the West Surrey HMA of Guildford, Waverley and Woking and that should any surplus arise within that area, it was expected that this would contribute towards that need rather than addressing needs arising from Elmbridge. Evidently, in accordance with the NPPF (at the time) this is what occurred. The surplus land supply available in Guildford and Waverley was allocated to Woking to help meet their unmet need as part of their Examination processes.
- 5.56 The council has continued to pursue the Duty as an option to meeting the local housing needs of Elmbridge. For example, in January 2020 the council wrote to all LPAs in the South East requesting a response as to whether they could assist in meeting our unmet need (the amount that could not be accommodated in the urban areas). No LPA responded stating that they could assist. The responses were fairly firm in that if other LPAs were being required to look at their Green Belt boundaries to accommodate their own housing need, why shouldn't Elmbridge and why should other LPAs amend their boundaries further to assist us.
- 5.57 This is the difficulty with the Duty in that firstly it is not a Duty to agree i.e. no LPA has to take our unmet need unless it is either agreed between authorities or there is a requirement of the Planning Inspector as part of the Examination process, and secondly, it removes the role of strategic planning and the allowance for redistributions.
- 5.58 Unfortunately, the Duty is not the solution to unmet need; and is now being

reconsidered by the Government as part of its planning reforms - [White Paper: Planning for the Future \(August 2020\)](#).

5.59 Concluding this point, the council disagrees with the statement that it has failed in its Duty. This will of course be tested at the Examination of the Plan. Nevertheless, even if it had failed its Duty, this would not amount to an exceptional circumstance to justify an alternative to the standard method. Rather, this would result in the Plan not being found to be legally compliant and therefore not proceeding to the hearing sessions into the soundness of the Plan. If the council were to pursue this approach, this would be at a significant risk to the soundness of the plan.

Development of settlements will be unsustainable

5.60 Through engagement with our residents and other stakeholders on the preparation of the draft Local Plan, it has been stated that to build the number of homes by the standard method would be unsustainable, thus contrary to the NPPF; destroying the character of the borough. It is stated that this also runs contrary to the new draft National Design Codes.

5.61 As set out in Section 2 of this Paper, the constraints to meeting the standard method figure / local housing needs of the borough, is the second step in terms of setting the housing target / requirement for the borough. The needs assessment is 'constraints-off' and therefore this point cannot be considered as an exceptional circumstance to justify an alternative method.

5.62 Whether or not it is sustainable to build a minimum of 641 dwellings per annum in the borough, has been considered as part of the wider evidence base and in the formation of the development strategy for the borough as set out in the draft Local Plan.

5.63 In light of the above, the council does not therefore consider that the point that the development of settlements would be unsustainable amounts to an exceptional circumstance to deviate away from the standard method. If the council were to pursue this approach, this would be at a significant risk to the soundness of the plan.

Affordable housing need will not be met

5.64 Through engagement with our residents and other stakeholders on the preparation of the draft Local Plan, it has been advanced that the affordable housing need of Elmbridge will not be met through a higher housing target assumed through the standard method. It is stated that land prices will continue to be driven upwards which will impact on viability. Reference is also made to how a higher housing target would rely on small sites on which the collection of

development contributions would remain even more difficult. It is stated that an exceptional bespoke solution to affordable housing is needed for Elmbridge.

- 5.65 Given the high level of affordable housing need within the borough and increasing issues relating to affordability, it is unlikely that the affordable housing needs of the borough will be met regardless of the housing target. As recognised by our communities, housing delivery is currently via the reliance of small sites where developers often cite viability issues. Furthermore, the Government's policy of not permitting affordable housing contributions (both on-site and financial) to be sought on small sites (of 10 or fewer dwellings) is making it increasingly challenging to provide the type of housing needed in the borough.
- 5.66 Nevertheless, in terms of meeting our affordable housing need, one of the biggest opportunities the council has to do this is through the development of larger sites which, it would be required to consider as part of the options for meeting the standard method figure given that this cannot be met solely within the existing urban areas. Through the delivery of large sites, the council is more likely to see the delivery of affordable housing on-site and at a higher percentage of all units proposed than on smaller sites.
- 5.67 Furthermore, with reference to Oxford City Council, they used the issues of affordability and the need for more affordable homes to go beyond the housing figure set out in the standard method. Rather than providing either 764 dpa (capped) or 810 dpa (uncapped) as required by the standard method, they went with a target of 1,400 dpa in recognition that a higher housing target would be required to deliver the level of affordable housing needed.
- 5.68 In addition, the need for affordable homes within the borough is not uncommon amongst neighbouring Surrey Authorities or London Boroughs. In light of this, the council does not consider this to be an exceptional circumstance which would justify the council for deviating from the standard method. Rather, the need for affordable housing within the borough and the limited opportunities to deliver this type of homes within the urban areas, is a driver of higher housing number

6 Conclusion

The use of the standard method

- 6.1 Throughout the preparation of the draft Local Plan the council has reflected on the Government's changes to the way in which the Local Housing Need figure is calculated; exploring the implications of these changes in the context of the borough and its emerging Local Plan and whether there are the exceptional circumstances that justify an alternative approach to the standard method.
- 6.2 It has been the focus of this Paper to set out the council's consideration of this matter with reference to the points raised by our local residents and other stakeholders and on review of the case made by other Local Planning Authorities in seeking to justify an alternative approach.
- 6.3 As set out in Section 5 of this Paper, the council does not necessarily disagree with some of the points made. For example, that the 2014 household projections are out of date and the lack of relationship between housing delivery and the affordability ratio.
- 6.4 Nevertheless, whilst the council may not agree with elements of the standard method, this does not necessitate that exceptional circumstances exist nor that those matters advanced are either uncommon across local authorities or uncommon in terms of the scale of consequences.
- 6.5 The council considers that if it were to pursue an alternative method, this would be at significant risk to the soundness of the draft Local Plan. As such, for the purpose of seeking to meet the Local Housing Need of the borough and in the preparation of the draft Local Plan, the council has used the standard method figure of 641 dwellings per annum as its basis.
- 6.6 However, as set out in Section 2 of the Paper it is important to remember that the Local Housing Need figure is not automatically transposed into a Local Plan to be the housing target / requirement for the authority. Government recognises that there are constraints to meeting needs and sets out in Guidance whether or not plan-makers should override constraints such as Green Belt, when carrying out the assessment (land availability) to meet identified need.
- 6.7 Whether or not the council can meet the Local Housing Need is set out in the draft Local Plan; informed by an extensive evidence base and the consideration of and balancing of the requirements of the NPPF and Guidance alongside our cooperate objectives and responses to previous

Local Plan consultations.

