Points on Consultation Questions – Mar 2020

Before Question 1 the Council summarise what they think are the **emerging key issues and challenges** facing it. The Council then ask whether what are identified are the right ones or whether there is anything missed. The Trust considers that while the issues (objectives) identified are important and right, greater emphasis is needed on a number of points.

1. Preparing for any impacts from climate change and reducing the borough's carbon footprint.

Reword as "Preparing for the impacts of climate change and reducing the borough's net carbon footprint to zero by 2030". That introduces the target already set.

2. Relieving congestion which hinders movement of people and goods through and around the borough at peak times.

Add "and exacerbates our carbon emissions and air pollution". This is as important an aim as easing movement

3. Increasing cross-borough accessibility and encouraging sustainable travel.

Agreed

4. Improving air quality.

Agreed

5. Enhancing access to open space and making the most of our green and blue infrastructure.

Add after open space "where this is consistent with other aims". Enhancing access is not always the point – often leaving things to nature is necessary (see 6).

6. Conserve and enhance the borough's natural assets, rivers and waterways and tranquil areas.

Agreed provided enhancements are natural and do not lead to unnecessary urbanisation.

7. Management of water supply, water quality, waste water management and flood risk.

Agreed, save there is an additional need for the Council to be proactive to prevent localised flooding. Climate change is resulting in wetter weather and that must be planned for.

8. Improving choice of employment space which responds to market demand and enables businesses to grow without leaving the borough.

There should be recognition that there is no need to attract new industries from outside the borough as well as there being a focus of growing existing local businesses serving the needs of the local people. Employment for many residents is by way of commuting particularly to London and that needs to be recognised and catered for.

9. Maintaining vibrant and adaptable town and local centres which respond to changing shopping habits and community needs.

Agreed

10. Enhancing and maintaining the borough's attractiveness and distinctive identity as a place to live, work and visit.

As implied Elmbridge must remain distinct from Greater London. In addition the different character of settlements in Elmbridge must also be retained – there must be a hierarchy of settlements and the character SPD's given an assured status.

11. Improving health and wellbeing of residents.

Agreed

12. Providing the right types of homes to ensure housing choice to meet the needs of the community.

Agreed. The current SHMA mandates housing to be of the right tenure (predominantly social rented) and in the right sustainable locations.– The Trust suggests within 500m of frequent and reliable public transport and close to amenities like doctors, dentists, schools , a wide range of shopping and community centres.

13. Addressing affordable housing shortage.

Agreed but this greatly understates this housing issue. Using the word "affordable" weakens the essential need for new housing in the borough to be social housing.

14. Estate and community regeneration.
Agreed.
15. Protecting and enhancing the borough's historic and cultural assets.
Agreed
16. Delivering the strategic and local infrastructure to support growth and regeneration.
While national policy envisages growth this should not be a key issue. Recognition is needed of the infrastructure needed now for the residents we have (as with regeneration and that the borough's capacity for growth is limited by planning constraints so that it accommodates only what the borough needs.

General observation. The challenge of preventing the loss the of Green Belt, green space, garden space, sport and recreational space, allotments, trees and landscape and enhancing the same is a key 'issue and challenge" and should be a priority in the Council's list.

In **Question 2** the Council ask whether you agree with achieving listed ambitions by 2036 and whether there is anything else the vision should be aiming for.

1.   A fairer place where there are quality homes for all and there is housing choice
Agreed. This does correctly imply that some previous policy could have been fairer.
2.   Environmentally sustainable borough where growth and new development has not been at the expense of the environment and resources
A focus on growth should be avoided. Suggested wording "Environmentally sustainable borough where new development has been to meet local needs and only allowed when it is not at the expense of the environment and resources"
3.   Resilient to climate change and where air quality improvements have been made to the benefit of residents, visitors and the borough
Agreed
4.   An attractive place where new development is well designed, interesting and helps to make my area distinctive
Agreed, but the focus should not only be on new development only - all Elmbridge needs to have benefited from this.
5.   Where the necessary infrastructure was delivered at the right time to support good growth
Agreed, if there was recognition that the right time was before any development was considered to foster that good growth
6.   Where our historic and cultural assets are valued and enhanced
Agreed
7. A place with vibrant communities where my family and I have a sense of belonging
Agreed. The role of local community amenities and organisations will have been recognised.
8.   A place where my business is able to prosper and grow without leaving the borough
Agreed. We need good local businesses that serve the residents of the borough recognisable as good growth.
9.   Where there are strong, locally distinctive centres where I want to visit and spend my leisure time
Agreed
10.   Where I feel safe to walk and cycle around the borough so I'm not as reliant on my car
Agreed

In **Question 3** we are asked if the objectives are the right ones and whether there any objectives that you think the Council have missed?

