

# **Elmbridge Local Plan Examination**

## **Response to Inspector's Stage 2 Matters - Matter 3**

**The vision, spatial strategy and the distribution of  
growth over the Plan period**

Mactaggart & Mickel Strategic Land

Representor Number 41089281

25 March 2024

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65216/01/JF/BS

30361289v1

1.0 **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.**

**Questions**

**2.1 What is the Plan Period? It is expressed within the Plan as both 2021-2037 and 2022-2037.**

- 1.1 We have commented elsewhere on what we think the Plan period should be, but we leave this for the Council to respond to.

**2.2 Paragraph 22 of the Framework requires that strategic policies should look ahead over a minimum 15 year period from adoption to anticipate and respond to long-term requirements and opportunities. This was raised as an issue in the initial letter of 14 September 2023 (ID-001). The Council are requested to extend the Plan period to 2039.**

- 1.2 To ensure compliance with the Framework, and given that the stage 3 hearings are still to be scheduled, the earliest the plan could be adopted following a consultation on main modifications is the end of 2024. Therefore, in order for the plan to look ahead for 15 full years from adoption requires the plan to run to 2039/40.

**2.3 What are the implications for the above change in terms of the level of planned growth across the borough? The Council are requested to address this point with reference to an update in terms of the planned level of growth proposed for housing, employment and other uses and what (if any) implications this may have for the IDP and housing trajectory which should also be updated (see questions 4.1 and 4.10 regarding the housing trajectory).**

- 1.3 The implication of a change in the plan period from one that starts in 2021 as set out at policy SS3 of the Plan to one that begins in 2024 or 2025 is that the planned growth cannot take into account the same levels of development already delivered or under construction as the housing trajectory currently does at Appendix A5 of the Submission Draft Plan (CD001). Likewise the figure for planning permissions not yet implemented must be amended. Fundamentally the implication is that less of the contribution towards the overall requirement will come from completed or committed units and therefore the amount to be planned for will be higher.

**2.4 The Vision for Elmbridge specifies, amongst other things, that good growth will be supported by the right infrastructure in the right place, at the right time. Reference is made to the use of innovative solutions to be used to improve transport interchanges, to manage the highway network for all users and foster a shift in travel behaviour towards more people walking and cycling, particularly for short journeys. Principle 5 (page 18 of the Plan) goes further to reference reducing reliance on the car, supporting modal shift in the way people live and access local services, workspaces and facilities, coordinating the delivery of the right infrastructure in the right place and at the right time. Which policies will deliver this principle?**

1.4 We do not have any specific submissions to make on this.

**2.5 The transport assessment (INF001) states that it has assessed the impact of 5480 new homes and 2167 new jobs growth. What employment floorspace provision does this jobs growth relate to?**

1.5 We do not have any specific submissions to make on this.

**2.6 How does the 5480 new homes relate to the 6785 (at least) net new homes identified in policy SS3?**

1.6 We do not have any specific submissions to make on this but may comment further once we have seen the Council's response to this question.

**2.7 The modelling work undertaken highlighted that Elmbridge has the second highest public transport usage in the county. Despite this, the transport assessment makes no detailed assessment of bus/rail accessibility and the modelling work assumes all travel is by car. What is the rationale for this approach? In what way does this approach support the vision objectives identified above?**

1.7 We do not have any specific submissions to make on this.

### **The Sustainability Appraisal (SA)**

**2.8 In terms of the SA, what is the reasoning for the scoping in relation to affordable housing (policy HOU4) and Specialist accommodation (policy HOU6) as set out at pages 148 -152? Is this a reasonable approach to take?**

1.8 In relation HOU4, SA objectives 3 to 16 have been scoped out by the Council as it is "considered that the affordable housing policy contributes neither positively nor negatively towards these SA objectives."

1.9 We do not consider that this is a reasonable approach to take. Sustainability Objective 6 'To support economic growth, which is inclusive, innovative and sustainable' and Objective 7 'To provide for employment opportunities to meet the needs of the local economy' have clear links with the provision of affordable housing as it is necessary to provide for the housing needs of all in society in order to allow those on lower incomes to live and work in the Borough. These objectives should not have been scoped out as the provision of affordable housing has the potential to positively impact these objectives and conversely, as

is the case with the current Draft Local Plan, the under-delivery of affordable housing against the identified need will have negative impacts which should be taken into account.

1.10 Policy HOU4 'Affordable Housing' is assessed with the SA and on page 149 the overall conclusions states that "the preferred draft policy would have a positive impact on both housing provision and the health and well-being of the population as it aims to provide affordable housing on larger sites where viability will not be affected."

