

HEARING STATEMENT RESPONSE TO INSPECTOR'S STAGE 2 MATTERS, ISSUES & QUESTIONS

1.0 Introduction

1.1 This Hearing Statement has been prepared on behalf of Burhill Group Limited in response to the Elmbridge Local Plan Examination, in respect of the following Matters:

- **Matter 3, Issues 5 and 6:**

- Sustainability Appraisal
- Spatial Strategy

Word count = 2400

- **Matter 4, Issue 7:**

- The housing requirement

Word count = 600

- **Matter 5, Issue 8:**

- Housing Delivery
- The Green Belt

Word count = 2500

1.2 As the Local Plan is being examined under the September 2023 version of the National Planning Policy Framework (NPPF), all references to the NPPF within this Statement are therefore made with reference to that document.

2.0 Responses to the Matters, Issues and Questions

Matter 3 – The vision, spatial strategy, and the distribution of growth over the Plan period.

Issue 5: Whether the vision and proposed spatial strategy is justified, effective, positively prepared, and consistent with national policy including the proposed distribution of development across the Borough.

The Sustainability Appraisal

Question 2.9 Has the SA considered all reasonable options for a spatial strategy that would secure a sustainable pattern of development in the borough?

- 2.1 No, the SA has not considered all reasonable options. With reference to the SA process flowchart set out within the PPG, the process of refining alternative options as part of Stage B of the process has been inadequate. EBC has had opportunities to consider ways of mitigating adverse effects and maximising beneficial effects by exploring the alternative options in greater detail, but has chosen to proceed on the basis of the selected strategy with further work undertaken after the plan was submitted for examination in an attempt to justify its position.
- 2.2 Options being considered in 2019 were too quickly dismissed on the basis that they lacked public support, despite scoring well against the SA criteria in some cases, for example Option 5 which scored positively or neutrally against all but one criteria, and proposed to meet the borough's identified housing need. A perceived lack of public support is no sound or justified way to dismiss reasonable alternatives.
- 2.3 Option 5 does not feature as a shortlisted reasonable alternative, when sites forming part of it, such as Land at Chippings Farm, were de-selected as part of subsequent Option 5a.

Question 2.16 The SA scores option 5a as a negative against the homes objective as it would fall short of the LHN figure by some 500 units. Is this correct?

- 2.4 Against the scoring criteria set out in Appendix 5 we acknowledge that this is technically correct, because it accords with the assessment methodology. But this assessment outcome has been applied prematurely. The PPG clearly sets out the process EBC should have gone through in instances where there were insufficient sites / broad locations to meet needs. It says [*with Bidwells' emphasis in bold*]:

When preparing strategic policies, it may be concluded that insufficient sites / broad locations have been identified to meet objectively assessed needs, including the identified local housing need.

In the first instance, strategic policy-making authorities will need to revisit their assessment, for example to carry out a further call for sites, or changing assumptions about the development potential of particular sites to ensure these

make the most efficient use of land. This may include applying a range of densities that reflect the accessibility and potential of different areas, especially for sites in town and city centres, and other locations that are well served by public transport.

If insufficient land remains, then it will be necessary to investigate how this shortfall can best be planned for. If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met in adjoining areas through the process of preparing statements of common ground, and in accordance with the duty to cooperate. If following this, needs cannot be met then the plan-making authority will have to demonstrate the reasons why as part of the plan examination.

Paragraph: 025 Reference ID: 3-025-20190722

Revision date: 22 07 2019

2.5 If the SA had correctly developed and refined alternatives as per the PPG flowchart, the Council would have considered ways of mitigating adverse effects. As Option 5a only falls 500 homes short, the Council could easily find ways to mitigate the adverse effect of falling short of its LHN, by finding further site(s) submitted for consideration through the process. There is no evidence that the Council has gone back to revisit assumptions/outcomes that were made as part of the site assessment process. It is in fact apparent that the Council has sought to justify its approach by producing further work to explain why it hasn't taken sites forward.

