

## Strategic Options Consultation Response Form

**We cannot accept anonymous comments.** Therefore, please complete the table overleaf with your contact information and return this with your response. Any comments that you submit will be published on the Council's website and in hard-copy form as appropriate. Signatures and personal contact details such as postal and email addresses will be redacted. Your name will however be published. If applicable, the name of the company / organisation etc. that you represent will also be published.

### Your Information

Please complete the appropriate sections below with your contact information and return this with your comments.

| Personal Details*   | Agent's Details (if applicable) |
|---|---------------------------------|
| *If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2. |                                 |
| Title   |                                 |
| First Name  |                                 |
| Last Name   |                                 |
| Job Title<br>(where relevant)   |                                 |
| Organisation<br>(where relevant)  |                                 |
| Address Line 1  |                                 |
| Line 2  |                                 |
| Line 3  |                                 |
| Line 4  |                                 |
| Post Code   |                                 |
| Telephone Number  |                                 |
| E-mail Address<br>(where relevant)  |                                 |

**Completed questionnaires must be returned by 4pm on Friday 24th February 2017**

## PART ONE

### The key challenges facing Elmbridge

Please read Section 2 of the Consultation Document that sets out the key challenges for Elmbridge

The key challenges facing the Borough will inform the vision and objectives the Council adopts in the way it will seek to manage development and growth in the future. It is important that we are addressing both the right challenges and the most important ones to everyone who lives, works and visits the Borough.

Therefore do you:

1. Agree that the challenges set out in section 2 of the consultation document are the key challenges facing Elmbridge?

Yes, I agree   
No, I disagree   
I don't know

*Please explain your answer:*

*There are the following additional key challenges:*

- *To retain the quality of life for existing residents in Elmbridge*
- *To address infrastructure requirements*
- *To resolve the transport congestion in our area – Cobham/Stoke d'Abernon/Oxshott have severe constraints due to enclosure by A3/M25*
- *To maintain strong protections for the Green Belt as set out in the Government's White Paper*
- *To avoid further urbanisation and in-fill*
- *To maintain the environment and avoid further pollution*
- *Elmbridge has already stated previously that a central part of its core strategy is to protect the Green Belt and this should remain an absolute*
- *To take account of the value of green spaces for the recreation of local people*

2. Do you consider there are other challenges that we should be addressing?

Yes   
No   
Don't know

*Please explain your answer:*

*There are the following additional key challenges:*

- *To retain the quality of life for existing residents in Elmbridge*
- *To resolve the transport congestion in our area - Cobham/Stoke d'Abernon/Oxshott have severe constraints due to enclosure by A3/M25*

- *To retain strong protection for the Green Belt as set out in the Government's White Paper*
- *To avoid further urbanisation and in-fill*
- *To maintain the environment and avoid further pollution*

**3. Do you consider any particular challenge or challenges that are more important than the others?**

- Yes
- No
- Don't know

*Please explain your answer:*

- *Maintaining quality of life for residents*
- *Infrastructure – schools, GPs, etc.*
- *Infrastructure – currently the traffic congestion and roads in Cobham/Stoke d'Abernon and Oxshott are unable to cope with current levels of traffic*
- *Urbanisation – increasing encroachment into the Green Belt*
- *Pollution – levels already unacceptably high given A3 & M25 proximity*
- *Erosion of environment and not protecting natural habitat*
- *Provision for the elderly*
- *Catering for the health of the current population*

## **Elmbridge Borough Council's Preferred Option**

**To answer these questions, please read Section 3 of the Consultation Document**

**Given the expected levels of demand for land from new development do you:**

**4. Agree that Option 2 is the most appropriate option?**

- Yes, I agree
- No, I disagree
- I don't know

**If you disagree, please explain why and what other option would you support and why?**

*Please insert your comments here*

- *Object to the fact that the questionnaire does not provide the opportunity to select either of the other options or provide a "do nothing" option*
- *Propose that Option 1 (increased urbanisation) should be the most appropriate option*
- *We disagree that the provision of housing is an Exceptional Circumstance that will allow the destruction of our Green Belt and heritage*
- *We understand that the Council's own figures show that only 50% of the housing planned would be needed by Elmbridge residents*