1.11 We consider that this conclusion should have been qualified with an acknowledgement that the impact will be substantially less than it might have been as the evidence base confirms that the Council will not be able to meet the affordable housing needs based on the preferred spatial strategy.

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

**2.10 What information has been used to inform the Flood Risk scoring allocated within the SA to the options considered and are the assumptions used reasonable in light of the representations made by the Environment Agency in relation to the SFRA work completed to date?**

**2.11 To what extent have the Council taken into account the need for new development to deliver at least 10% biodiversity net gain and how has this been reflected in the SA scoring system used?**

**2.12 Is it clear how the SA has assessed employment needs arising from the Plans overall approach? In particular, how have the economic growth (6) and employment (7) scores been arrived at (see tables 7 and 11 of the SA) and what is the rationale behind the difference of approach in relation to these two sets of scoring? Paragraph 3.71 states that unknown scores are also given to SA objective 6: Economic growth as all three-options support economic growth but do not allocate land due to the uncertainty in the market for premises. Is this correct? Why is this different from the options assessed at table 7?**

**2.13 Is the scoring attributed to 'homes' within the SA accurate? In particular, are the scorings between option 4a and 5a in terms of homes accurate?**

**2.14 Table 16 of the SA (page 59) summarises the total Plan impacts. What are the 197 allocated sites referred to under Economic Growth?**

**2.15 Under the heading 'Access and Equality' (page 13) what is the reason that boat dwellers have been excluded from this list provided?**

**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?**

**2.17 What is the rationale behind the Plans approach to supporting economic growth but not allocating land due to the uncertainty in the market for premises (paragraph 3.71 of document CD002) (Please note this question refers specifically to how the SA has assessed economic growth only , meeting employment needs in detail is set out under matter 8 below)**

1.12 We do not have any specific submissions to make on the questions above (2.9-2.17).

**2.18 Is the distribution of housing growth across the borough supported by the SA and will it deliver an appropriate pattern of housing growth?**

- 1.13 No. The distribution of housing growth across the borough is not supported by the SA and it will not deliver an appropriate pattern of housing growth.
- 1.14 The SA confirms that Option 4a “will not significantly boost the supply of housing as it will only meet 70% of the housing need. Furthermore, using only sites in the urban area will not provide for the range of homes that are of a suitable size and type to meet identified needs.
- 1.15 In addition, within the conclusions of the SA it is acknowledged that “the lack of larger sites does result in less opportunities to provide affordable homes, smaller family homes, specialist housing, custom builds and Traveller pitches. Therefore, as this Option will not meet housing need or provide the mix required a significant negative impact is expected.”
- 1.16 This demonstrates that the distributions of housing growth across the borough is not supported by Option 4a within the SA.

**2.19 Is it clear how alternative development options within the SA which would meet the 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).**

- 1.17 No, it is not clear.
- 1.18 Paragraph 11a of the framework requires “all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”.
- 1.19 Within the SA, the following effects are reported in relation to Options 4a:
- ‘Option 4a will not significantly boost the supply of housing as it will meet 70% the housing need.’
  - ‘Using only sites in the urban area due to the borough’s constraints the draft policy will not provide homes that are a suitable size and type to meet identified needs.’
  - ‘The lack of larger sites does result in less opportunities to provide affordable homes, smaller family homes, specialist housing, custom builds and Traveller pitches’
  - ‘The demand for land will also impact employment uses which could impact employment opportunities.’
  - ‘The draft plan does not meet the housing need in full and will include smaller scale site allocations in the urban area which is likely to impact on the delivery of the mix of housing, particularly affordable housing.’
  - ‘Urban character is likely to change, which could impact on heritage assets located in the borough’s town, district and local centres.’
  - ‘Lack of affordable housing due to reliance on small sites in the urban area.’