Appeal Decisions

Site Visit made on 10 March 2021

by Rory MacLeod BA (Hons) MRTPI

an Inspector appointed by the Secretary of State

Decision date: 16 June 2021

Appeal A Ref: APP/K3605/W/20/3261529

8-14 Oatlands Drive, Weybridge, KT13 9JL

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by The Ridge LLP against the decision of Elmbridge Borough Council.
 - The application Ref 2020/0691, dated 2 April 2020, was refused by notice dated 10 September 2020.
 - The development proposed is a redevelopment scheme to provide 51 apartments split between three 2½-storey blocks with additional lower ground level parking, plant, storage and accommodation comprising 12 x 1-bed flats, 35 x 2-bed flats and 4 x 3-bed flats with 57 associated parking spaces, bin and bicycle storage, additional landscaping and new vehicular access following demolition of the existing 4 detached properties.
-

Appeal B Ref: APP/K3605/W/21/3270427

8 - 14 Oatlands Drive, Weybridge, KT13 9JL

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by The Ridge LLP against the decision of Elmbridge Borough Council.
 - The application Ref 2020/3223, dated 26 November 2020, was refused by notice dated 25 February 2021.
 - The development proposed is a redevelopment scheme to provide 51 apartments split between four 2½-storey blocks with additional lower ground level parking, plant, storage and accommodation comprising 19 x 1-bed flats, 27 x 2-bed flats and 5 x 3-bed flats with 53 associated parking spaces, bin and bicycle storage, additional landscaping and new vehicular access following demolition of the existing 4 detached properties.
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Decisions

Appeal A

1. The appeal is allowed and planning permission is granted for a redevelopment scheme to provide 51 apartments split between three 2½-storey blocks with additional lower ground level parking, plant, storage and accommodation; comprising 12 x 1-bed flats, 35 x 2-bed flats and 4 x 3-bed flats with 57 associated parking spaces, bin and bicycle storage, additional landscaping and new vehicular access following demolition of the existing 4 detached properties at 8-14 Oatlands Drive, Weybridge, KT13 9JL in accordance with the terms of the application, Ref 2020/0691, dated 2 April 2020, subject to the conditions set out in the attached schedule.

Appeal B

2. The appeal is allowed and planning permission is granted for a redevelopment scheme to provide 51 apartments split between four 2½-storey blocks with additional lower ground level parking, plant, storage and accommodation comprising 19 x 1-bed flats, 27 x 2-bed flats and 5 x 3-bed flats with 53 associated parking spaces, bin and bicycle storage, additional landscaping and new vehicular access following demolition of the existing 4 detached properties at 8-14 Oatlands Drive, Weybridge, KT13 9JL in accordance with the terms of the application, Ref 2020/3223, dated 26 November 2020, subject to the conditions set out in the attached schedule.

Applications for costs

3. An application for an award of costs has been made by the appellant against the decision of Elmbridge Borough Council in respect of Appeal A. This is the subject of a separate Decision.

Preliminary Matters

4. Planning permission was refused and dismissed at appeal in 2007 to Cala Homes for the redevelopment of 4-18 Oatlands Drive to provide 50 dwellings. This is a material consideration albeit that local and national planning policies have changed since that time.
5. The proposal in Appeal A follows advice received by the Appellant from the Council following a Pre-application submission.
6. Amended plans were submitted for the Appeal A proposal during consideration of the application including design changes and a reduction in the number of parking spaces from 61 to 57.
7. Planning obligations have been submitted for both appeals in relation to a late review mechanism towards the provision of affordable housing.
8. The Appellant has submitted amended plans at the appeal stage for Appeal B to address the Council's second and third refusal reasons relating to the adequacy of the parking and refuse storage arrangements.
9. There is similarity between the appeal proposals in several respects. I shall therefore examine some issues for the two proposals together and shall refer to the proposals individually when appropriate to do so.

Main Issues

10. The main issues are:

- (a) the effect of the development on the character and appearance of the area with respect to its design, scale, appearance and form, and whether there would be adequate separation between front and rear buildings in Appeal B,
- (b) whether there should be a review mechanism towards the provision of affordable housing, and
- (c) in relation to Appeal B only, the adequacy of the parking and refuse storage arrangements.

Reasons

Character and appearance

11. The appeal site comprises four detached dwellings on the western side of the road each with a vehicular access on to Oatlands Drive. The dwellings have deep gardens with land levels falling significantly towards the rear boundary in a series of terraces. A Tree Preservation Order covers several trees at the site. Oatlands Drive is residential in character with a mixture of bungalows and two storey houses near to the site and some higher flatted developments further to the south. There are two Grade II Listed Buildings opposite the site at 1 and 3 Oatlands Drive. Adjacent to the rear boundary is the Engine River, (both a pond and a stream) and beyond this a wooded area and meadow known as Cowey Sale subject to Green Belt policies and which is within Spelthorne.
12. The Council acknowledges that it cannot currently demonstrate a five year housing land supply. Therefore, the tilted balance at Paragraph 11(d) of the National Planning Policy Framework (the Framework) is engaged. As such, the Framework states that planning permission should be granted unless *"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"*.
13. The site has an area of about 0.55 hectares and is currently developed at a low density. Paragraph 59 of the Framework sets out the Government's objective of *"significantly boosting the supply of homes"* and Paragraph 117 promotes *"an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions"*. The site is in a sustainable location, not far from the services and facilities at Walton Town Centre. It is therefore suited to a higher density housing scheme. As much of Elmbridge is subject to Green Belt designation, and in view of the ongoing shortfall in housing delivery, such sites need to be released for development if the Council is to meet its housing targets.
14. The Council does not object to the principle of residential redevelopment or to the approach with a second tier of development on the rear part of the site. I have no reason to disagree with this as a strategy. The area immediately surrounding the site is characterised by single dwellings, and a development of flats at a higher density to make more effective use of the land would inevitably result in buildings of a greater scale and form and some change in character. But both proposals would reflect the scale and form of flatted developments, elsewhere along Oatlands Drive on wider sites. The proposals' scale would be compatible with the Elmbridge Design and Character Guide SPD (2012) Companion Guide which describes this area as *"Predominantly mixed residential 20th Century two-storey houses at a low to medium density on medium to large plots with some post-war three-storey flatted development interspersed throughout"*.

Appeal A

15. The two buildings proposed to the Oatlands Drive frontage would both have second floor flats primarily within the roofspace served by dormer windows. They would be a little higher than nearby houses but of much greater width and mass. Nonetheless, their form would not be dissimilar, including hipped roofs with reducing ridge heights to the flanks and multi-storey bay windows.