2.6 In a single site, Land at Chippings Farm would deliver at least an additional 500 dwellings required to mitigate the adverse effect of falling short of its LHN under this option. It accords with the evidence base which confirms that the site has a low-moderate landscape sensitivity to development. The Green Belt Boundary Review (document reference OTH001) considers that the site represents an opportunity for large-scale development.

Question 2.19 Is it clear how alternative development options within the SA which would meet local housing need have been assessed and is it clear how the conclusions have been reached? In particular, is it clear how the scoring of options 4a, 5a and 6 have been arrived at and will the proposed strategy promote a sustainable pattern of development that seeks to meet the development needs of the area (paragraph 11a of the Framework).

2.7 No, it is unclear how alternative development options have been assessed and it is unclear how the conclusions have been reached. For instance, as part of the process of refining the options, the SA states at paragraph 3.65 that:

“it was important to undertake further work on the Green Belt sites for option 5 and make sure that the final sites selected were the most sustainable. To help determine which of the 33 sites in Option 5 are the least sustainable and so should be removed, all 33 sites were appraised using the scoring system described at Appendix 5. Table 9 shows the SA results for all 3 sites and highlights the 12 sites that are now considered suitable for new Option 5a.”

2.8 The scoring system described at Appendix 5 provides no clue as to how sites were graded to enable comparative assessment of those that were selected for inclusion under Option 5a, as

compared with those that were excluded. Appendix 5 of the SA provides no clear methodology in this respect. This matters because it affects how the reasonable alternatives are presented against the selected option.

Issue 6: Does the Plan’s spatial strategy expressed within policy SS3 present an appropriate strategy, taking into account the reasonable alternatives?

Question 2.20 Does the Plan present an appropriate spatial strategy and in what way is this supported by the evidence base? In particular, will the proposed distribution of housing help to ensure that sufficient land will be available in the right places to meet the housing needs of present and future generations (paragraph 8 of the Framework).

2.9 No, the Plan does not represent an appropriate strategy. There are two reasons for this.

Deliverability and availability risks

2.10 The spatial strategy has an over-reliance on small sites in the early years of the plan period and, assuming these sites deliver in line with expectations, there remain significant doubts over the five-year supply – which EBC itself acknowledges is only 4.36 years in the Land Availability Assessment (HOU002).

2.11 Coupled with this, the trajectory as set out in Appendix A5 of the Plan is notably back-ended, with a significant number of the larger allocations forecast to deliver between years 11-15 of the plan (notably ESH24 at the Civic Centre which is the largest for residential use in the plan) with the availability of many allocation sites unconfirmed or simply unknown. We are concerned that this approach faces the very real risk of non-delivery should any number of these allocations run into issues in respect of deliverability and/or availability following adoption of the Plan.

Lack of settlement hierarchy

2.12 The spatial strategy is not appropriate because there is no settlement hierarchy, which means that there is no overarching rationale that guides the distribution of development across the Borough. There is a lack of integration between different policy objectives for the Borough, which results in the plan being ineffective. For instance, the plan proposes to upgrade the centre of Cobham to the status of Town Centre under policy ECO3, as compared with its status under current policy as a District Centre. The supporting text to Policy ECO3 at paragraph 7.18 states that it encourages “*local development opportunities for retail and other town centre uses that can maintain and enhance the overall health, vitality and offer of a centre*”. However, the settlement of Cobham & Oxshott, Stoke D’Abernon and Downside as stated in the Policy SS3 text is attributed 12.8% of the total housing growth, which is notably less than the quantum of housing growth attributed to the other settlements with centres identified as Town Centres as follows:

- Esher 17.9%
- Walton-on-Thames 18.5%
- Weybridge 17.7%

2.13 There is no apparent analysis to demonstrate how this reduced level of proposed growth in Cobham would help support the newly elevated status of its Town Centre. This is symptomatic of the lack of a spatial strategy to help provide strategic direction to the Borough's growth as a whole.

