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**Examination of the Submitted Elmbridge  
Local Plan 2037**

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**STATEMENT FOR:**

**MATTER 3 – THE VISION, SPATIAL  
STRATEGY, AND THE DISTRIBUTION OF  
GROWTH OVER THE PLAN PERIOD**

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**WRITTEN STATEMENT**

**Prepared by:**

**Woolf Bond Planning Ltd**

**On behalf of:**

**Claygate House Investments Ltd and MJS  
Investments Ltd**

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**March 2024**

**User ID: 41185601**

**WBP Ref: 8094**



**Woolf Bond Planning**  
Chartered Town Planning Consultants

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## Executive Summary

*Claygate House Investments Ltd and MJS Investments Ltd (“CHI & MJSI”) have a controlling interest in a sustainably located and deliverable omission site (Site Ref: SA-59) that should be allocated for housing in seeking to meet the identified housing need during the plan period.*

*The Plan fails to plan for sufficient housing growth (in terms of the overall housing target in Policies SS3 and HOU1) and does not include sufficient land to meet its needs. Accordingly, additional site allocations should be identified.*

*CHI & MJSI’s objections may be summarised as follows:*

- *The Plan is **not positively prepared** in so far as the proposed strategy for growth will fail to deliver the identified housing need. It should plan for the uncapped need of 860dpa over an 18 year period 2022 to 2040, or at the very least for the capped need of 647dpa over that period.*
- *The Plan is **not justified** having regard to the approach envisaged to maintain a rolling five year supply of housing land and/or in relation to the approach to the allocation of sites for housing, such that it cannot be said to provide the most appropriate strategy when considered against the reasonable alternatives.*
- *The Plan is **not effective** and will fail to provide a five year supply of deliverable housing land on adoption and nor will it deliver the requisite amount of housing during the plan period; when assessed against the objectively assessed housing need.*
- *The Plan is **not consistent with national policy** having regard to the need to ensure housing site allocations will maintain an adequate supply of deliverable housing land.*

*The failure to provide sufficient deliverable site allocations will serve to frustrate attempts to address key factors affecting worsening affordability and denying people the opportunity to own their own home, contrary to Government policy under paragraph 60 of the NPPF which is seeking to significantly boost the supply of housing to address the current housing crisis.*

*Land north of Raleigh Drive, Claygate should be removed from the Green Belt and allocated for at least 60 dwellings (LAA Site Ref: SA-59).*

*The above changes are necessary to ensure the Local Plan satisfies the tests of soundness at paragraph 35 of the NPPF (September 2023)<sup>1</sup>.*

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<sup>1</sup> Paragraph 230 of the ‘new’ NPPF (Dec 2023) states that Local Plans that reach the Regulation 19 stage before 19 March 2024 will be examined under the relevant previous version of the NPPF. As such, the Elmbridge Local Plan is to be examined against the requirements contained in the September 2023 NPPF.

## CONTEXT AND BACKGROUND

- 1.1. This Statement has been prepared by Woolf Bond Planning Ltd on behalf of Claygate House Investments Ltd and MJS Investments Ltd (“CHI & MJSI”), and addresses several questions posed for Matter 3 of the Hearing Sessions as set out in the Inspector’s Schedule of Matters, Issues and Question (“MIQs”) (ID-005).
- 1.2. In setting out our response, we continue to rely upon the content of our detailed Regulation 19 representations (“our Representations”) submitted on behalf of CHI & MJSI in response to the Regulation 19 consultation on the Draft Local Plan in July 2022.
- 1.3. As set out at footnote 1 on page 2 above, the Local Plan is being examined for consistency against the September 2023 version of the NPPF. Accordingly, all references to the NPPF in this Statement relate to that version (unless otherwise stated).
- 1.4. Our answers to the questions should be read in the context of our position that insufficient deliverable and developable land has been identified in the submitted Local Plan in order to maintain a rolling 5 year supply of housing land as obligated by paragraph 74 of the NPPF.
- 1.5. The Plan would not be sound without modifications to include:
  - Extending the Plan period to 2040 (thus covering the period 2022 to 2040);
  - Increasing the housing requirement to reflect the uncapped need of 860dpa, or alternatively the capped need of 647dpa;
  - Additional site allocations (within revised settlement boundaries); and
  - Consequential adjustments to Green Belt boundaries.
- 1.6. This Statement amplifies our Representations and references are made to that document where relevant.