- *Once the Green Belt has been taken away it will NEVER be regained. This will result in encroachment of countryside and removal of green spaces. The Government's White Paper reinforces the strong protection of the Green Belt*
- *The Council has not sufficiently explained or justified why it cannot build on brownfield land and a thorough assessment of brownfield sites should be the first priority. The Government's White Paper emphasises that Councils need to explore brownfield land and higher densities in urban areas before exploring Green Belt land*
- *Increased urbanisation of the more major urban areas in the borough. The Council should seek to develop social/affordable housing near to the major sources of employment and nearer to better service provision. This is also supported in the Government's White Paper*
- *Opportunities should be explored near to established fast transport links with easy transport access. An example would be the fast Woking/Walton/Esher line*
- *Building social/ affordable housing in Parcel 14 and Parcel 20 is very unrealistic - this is one of the most expensive parts of Elmbridge and placing social/ affordable housing in this area will not meet the needs of those folks who need easy access to job opportunities and good public transport links, neither of which exist in this area*
- *The Council has not demonstrated that it has sufficiently explored options with neighbouring boroughs*

**5. Do you consider the suggested exceptional circumstances are sufficient to support the amendment of the Green Belt boundary?**

- Yes
- No
- Don't know

*Please explain your answer:*

- *No – National Guidelines state that “unmet housing need is not a justification”*
- *No – the Consultation Documents state that Green Belt boundaries should only be adjusted “with the support of local people”. The Council does not have this*
- *No – the Alternative Options paper does not demonstrate that the Council has given due consideration to other options e.g. Urban intensification, working with other councils.*
- *The Government White Paper emphasises that Councils need to have fully demonstrated all other options before exploring Green Belt land. Elmbridge Borough Council have not demonstrated this*
- *No - The Strategic Options paper has only explored 3 parcels of so called weakly performing Green Belt. The work should have been completed at a much lower level. Who is to say that the next levels of your identified weakly performing Green Belt Parcels are not more suitable and have more developable areas?*
- *No - We believe that the Council is taking the easy way out in targeting Green Belt and should re-focus on brownfield sites. Consideration should be given to increasing the densities on these sites.*

**6. Agree that, given the appropriate exceptional circumstances, these three key strategic areas are appropriate for removal from the Green Belt?**

- Yes, I agree
- No, I disagree

I don't know

*Please explain your answer:*

- *Methodology and assessment is subjective and flawed. Inconsistency with the scoring and categorisation across all the parcels of land*
- *Strongly disagree with Parcel 14 (Knowle Hill Park, north Blundel Lane) being included for the following reasons:*
  - *This Green Belt currently prevents the merger of “neighbouring” areas of Stoke d’Abernon and Oxshott*
  - *Cobham, Stoke d’Abernon and Oxshott are distinct communities – EBC’s own Flood Risk Assessment recognises them as separate entities*
  - *The Green Belt Review scoring is wrong – parcel 14 is only 2.5% built on and therefore should be 4 or 5 not 2.*
  - *Description of Parcel 14 as “semi-urban” is very subjective and patently untrue – it is semi-rural.*
  - *Description of Parcel 14 as having “weak links” to the strongly performing parcel 10 is untrue and solely due to Blundel Lane and the railway line*
  - *Previous owners of the Knowle Hill Park area had higher protection than Green Belt (via a section 52 agreement). This was removed by the Council – there is no justification for why this has changed*
  - *Infrastructure, particularly roads would not cope*
  - *We believe this should be subject to review and independent audit verification as insufficient weighting has been given to the points detailed below:*
    - i. *Ancient woodlands are present on Parcel 14. These need to be surrounded with buffer zones and wildlife corridors*
    - ii. *The verified presence of Greater Crested Newts which are protected by both U.K. and EU legislation.*
    - iii. *It is also a natural habitat for bats, beetles, adders, buzzards, deer, hedgehogs and owls.*
    - iv. *Knowle Hill Park as its name suggests is on a hill and the presence of a flood plain at the bottom of the hill has not been recognised or scored*
    - v. *We also maintain these are actually Absolute Constraints and need to be recognised and scored as such*
- *Strongly disagree with Parcel 20 (next to Portsmouth Road, Cobham) being included for the following reasons:*
  - *Parcel 20 acts as a vital separation between Cobham and Esher*
  - *It protects against ribbon development along the Portsmouth Road (A307)*
  - *The Common Land and Site of Special Scientific Interest in this area must be protected*
  - *Development on such a large scale would change the character of Cobham and damage local community cohesion*
  - *The infrastructure couldn't cope*
  - *The Green Belt Review undervalues this land which has only 4.6% built structures on it. This would result in a score of 3 or 4.*
  - *The area provides a habitat for a variety of wildlife, rare birds, 6 types of reptiles and insects such as the silver studded blue butterfly *Plebejus argus* found on the Esher common SSSI site*

**7. Do you know of any sites within any of the three key strategic areas that could be considered for future development?**