2.14 The reasonable alternatives do not provide an appropriate response to this because they would not result in the allocation of any larger scale development sites in Cobham. However, should EBC seek to revisit the assumptions made in respect of Option 5a, it would be possible to see that Land at Chippings Farm, Cobham would be an appropriate location for a wide mix of new homes in the town to help support the role of its Town Centre.

Question 2.21 In what way will the spatial strategy address the Council's priority of addressing the acute affordable housing need within the Borough?

2.15 The spatial strategy will not address the acute affordable housing need within the Borough. EBC's brownfield only approach self-imposes a restriction both on the total quantum of affordable housing delivered, and upon the percentage of affordable housing that could be delivered on larger schemes. This approach means that the Plan is not effective and is therefore unsound.

2.16 There are several issues that this approach raises.

- **By its very nature, the strategy unduly restricts the total quantum of affordable housing that would be delivered.** The Affordable Housing Topic Paper (TOP002) identifies at paragraph 6.17 that relevant schemes could deliver up to 135 (or around 50%) of the total 269 affordable dpa need identified in the Council's LHNA. The Paper then states at 6.17 that *"in order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes; a quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full."*

Delivery of a higher quantum of EBC's overall identified affordable housing need is not contingent upon the development of 13,600 homes. EBC's strategy is predicated on a brownfield-led approach, where it is acknowledged that there is insufficient land of this type within the Borough. If EBC were to adopt a reasonable alternative that included greenfield sites, the overall quantum of affordable housing delivery would be increased, better contributing to the objective of creating mixed and balanced communities, and therefore the Plan would be more effective.

Furthermore, the heavy reliance on small sites as part of the strategy means that contributions gained would only equate to a financial contribution of 20%. This further reduces the extent of affordable housing that could be delivered in the Plan period.

- **The strategy unduly restricts the percentage of affordable housing that could be delivered on larger schemes, as compared with an alternative strategy that includes greenfield sites.** The Plan's affordable housing policy HOU4 proposes to reduce the level of affordable housing provision required for 10 or more dwellings from 40% to 30%. This follows recommendations from the Viability Assessment (OTH025) which confirms that this reflects a viability testing informed reduction.

This reduced 30% requirement proposed under the brownfield only approach already acknowledges to a certain degree the potential for a higher likely occurrence of abnormal costs. However paragraph 2.9.3 of the Viability Assessment states that *"for site typology testing, we have not allowed for abnormal costs that may be associated with particular sites."*

The proposed policy reduction is applied *before* site-specifics are taken into account. The reduced 30% affordable housing requirement therefore represents a best-case scenario.

EBC's track record does not support the expectation that affordable housing would be delivered in line with policy requirements. Paragraph 1.3.5 of the Viability Assessment identifies that "*approximately 58% of schemes currently comply with policy requirements for affordable housing. A further 30% are not compliant and have not made any contributions to AH. However, approximately 12% have produced a reduced level of contribution through the submission of a viability assessment and subsequent assessment and negotiation.*" So, this means that 42% of schemes in the Borough do not currently provide affordable housing in line with policy requirements.

- 2.17 This demonstrates that EBC's approach would simply fail to contribute to the objective of addressing acute affordable housing need in the Borough. This would not be the case if the Council were to take a more positive, ***Plan-led*** approach to greenfield development.

Question 2.22 Noting that the proposed strategy would not meet the Borough's objectively assessed housing need, in what way will the proposed spatial strategy support the Government's objective of significantly boosting the supply of homes (paragraph 60 of the Framework) by providing a sufficient amount and variety of land to come forward? In particular, in what way will the proposed strategy deliver the mix of homes needed? Is the Plan positively prepared in this regard?