**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?**

**Question 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.**

- 2.1. Although the question suggests an extension to the Plan period to 2039, as indicated in our Representations (paragraphs 5.33 to 5.42 refer) we contend that it should cover until at least 31<sup>st</sup> March 2040 (paragraph 5.41 of our Representations refer).
- 2.2. As referenced in our Representations, such an approach would reflect the approach derived through the examination of other Plans<sup>2</sup> and reflects the fact that Stage 2 of the Examination is scheduled from 25<sup>th</sup> April until 20<sup>th</sup> June 2024 and the subsequent timing for Stage 3 has yet to be set.

**Question 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)**

- 2.3. As indicated in our Representations (paragraph 5.60 refers), it is essential that further sites are allocated in the Plan which can ensure the uncapped need of 860dpa (or at the very least the minimum LHN of 647dpa) can be achieved over the extended Plan period. See our separate Matter 2 Statement on the need to

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<sup>2</sup> Whilst the Representation referenced initial conclusions of Inspector's examination of the Local Plans for Watford (appendix 2), Bracknell Forest (appendix 3) and Maidstone (appendix 4), these have all since concluded. Extracts of the Final Reports for these examinations are included as Appendix A (Watford, September 2022) and Appendix B (Maidstone, March 2024).

plan for an uncapped need of 860dpa, or at the very least the capped figure of 647dpa and see our Matter 5 Statement regarding need for Green Belt boundary changes.

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

2.4. Whilst this is a matter for the Council, this inconsistency in the evidence base must be addressed given the Plan is committed to delivery of at least 6,785 dwellings, albeit, as we have explained, additional homes must be planned for. An uncapped 860dpa from April 2022 to March 2040, requires delivery of a minimum 15,480 dwellings, whilst a capped 647dpa over the same period requires delivery of a minimum 11,646 dwellings.

**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?**

2.5. No.

2.6. As indicated in paragraph 5.57 of our Representations, the SA did not consider growth at 860dpa (uncapped LHN). This lay between the quantum assessed in options 5 (627dpa) and 3 (1,078dpa) and since it is roughly midway between these figures, it cannot be assumed that the conclusions of either can be applied to such a strategy.

**Question 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?**

2.7. No.

2.8. Table 11a of the SA is clear that the approach subsequently included in the Plan (option 4a) had negative impacts both in terms of the qualitative and quantitative provision of housing.

2.9. This contrasts with approaches which had higher levels of supply, including Green Belt releases (including option 5a).

2.10. Accordingly, the proposed strategy will not deliver an appropriate pattern of housing growth. Such a view also reflects that stated in paragraph 5.18 of our Representations.

**Question 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)?**

2.11. It is not clear how the scoring of options was reached.

2.12. Whilst this is primarily a concern with regard to providing for social and economic needs of the Borough's residents and workers through ensuring sufficient housing is available (including affordable), as recognised in our Representations (paragraph 5.31 refers), it is also necessary to consider the implications of this for other authorities. This would have included the wider sustainability impacts of not providing sufficient homes on factors such as social cohesion in the Borough and adjoining areas together with increased journey lengths from not providing homes close to work.

2.13. The overall approach of the Plan conflicts with paragraph 11(a) of the NPPF.

**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).**

2.14. No.

2.15. As indicated in this Statement and our earlier Representations, the proposed distribution of housing will not ensure that sufficient land is available in the right places to meet current and future housing needs.