- 1.20 The conclusions within the SAs above confirm that Option 4a will not meet the development needs of the Borough and in focusing housing growth exclusively on brownfield sites within urban areas, many of which have other uses on them already which are therefore likely to be displaced, the strategy will not promote a sustainable pattern of growth in accordance with Paragraph 11a of the framework.
- 1.21 In addition, it is not clear why the results of the community consultation are included in Table 8 and have been factored in as a 'limitation' to the previous options. The Sustainability Appraisal is a technical exercise but this seems to have been influenced by the results of the public consultation that favoured Option 4.
- 1.22 Option 5a includes 12 'small Green Belt areas'. Notably, Local Area 14 (LA14) is excluded from the sites listed under Option 5a. It is not clear why LA14 has been omitted as it has consistently formed part of the Council's preferred strategy and/or options throughout the Plan process.
- 1.23 Table 9 includes the sustainability appraisal of the 33 sites forming part of the original Option 5 (which included LA14). We question why LA14 has been excluded when it scores on par with and better for some criteria than the selected 12 sites (please see Para 4.16 of our representations for further details).
- 1.24 The post submission evidence base includes Green Belt site assessment proformas for the Sites considered for release under spatial strategy option 5a (2021) (ref. OTH040). This assessment did not include LA14. An assessment of Sites no longer considered suitable for release was updated in 2023 (ref. OTH041) and this also does not include LA14. Therefore no justification has been provided for the removal of LA14.
- 1.25 Topic Paper 1 reviews the 12 Green Belt sites for release and the Council identifies that it has applied its own planning judgement and reached a different conclusion (to that identified in the GBBR 2016 prepared by Arup) on the performance of the sites against the Green Belt purposes. This confirms that there are inconsistencies in the evidence base and that the Council are not following the technical evidence, which included the GBBR prepared by Arup in 2016.
- 1.26 The Council's evidence in the Sustainability Appraisal Report (June 2022) supporting the refinement of Option 5 into Option 5a is not justified. On this basis, the draft Plan is not based on proper consideration of 'reasonable alternatives' as required by paragraph 35(b) of the NPPF. As LA14 has consistently been identified as weakly performing against the NPPF Green Belt purposes, it is important that this area is included within alternative options considered by the Council.

## **Issue 6: Does the Plans spatial strategy expressed within policy SS3 present an appropriate strategy, taking into account the reasonable alternatives?**

### **Questions**

#### **Spatial Strategy - General**

#### **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).**

- 1.27 No, the Plan does not present an appropriate spatial strategy that is supported by evidence. The evidence indicates that the proposed spatial strategy will have a significant negative impact on the delivery of much needed homes.
- 1.28 The spatial strategy for the new Local Plan is Option 4a which includes development in urban areas only. This proposed spatial strategy conflicts with the Council's evidence base. The LAA assessment (2022) shows that there is a shortfall of housing and the borough's housing need of 647 per year cannot be met in the urban area over a 15-year period. Therefore, there will be insufficient land coming forward within the borough's urban areas to meet its development needs over the plan period.
- 1.29 The Council's earlier evidence also conflicts with the proposed spatial strategy. In 2016 it was identified that the objectively assessed housing need (OAHN) for the Borough was 9,480 new homes over the next 19 years to 2035 and it was estimated that 3,700 new homes could be provided on previously developed land in the urban areas over this time period.
- 1.30 The Council undertook further evidence base work including a Review of Absolute Constraints (2016) and Exceptional Circumstances Case (2016) in relation to seeking to meet the shortfall identified. The Exceptional Circumstances Case (2016) identified five factors that were considered capable of amounting to 'exceptional circumstances. This included housing need, housing prices and affordability issues, affordable housing need, starter homes and imbalance of housing mix.
- 1.31 On the basis of the 2016 evidence, the Council considered that exceptional circumstances applied and the Local Plan Strategic Options 2016 (Regulation 18) consultation identified its initial preferred approach to meeting its development need, including identification of three strategic areas within the Green Belt where the designation could be removed as they were weakly performing. It also informed the subsequent Regulation 18 consultation in 2019.
- 1.32 It is unclear how the Council can now conclude that exceptional circumstances have not been fully evidenced, when there is evidence from 2016 demonstrating that these did exist.
- 1.33 The LAA assessment (2022) shows that there is a shortfall of housing and the borough's housing need of 647 per year cannot be met in the urban area over a 15-year period. And there will be insufficient land coming forward within the borough's urban areas to meet its



development needs over the plan period. Again, it is unclear how exceptional circumstances were considered to apply in 2016 and not now.

1.34 The spatial strategy is overly and unrealistically reliant on brownfield sites. The strategy does not align with the Council's own evidence which demonstrates that the Council will not be able to deliver the identified housing needs in terms of quantity, mix and tenure on brownfield sites. This evidence should have resulted in the Council identifying a spatial approach that included deliverable sites that are capable of delivering the Borough's overall housing needs, including the type and tenure required to meet the Borough's housing needs.

1.35 In addition to this, the spatial strategy does not accord with Paragraph 60 of the Framework, which is clear that a sufficient amount and variety of land should come forward where it is needed. This spatial approach will not provide a sufficient variety of land and as a consequence will not meet the housing needs of the population in terms of size, type and tenure.

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

1.36 The spatial strategy will not address the acute affordable housing need in the borough.

1.37 Policy SS3 states that the Plan will make provision for the delivery of 30% affordable homes. This would equate to 2,035 affordable dwellings over the Plan period.