16. Their siting would respect the strong building line to this side of the road leaving a substantial area to the frontage for soft landscape measures that would enhance the appearance of the scheme. The gaps to both side boundaries and between the buildings would ensure that the buildings do not crowd adjacent dwellings and would help in assimilation in the appearance of the street scene. This spacing would also address a concern raised against the proposal dismissed on appeal in 2007. Both frontage buildings would include a crown roof but as these would be modest in size, they would not be readily discernible from Oatlands Drive.
17. Block C at the rear would be of greater scale having a width equivalent to that of the frontage buildings combined. Its flat roof form and angular design would contrast with that of the frontage buildings and whilst it would be glimpsed between them and along the side boundaries, its set back would not result in a significant impact on the street scene. Its design has been amended during the application process to break up the massing at top floor level when viewed from the front or rear, and a glazed central recess created to provide a break in the form. The resultant scheme shows a bold modern design, greatly differing in appearance to the frontage buildings but which would not be unattractive in relation to its design and appearance.
18. The Council's concerns relate mainly to the visual impact when viewed from a footpath on the opposite side of the Engine River. At the time of my visit it was evident that some tree clearance alongside this footpath has opened up views of the footpath and the rear part of the site. Due to Block C's split level it would appear four storeys high from the footpath and would be a conspicuous feature in close views. But even if it were to be reduced in height with additional landscape measures, the building's considerable width would still be prominent in views from the footpath. If a second tier of development is to be provided to make more effective use of the land, a point accepted by the Council, then there will be some impact on close range views from the footpath arising from the position of the building on the opposite side of the river sited on rising land.
19. The appellant's usage survey indicates that the footpath adjacent to the Engine River is infrequently used and therefore that the building's impact from this close range public viewpoint would not be widely experienced. The Council have disputed the findings of the survey, but regardless if use of the footpath were to increase during drier summer months, the important consideration is the impact of the building from this public vantage point. Even in close views, the building's relatively isolated position means it would not be perceived in the close context of other buildings such that it should adhere to immediate local design precedents. Block C would have an acceptable design and its siting would be far enough back from the boundary with the Engine River to provide a suitable landscaped setting and a satisfactory overall appearance.
20. There are other footpaths in the wider area leading to a popular café and parking area close to the River Thames. Notwithstanding the recent clearance of trees near to the footpath, a substantial block of trees remain that would obscure views of the development at the appeal site from positions alongside the Thames, from the open meadows alongside in Cowey Sale and also from many vantage points along Bridge Street. In long views the public impact of the building's design, scale, appearance and form would therefore be limited, but that impact would nonetheless be satisfactory in the context of the building's relatively isolated and landscaped setting.

21. The proposal would thereby be in accordance with Policy DM2 of the Elmbridge Development Management Plan (2015) (DMP) which requires proposals to be based on an understanding of local character and guidance in the Design and Character SPD in relation to design issues including appearance, scale, height, levels, prevailing patterns and separation distances to boundaries. There would not be conflict with Policies CS3 or CS17 of the Elmbridge Core Strategy (2011) (ECS) relating to development in the environs of Walton on Thames or in regard to respecting local character and achieving appropriate densities.

Appeal B

22. In this proposal the buildings would be similarly sited but the single building at the rear would be replaced by two buildings with a gap between, aligning with the gap between the frontage buildings. The number of flats remains at 51 but the mix has changed to provide more 1-bed and fewer 2-bed flats. A more traditional and formal design to the appearance of all buildings is proposed with a more horizontal emphasis and a slight reduction in overall height and massing compared with the design at Appeal A.
23. The central parts to the frontage buildings would be forward of the established building line but the side wings would step back to broadly align with adjacent dwellings. As about 12m would remain between the most forward points and the front boundary, this stepping forward would not have an adverse effect on the appearance of the street scene.
24. The separation between front and rear buildings would be approximately 20m, a little below the Council's preferred back to back distance of 22 metres to maintain privacy between occupiers. Such optimum separation cannot always be achieved in higher density urban developments. Future occupiers would be aware of this relationship prior to making a commitment to any flat. In my judgement the siting of frontage and rear buildings makes effective use of the land and is acceptable in regard to the appearance in the street scene and in providing sufficient set back from the Engine River whilst achieving adequate separation to safeguard the privacy of future occupiers.
25. The detailed design of the frontage buildings would be symmetrical, with a mansard type roof and elements of architectural 'grandeur' (according to the Council) not typified by immediately surrounding buildings. Nonetheless, there are examples of more formal approaches to flatted developments with a greater horizontal emphasis in the wider area. The buildings would have a balanced and well-articulated design approach that would be attractive in its own right. They would contrast with the hipped pitched roofs to adjacent housing but there are variations in the design of buildings in this part of Oatlands Drive. There would be ample separation to adjacent dwellings and the two buildings would fit it with the rhythm of building blocks and spaces between them in the street scene.
26. There is a wide range of front boundary treatments in Oatlands Drive including high walls and gates that obscure views to front gardens and also railings which allow such views. The proposed railings would be extensive in length compared to nearby frontages but would be commensurate with the character of the redeveloped site allowing clear views of the extensive landscaped front gardens and limited views to land behind the frontage buildings. The area between front and rear buildings would be predominantly hard surfaced for parking with more limited opportunities for incorporation of soft landscape

measures in a central band and to the edges. The parking area would not be readily visible from the footway to Oatlands Drive and would not detract from a satisfactory landscaped appearance in the street scene for the front part of the site.

27. The design approach to the rear two buildings would resemble that of the two frontage buildings resulting in a better internal integration than on Appeal A. The buildings would have recessed wings and top floors that would help to break their massing and detailed well-proportioned fenestration that would result in an attractive appearance. The Council has criticised the 'grandeur' appearance in the context of the setting of the rear building, also pointing out that the eaves would be high and the large scale of the buildings apparent in views from across the Engine River. But there are no other rear sited buildings nearby to set an alternative design approach and within the wider area there are examples of flatted developments having 4 storeys visible at the rear, such as Berkeley Court, which similarly has a flat roof design and a landscape buffer between the buildings and the river.
28. The rear buildings would be prominent in views from the footpath alongside the Engine River but not from other locations across Cowey Sale or from Bridge Street. They would be set back far enough from the Engine River to allow for a landscaped buffer of retained trees and supplementary planting to enhance the appearance of the development. The proposal would not be harmful to either the 'tranquil nature' of the Engine River in close views or to the River Thames environs in longer views towards the site. The rear buildings would be of acceptable appearance in the context of the site even in hours of darkness when windows may be illuminated. The proposals would not have an overbearing impact on Cowey Sale.
29. The proposal in Appeal B would not be contrary to the design provisions of Policies CS3, CS17 and DM2. Neither would there be conflict with Policy CS12 of the ECS or Policy DM13 of the DMP which require development proposals to sympathetically respect riverside settings and open character. The proposal would be in accordance with the design provisions in the Framework.

Affordable housing

30. Policy CS21 of the ECS requires that development resulting in the net gain of 15 and more residential units should provide where viable 40% of the gross number of dwellings on-site as affordable housing. The Council's independent viability consultants have confirmed the appellant's contention that the proposals are unviable to support contributions. But they recommend the imposition of a late review mechanism (LRM) to allow the Council an appropriate method to seek to capture any planning gain beyond the forecasted levels. Support for this stance is taken from the Council's recently adopted Development Contributions Supplementary Planning Document (2020) (SPD).
31. The appellant disputes that a LRM is warranted for either appeal proposal given the viability findings but has submitted completed unilateral undertakings incorporating a LRM in the event that I consider these to be necessary. The undertaking is to provide a review if the foundations of the development are not completed within 12 months of the discharge of the last of the pre-commencement conditions included in the planning permissions if granted on

- appeal. The LRM would then be triggered and undertaken on disposal of 75% of the units.
32. The appellant has commissioned a report on the reasonableness of the Council's affordable housing stance on these appeals. This disagrees with some of the inputs adopted by the Council's viability consultants and notes that the original viability reporting was completed prior to government announcements regarding leasehold and ground rent reform in early 2021. Further, the terms of government programmes such as 'Help to Buy' and the 'Homebuilders Fund' now preclude the charging of significant ground rents. Ground rent values previously included would not therefore be realised.
33. The supporting text to Policy CS21 states that if the Council is satisfied that affordable housing cannot be provided in accordance with the policy, "*it will seek to negotiate alternative provision*". However, there is no mention of a LRM in Policy CS21 or its supporting text. The recent SPD is a material consideration but is guidance and not planning policy, and only suggests the use of a LRM "*where deemed appropriate*". Planning Practice Guidance points out that plans should set out circumstances where review mechanisms may be appropriate, as well as clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy compliance and optimal public benefits through economic cycles. Policy CS21 does not do this.
34. I acknowledge the Council's explanations of an acute need for affordable housing provision in Elmbridge but Policy CS21 only seeks provision of affordable housing "*where viable*". On the viability evidence before me and through examination of the policy basis upon which the Council is relying, the need for a LRM in the event that either proposal may enable a contribution towards affordable housing has not been demonstrated. There would not therefore be conflict with Policy CS21. Accordingly, the Unilateral Undertakings submitted to provide a LRM are not necessary to make the development acceptable in planning terms.