- 2.18 No, the Plan would not support the Government's objective of significantly boosting the supply of homes, because EBC has made a policy decision not to meet the Borough's LHN. The proposed strategy would also fail to deliver 30% affordable housing because the identified sources of affordable housing leave a shortfall of approximately 1000 affordable dwellings.
- 2.19 The small size of many site allocations and their corresponding densities, as set out in LAA002, strongly suggest that a significant number of new dwellings would need to be flats in order for the anticipated delivery rate to be met. The Local Housing Needs Assessment (2020) recommends a breakdown of new dwellings by size of 30% three and four bedroomed units. We do not consider that the spatial strategy is appropriately equipped to deliver this proportion of larger family homes, with gardens, in a manner that accords with prevailing local character.
-

Matter 4: The Housing Requirement

Issue 7: Whether the Local Plan has been positively prepared and whether the approach is justified, effective and consistent with national policy in relation to the housing requirement.

Question 3.1 The housing requirement for Elmbridge has been calculated at 9705 homes. Policy SS3 sets out that the Plan will deliver at least 6785 net additional homes over the Plan period. This equates to some 453 dpa and will leave an unmet need of some 2920 dwellings over the Plan period. This is a significant shortfall. Is the Plan justified in not meeting the full LHN?

- 2.20 No, the Plan is not justified in not meeting the full LHN. This is because EBC has not demonstrated that it has done everything it realistically could to identify potential housing sites, contrary to NPPF paragraph 60 which states that “*the overall aim should be to meet as much of an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community.*” If this were the case, suitable Green Belt sites would have been identified for release as part of the strategy in accordance with the evidence base. Indeed, EBC had a strategy that would have amended Green Belt boundaries to meet housing needs, but this was rejected despite the fact that there was no support from other authorities to meet some of EBC’s housing needs. Additionally, the evidence supports a strategy that would have proposed Green Belt release to meet housing need. On the contrary, EBC has retrospectively provided justification for the proposed approach, by exaggerating the importance of the Green Belt in the Borough generally and at the site-specific level by disagreeing with its own evidence base (e.g. in documents TOP001 and OTH041). This is contrary to the NPPF which states the Government’s objective of significantly boosting the supply of homes and which requires Plans to be an appropriate strategy taking into account the reasonable alternatives and based on proportionate evidence.
- 2.21 EBC has not suggested that there is insufficient capacity within the Borough to meet its needs. This is demonstrated by the reasonable alternatives which include an option to meet the full LHN, by releasing Green Belt land. EBC has simply made a policy decision not to meet its needs and this approach is unsound.

Question 3.2 Does the approach demonstrate that the Plan has been positively prepared in accordance with paragraph 35 of the Framework and will it be effective?

- 2.22 No. The approach clearly demonstrates that the Local Plan does not seek to meet the area’s LHN. EBC has not adequately demonstrated that it has done everything it could realistically do to identify potential sites. Given the importance EBC places upon Green Belt protection, had it done so, and following the process of cooperating with neighbouring authorities, there would be evidence to demonstrate that EBC would have gone to greater lengths to minimise the extent of Green Belt release required, thereby minimising the nature and extent of Green Belt harm. Instead, the Plan proposes no Green Belt release as a matter of principle and this is at great cost to both market and affordable housing delivery, and the creation of sustainable communities.
- 2.23 Even if the Green Belt in Elmbridge did provide a strong reason for restricting the overall scale, type and distribution of development, EBC’s approach to avoid the release of any land from the Green Belt demonstrates a blanket policy approach without having regard to its evidence.
-

Matter 5: Housing Delivery

Issue 8 – Whether the approach towards the delivery of housing land is justified, effective, consistent with national policy and positively prepared.

Policy HOU1 – Housing Delivery

Question 4.4 Will the Plan provide for a five year supply of deliverable housing sites upon adoption with particular reference to the definition of deliverable contained within Annex 2 of the Framework?

Question 4.5 HOU002 states that the five year housing supply position is 4.36 years. How does this accord with paragraph 74 of the Framework which requires Local Planning authorities to identify and maintain a supply of specific deliverable sites sufficient to provide a minimum of five years worth of housing against their housing requirements? Is the Plan positively prepared in this regard?