- 2.16. Applying the standard method, the capped figure for the Borough's needs is a minimum of 647dpa. However, as set out in our Matter 2 Statement, we consider the plan should meet the uncapped needs of 860dpa.
- 2.17. The Plan's failure to deliver even the capped requirement is an indication that the Plan does not contribute towards ensuring sufficient land is available to meet current and future needs.
- 2.18. This failure is emphasised by the fact that, at the time of our Representations, Elmbridge Borough had the ninth highest median affordability ratio in the country (paragraph 5.15 of our Representations refer).
- 2.19. The ONS data released on 22<sup>nd</sup> March 2023<sup>3</sup> indicates that the median workplace based affordability ratio for the borough increased from 18.05 (2021) to 20.04 (2022) which is now the fourth highest nationally<sup>4</sup>. Taken together with the increase in household size<sup>5</sup>, this is a clear indication of the impacts for current and future generations regarding the failure to provide sufficient homes.
- 2.20. Although Topic Paper 1 (paragraphs 6.41 to 6.43) is dismissive of the role that increased housebuilding would have on house prices and affordability, the Council does not provide any evidence that this would not occur, should each local authority ensure their delivery achieved or exceeded its LHN.
- 2.21. Ensuring all authorities deliver at least their LHN would mean that the concern at paragraph 6.62<sup>6</sup> of Topic Paper 1 would not arise.
- 2.22. Although Topic Paper 1 (paragraph 6.62) highlights the Council's fears that increasing housing delivery in the Borough will not achieve the Government's aims for improving affordability, especially if there is no corresponding increase in nearby areas, Councils are nevertheless obliged to undertake reviews of their

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<sup>3</sup> [House price to workplace-based earnings ratio - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

<sup>4</sup> Behind Kensington & Chelsea (38.39), Westminster (22.04) and Richmond upon Thames (20.73).

<sup>5</sup> See paragraphs 5.25 & 5.26 of our Representations alongside the associated tables.

<sup>6</sup> Increasing delivery in a limited number of authorities will not make a significant difference to affordability.



Local Plans at least every five years<sup>7</sup>. As these reviews will result in all authorities' Local Plans aligning with the output of at least the minimum LHN, this is not a valid concern. Furthermore, whilst the first Local Plan prepared under the 2018 (or subsequent) versions of the NPPF may only include a 40% uplift on household projections in determining LHN, this need not be the case<sup>8</sup>. And in any event each subsequent reassessment will include an additional adjustment resulting in the full inclusion of the relevant affordability ratio<sup>9</sup>.

2.23. As the current affordability ratio for Elmbridge Borough is 20.04<sup>10</sup>, this should result in an affordability adjustment of 2.0025 rather than the capped 1.4. Even if the full uplift cannot be achieved at the outset and may take several plan making cycles, that is no reason not to be ambitious, and still less to plan for well below the capped LHN.

**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?**

2.24. It will not.

2.25. Although Policy HOU3 indicates detailed thresholds and percentages for delivery of affordable housing (including for sites less than 4 dwellings), the Council has not demonstrated that its approach will address needs, especially as the NPPF (paragraph 64) is clear that sites not involving major development<sup>11</sup> should not provide affordable housing.

2.26. Paragraphs 5.45 and 5.46 of our Representations reference the extensive reliance of the Borough on small site housing delivery with at least 987 dwellings on sites providing up to 4 dwellings. This is notwithstanding the inclusion of numerous allocations which were below this size<sup>12</sup>.

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<sup>7</sup> Regulation 10A of The Town and Country Planning (Local Planning)(England) Regulations 2012 (as amended)

<sup>8</sup> The PPG expressly contemplates that where the minimum annual local housing need figure is subject to a cap, consideration can still be given to whether a higher level of need could realistically be delivered (Paragraph: 007 Reference ID: 2a-007-20190220).

<sup>9</sup> As Step 3 in the calculation applies a 40% cap to the Plan figure where the review is within 5 years.

<sup>10</sup> See paragraph 2.19 above

<sup>11</sup> Defined as up to 9 dwellings or under 0.5ha

<sup>12</sup> See footnote 18 on page 18 of the Representations.

- 2.27. Although the approach of policy HOU3 will be considered through the examination, given the role of small sites for delivery together with the reliance on brownfield land within the strategy, viability issues will impact upon the ability to achieve affordable housing. This can only be addressed through increasing the supply of sites, especially of those which would involve major development.
- 2.28. The signed and dated Affordable Housing Statement of Common Ground Statement of Common Ground for the current appeal on land north of Ralieggh Drive, Claygate (Pins Ref: APP/K3605/W/23/3334391) is attached at **Appendix E**. This demonstrates the acute need for affordable homes with the Borough.