1.38 The Local Housing Needs Assessment 2022 (HOU005) sets out a net annual requirement for affordable housing of 269 units, which equates to 4035 units over the Plan period. Policy SS3 would result in a shortfall of 2,000 affordable homes, therefore not addressing the council priority of addressing the acute affordable housing need within the Borough.

1.39 Draft Policy HOU1 also requires the delivery of 30% affordable homes across the plan period. This Policy is assessed again Option 4a within the SA and it is concluded that "significant negative impacts are expected because the draft policy will not meet housing need or provide the housing required to enable people to live in a home suitable to their needs and which they can afford. Urban land supply is also likely to become scarcer in the long term. There is no mitigation" (Page 140). This conclusion confirms that the spatial strategy will not address the Council's priority of addressing the acute affordable housing needs and no mitigation is proposed to address this issue.

1.40 The Establishing Housing Need Report (2022) states that in terms of meeting affordable housing need, one of the biggest opportunities the Council has to do this is "through the development of larger sites...given that this cannot be met solely within the existing urban areas. Through the delivery of large sites, the council is more likely to see the delivery of affordable housing on-site and at a higher percentage of all units proposed than on smaller sites." (Para 5.66). However, within the draft Local Plan, there are 199 proposed site allocations. Of these sites 98 are small sites (1-9 units) (Topic Paper 2 ref. TOP002). Therefore, the spatial strategy does not reflect the evidence base.

1.41 In addition, Paragraph 8.11 of the Exception Circumstances Case (2022) (ref. OTH043) confirms that officers have also attached great importance to the council priority of providing more affordable homes and consider that this can best be achieved through

Option 5a”. This again confirms that affordable housing would be more appropriately addressed by an alternative spatial strategy.

- 1.42 Overall, the evidence confirms that the spatial strategy will result in a significant negative impact for affordable housing. We do not consider this approach to be accordance with Paragraph 60 of the NPPF which makes clear that a sufficient amount and variety of land must be allocated.
- 1.43 In relation to the delivery of new affordable homes in the borough, 2022/23 marked the completion of 13 new affordable homes (AMR 2024). This demonstrates that EBC delivered only 5% of the affordable housing need for 2022/23 (against a requirement of 269 dwellings). This confirms that there is chronic need for affordable housing and the evidence behind the Plan suggests that the spatial strategy proposed will not address this shortfall.
- 1.44 In order for the Plan to be found sound, we recommend that the spatial strategy is amended to include some release of Green Belt land.

**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?**

- 1.45 The proposed spatial strategy will not support the Governments objective of significantly boosting the supply homes by providing a sufficient amount and variety of land to come forward.
- 1.46 The Council’s evidence confirms that an urban only approach (Option 4a) “will not provide homes that are a suitable size and type to meet identified needs. The lack of larger sites does result in less opportunities to provide affordable homes, smaller family homes, specialist housing, custom builds and Traveller pitches. Therefore, as this policy will not meet housing need or provide the mix required a significant negative impact is expected” (SA 2022).
- 1.47 Further, Paragraph 7.17 of Topic Paper 1 (TOP001) confirms that the Council’s preferred approach will result in a significant negative impact for the homes SA objective as this option will not meet the housing need or the mix required.
- 1.48 A spatial strategy that is entirely based on brownfield sites with 49% of the supply coming forward on small sites (Para 2.26 TOP002), will not meet the needs of a number of different elements of the Borough’s population. The predominance of small sites within the proposed allocations means that there is little or no prospect of achieving the delivery of 30% of the proposed district-wide housing requirement as affordable dwellings as many will be unviable.
- 1.49 We do not consider this approach to be accordance with Paragraph 60 of the NPPF which makes clear that a sufficient amount and variety of land must be allocated. Therefore, the draft Local Plan has not been positively prepared in this regard.

**2.23 Document TOP001 outlines a number of key principles behind the scale and location of growth within the borough (paragraph 7.16). The last bullet point refers to, amongst other things, avoiding areas at high risk of flooding. In light of the representations received from the Environment Agency1 , does the spatial strategy accord with this principle? 2.24 In responding to this question, it is not clear to me how the screening of sites, flood risk and the need to apply the sequential test have been taken into account in terms of the spatial strategy. The Council are therefore requested to set out clearly how it has carried out its site selection process including at the initial screening stage. Given the advice contained within the Planning Practice Guidance that reasoned justifications should be provided where other sustainability criteria are considered to outweigh flood risk, I will need to understand how flood risk informed the site selection process and the spatial strategy outlined within the Plan.**