- 2.24 Our response to these questions overlaps with our response to questions in respect of the spatial strategy above. Our key concern in relation to the trajectory relates to the slow delivery rate anticipated over the first five years of the Plan period, before more sizeable allocations begin to kick-in in the latter stages of the Plan.
- 2.25 As the Inspector has rightly asked, there are deliverability and policy compliance issues that remain unanswered in respect of several site allocations and this will be scrutinised as part of the Examination process.

The Green Belt

Question 4.15 The Council have stated that the need in Elmbridge is no more acute/intense than in neighbouring boroughs. However, a majority of neighbouring boroughs (Guildford, Waverley, Runnymede, Spelthorne) have progressed a strategy with an element of Green Belt release and/or are able to meet their housing need in full. If the Council consider the need to be no more acute than these neighbouring boroughs, what is the rationale for Elmbridge not following this approach?

- 2.26 There is no sound reason for not following this approach. Topic Paper 1 (TOP001) seeks to address this point by stating at 6.208 that “*each Local Planning Authority area is different and, just because one authority determines is appropriate to alter the boundaries of the Green Belt, does not automatically transpose to others.*” This does not adequately explain the rationale for EBC not following this approach.
- 2.27 TOP001 presents the findings of the Core Strategy Inspector which states at 6.216 that “*even small-scale deletions from the Green Belt would be likely to be harmful and undermine its longer-term protection*”. The planning context applicable in 2011, when the Core Strategy Inspector’s report was published, is not comparable to today; the Core Strategy made provision for 281 dwellings per year – much lower than the current identified need, and the NPPF had not been published at that time which supports the Government’s objective of significantly boosting the
-

supply of homes. The context is demonstrably different, notably because affordability is now much worse.

2.28 Despite EBC's approach, we consider that the evidence demonstrates that exceptional circumstances for the release of Green Belt land **do** exist. The Exceptional Circumstances Case – Green Belt – Jan 2022 paper (document reference OTH043) confirms the acuteness of the housing need.

- The extent of available developable non-Green Belt land in the Borough would only meet 70% of the housing need.
- The average property price for the Borough in 2021 was higher than the England average by 56%.
- The affordability ratio in is severe and deteriorating. For Elmbridge in 2020 it was 16.83, placing it in the top 5% of least affordable local authorities, the 11th least affordable borough in England (only London Boroughs and the Surrey Boroughs of Epsom & Ewell and Waverley are ranked above).
 - Specifically in respect of Cobham, the Settlement Assessment (OTH038) identifies that local workers' salaries are at an average of £31,043 per year or £2670 per month and it would still cost 41 times a local salary for the price of an average property in this settlement
- The affordability ratio has increased from 12.73 in 2020 and is above Ratio for Surrey (13.37), the South-East (10.73) and London (14.84). Note that this has progressively increased from 12.73 in 2010.
- Despite falling just short of Local Housing Need, the sites identified through Option 5a would have been capable of providing approximately half of the affordable housing delivery across the Plan period, significantly more than the proposed strategy.

2.29 We consider that there would be difficulties in achieving sustainable development without use of Green Belt land. It is necessary to consider whether the failure to release any, or sufficient, land from the Green Belt would have unintended consequences for the Plan's identified Principles, for instance improving the choice of housing that is needed. OTH043 confirms at para 6.14 that 30% of all new market housing stock should be for three or more bedrooms. For affordable homes 40% should be for four or more bedrooms. We consider that to deliver this mix of dwellings would require sufficient sites with enough hectareage to accommodate this proportion of larger family dwellings, with gardens, in line with local character. It is clear that the Plan, with its brownfield only approach, would fail to meet this identified need.

2.30 Additionally, whilst realising the extent of housing need in the Borough, there is no evidence that the Council has made any attempt to minimise the extent of Green Belt harm through the targeted allocation of specific sites that a) would cause the least impact, and b) would provide the most substantive public benefits, or both. Such an approach is taken in neighbouring authorities and indeed elsewhere. Indeed, EBC's evidence base enables the Council to have taken such an approach but this has not been done.