Parking and refuse storage

35. The appellant has submitted amended plans to address the Council's second and third refusal reasons relating to parking spaces and the location of the refuse store in Building B. The plans also involve a reduction in the number of parking spaces from 57 to 53 spaces. I note that residents' objections include parking concerns, but this change would still provide at least one space per unit, which would accord with the Council's maximum parking standards, and would be appropriate for the site's sustainable location close to a town centre. The amended plans have not been subject to formal renotification but a range of opinions on parking totals have already been expressed in response to previous notifications of both proposals. The change on refuse relates only to an internal arrangement. Acceptance of the plans would be in accordance with the 'Wheatcroft¹ principles' in that the development would not be so changed that to grant it would deprive those who should have been consulted on the changes of the opportunity of such consultation.
36. The revised parking arrangements include some echelon spaces for the basement taking account of the increased dimensions for parking spaces set

¹ Bernard Wheatcroft Ltd v SSE [JPL 1982 P37].

out in the Council's recently adopted Parking SPD. The Council has questioned the practicality of some of these spaces, but the appellant has submitted tracking diagrams to demonstrate the accessibility of the spaces for vehicles. The revised plans also make minor reductions in the size of the soft landscape areas alongside the main parking forecourt between frontage and rear buildings. The number and layout of parking spaces would be satisfactory and there would not be conflict with Policy DM7 of the DMP which requires that parking provision should be appropriate to the development and not result in an increase in on-street parking stress.

37. The amended plans also satisfactorily address the Council's concerns in the third refusal reason about the location of the refuse store in Building B exceeding the maximum acceptable distance to the collection vehicle stopping point. The revised accessibility arrangements would not conflict with Policy DM8 of the DMP on the provision of appropriate waste and recycling facilities.

Housing Need

38. Both proposals would result in a net increase of 47 additional dwellings in a sustainable location. Whilst the density of development would exceed Council guidelines, the mix of unit sizes would accord with needs and priorities identified in Policy CS19, and the quality of accommodation would be satisfactory with sufficient amenity space provision. Implementation of either appeal proposal would result in a significant benefit towards meeting housing need in Elmbridge.
39. The Council cannot demonstrate a five year housing land supply. Their Annual Monitoring Report for 2019-2020 sets out a position of only 3.93 years. The Housing Delivery Test results for Elmbridge published in January 2021 show a score of 58% of homes delivered against the total required by targets. These figures indicate a consistent and significant underachievement in relation to housing supply. These shortfalls add weight to the benefit of additional housing on the appeal site, even without the inclusion of affordable housing.

Heritage

40. Nos 1 and 3 Oatlands Drive located on the opposite side of the road to the appeal site are Grade II Listed Buildings. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, requires in considering whether to grant planning permission for development which affects a listed building or its setting, that special regard be paid to the desirability of preserving the building or its setting or any features of architectural or historic interest it possesses.
41. The significance of the two Listed Buildings are in the detail of their original design and construction. Both buildings are set back from the road frontage within relatively wide curtilages. Appreciation of the significance of the buildings and their settings is primarily restricted to their own grounds and the near footway to Oatlands Drive. The road acts as a significant physical separator to the appeal site and the frontage buildings proposed would be set well back from the footway on the opposite side of the road. Having regard to this separation and the limited longer range views in which appeal buildings and Listed Buildings may be viewed together, neither appeal proposal would adversely affect the setting of the two Listed Buildings.

42. There is also a Listed Building at 7-13 Oatlands Drive (Ashley House). The separation distances to this site would be greater still. The proposals would accord with the special duty to preserve the setting of listed buildings and would not conflict with Policy DM12 of the DMP on heritage issues.

Other matters

43. There are many trees on the site, the majority of which are young to semi-mature and most densely located towards the boundaries and rear parts to the gardens. A Tree Preservation Order (TPO) dating from 2012 relates to certain trees at 4-16 Oatlands Drive. The Council estimates that some 23 trees would need to be removed as a result of the proposals including some subject to the TPO. These include a silver birch (T23) that would be unduly close to a building and a beech (T28) which has declining health. However, many mature trees would be retained and I have no reason to disagree with the Council's findings that a well thought out landscape strategy to supplement retained trees not at threat from the proposal would bring about a greater long-term benefit than seeking to retain and protect other existing trees poorly sited in relation to the buildings or of declining health. The appellant has submitted a landscape plan for the site for both proposals. There would not be conflict with Policy DM6 of the DMP which requires development to be designed to include an integral scheme of landscape, tree retention protection and planting. Planning conditions can be used to protect retained trees, require implementation of supplementary landscape measures and to protect biodiversity interests.
44. Land beyond the Engine River at Cowey Sale is within the Green Belt. The appeal site itself is not within the Green Belt and there is no policy requirement referencing the setting of the Green Belt. Notwithstanding this the substantial block of trees remaining between the open meadows at Cowey Sale and the appeal site would effectively screen the site from many viewpoints within the Green Belt.
45. Several residents have raised objections on various highway grounds including traffic generation, congestion at the junction with Bridge Street and inadequate parking provision. The existing site has four access points from Oatlands Drive, which would all be closed, and a new access formed at a point with the greatest distance from the junction with Bridge Street. This would be an improvement in terms of the number and position of access points. Paragraph 109 of the Framework states that development should only be refused on highway grounds *"if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"*. I note that the County Highway Authority (CHA) has not objected. I do not consider that any of the highway or parking impacts that may arise from the proposals would have a severe adverse impact and have no reason to disagree with the conclusions of the CHA.
46. The appellant has also agreed to related off-site works requested by the CHA which would result in benefits. These include shelters and other improvements to the bus stops closest to the site on Oatlands Drive, construction of an information pedestrian crossing point to allow for access to the south bound bus stop, and provision of "Keep Clear" markings at the proposed new access.
47. I have taken account of the other concerns raised in representations, including in relation to noise from cars using the basement parking and other matters that could affect neighbours' living conditions, the impact on biodiversity

interests on land to the rear of the site beyond the Engine River, flood risk, the adequacy of external amenity space provision, precedent and the lack of prior discussions with residents. However, based on the information before me, none of these matters would form grounds to dismiss the appeal.

Planning balance

48. I have examined the issues raised by the Council and by interested parties in representations. My findings are that neither proposal would conflict with the development plan as a whole.
49. The tilted balance at paragraph 11(d) of the Framework is engaged as result of the Council's poor performance on housing delivery. I acknowledge the minor shortfall in the recommended separation distance between frontage and rear buildings in Appeal B, the loss of some trees subject to a TPO and the concerns raised by interested parties on the scale of the buildings and on other matters. But any adverse effects arising from points raised against either proposal would not significantly and demonstrably outweigh the benefits of the proposals when assessed against the policies in the Framework taken as a whole.
50. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. There are no material considerations before me to indicate that the decisions on both appeals should not be taken in accordance with the development plan.