**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?**

- 2.29. It is in clear conflict with the Government's objective of significantly boosting the supply of housing. As set out above, the Plan should provide for the uncapped housing needs of 860dpa or at the very least the capped 647dpa.
- 2.30. Topic Paper 1 (paragraph 6.48) references the need for larger homes as established in the Local Housing Need Assessment (HOU005).
- 2.31. Although paragraph 5.39 of Topic Paper 1 indicates that developers have historically focused on larger homes, paragraph 6.26 indicates that this has reduced<sup>13</sup>.
- 2.32. Whilst this change is noted, the Council's Land Availability Assessment ("LAA") (2022) (**HOU002**) seeks high density development on numerous sites which would limit the achievability of the mix envisaged. The importance of ensuring both quantitative and qualitative housing needs was acknowledged by the

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<sup>13</sup> In 2017/18, 50% of all gross completions related to 4+ bedroomed homes. In 2020/21 this had reduced to 30%.

Inspector examining Woking's Site Allocations Local Plan<sup>14</sup>.

2.33. The Plan is not positively prepared.

**Question 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 [Council's] approach to housing will only provide for approximately 69% of the [borough's] housing needs over the Plan period. Is the policy justified and effective as a result?**

2.34. No.

2.35. Consistent with the Inspector's question, a strategy which provides only 69% of the capped LHN cannot be regarded as justified or effective.

2.36. In order that these elements of soundness are addressed, together with consistency with national policy and to be positively prepared, it is essential that the Plan provides sufficient sites to both exceed the LHN and to maintain the rolling year supply.

**Question 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.**

2.37. Although this is a matter for the Council to address, the asterisk following part 4 of the table indicates that the figures exclude windfalls. However, as indicated in paragraph 5.46 of our Representations, numerous sites in the LAA 2022 (**HOU002**) are below the threshold for windfalls (defined in the Plan as up to 4 dwellings). Therefore, there is unjustified duplication for such sites.

2.38. The Council published its updated LAA (2023) on 9<sup>th</sup> February 2024. Frustratingly, this document does not seem to have found its way into the Examination Library. This is also the case for the Authority Monitoring Report ("AMR") (2023) that was published in December 2023.

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<sup>14</sup> Extract in Appendix D – see paragraphs 101, 108, 116 & 128.

2.39. It is not clear how participants for this Hearing Session are expected to prepare, when key evidence base documents have not been submitted.

2.40. We have availed ourselves of the AMR and LAA, noting the LAA retains sites in its listings which still would duplicate the threshold for a windfall. This is illustrated by the following sites in Cobham (US159<sup>15</sup>, US160<sup>16</sup> & US530<sup>17</sup>) and this is repeated for other parts of the borough.

**Changes sought to the Local Plan**

2.41. The following are necessary for the Local Plan to satisfy the tests of soundness at paragraph 35 of the NPPF:

- Extending the Plan period to 2040 (thus covering the period 2022 to 2040);
- Increasing the housing requirement to 15,480 (860dpa), or at the very least a minimum of 11,646 (647dpa)
- Additional site allocations (within revised settlement boundaries); and
- Consequential adjustments to Green Belt boundaries.

SBGR/WBP/7679

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<sup>15</sup> Garages to the rear of 6-24 Lockhart Road (4 dwellings)

<sup>16</sup> Garages at Bennett Close (3 dwellings)

<sup>17</sup> Garage block, Middleton Road (3 dwellings)



The Planning Inspectorate

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## **Report to Watford Borough Council**

**by William Fieldhouse BA (Hons) MA MRTPI**

an Inspector appointed by the Secretary of State

Date: 20 September 2022

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Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

## **Report on the Examination of the Watford Local Plan 2018-2036**

The Plan was submitted for examination on 6 August 2021

The examination hearings were held between 18 January 2022 and 9 February 2022

File Ref: PINS/Y1945/429/7

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## **Abbreviations used in this report**

The 2004 Act	The Planning & Compulsory Purchase Act 2004 (as amended)
The 2012 Regulations	The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)
The Council	Watford Borough Council
NPPF	National Planning Policy Framework (July 2021)
The Plan	The Watford Local Plan 2018-2036
PPG	Planning Practice Guidance
sqm	Square metres

## **Evidence and Examination Documents**

All of the Council's supporting evidence submitted with the Plan along with documents that I issued, requested or accepted during the examination were published on the examination website. Each document has its own individual reference number such as SUB1, ENV4, EMP5, etc. Where appropriate, I refer to documents by their reference numbers in this report.