1.   Deliver sustainable development and vibrant places that are excellently designed to achieve a

better quality of life, a prosperous economy and a healthy built and natural environment for the benefit of existing residents and future generations.

The Trust has already commented on the fixation on growth and suggests that "Deliver sustainable development and ……." Could be replaced by "Maintain Elmbridge as having…… ".

2.   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.

Agreed

3.   To provide the environment and opportunities to foster a prosperous economy with modern, flexible and well-connected workspaces where industries and businesses can thrive. Where our locally distinctive centres offer a vibrant place to live, work and socialise, continuing to be the heart of our communities.

Agreed, save for the implication that policies could attract new industries to Elmbridge when planning constraints cannot accommodate that.

4.   To deliver quality homes for all to create inclusive communities, promoting healthy lifestyles and positively contribute to the physical and mental health and wellbeing of those that live, work and visit the borough.

Agreed, save that rather than the emphasis being on delivering new homes these objectives should start with being for the existing population

5.   Ensure the delivery of the right infrastructure in the right place and at the right time to support growth.

Again the emphasis should not be on growth – infrastructure is needed for the existing communities.

General Observation. Again there is a need to emphasise the objective of preserving the Green Belt and other natural environment (although referred to later) and to prevent development upon it.

Question 4 follows a long explanation as to how the Council see their proposed policy directions **to conserve and enhance our natural environment,** and asks whether you agree them. **Question 5** gives you the opportunity to comment.

1.   Improving air quality and reducing carbon emissions.

Agreed. Needs to be linked to detail as to how it would be achieved

a.   Encouraging active and sustainable transport within the borough to reduce carbon dioxide emissions and promote air quality improvements.

Agreed. Needs to be linked to detail as to how it would be achieved

b.   Supporting pro-active interventions to enable a more sustainable, low carbon future for Elmbridge e.g. introduction of borough car clubs and an electric vehicle charging point network and that new development contributes to delivering a 'destination led' network (home-business-retail/leisure-home).

Agreed but needs additional detail for the transfer of movement to buses, electric only in due course.

c.   Promoting sustainable design and construction principles to reduce the associated carbon dioxide emissions of all new development.

Agreed but principles should become required standards.

d.   Exploring inclusion of targets for minimising Carbon Dioxide emissions including the requirement of zero carbon developments and reduction beyond maximum allowable emissions set out in Building Regulations.

Agreed - particular reference to the aim of reducing the borough's net carbon footprint to zero by 2030.

2.   Conserving and enhancing biodiversity

a. Conserving and enhancing the borough's biodiversity, especially where there are recognised habitats, species and sites.
Agreed
b. Supporting Suitable Alternative Natural Greenspace (SANG) to provide alternative areas for residents to visit and to protect sensitive internationally protected habitats found within the Thames Basin Heaths Special Protection Area (SPA).
Agreed
c. Improving ecology and ensure that new development results in biodiversity net gains.
Agreed
d. Promoting mitigation and avoidance of light pollution which can be harmful to local biodiversity as well as residential amenity.
Agreed

3. Waste and resource management
a. Supporting the optimisation of development land and ensuring that development proposals represent an efficient use of the borough's land supply and contributes to meeting local development needs. Optimisation should primarily be about enhancing local communities with development respecting the character of those.
b. Continuing to resist inappropriate development in the Green Belt, except where justified applying national policy.
Delete reference to national policy. The starting point must be that all development in the Green Belt is per se inappropriate with very special circumstances required to establish otherwise. A policy consistent with the views of most residents would unequivocally state that there should be 'no Green Belt releases'.
c. Encouraging the prudent use of natural resources and supporting the use of sustainable construction materials and methods in accordance with the waste hierarchy.
Agreed
d. Ensuring new buildings and conversions are water and energy efficient and promoting the principles of the energy hierarchy.
Agreed
e. Promoting the incorporation of water conservation devices and recycling techniques in new development to improve water efficiency. Exploring the requirement for new homes to achieve water use of no greater than 110L per person per day.
Agreed, but there should be particular reference to water metering for consumption of water by all properties in the borough.
f. Improving river and ground water quality and continue to work with the Environment Agency and other stakeholders on flood mitigation and resilience schemes.
Agreed but with the emphasis on flood prevention