Question 4.16 In general terms, the Framework seeks to support the Government's objective of significantly boosting the supply of homes. Paragraph 35 states that Plans should provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs. Paragraph 11 of the Framework sets out the approach to Plan making. In

what way does the Green Belt in Elmbridge provide a strong reason for restricting the overall scale, type or distribution of development?

- 2.31 The Green Belt in Elmbridge does not provide a strong reason for restricting the overall scale, type and distribution of development. EBC has sought to apply a blanket restriction on the release of land from the Green Belt as a matter of principle, based on unsubstantiated and vague reasoning that includes reference to “impact on character”, “diluting the sense of place”, and that it would “lead to an unsustainable pattern of development”. There is no suggestion that the absolute constraints present in the Borough, such as flood zone, land subject to environmental, heritage or nature conservation value, would prevent the delivery of sustainable development on land released from the Green Belt. This is confirmed by the reasonable alternative, Option 5a, which actually *seeks* to deliver LHN on land released from the Green Belt that would not be subject to such constraints.
- 2.32 As described in our response to Question 4.15 above, EBC presents the Core Strategy Inspector’s consideration of the Green Belt as relevant to the context of today. It is not relevant, nor is it the applicable policy test. EBC has provided reasons including the effect on character, but these are not strong reasons for restricting the overall scale, type and distribution of development. Furthermore the alleged effect on character is not appropriately evidenced.
- 2.33 EBC’s approach to how Green Belt release would negatively impact accessibility and retail centres is illogical. For instance, the Plan proposes to upgrade the centre of Cobham from its current status as a “District Centre” to become a “Town Centre”, in which further town centre development will be encouraged where it adds to the overall vitality and viability of the centre. However, TOP001 considers that outward expansion of the existing settlements on land released from the Green Belt could negatively affect the vitality, vibrancy and viability of the economic centres within them, on the basis the new residents would be located further from the facilities and services provided by the Borough’s centres; *“the further the distance of new homes from the centres, the less likely residents are to make the use of services provided.”* At 6.193 it states that *“as the range of shops / services / facilities provided by the borough’s centres is relatively limited compared to the higher order settlements just beyond the boundary, the Council considers this will have a negative impact on its centres”*...*“Elmbridge’s centres already retain relatively low proportions of residents’ spending on comparison and convenience goods. Locating new residential development on the outskirts of existing settlements is considered unlikely to reverse this trend.”* By far the largest site in Cobham that could deliver residential development to maintain the vitality and viability of the Town Centre is LA-20 land at Chippings Farm. The approach is illogical when additional population in the settlement increases the chances of maintaining the viability of the facilities in said settlement. There are also brownfield sites proposed for allocation that are located a similar distance from the Town Centre as Green Belt sites such as Chippings Farm, but which are included in the strategy by virtue of being brownfield.
- 2.34 Additionally, the Infrastructure Delivery Plan Update (INF003) contains a package of measures to improve cycle routes across the Borough, including Portsmouth Road South, the strategic north/south corridor linking Cobham and Esher town centres. This in itself would help improve accessibility and runs contrary to EBC’s stated position on the impact the release of land from the Green Belt would have. The release of Green Belt land in accordance with LHN would boost the potential of the Infrastructure Delivery Plan to seek additional infrastructure enhancements to boost accessibility further, but unfortunately the selected strategy means that this is not the case.
-

2.35 It is clear from the above that the sustainability reasons for not releasing land from the Green Belt are not strong, because the alleged adverse effects of doing so do not outweigh the benefits of creating sustainable communities by meeting objectively assessed needs for housing in the Borough, including affordable housing, through the release of land from the Green Belt. It is not a close-run thing.

Question 4.17 CD034a which was updated in November 2023 states that the Council consider the release of land from the Green Belt for housing purposes would negatively affect the borough's existing settlement pattern and thus cause harm to the character of Elmbridge's existing communities. Where in the evidence base is this assessment undertaken which explains how this conclusion has been reached?