**2.25 Is the IDP sufficiently clear regarding the infrastructure requirements to deliver the spatial strategy over the Plan period and how these will be delivered? There appears to be a general policy support and emphasis on sustainable transport measures however it is not clear to me what these measures will be? Does the Plan need to be more precise in this regard?**

**2.26 Surrey County Council representations refer to a requirement for a SEND school within the County and an application by Elmbridge to provide such a facility. What site is identified for this use and should it be reflected in the Plan?**

**2.27 Representors have raised concerns regarding document ENV012 Playing Pitch Strategy 2019 and the conclusions drawn. Has this document been updated? What are the requirements for the Period and are the concerns raised by Esher Rugby Club regarding this part of the evidence base valid?**

1.50 We do not have any specific submissions to make on the above questions (2.23-2.27).

## **Policy SS1 – Responding to the Climate Emergency**

**2.28 As currently drafted, policy SS1 requires development must (f) avoid demolition by repurposing existing structures and (g) promote the retrofit of existing buildings, including incorporating measures to reduce energy consumption. These requirements of the policy do not appear to have been taken into account in relation to the viability, capacity or density evidence which supports the Plan. Without these assessments, how can these policy requirements be justified and deliverable?**

**2.29 What are the implications of these policy requirements for the Council's site allocations in terms of the capacity and density requirements? In responding, the Council should be explicit with reference to: (i) the site allocations which would be affected by this policy requirement (ii) the extent to which this policy requirement has been taken into account (iii) the implications in terms of capacity to accommodate development ( if relevant). I suggest a table format is used utilising the Local Plan references for the individual sites listed at chapter 9 of the Local Plan.**

**2.30 Is there an inherent conflict between policy SS1 parts (f) and (g) and policy HOU2 (d) which seeks comprehensive development that leads to more efficient and effective site layouts? If this is the case is it clear how a decision maker should respond to the policies?**

1.51 We do not have any specific submissions to make on the above questions (2.28-2.30).

Word count: 2,839

## **Policy SS2 – Sustainable place-making**

**2.31 The Council’s approach to sustainable place making is set out at policy SS2. Is the approach reflective of paragraph 7 of the Framework? Part 2b of the policy refers to delivering homes for all. However the Councils approach to housing will only provide for approximately 69% of the boroughs housing needs over the Plan period. Is the policy justified and effective as a result?**

**2.32 Policy SS2 2 (a) i refers to ‘minimising flood risk’ however paragraphs 3.6 and 4.5 of the Plan refer to ‘delivering improvements to flood risk’. What improvements are being referred to here and how will the Plan achieve this?**

**2.33 The Council’s spatial strategy relies entirely on brownfield sites within urban areas and is set out at policy SS3 which identifies the scale and location of good growth. Part 4 of the policy identifies the individual settlements within the borough and the number of units to be delivered. For each of the settlements identified, could the Council provide in a table a breakdown as to how the individual number of units have been arrived at.**

**2.34 Do these numbers correlate with the site allocations contained within chapter 9 of the Plan?**

**2.35 Where in the evidence base does it set out which sites are included within these numbers?**

1.52 We do not have any specific submissions to make on the above questions.

**2.36 According to the footnote, the figures do not include a non-implementation rate or windfall allowance – is this correct? How do these figures relate to those presented within the housing trajectory?**

1.53 There is evident confusion between the figures presented in SS3, the footnote and the housing trajectory at Appendix A5 of CD001. A non-implementation rate or windfall allowance should be accounted for as included in PPG [ref. 023 Reference ID: 3-023-20190722]. This suggests that the housing trajectory is incorrect.

**2.37 Part 5 of the policy identifies 3 further locations for development within the borough as follows: Brooklands College for higher education, further education and vocational training/upskilling, Lower Green for community regeneration, Whiteley Village for specialist care facilities. Are there corresponding site allocations associated with these locations?**

**2.38 What precisely is meant by 'community regeneration' at Lower Green?**

**2.39 How do these locations relate to the spatial strategy identified at TP001 which seeks to focus development within the urban areas?**

**2.40 Where in the evidence does it set out the approach to these 3 locations for development? 2.41 Are the sites at Brooklands College and Whiteley Village Green Belt sites (TP001 appears to suggest that these sites offer elements of previously developed land in Green Belt terms?)**

**2.42 If this is the case how does the identification of these sites within policy SS3 fit with the overall spatial strategy identified? Is this approach justified and is the spatial strategy positively prepared in this regard?**

1.54

We do not have any specific submissions to make on the above questions.

Word count: 2930



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