Again at **Question 6** the Council set out some policy proposals, this time on **grow a prosperous economy** and asks whether you agree them, with **Question 7** giving you the opportunity to comment.

1. Employment land supply
a. Provide and maintain a portfolio of employment sites that responds to businesses needs including the needs of Small Medium Enterprises (SMEs) and business start-ups.
Agreed as an aspiration but who maintains the "portfolio of employment sites" and how are they protected from being converted to housing?
b. Ensuring efficient use of land by densifying and intensifying new and existing employment uses in strategic locations.

The Council must ensure that such land is safeguarded as strategic employment land and not released on the basis that other employment land can be found elsewhere in the borough. There is anyway, manifestly no need for more new employment land given the proliferation of empty offices and shops around the borough. Employment policy must reflect transport difficulties within the borough and not encourage entrepot activities or undermine the shopping facilities on high streets.

2.   Supporting the delivery of affordable and connected workplaces.
a.   Mixed use development: Promoting employment including accommodation for SMEs and business start-ups as part of mixed-use schemes in accessible locations including town and local centres.
Agreed provided the emphasis is not just including but preferring town and local centres (see 3). It must go without saying that no Green Belt, green space, natural areas, recreational land or equivalent should become employment land.
b.   Vibrant town and local centres for all: Maintaining the existing town and local centre retail hierarchy within the borough and identifying primary shopping areas. Agreed. Putting vibrancy back into our high streets is urgent and the Council should lobby for change to business rates? The availability of car parking places and balance of car parking charges need to be frequently monitored.

3.   Supporting the role of town and local centres as community hubs where people live, work, shop, socialise and spend their leisure time.
Strongly supported.
a.   Deliver vibrant and locally distinctive centres, each with their own identity and sense of place. Encouraging specialisation and differentials between them.
Strongly supported
b.   Pro-actively managing vacant floor space in centres by supporting and promoting 'pop-up' and 'meanwhile' uses where appropriate.
Agreed provided the concept does not lead to a degrading of the area in which they are located.
c.   Supporting café, restaurant, community, leisure and night-time/ evening economy uses in centres.
Agreed, subject to the hierarchy of settlements.
d. Promoting public realm improvements within centres to create attractive spaces for the enjoyment of users and visitors which aid to bring people together, supporting social cohesion.
Agreed
b.   Supporting the borough's visitor attractions and promoting access to the borough's historic and cultural offers.
Agreed

5.   Connectivity and movement
a.   Supporting the delivery of high-quality digital infrastructure as well as ensuring full-fibre connections to all new residential and business developments.
There should be a policy of ensuring FTTH service to all homes and businesses in Elmbridge by 2030, and subject to safety, 5G coverage throughout Elmbridge with free 5G wifi for town and local centre hotspots?
b.   Supporting transport improvements that increase capacity, improve user experience and ease of movement.
This should involve a switch to public transport. Many Elmbridge residents are employed with commuting to London and should be specifically served with buses, cycle racks, parking, shops at stations, etc.

c.   Ensure services and facilities are located to reduce reliance on the car and increase pedestrian footfall and that streets and public spaces are well designed to encourage walking and cycling.
Agreed.

Again at **Question 8** we are asked whether you agree with the proposed policy directions to **seek to ensure health and wellbeing for all** with **Question 9** giving you the opportunity to comment.