2.36 We consider that there is no substantive evidence underpinning this approach. The reasoning provided by EBC to justify the harm that would occur to the Borough's existing settlement pattern and character of its existing communities is vague and unsubstantiated in its claim that by not releasing land from the Green Belt it would preserve an undefined "character" of existing communities, and that the development of Green Belt sites would result in the "*dilution of the sense of place that our residents value so highly*" (CD034a). The Density Study (HOU011), Urban Capacity Study (HOU012), and Heritage Impact Assessments (ENV005 & ENV006) for instance, make no such conclusions.

2.37 At the site-specific level, the Landscape Sensitivity Study (ENV013) identifies that the wider parcel within which land at Chippings Farm is located (SW6-A) contains "*a variation in landscape sensitivity...in the south west of the Landscape Unit, where the simpler, flat, enclosed, farmland landscape indicates a **Moderate-Low** sensitivity to change arising from residential and mixed-use development.*" This does not reflect EBC's assertions.

2.38 The Settlement Assessment (OTH038) identifies at 4.237 that Cobham's "*high-quality environment and access to the A3, M25 and Heathrow and Gatwick airports makes it highly desirable. This desirability has attracted extremely wealthy people to the area and this demand for high quality luxury housing has all raised prices to extreme levels. These housing types and housing prices are simply unobtainable for the majority of people. The settlement cannot attract a mix of people as there is very little affordable housing being built.*" It states further at 4.257 that "*the high affluence and wealth have affected the sustainability of the settlement as it has impacted the level of available affordable housing. A better mix of housing at a reasonable price is vital to the area if it is to attract a mix of people.*" The SWOT analysis identifies threats to the settlement as including the district centre becoming too expensive and excluding people, and a lack of housing mix and affordability pushing smaller families out of the settlement.

2.39 We consider that these factors present a much more significant threat to the character of Elmbridge's existing communities, than the development of Green Belt land on the edge of said settlements.

2.40 Based on the above, it is clear that EBC's approach is in fact contrary to the evidence.

Question 4.18 Paragraph 145 of the Framework advises, amongst other things, that local Planning authorities should Plan positively to enhance Green Belt use. Such as looking for opportunities to provide access, to provide opportunities for outdoor sport and recreation, to retain and enhance landscapes, visual amenity and biodiversity or to improve damaged and derelict land. In what way does the Plan address this?

2.41 EBC's blanket approach to preserve existing Green Belt boundaries means that opportunities to enhance its beneficial use through the designation of new land for a range of public open space, recreation and biodiversity net gain amongst other uses, are lost.

2.42 In the first instance, the relevant available evidence base document on EBC's website – the Green and Blue Infrastructure Study (ENV007) – appears incomplete. It is therefore not possible to conduct an informed analysis of the green and blue infrastructure requirements and potential mitigation.

2.43 In respect of the opportunities to enhance Green Belt use through development proposals/site allocations, the Burhill Estate extends to more than 300 hectares stretching beyond the immediate extent of Land at Chippings Farm. Indeed, there is approximately 7 hectares of land within the extent of the Land at Chippings Farm to the north of the A3 as shown on the indicative site plan below, which could be dedicated to sports, leisure and/or other green infrastructure.



2.44 Burhill Group Limited is a major local stakeholder and has an interest in securing a legacy from the development of the site and for the benefit of the local area in the long-term. Burhill Group Limited is already a major employer in the Borough; a significant number (35%) of its employees live in KT postcodes and over 53,000 member visits a year, approximately 9,000 of those include visits with guests. Burhill Group Limited works closely with several local schools and leases an extensive area of woodland to a local charity.

- 2.45 Land at Chippings Farm could accommodate additional local facilities, such as a medical facility and primary school as part of an integrated sustainable community. This would not only benefit the future residents of a scheme on Chippings Farm but the existing wider local area.
- 2.46 However, these potential benefits could only be delivered alongside a strategic site allocation for residential development through the Local Plan.
-



BIDWELLS