- Yes
- No

*Please explain your answer:*

- We believe that this is the responsibility of the Council and would request that details of further options be provided. If the Council has not fully evaluated all the other options in these three areas it clearly must do so.*
- We believe that the Council's approach to only detail the largest three land masses is simplistic and erroneous. The actual amount of developable land is a more relevant and critical component.*

*Parcel 14 (Knowle Hill Park and north of Blundel Lane, Stoke d'Abernon):*

- Parcel 14 topography next to Blundel Lane is steep, flood risk and was also a landfill site – so unsuitable for development*
- Parcel 14 also has a Scout Camp which is widely used not just by Elmbridge but also by neighbouring boroughs including Kingston. Historic memorial present*
- Parcel 14 also has a number of Ancient Woodlands*
- Parcel 14 is covered with protected animal species*
- Parcel 14 has a lake at the top of it and springs around the lower levels and floods*
- Parcel 14 has clay work mine shafts and underground bunkers used during the Second World War*

*Parcel 20 (next to Portsmouth Road, Cobham):*

- No part of Parcel 20 is suitable for development*
- There are allotments on Parcel 20 which constrain development*
- The Rugby Club has a very long lease on part of the land*

**8. Do you consider that other areas of land should be removed from the Green Belt including those that are moderately or strongly performing?**

- Yes
- No
- Don't know

*Please explain your answer:*

- We believe that urban regeneration is the way forward and that more joined up thinking and cooperation across boundaries is required in order to find an optimum solution*
- The Council has admitted it has not assessed the viability or contribution of the moderately performing sites and this seems an oversight that must be urgently corrected*
- Providing infrastructure for the three identified sites is considerably more complex and expensive than linking one larger site in a logistically better positioned area*

- *Any plan of this complexity cannot be considered in isolation and hence we fundamentally disagree with an approach that just singles out housing*
- *It is worth reiterating that housing is NOT an exceptional circumstance to remove Green Belt and does not meet with the majority support of the residents*
- *We must also strongly object and put on the record that the nature of the questions is in our opinion manipulative and self-serving seeking to justify the Council's recommendations and is thus not consultative but merely ticking boxes*

## PART TWO – KEY ISSUES

### Housing Size and Type

To answer these questions, please read Section 4 of the Consultation Document

Based on your knowledge of the housing market in Elmbridge:

**9. Do you agree that we should seek to provide more of a balance in terms of the size of new homes being built?**

- Yes, I agree
- No, I disagree
- I don't know

*Please explain your answer:*

- *Yes. But we believe smaller sized houses are feasible in existing urban areas and that a more joined up thinking and cooperation across boundaries is required in order to find an optimum solution*
- *Urban renewal and regeneration continues to be of higher priority and we believe the Council should be seeking to further identify and invest in brownfield sites. Increased density in such areas will allow for the provision of smaller, more affordable homes*

**10. Given the over delivery of homes with 4 or more bedrooms should we try to limit their delivery in future?**

- Yes
- No
- Don't know

*Please explain your answer:*

### Housing Densities

Given the need for both market and affordable housing:

**11. Should we seek to increase minimum densities at sustainable locations in the urban areas, such as in town centres and at train stations, above 40 dwellings per hectare, where this would not impact on local character?**

- Yes  **If yes, what density do you think would be appropriate?**  
No   
Don't know

*Please explain your answer:*

- *Density depends on many factors so a definitive answer is subjective.*
- *Creative design should be used to maximise the opportunity with these developments.*

**12. Within the three key strategic areas we will be exploring opportunities for accommodating our development needs taking into account site constraints, land ownership, compliance with other planning policies and the need to support sustainable development. If potential housing sites are identified within these areas, do you consider it appropriate to:**

**a. deliver at higher densities i.e. above 40 dwellings per hectare, in order to maximise delivery?**

- Yes   
No   
Don't know

*Please explain your answer:*

*Parcel 14 (Knowle Hill Park and next to Blundel Lane, Stoke d'Abernon):*

- *With regard to Parcel 14 – the semi-rural nature, the topography of the land and the existing housing in the surrounding area*
- *Economics of building social/affordable housing in an area that is one of the most expensive in Elmbridge is unrealistic*
- *Infrastructure totally insufficient*
- *Moving from the current 8 hpd to the proposed 40 or 60 is quite totally out of keeping with the current environment*

*Parcel 20 (next to Portsmouth Road, Cobham):*

- *Infrastructure totally insufficient*
- *Will adversely affect air quality in a heavily polluted area*

**b. support lower density developments that maintain the open character of an area and reflects the surrounding character**

- Yes   
No   
Don't know



Please explain your answer:

- *Do not believe Parcels 14 or 20 should be developed. The analysis is subjective and flawed*

## Affordable Housing

Given the need for affordable housing in Elmbridge and the nature of development sites coming forward do you:

13. Agree with our approach to continue to apply Policy CS21 of the Core Strategy e.g. consider on a case by case basis whether local circumstances are sufficient to warrant the requirement of affordable housing contributions on all sites where there is a net increase in housing and where it is viable?