Conditions

51. The Council has suggested planning conditions in the event that either appeal is allowed. I have considered these against the advice in Planning Practice Guidance and have amended some for clarity. The appellant has had opportunity to review these conditions, including the reasonableness of pre-commencement conditions suggested, in the submission of final comments for both Appeals. There is substantial overlap on the Council's suggested conditions for both appeals. My comments on conditions therefore relate to both proposals apart from a specific condition for Appeal B precluding the subsequent use of the flat roofs to the buildings in that proposal as an external amenity area in the interests of privacy.
52. In addition to the standard 3 year time limitation for commencement, I have imposed a condition requiring the development to be carried out in accordance with the submitted plans. Pre-commencement conditions are necessary in relation to a Construction Method Statement and a Construction and Environmental Management Plan in the interests of highway safety and to safeguard biodiversity at the site throughout the course of development operations. Similarly, before ground works take place, the approval of pre-commencement conditions is necessary to ensure appropriate action is taken in relation to findings relating to archaeology and contamination and to approve a surface water drainage system.
53. As many retained trees are subject to a Tree Preservation Order, the Council's suggested condition requiring a pre-commencement meeting on site is appropriate. Together with other tree protection conditions this should ensure that retained trees thrive during building operations and enhance the appearance of the finished development. Conditions requiring the approval of

hard and soft landscape measures and external materials for the buildings are necessary to ensure a satisfactory appearance to the completed development. To ensure the privacy of future occupiers, conditions are necessary to require obscured glazing to side windows and privacy screens to balconies. A condition on sound attenuation is needed to avoid adverse impacts on health from noise.

54. Highway conditions are needed to ensure the provision of the new vehicular and pedestrian accesses, visibility splays, parking and cycle spaces, turning areas, the closure of existing accesses and provision of electric charging points to ensure that the site operates effectively and does not prejudice highway safety. For the same reasons, in view of the scale of the development, it is appropriate to include a condition requiring works on Oatlands Drive adjacent to the site prior to occupation including bus stop upgrades, a pedestrian crossing and a "Keep Clear" road demarcation. A condition is needed to ensure refuse storage is provided in accordance with the approved plans for the convenience of occupiers and service vehicles.
55. It is necessary to include a condition requiring adherence to agreed flood mitigation measures to reduce the risk of flooding at the site and elsewhere. The Council's suggested condition on "Secured by Design" is appropriate in the interests of creating safer communities. I have included the Council's sensitive lighting management condition in relation to safeguarding biodiversity but have changed its trigger point to development above ground level; it is not necessary for this to be a pre-commencement condition. I have not included the Council's suggested biodiversity net gain condition; this is not necessary to make the development acceptable and many of the measures stipulated are replicated in other conditions included.

Conclusions

56. For both appeals, the effect of the development on the character and appearance of the area with respect to its design, scale, appearance and form would be acceptable. On Appeal B there would be adequate separation between front and rear buildings to safeguard the privacy of future occupiers and the revised parking and refuse storage arrangements would be satisfactory. My findings in relation to affordable housing are that planning obligations relating to a late review mechanism are not required to make the proposals acceptable in planning terms and that there would be no conflict with Policy CS21. Both appeals should therefore be allowed subject to appropriate planning conditions.

Rory MacLeod

INSPECTOR

Schedules of Conditions

Appeal A

- 1) The development hereby permitted shall begin not later than 3 years from the date of this decision.
- 2) The development hereby permitted shall be carried out in accordance with the following approved plans:
MA196 001 P2, MA196 030 P7, MA196 050 P6, MA196 051 P6, MA196 052 P7, MA196 053 P6, MA196 054 P5, MA196 055 P5, MA196 100 P5, MA196 110 P5, MA196 120 P5, MA196 120 P5, MA196 121 P3, MA196 130 P4, MA196 131 P4, MA196 135 P3, MA196 135 P4, MA196 140 P3, MA196 150 P4 received on 20/07/2020.
- 3) No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by the local planning authority. The Statement shall provide for:
 - i) the parking of vehicles of site personnel, operatives and visitors;
 - ii) loading and unloading of plant and materials;
 - iii) storage of plant and materials used in constructing the development;
 - iv) the erection and maintenance of security hoarding behind any visibility zones;
 - v) measures to prevent the deposit of materials on the highway;
 - vi) measures to control the emission of dust and dirt during construction;
 - vii) on-site turning for construction vehicles;
 - viii) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused;
 - ix) programme of works (including measures for traffic management).The approved Construction Method Statement shall be adhered to throughout the construction period for the development.
- 4) Prior to the commencement of the development hereby approved, a detailed Construction and Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the local planning authority. The CEMP should include details of how the protected habitats (Habitat of Principal Importance – Deciduous Woodland and Freshwater Pond; and River Thames Site of Nature Conservation Importance) and species will be protected from any adverse impacts as a result of construction. In addition, the CEMP should include adequate details of:
 - a) Impact avoidance and mitigation measures relating to protected species within the development site;
 - b) Risk assessment of potentially damaging construction activities;
 - c) Practical measures to avoid and reduce impacts during construction including but not limited to dust management and polluted run off control;
 - d) Location and timing of works to avoid harm to biodiversity features (all materials, machinery and work should remain within the red line

- boundary at all times before, during and after construction is completed)
- e) Responsible persons and line of communication; and
 - f) Use of protected fences, exclusion barriers and warning signs where required.
- 5) No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work, to be conducted in accordance with a written scheme of investigation which has been submitted to and approved, in writing, by the local planning authority. The development shall be carried out in accordance with the approved details.
- 6) The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the local planning authority. The design must satisfy the SuDS Hierarchy and be compliant with the national Non-Statutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:
- a) The results of infiltration testing completed in accordance with BRE Digest: 365 and confirmation of groundwater levels.
 - b) Evidence that the proposed final solution will effectively manage the 1 in 30 & 1 in 100 (+40% allowance for climate change) storm events, during all stages of the development. If infiltration is deemed unfeasible, associated discharge rates and storage volumes shall be provided using a maximum discharge rate of 2.3 litres/sec.
 - c) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.).
 - d) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected.
 - e) Details of drainage management responsibilities and maintenance regimes for the drainage system.
 - f) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.
- 7) Prior to the first occupation of the development, a verification report carried out by a qualified drainage engineer shall be submitted to and approved in writing by the local planning authority. This shall demonstrate that the drainage system has been constructed in accordance with the agreed scheme (detailing any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls).
- 8) No development shall commence until an assessment of the risks posed by any contamination, carried out in accordance with British Standard BS 10175: Investigation of potentially contaminated sites - Code of Practice

and the Environment Agency, Model Procedures for the Management of Land Contamination (CLR 11) (or equivalent British Standard and Model Procedures if replaced), shall have been submitted to and approved in writing by the local planning authority. If any contamination is found, a report specifying the measures to be taken, including the timescale, to remediate the site to render it suitable for the approved development shall be submitted to and approved in writing by the local planning authority. The site shall be remediated in accordance with the approved measures and timescale and a verification report shall be submitted to and approved in writing by the local planning authority. If, during the course of development, any contamination is found which has not been previously identified, work shall be suspended and additional measures for its remediation shall be submitted to and approved in writing by the local planning authority. The remediation of the site shall incorporate the approved additional measures and a verification report for all the remediation works shall be submitted to the local planning authority on completion and approved in writing by the local planning authority.