1.   Excellently designed development and spaces.
a.   Pro-actively create sustainable, excellently-designed places and multi-functional spaces that respond to their context, environment, local history, culture and heritage and integrate with their surroundings through use of best practice and industry standards on design.
Agreed. There must be greater emphasis on good design. External design in particular has been wanting on too many developments. Local character must be respected and street scenes retained or improved. This is not about measurement (dwelling separation, plot ratios, heights, mass and types of dwelling but also style (e.g. Georgian is not the same as Tudor, render not the same as brick, whether slate or clay tiles suit). Appropriate amounts of garden space must be retained and not turned into hard standing space.
b.   Protecting and enhancing the borough's historic and cultural assets including Ancient and Veteran Trees and the borough's strategic views. Ensuring that new development respects these assets and their settings.
Agreed
c.   Explore the introduction of local design guidance and / or design codes for particular sites or areas to assist in proposals according with good design practice.
Agreed
d.   Encourage the provision of well-designed and well-maintained public spaces which can be enjoyed by communities and visitors and has a positive effect on climate change adaptation, flood risk, the environment and wildlife.
Agreed although while public spaces are vital but so are 'views'. Public spaces must not be unduly 'urbanised' via car parks, refreshment facilities, paved paths, etc.
e.   Promoting new developments that are visually attractive and positively contribute to residents' health and wellbeing and which support social inclusion and provide a sense of community cohesion.
Agreed
f.   Ensuring that buildings and public spaces are accessible for everyone. Incorporating lifetime home standards, wheelchair accessibility guidance and exploring targets for accessible and adaptable buildings as set out in part M of the Building Regulations.
Agreed although even higher standards are available.

2.   Quality homes for all
a.   Optimise opportunities to increase the supply of new homes.
Optimisation must also mean the recognition of constraints that exist to being able to supply new homes and not result in inward migration from London and elsewhere.
b.   To continue to support and maximise the delivery of affordable homes, including contributions from small housing sites (of less than 10 homes).
Agree. Developers have taken advantage of flaws in the current provisions, which must be tightened.
c.   Encourage a range of housing and supporting a mixture of housing tenures and unit sizes to deliver the homes needed locally. Agreed if, as recognised in the most recent SHMA, social and affordable small units are favoured.
d.   Ensure delivery of housing and care for our older residents to meet their needs and support independent living.

Agreed but the Council needs to recognise that developers have currently used provision for older residents to build an excess of this type of housing with the result that it can only be filled by inward migration rather than catering for local needs. The objective must be a balance of age groups throughout the borough.

e.   Delivering high quality homes for all and places that provide choice to existing and future residents' by responding to evolving lifestyles and meeting their needs over the course of their life-time and changing circumstances.

Agreed. In terms of design houses must be zero carbon, have fast chargers, etc

f.   Ensuring new homes are designed to have adequate space internally and externally for storage, activities, parking and be adaptable to different occupiers needs during their lifetime.

Agreed provided constraints such as the need for garden and amenity space are recognised.

g.   Ensuring private amenity space for every home.

Agreed. Too often permission has been given when this aspect has been wanting.

3.   Connectivity, movement and parking

a.   Promoting inclusion of facilities and infrastructure for home office working within residential developments to support home working.

Agreed

b.   Promoting active living environments and ensuring that new development delivers opportunities to reduce reliance upon the car and promote walking and cycling especially for local destinations.

Agreed with the provision of public transport for longer local distances.

c.   Incorporation of minimum car and cycle parking standards for new development that respond to the accessibility of the location and the local parking demand.

Minimum onsite parking provision must be implemented. Even if electric there will be a trend to increased vehicle use until other modes of transport are made available to achieve sustainability. Elmbridge must follow the lead of many boroughs by demanding parking below ground in appropriate sites, both in shopping centres and in private dwellings.

d.   Promotion of car club schemes for residents and businesses to reduce car ownership and private parking.

Agreed

4.   Social and community infrastructure

a.   Ensuring that growth in population and new homes are supported by the necessary social and community infrastructure.

Sustainability needs a clear definition and tight control. It cannot be sustainable to locate housing more than 500M from frequent reliable public transport and a complete range of school, health and shopping facilities.

b.   Allocate sites for infrastructure, such as new schools, as needed in the plan period.

See above. The policy must be to have the infrastructure in place before permissions are given for development that is to rely on it.

c.   Safeguarding existing social and community infrastructure including education and health facilities.

Agreed

d.   Support the co-location of social and community facilities in town and local centres.

Agreed.

e.   Encouraging the inclusion of new social and community facilities as part of residential or other mixed-use schemes.

Agreed. Community hubs should be provided and encouraged.