- Yes, I agree
- No, I disagree
- I don't know

Please explain your answer:

- *A blanket approach to the challenge around development of affordable housing regardless of the quality of life and/or environmental impact is not the right way to go. Each area is different and there needs to be some accurate science behind the proposed development of each site in the Borough*

## Gypsies, Travellers and Travelling Showpeople

14. Are there any other aspects of Government policy which you think we should consider with regard to meeting the accommodation needs of non-travelling Travellers?

- Yes
- No
- Don't know

Please explain your answer:

## Housing Needs

15. Do you consider there to be any other specific housing needs that are an issue within Elmbridge and that we should seek to address as part of the new Local Plan?

- Yes
- No
- Don't know

Please explain your answer:

## The Economy: Offices, warehousing and industry

**16. Do you agree that the Council should seek to protect our most important and strategic employment areas from redevelopment to uses other than offices, warehousing and factories?**

- Yes, I agree
- No, I disagree
- I don't know

*Please explain your answer:*

- *Mixed residential/retail/small business developments are very viable and effective.*
- *Mixed residential/retail/small business developments are the norm in many other countries in Europe and have proven successful.*
- *Mixed residential/retail/small business developments are likely to draw the required talent/labour resources to the strategic employment areas in the Borough and do so in a more affordable manner.*

**17. If not, what degree of flexibility do you consider would be appropriate with regard to alternative uses in such areas?**

*Please insert your comments here:  
Complete flexibility and open mindedness*

## Brooklands

**18. Do you think that there are any exceptional circumstances that would support the amendment of the Green Belt boundary at Brooklands to support the further development of employment uses at this site?**

- Yes
- No
- Don't know

*Please explain you answer:*

**19. Other than Green Belt what other barriers do you consider could prevent further development at Brooklands?**

*Please insert your comments here:*

## Sandown Park Racecourse

20. We will seek to maintain our broad support for tourism related development as set out in the Core Strategy. However, to recognise the importance of Sandown Park Racecourse as both a sporting and exhibition venue should we:

- Encourage the redevelopment of Sandown Racecourse to provide improved and extended conference and hotel facilities?

Yes   
No   
Don't know

*Please explain your answer:*

## Retail provision in our town and village centres

21. Given changing consumer habits should we:

- Maintain our policy of focussing new retail development to town and village centres?

Yes   
No   
Don't know

*Please explain your answer:*

- *There should be a focus on mixed residential/retail/small business developments in these areas.*
  - *Mixed residential/retail/small business developments are the norm in many other countries in Europe and have proven successful.*
  - *Mixed residential/retail/small business developments are likely to draw the required talent/labour resources to the strategic employment areas in the Borough and do so in a more affordable manner.*
- Continue to protect primary shopping areas from other uses as set out in the current Core Strategy?

Yes   
No   
Don't know

*Please explain your answer:*

- *There should be a focus on mixed residential/retail/small business developments in these areas.*

- *Mixed residential/retail/small business developments are the norm in many other countries in Europe and have proven successful.*
  - *Mixed residential/retail/small business developments are likely to draw the required talent/labour resources to the strategic employment areas in the Borough and do so in a more affordable manner.*
- **Consider allowing other important uses in primary high street shopping frontages such as doctor’s surgeries, dentists and libraries?**

Yes

No

Don’t know

*Please explain your answer:*

- *Flexible usage of urban/high street areas should be encouraged.*
- *Mixed residential/retail/small business developments are likely to draw the required talent/labour resources to the strategic employment areas in the Borough and do so in a more affordable manner.*

## The Natural and Built Environment

### Open Space

**22. Should the Council continue to give a high level of protection to all open spaces and designate those spaces that meet the criteria for Local Green Spaces?**

Yes

No

Don’t know

*Please explain your answer:*

- *Green spaces provide the “green lungs” to counter the increasing urbanisation*
- *Creative design should be used to maximise the opportunity around these areas.*

### Biodiversity and the Thames Basin Heaths Special Protection Area

**23. Do you agree with our approach to biodiversity and mitigating the impact of new development on the Thames Basin Heaths habitat?**