- 9) Clean, uncontaminated rock, soil, brick rubble, crushed concrete or ceramic only shall be permitted as infill material. The developer shall not import any material until a sampling program, including appropriate import criteria for the proposed end use and frequency of sampling, has been submitted in writing, and approved by, the local planning authority. The developer shall carry out the approved sampling program to check that all imported material conforms to the agreed criteria. The sampling program shall also include samples taken from the imported material after final placement. Written confirmation of the suitability of all imported materials shall be provided to the local planning authority as a written verification report. This shall include both the results of the sampling program and also details of the origin, transport, final deposition and any temporary stockpiling of the imported materials. The verification report shall be submitted to, and agreed in writing by, the local planning authority before occupation of any part of the site. Verification of imported materials and preparation of the report shall be carried out by an independent, competent person, stating that the site is suitable for the permitted end use.
- 10) No development including groundworks or demolition shall take place and no equipment, machinery or materials shall be brought onto the site for the purposes of the development until a pre-commencement meeting has been held on site and attended by a suitable qualified arboriculturist representative from the local planning authority and the site manager or foreman. The site visit is required to ensure operatives are aware of the agreed working procedures and the precise position of the approved tree protection measures and to ensure that all tree protection measures are installed in accordance with the approved tree protection plan(s) Keen Consultants 8-14 Oatlands Drive Weybridge Tree Protection Plan Drawing Number 1357-KC-XX-YTREE-TPP01Rev0 April 2020. Thereafter, all tree protection measures shall be maintained for the course of the development works.
- 11) No development including groundworks or demolition shall take place until all supporting arboricultural information has been submitted to and approved in writing by the local planning authority. This shall include:

- a) location and installation of services/utilities/drainage/soakaways, including services to automated gates.
- b) details of construction and installations including methodologies within a root protection area or that may impact on retained trees.
- c) full specification for the construction of any roads, parking areas, driveways, hard surfacing, including details of no dig specification and extent of the areas to be constructed using no dig surfacing.
- d) all arboricultural site monitoring and supervision required for the duration of the development.

The development thereafter shall be implemented in strict accordance with the approved details. All tree work shall be carried out in accordance with British Standard BS 3998: Tree work: Recommendations (or an equivalent British Standard if replaced).

- 12) No retained tree shall be cut down, uprooted, destroyed, pruned, cut or damaged in any manner within 5 years from the date of first occupation of any building for its permitted use, other than in accordance with the approved plans details, without the prior written approval of the local planning authority.

[In this condition "retained tree" means an existing tree which is to be retained in accordance with the approved plans and particulars.]
- 13) If any retained tree is cut down, uprooted or destroyed or dies another tree shall be planted at the same place before the end of the next available planting season and that tree shall be of such size and species as may be specified in writing by the local planning authority.

[In this condition "retained tree" means an existing tree which is to be retained in accordance with the approved plans and particulars.]
- 14) A scheme of hard and soft landscaping shall be submitted to and approved in writing by the local planning authority. The scheme shall include indications of all existing trees and hedgerows on the land to be retained and set out measures for their protection throughout the course of development. It shall also include details of boundary treatments and fencing which shall incorporate suitable gaps (13cm x 13cm) to allow species such as hedgehogs to move through the site post development. All planting, seeding or turving comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the occupation of the buildings or the completion of the development, whichever is the sooner; and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.
- 15) No development shall commence above ground level until details / samples of the materials to be used in the construction of the external surfaces of the buildings hereby permitted have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details / samples.
- 16) Prior to the first occupation of the development all above ground level side facing windows of the development hereby permitted shall be glazed with obscure glass that accords with level three obscurity as shown on

the Pilkington textured glass privacy levels (or equivalent) and shall only be openable above a height of 1.7m above the internal floor level of the room to which it serves. The windows shall be permanently retained in that condition thereafter.

- 17) Notwithstanding the approved plans, prior to the first use/occupation of the balconies hereby approved details of 1.8m privacy screens shall be submitted to, and approved in writing by, the local planning authority. The screens shall be erected on the side of the balconies and shall be permanently retained in accordance with the approved details.
- 18) The design and structure of the development shall be of such a standard (BS 8233:2014) that it protects residents within it from existing external noise so that they are not exposed to levels indoors of more than 35 dB LAeq 16 hrs daytime and of more than 30 dB LAeq 8 hrs in bedrooms at night. The development shall be retained as such thereafter.
- 19) No part of the development hereby approved shall be occupied unless and until the following have been provided:
 - a) new access to the site from Oatlands Drive
 - b) bus stops upgrades at stops adjacent to the site on Oatlands Drive
 - c) a new uncontrolled pedestrian crossing on Oatlands Drive
 - d) reinstatement of the kerbline and footway and existing accesses closed
 - e) provision of "Keep Clear" demarcation to the road in front of the new access.

These details shall be provided in accordance with a scheme to be submitted to and approved in writing by the local planning authority through a Section 278 agreement, under the Highways Act 1980. The measures thereafter shall be permanently retained and maintained.

- 20) No part of the development shall be first occupied unless and until the proposed vehicular and pedestrian accesses to the site have been constructed and provided with visibility zones in accordance with the approved plans; thereafter the visibility zones shall be kept permanently clear of any obstruction over 1.05m high.
- 21) The development hereby approved shall not be first occupied unless and until the existing accesses from the site to Oatlands Drive have been permanently closed and any kerbs, verge, footway, fully reinstated.
- 22) The development hereby approved shall not be first occupied unless and until space has been laid out within the site in accordance with the approved plans for vehicles and cycles to be parked and for vehicles to turn so that they may enter and leave the site in forward gear. All cycle parking shall be secure, covered and lit. Thereafter the parking and turning areas shall be retained and maintained for their designated purposes.
- 23) The development hereby approved shall not be first occupied unless and until space has been laid out in accordance with the approved plans for the storage of refuse within the development site. The storage facilities shall be retained and maintained thereafter.