## Non-Technical Summary

This report concludes that the Watford Local Plan provides an appropriate basis for the planning of the Borough, provided that a number of main modifications are made to it. Watford Borough Council has specifically requested that I recommend any main modifications necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal of them. The main modifications were subject to public consultation over a six week period in June and July 2022. In some cases I have amended the detailed wording of the modification to take account of consultation responses and ensure soundness. I have recommended their inclusion in the Plan after considering the sustainability appraisal and all the representations made in response to consultation on them.

The main modifications can be summarised as follows:

- Amend the plan period from 2018-2036 to 2021-2038.
- Change the minimum housing requirement from 793 homes per year to 784 homes per year (13,328 between 2021 and 2038).
- Clarification that at least 158 homes per year will be required on unallocated sites, in addition to a total of 11,112 on commitments and allocations, if the minimum housing requirement is to be met.
- Changes to policy CDA2.1 and relevant allocation requirements to achieve sustainable development and transformation of the Watford Gateway Strategic Development Area.
- Amendments to policies CDA2.2, VT5.1 and VT5.2 and relevant allocation requirements to achieve sustainable development and promote the vitality and viability of Watford town centre.
- Changes to policy CDA2.3 and relevant allocation requirements to achieve sustainable development and transformation of the Colne Valley Strategic Development Area including through the preparation of a masterplan supplementary planning document for Lower High Street.
- Amendments to policies HO3.5 and HO3.10 to meet the housing needs of the elderly and those with special needs.
- Changes to policy HO3.11 to secure the provision of shared private outdoor amenity space in new apartment blocks.
- Removal of Reach Printing Services Limited from a designated industrial area.
- Amendments to various policies to set out a positive strategy for the conservation and enjoyment of the Borough's historic environment.
- A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

## Introduction

1. This report contains my assessment of the Watford Local Plan 2018-2036 in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended) ("the 2004 Act"). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is compliant with the legal requirements and whether it is sound. The National Planning Policy Framework ("the NPPF") makes clear that in order to be sound, a local plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that Watford Borough Council ("the Council"), the local planning authority, has submitted what it considers to be a sound plan. The Final Draft Watford Local Plan 2018-2036 Consultation Version ("the Plan"), submitted in August 2021<sup>1</sup>, is the basis for my examination. It is the same document as was published in January 2021 for consultation under regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) ("the 2012 Regulations").

## Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications necessary to rectify matters that make the Plan unsound and/or not legally compliant and thus incapable of being adopted. My report explains why the recommended main modifications are necessary. The main modifications are referenced in bold in this report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix.
4. Following the examination hearings, the Council prepared a schedule of proposed main modifications and carried out sustainability appraisal of them. The main modifications schedule was subject to public consultation for six weeks in June and July 2022. I have taken account of the consultation responses in coming to my conclusions in this report and have made some amendments to the detailed wording of some of the main modifications. None of the amendments significantly alters the content of the modifications as published for

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<sup>1</sup> SUB1.

by policies in the Plan when it is adopted as required by regulation 8(5).

24. The Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

## **Assessment of Soundness**

### **Main Issues**

25. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified 15 main issues upon which the soundness of the Plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan.

### **Issue 1 – Are the amounts of housing and economic development that the Plan aims to accommodate clearly expressed, justified and consistent with national policy?**

#### **Plan period**

26. The submitted Plan covers the period 2018 to 2036. However, the start date needs to be modified to 2021 so that it is as up-to-date as possible on adoption and consistent with national policy and guidance relating to the standard method for establishing local housing need. Furthermore, to ensure that strategic policies look ahead over a minimum of 15 years from adoption as required by national policy, the end date needs to be modified to 2038 [**MM2 to MM11, MM14, MM38, MM59, MM60, MM77, MM88, MM156, MM248 and MM257**]. I deal with the implications of this for various aspects of the Plan, including housing and employment land needs and supply, below.