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General observation - Health and well being depend to an extent on there being little change, maintaining and enhancing what exists and not encouraging growth and development. There is no clear policy on enhancement of our Green Belt, green spaces and recreational spaces to accomplish improved well being. There are no policies to improve aspects of social and health care that the council can influence using its duty to co-operate with other authorities

Question 9 asks whether you have any other comments (for example, other issues or directions the Council should consider). **Question 10** asks "As this consultation is the last of the early engagement on the Local Plan, do you have any further comments to make on this consultation or any of the previous consultations to date?"

The Trust identifies these at this time

Housing

1. As the result of the 2017/18 consultation showed, and the 2019 consultation reconfirmed, there is incontrovertible strong opposition everywhere in Elmbridge to any loss of Green Belt land. and green space. This part of the Vision must be paramount in the Local Plan. Participation was higher than in similar consultations in other boroughs and the Trust totally rejects any suggestions that those consultations were not conclusive and did not reflect the feelings of residents across the borough.
2. When looking at constraints on development it needs to be recognised that land is also required for infrastructure to support additional housing.
3. Market signals must be examined against adherence to targets that are dated and unrealistic. By way of example the evidence is that small apartments distant from town centres are unwanted. The market demonstrates that too many apartments have been built for the older population. The number of rooms sought in a dwelling can be unrelated to the number of people living in them.
3. The consultations to date seem to have, for the most part, avoided the issue of safeguarding local character. The character SPD's must be given enhanced status and legal force. In particular there should be protection against 'garden grabbing' and replacing with hard standing for cars and additional building space.
4. The consultations to date do not seem to have sufficiently highlighted local considerations. Elmbridge is not a uniform borough but rather a collection of settlements with their own characters. and local concerns.
5. For necessary sustainability all new housing must be located to minimise the need for vehicle journeys (including collect or deliver) and best within walking distance (500m) of shops, doctors, schools and frequent reliable public transport. Defining this would fit the demographics of the housing most needed (primarily social rented), the need to tackle the climate emergency and the need to revitalise our towns (by bringing them more footfall).
6. In looking at policies for housing the Council needs to be more proactive about bringing existing properties into full occupation taxing empty and dilapidated houses and second/holiday homes as necessary.
7. The Council need to track of planning permissions granted and make clear they will not be renewed if unimplemented.

Policy relating to the Council's assets

1. The Council has direct influence on the way it uses its assets and should have policy formulated that takes in the climate emergency and the aim to become carbon neutral by 2030.
2. The Council needs to use its own assets and directly intervene in the property market to realise the need for social housing.

3. The Council owns many car parks across the borough that could be better utilised including for underground parking and other uses above and a policy should be formulated accordingly.

Transport

1. Working with Surrey County Council is vital and the Trust understands that the Elmbridge Borough Council has consultants working with SCC for its own modelling on traffic. The Trust would like to see more co-operation on the issue of on road car parking. The SCC Infrastructure Delivery Plan is an important document to which Elmbridge contributed with other authorities on housing and other issues.
2. The Trust is concerned that the Council is not sufficiently promoting by policy measures that could improve many aspects of life in the borough including cutting speed on residential roads (Twenty is plenty!), Home Zones, discouraging HGV's and through traffic, and shifting movement to buses, community buses school buses and then onto Electric buses.

Climate emergency and trees

Political parties have now recognised the urgent need to plant more trees, with a need for plant6ing three times the number presently being planted. Trees capture carbon dioxide and pollution to offset emissions and slow down the run-off of water, helping to prevent flooding. This makes planting in urban areas as important as rural. Existing trees need protection and the Council must plant, and must ensure that others plant, trees where suitable. This should feature as a separate challenge.

Working with other authorities

1. The Council knows what large infrastructure projects are on the horizon and needs some stated vision about how it will approach them.
2. There needs to be policy to ensure cross-authority issues such as education, social care, health, noise and light. Pollution, crime and road safety are tackled.
3. The proximity of Heathrow Airport should impinge on Elmbridge Borough Council in considering housing, transport and above all, aircraft noise. The relationship should be formulated in a policy that ties in with the Council action on climate change.

Questions 11 and 12 go on to ask whether you have taken part in previous consultations. **Question 13** enables you to upload a file in support of your answers.