- 24) The development hereby approved shall not be occupied unless and until a scheme for the provision of fast charge sockets (current minimum requirements - 7 kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply) has been submitted to and approved in writing by the local planning authority. The development shall and thereafter be retained and maintained in accordance with the approved scheme.
- 25) The development permitted by this planning permission shall be carried out in accordance with the Flood Risk Assessment (FRA) LANMOR Consulting Ltd, 8-14 Oatlands Drive, Weybridge, November 2020, 191216/FRA/MK/RS/01 Rev B and the following mitigation measures detailed within the FRA:
1. Finished floor levels are set no lower than 11.850 metres above Ordnance Datum (mAOD)
 2. No built development will be located within the 1% AEP plus 35% climate change flood extent.
- The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing/phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.
- 26) Prior to the commencement of development above ground level, a full and detailed application for the Secured by Design award scheme shall be submitted to and approved in writing by the local planning authority in consultation with the Surrey Police Designing Out Crime Officers, setting out how the principles and practices of the Secured by Design Scheme are to be incorporated. The development shall be carried out in accordance with the agreed details.
- 27) No development shall commence above ground level until a detailed Sensitive Lighting Management Plan shall have been submitted to and approved in writing by the local planning authority. The report shall demonstrate that the development would not result in a net increase in artificial lighting and shall include lighting plots and evidence that effort has been made to address lightspill, by for example (but not limited to) using low level lighting, cowling and landscape screening. The approved scheme shall be fully implemented and thereafter retained, in accordance with the approved details.
- 28) Prior to first occupation of any of the buildings, measures shall be carried out in accordance with the mitigation, compensation and enhancements actions presented in the Conclusions and Recommendations in the Ecology Report by AA Environmental Limited (ref: 193355/JDT) dated 24/02/2020 and the Discussion and Recommendations in the Supplementary Bat Report by AA Environmental Limited (ref: 193355) dated November 2020. A soft felling approach shall be undertaken to the felling of any trees with low roost suitability under the watching brief of a licenced bat ecologist. The development offers opportunities to restore or enhance biodiversity measures to help offset localised harm to biodiversity caused by the development process. The development shall include provision of bird and bat boxes erected on or integral within the new buildings or on neighbouring trees.

Any trees identified for planting should be complimentary to those growing in adjacent and surrounding deciduous woodland identified as habitat of principal importance, using native species raised and grown only in the UK, suitable for site conditions and complimentary to surrounding natural habitat. Planting should focus on nectar-rich flowers and/or berries as these can also be of considerable value to wildlife.

Appeal B

- 29) The development hereby permitted shall begin not later than 3 years from the date of this decision.
- 30) The development hereby permitted shall be carried out in accordance with the following approved plans:
MA196 201 Rev P1, MA196 230 Rev P3, MA196 250 Rev P1, MA196 251 Rev P3, MA196 252 Rev P1, MA196 253 Rev P1, MA196 254 Rev P1, MA196 255 Rev P1, MA196 300 Rev P1, MA196 310 Rev P1, MA196 320 Rev P1, MA196 321 Rev P1, MA196 331 Rev P1, MA196 335 Rev P1, MA196 336 Rev P1, MA196 340 Rev P1, MA196 341 Rev P1, MA196 350 Rev P1, MA196 351 Rev P1 received on 26/11/2020; MA196 330 Rev P1 received on 14/12/2020.
- 31) No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by the local planning authority. The Statement shall provide for:
- i) the parking of vehicles of site personnel, operatives and visitors;
 - ii) loading and unloading of plant and materials;
 - iii) storage of plant and materials used in constructing the development;
 - iv) the erection and maintenance of security hoarding behind any visibility zones;
 - v) measures to prevent the deposit of materials on the highway;
 - vi) measures to control the emission of dust and dirt during construction;
 - vii) on-site turning for construction vehicles;
 - viii) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused;
 - ix) programme of works (including measures for traffic management).
- The approved Construction Method Statement shall be adhered to throughout the construction period for the development.
- 32) Prior to the commencement of the development hereby approved, a detailed Construction and Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the local planning authority. The CEMP should include details of how the protected habitats (Habitat of Principal Importance – Deciduous Woodland and Freshwater Pond; and River Thames Site of Nature Conservation Importance) and species will be protected from any adverse impacts as a result of construction. In addition, the CEMP should include adequate details of:

- a) Impact avoidance and mitigation measures relating to protected species within the development site;
 - b) Risk assessment of potentially damaging construction activities;
 - c) Practical measures to avoid and reduce impacts during construction including but not limited to dust management and polluted run off control;
 - d) Location and timing of works to avoid harm to biodiversity features (all materials, machinery and work should remain within the red line boundary at all times before, during and after construction is completed)
 - e) Responsible persons and line of communication; and
 - f) Use of protected fences, exclusion barriers and warning signs where required.
- 33) No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work, to be conducted in accordance with a written scheme of investigation which has been submitted to and approved, in writing, by the local planning authority. The development shall be carried out in accordance with the approved details.
- 34) The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the local planning authority. The design must satisfy the SuDS Hierarchy and be compliant with the national Non-Statutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:
- a) The results of infiltration testing completed in accordance with BRE Digest: 365 and confirmation of groundwater levels.
 - b) Evidence that the proposed final solution will effectively manage the 1 in 30 & 1 in 100 (+40% allowance for climate change) storm events, during all stages of the development. If infiltration is deemed unfeasible, associated discharge rates and storage volumes shall be provided using a maximum discharge rate of 2.3 litres/sec.
 - c) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.).
 - d) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected.
 - e) Details of drainage management responsibilities and maintenance regimes for the drainage system.
 - f) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.
- 35) Prior to the first occupation of the development, a verification report carried out by a qualified drainage engineer shall be submitted to and approved in writing by the local planning authority. This shall demonstrate that the drainage system has been constructed in

accordance with the agreed scheme (detailing any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls).

- 36) No development shall commence until an assessment of the risks posed by any contamination, carried out in accordance with British Standard BS 10175: Investigation of potentially contaminated sites - Code of Practice and the Environment Agency, Model Procedures for the Management of Land Contamination (CLR 11) (or equivalent British Standard and Model Procedures if replaced), shall have been submitted to and approved in writing by the local planning authority. If any contamination is found, a report specifying the measures to be taken, including the timescale, to remediate the site to render it suitable for the approved development shall be submitted to and approved in writing by the local planning authority. The site shall be remediated in accordance with the approved measures and timescale and a verification report shall be submitted to and approved in writing by the local planning authority. If, during the course of development, any contamination is found which has not been previously identified, work shall be suspended and additional measures for its remediation shall be submitted to and approved in writing by the local planning authority. The remediation of the site shall incorporate the approved additional measures and a verification report for all the remediation works shall be submitted to the local planning authority on completion and approved in writing by the local planning authority.
- 37) Clean, uncontaminated rock, soil, brick rubble, crushed concrete or ceramic only shall be permitted as infill material. The developer shall not import any material until a sampling program, including appropriate import criteria for the proposed end use and frequency of sampling, has been submitted in writing, and approved by, the local planning authority. The developer shall carry out the approved sampling program to check that all imported material conforms to the agreed criteria. The sampling program shall also include samples taken from the imported material after final placement. Written confirmation of the suitability of all imported materials shall be provided to the local planning authority as a written verification report. This shall include both the results of the sampling program and also details of the origin, transport, final deposition and any temporary stockpiling of the imported materials. The verification report shall be submitted to, and agreed in writing by, the local planning authority before occupation of any part of the site. Verification of imported materials and preparation of the report shall be carried out by an independent, competent person, stating that the site is suitable for the permitted end use.
- 38) No development including groundworks or demolition shall take place and no equipment, machinery or materials shall be brought onto the site for the purposes of the development until a pre-commencement meeting has been held on site and attended by a suitable qualified arboriculturist representative from the local planning authority and the site manager or foreman. The site visit is required to ensure operatives are aware of the agreed working procedures and the precise position of the approved tree protection measures and to ensure that all tree protection measures are installed in accordance with the approved tree protection plan(s) Keen

Consultants 8-14 Oatlands Drive Weybridge Tree Protection Plan Drawing Number 1357-KC-XX-YTREE-TPP01Rev0 April 2020. Thereafter, all tree protection measures shall be maintained for the course of the development works.