#### **Household growth and housing requirement**

27. Policy HO3.1 and paragraph 3.1 refer to 14,274 homes (793 per year) in the period 2018 to 2036 to meet local housing need as determined using the government's standard method. However, the standard method indicates that, when the Plan was submitted for examination in 2021, the annual need figure was 784 homes per year. National guidance expects housing need to be updated until the Plan is submitted. Policy HO3.1, and other parts of the Plan as

appropriate, therefore need to be modified to refer to a minimum housing requirement of 784 net additional homes per year which represents a total of 13,328 in the modified plan period of 2021 to 2038 [**MM13, MM56, MM62, MM172** and **MM246**].

28. Furthermore, to be justified and effective, policy HO3.1 also needs to be modified to delete reference to a buffer of 5% or 714 homes. This is because those figures are ambiguous in terms of their purpose and they do not reflect the latest evidence about housing land supply, an issue I return to later in this report [**MM56** and **MM62**].

### **Additional industrial, warehouse and office floorspace**

29. Proportionate and up-to-date evidence<sup>13</sup> indicates a need for a total of 188,000 sqm of additional office floorspace and 481,500 sqm of additional industrial and warehouse floorspace in South West Hertfordshire. Of that need, 37,600 sqm of office floorspace and 98,400 sqm of industrial and warehouse floorspace are required in Watford. In order to ensure that the Plan is justified, the reasoned justification to policy EM4.1 needs to be modified to refer to the floorspace requirements in Watford [**MM83**].
30. The Plan refers to the creation of 11,500 new jobs. However, the basis for that figure, the time period to which it relates, and its relationship with the identified need for additional office, industrial and warehouse floorspace are not clear. Furthermore, specifying a potential number of new jobs does not make clear how a decision maker should react to a development proposal. Policies SS1.1 and EM4.1 and Appendix A therefore need to be modified to delete reference to 11,500 jobs to ensure the Plan is effective and justified [**MM13, MM85** and **MM245**].

### **Conclusion**

31. The modifications I have described above are necessary to ensure that the amounts of housing and economic development that the Plan aims to accommodate are clearly expressed, justified and consistent with national policy.

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<sup>13</sup> South West Hertfordshire Economic Study 2016 and Update 2019 [EMP3 and EMP4] and Employment Topic Paper [ED14].

## **Issue 2: Is the Plan informed by a proportionate and up-to-date assessment of viability and will the policy requirements not undermine deliverability?**

32. The Council's Local Plan Viability Assessment 2021<sup>14</sup> provides up-to-date and proportionate evidence about the economic viability of development that is consistent with national policy and guidance. The types of development tested reflect the allocations in the Plan and windfall proposals that are likely to come forward. Reasonable assumptions are made about development values and costs, including those associated with policy requirements in the Plan. Whilst an additional cost for providing electric vehicle charging points in residential developments was not factored in, this would not make a significant difference to the overall findings of the assessment that I describe below<sup>15</sup>.
33. The evidence shows that the majority of housing and mixed use allocations are likely to be viable assuming that all relevant policy requirements are met<sup>16</sup>. However, despite that, nearly 4,000 of the new homes proposed in the Plan are on allocations that the evidence indicates may not be viable unless fewer affordable homes are provided than required by policy HO3.3. I consider whether that policy is sound later in this report, but in summary I conclude that subject to a main modification it will be effective in securing the maximum amount of affordable housing whilst being flexible enough to avoid preventing schemes coming forward due to poor viability.

### **Conclusion**

34. I therefore conclude that the Plan is informed by a proportionate and up to date assessment of viability and that the policy requirements will not undermine deliverability.

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<sup>14</sup> VIA1.

<sup>15</sup> Oral evidence by the Council at the hearing session on 9 February 2022.

<sup>16</sup> 42 out of a total of 55 housing and mixed use allocations [ED38].

### **Issue 3 – Is the spatial strategy set out in the Plan justified having regard to reasonable alternatives, and is the approach to Green Belt consistent with national policy?**