Yes

No

Don’t know

*Please explain your answer:*

## Heritage and Historic environment

**24. Do you agree that our strategic and pro-active approach to supporting our heritage assets is appropriate?**

- Yes, I agree
- No, I disagree
- I don't know

*Please explain your answer:*

**25. If not, what approach do you think we should take?**

*Please insert your comments here:*

## Design and Character

**26. Do you agree that the Council's current approach to considering design and character is appropriate?**

- Yes
- No
- Don't know

**27. If not, what approach do you think we should take?**

*Please insert your comments here:*

- *Creative design should be used to maximise the opportunity around these areas.*
- *There are opportunities for commercial development close to open spaces that should be considered.*
- *Mixed residential/retail/small business developments are likely to draw the required talent/labour resources to the strategic employment areas in the Borough and do so in a more affordable manner.*

## Flooding

**28. Should we look at including a policy providing more detailed advice on what is required to limit the cumulative impact of small scale development on flood risk?**

- Yes
- No
- Don't know

*Please explain your answer:*

- *Any plan of this complexity cannot be considered in isolation and hence we fundamentally disagree with an approach that just singles out housing.*

## Sustainable transport and travel patterns

**29. Do you consider the existing policies seeking to reduce the impacts of new development with regard to delivering more sustainable travel patterns outlined above are still appropriate?**

- Yes
- No
- Don't know

*Please explain your answer:*

**30. Are there other approaches we should consider?**

- Yes
- No
- Don't know

*Please explain your answer:*

## Infrastructure Delivery

**31. What do you consider to be the essential infrastructure items required to support new communities e.g. the potential development of the 3 key strategic areas?**

*Please insert your comments here:*

- *Opportunities should be explored near to established fast transport links with easy transport access. An example would be the fast Woking/Walton/Esher line*
- *Providing infrastructure for the three identified sites is considerably more complex and expensive than linking one larger site in a logistically better positioned area*
- *Current infrastructure and services are already not fit for purpose.*
- *Essential infrastructure developments that must be considered before development of the proposed areas include:*
  - *Alternative road patterns be developed to ease existing and future traffic congestion, including improvement of rail road bridges, roundabouts and traffic lights.*
  - *Adequate number of schools, surgeries and green areas to ensure quality of life for residents.*
  - *Parking at or near transportation links, including Stoke d'Abernon and Cobham Stations.*
  - *Improvements of bus services in area offering alternative to travel by car.*
-

**32. What smaller infrastructure improvements do you think could be made within your local area to address some of the negative impacts arising from new development?**

*Please insert your comments here:*

### **Any other issues?**

We recognise that there may be other issues or options we have not considered that you would like to raise. If there are we would like to hear these and consider them as part for this consultation. Please use this page to write anything else you would like us to consider.

- *The Strategic Consultation paper contains numerous flaws and inconsistencies. The methodology is subjective and flawed*
- *Entire premise of the consultation rests on the requirement to build 9480 new homes. The probability of this forecast being correct needs to be understood – is it enough to remove Green Belt status forever?*
- *The paper has only explored 3 parcels of so called “weakly performing” land – other parcels of so called “weakly, moderately or strongly” performing may be more suitable for development e.g. nearer to higher urban areas*
- *No consideration given with the proposals for the Cobham & Stoke d’Abernon proposals of access to jobs and employment. Limited employment opportunities in the immediate area as opposed to exploring options in Walton or Weybridge*
- *Economics of building lower cost housing on areas of Elmbridge (parcels 14 and 20) that are focused on high value homes. Risk if Green Belt is removed that Millgate Homes (current owners of 45 acres of parcel 14) will look to build more high-end (4+ bedroom) homes and pay the Council off as they have done on the existing building. What makes the Council think this would change in the future?*
- *Elmbridge strategy does not support the stated EU requirement which seeks to preserve and enhance the quality of life of its residents, both current and future. In our opinion Elmbridge proposals directly contradict these EU directives*
- *Timing of this consultation being launched just prior to Christmas, the lack of information provided to local residents and the length and complexity of the questionnaire seem to lead to the conclusion that the Council is simply going through a process and not seriously open to any challenge from local residents*
- *These proposals have no regard to the size of the existing settlements where the new house building is being considered and the impact on their existing communities and infrastructure. Because Elmbridge is neither a place of being or a community in its own right but a collection of very separate and different communities and settlements, any sensible housing strategy has to be broken down and as a starting point to look at each settlement / community and assess how many additional dwellings need to be accommodated having regard to the size of that settlement to Elmbridge as a whole.*
- *As the whole purpose of deselecting green belt land is for meeting housing need, it is a flawed process that ignores infrastructure. Green belt land in an urban or semi urban community may be more appropriate for development where there is adequate or good infrastructure than where it is in a rural or semi rural community where there is inadequate or poor infrastructure.*