- 39) No development including groundworks or demolition shall take place until all supporting arboricultural information has been submitted to and approved in writing by the local planning authority. This shall include:
- a) location and installation of services/utilities/drainage/soakaways, including services to automated gates.
 - b) details of construction and installations including methodologies within a root protection area or that may impact on retained trees.
 - c) full specification for the construction of any roads, parking areas, driveways, hard surfacing, including details of no dig specification and extent of the areas to be constructed using no dig surfacing.
 - d) all arboricultural site monitoring and supervision required for the duration of the development.

The development thereafter shall be implemented in strict accordance with the approved details. All tree work shall be carried out in accordance with British Standard BS 3998: Tree work: Recommendations (or an equivalent British Standard if replaced).

- 40) No retained tree shall be cut down, uprooted, destroyed, pruned, cut or damaged in any manner within 5 years from the date of first occupation of any building for its permitted use, other than in accordance with the approved plans details, without the prior written approval of the local planning authority.

[In this condition "retained tree" means an existing tree which is to be retained in accordance with the approved plans and particulars.]

- 41) If any retained tree is cut down, uprooted or destroyed or dies another tree shall be planted at the same place before the end of the next available planting season and that tree shall be of such size and species as may be specified in writing by the local planning authority.

[In this condition "retained tree" means an existing tree which is to be retained in accordance with the approved plans and particulars.]

- 42) A scheme of hard and soft landscaping shall be submitted to and approved in writing by the local planning authority. The scheme shall include indications of all existing trees and hedgerows on the land to be retained and set out measures for their protection throughout the course of development. It shall also include details of boundary treatments and fencing which shall incorporate suitable gaps (13cm x 13cm) to allow species such as hedgehogs to move through the site post development. All planting, seeding or turving comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the occupation of the buildings or the completion of the development, whichever is the sooner; and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.

- 43) No development shall commence above ground level until details / samples of the materials to be used in the construction of the external surfaces of the buildings hereby permitted have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details / samples.
- 44) Prior to the first occupation of the development all above ground level side facing windows of the development hereby permitted shall be glazed with obscure glass that accords with level three obscurity as shown on the Pilkington textured glass privacy levels (or equivalent) and shall only be openable above a height of 1.7m above the internal floor level of the room to which it serves. The windows shall be permanently retained in that condition thereafter.
- 45) Notwithstanding the approved plans, prior to the first use/occupation of the balconies hereby approved details of 1.8m privacy screens shall be submitted to, and approved in writing by, the local planning authority. The screens shall be erected on the side of the balconies and shall be permanently retained in accordance with the approved details.
- 46) The design and structure of the development shall be of such a standard (BS 8233:2014) that it protects residents within it from existing external noise so that they are not exposed to levels indoors of more than 35 dB LAeq 16 hrs daytime and of more than 30 dB LAeq 8 hrs in bedrooms at night. The development shall be retained as such thereafter.
- 47) No part of the development hereby approved shall be occupied unless and until the following have been provided:
 - a) new access to the site from Oatlands Drive
 - b) bus stops upgrades at stops adjacent to the site on Oatlands Drive
 - c) a new uncontrolled pedestrian crossing on Oatlands Drive
 - d) reinstatement of the kerblines and footway and existing accesses closed
 - e) provision of "Keep Clear" demarcation to the road in front of the new access.

These details shall be provided in accordance with a scheme to be submitted to and approved in writing by the local planning authority through a Section 278 agreement, under the Highways Act 1980. The measures thereafter shall be permanently retained and maintained.
- 48) No part of the development shall be first occupied unless and until the proposed vehicular and pedestrian accesses to the site have been constructed and provided with visibility zones in accordance with the approved plans; thereafter the visibility zones shall be kept permanently clear of any obstruction over 1.05m high.
- 49) The development hereby approved shall not be first occupied unless and until the existing accesses from the site to Oatlands Drive have been permanently closed and any kerbs, verge, footway, fully reinstated.
- 50) The development hereby approved shall not be first occupied unless and until space has been laid out within the site in accordance with the approved plans for vehicles and cycles to be parked and for vehicles to turn so that they may enter and leave the site in forward gear. All cycle parking shall be secure, covered and lit. Thereafter the parking and

turning areas shall be retained and maintained for their designated purposes.

- 51) The development hereby approved shall not be first occupied unless and until space has been laid out in accordance with the approved plans for the storage of refuse within the development site. The storage facilities shall be retained and maintained thereafter.
- 52) The development hereby approved shall not be occupied unless and until a scheme for the provision of fast charge sockets (current minimum requirements - 7 kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply) has been submitted to and approved in writing by the local planning authority. The development shall and thereafter be retained and maintained in accordance with the approved scheme.
- 53) The development permitted by this planning permission shall be carried out in accordance with the Flood Risk Assessment (FRA) LANMOR Consulting Ltd, 8-14 Oatlands Drive, Weybridge, November 2020, 191216/FRA/MK/RS/01 Rev B and the following mitigation measures detailed within the FRA:
 1. Finished floor levels are set no lower than 11.850 metres above Ordnance Datum (mAOD)
 2. No built development will be located within the 1% AEP plus 35% climate change flood extent.The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing/phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.
- 54) Prior to the commencement of development above ground level, a full and detailed application for the Secured by Design award scheme shall be submitted to and approved in writing by the local planning authority in consultation with the Surrey Police Designing Out Crime Officers, setting out how the principles and practices of the Secured by Design Scheme are to be incorporated. The development shall be carried out in accordance with the agreed details.
- 55) No development shall commence above ground level until a detailed Sensitive Lighting Management Plan shall have been submitted to and approved in writing by the local planning authority. The report shall demonstrate that the development would not result in a net increase in artificial lighting and shall include lighting plots and evidence that effort has been made to address lightspill, by for example (but not limited to) using low level lighting, cowling and landscape screening. The approved scheme shall be fully implemented and thereafter retained, in accordance with the approved details.
- 56) Prior to first occupation of any of the buildings, measures shall be carried out in accordance with the mitigation, compensation and enhancements actions presented in the Conclusions and Recommendations in the Ecology Report by AA Environmental Limited (ref: 193355/JDT) dated 24/02/2020 and the Discussion and Recommendations in the Supplementary Bat Report by AA Environmental Limited (ref: 193355) dated November 2020. A soft felling approach shall be undertaken to the

felling of any trees with low roost suitability under the watching brief of a licenced bat ecologist. The development offers opportunities to restore or enhance biodiversity measures to help offset localised harm to biodiversity caused by the development process. The development shall include provision of bird and bat boxes erected on or integral within the new buildings or on neighbouring trees.

Any trees identified for planting should be complimentary to those growing in adjacent and surrounding deciduous woodland identified as habitat of principal importance, using native species raised and grown only in the UK, suitable for site conditions and complimentary to surrounding natural habitat. Planting should focus on nectar-rich flowers and/or berries as these can also be of considerable value to wildlife.

- 57) The flat roofs to the development hereby permitted shall not at any time be altered or adapted to form a balcony, roof garden or similar amenity area without the grant of a further specific permission from the local planning authority.