#### **The spatial strategy**

35. The identified need for 784 additional homes per year compares with an historic average completion rate of under 380 homes per year. A number of spatial options to accommodate these homes, and economic development, were considered and assessed during the preparation of the Plan. However, the built-up nature of the Borough means that realistic opportunities for accommodating such a scale of development are extremely limited. This is exemplified by the fact that every site that was identified as being available and suitable is allocated in the Plan following a thorough process that involved consideration of all undeveloped land, including Green Belt, as well as opportunities on currently and previously developed land.
36. The spatial strategy is described as transformational in policy SS1.1 and illustrated on the Key Diagram (Figure 1.2). It aims to make efficient use of the limited sites that are available and maximise opportunities to use sustainable forms of transport by focussing 80% of development in the Core Development Area based on and around the town centre. Detailed proposals for the implementation of the strategy in the Watford Gateway, Town Centre, and Colne Valley Strategic Development Areas, that collectively make up the Core Development Area, are set out in policies CDA2.1 to CDA2.3 and the development requirements for allocated sites.
37. All of the allocated sites in the Core Development Area are brownfield, most being in active use comprising buildings of varying quality and/or surface car parks. The strategy requires high density development, including through new buildings that will be significantly taller than existing prevailing heights. Heritage Impact Assessments<sup>17</sup> conclude that development of this nature can be designed such that there would be no, or less than substantial, harm to heritage assets. However, a number of modifications are needed to the policies relating to the three Strategic Development Areas and the development requirements for the relevant allocations so that the

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<sup>17</sup> ED32A to ED32K.

Plan is effective in that regard. I identify those modifications in subsequent sections of this report.

38. Outside the Core Development Area, identified development opportunities are more limited although there are 29 housing or mixed use allocations, most being for up to 50 homes. The density of new development is expected to be optimised, but significantly lower than in the Core Development Area.
39. In principle this is a sound spatial strategy for the Borough. However, whether it is effective in enabling the delivery of the amount and type of new homes and other development that is needed, creating well-designed places, protecting heritage assets, and achieving sustainable development in other respects are matters that I consider in subsequent sections of this report, including those relating to the three Strategic Development Areas.
40. Strategic policy SS1.1 provides a high level description of the spatial strategy and sets out some principles that are followed through in more detailed policies throughout the Plan. In most respects, the policy is sound. However, the requirement for all development to take place on brownfield land is not justified or consistent with national policy. Furthermore, it would not be effective in helping to facilitate sufficient development to meet identified needs as it would unnecessarily rule out opportunities that may become available on suitable greenfield sites. That part of the policy should therefore be deleted [**MM15**].

## **Green Belt**

41. The detailed wording of policy SS1.1 needs to be modified so that it is consistent with national policy relating to inappropriate development in the Green Belt only being approved in very special circumstances [**MM15**].
42. The Council carried out a systematic two-stage Green Belt assessment during the preparation of the Plan to inform decisions about whether changes needed to be made to help meet development needs or for other reasons<sup>18</sup>. Based on that, and other site specific information, the Plan removes a limited amount of land from the Green Belt in five locations.

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<sup>18</sup> ENV4 and ENV5.

43. In three of those cases, the physical character of the land has changed significantly due to development that has taken place such that it no longer serves any Green Belt purpose. Furthermore, retaining the designation would not provide an effective policy approach for considering any proposals for further development that may come forward in those locations during the plan period.
44. Land at Tolpits Lane is now an established gypsy and traveller site. An adjoining area will form an extension to that site to ensure that the identified need for an additional two pitches can be met in a suitable location. National policy allows for limited alterations to the Green Belt to meet specific identified needs for traveller accommodation<sup>19</sup>.
45. Land to the north of the A41 on the Borough boundary now forms part of a large film studio complex. It no longer serves any Green Belt purpose. To the south of this is a small field that is essentially contained by the A41, Hempstead Road, and the existing urban area. It is available now and suitable for the development of around 90 dwellings and included in the Plan as housing allocation HS06 Russell Lane. Significantly, the site provides a rare opportunity for the development of new family homes with gardens, rather than high density flats. The proposal would be likely to have an overall low to moderate effect on Green Belt purposes. Subject to a modification, the development requirements for the site in chapter 13 would be effective and consistent with national policy with regard to securing compensatory improvements to the environmental quality and accessibility of remaining Green Belt [**MM180**]. The harm that the development would cause would clearly be outweighed by the significant benefits that the proposal would bring in helping to meet housing needs. That is particularly so in light of my findings later in this report about the difficulties in fully meeting those needs due to land constraints.
46. To the south and south east of housing allocation HS06 Russell Lane is a school, woodland and recreation ground that are enclosed by the existing urban area and that allocation. None of that land would continue to serve a Green Belt purpose once the allocation is developed.

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<sup>19</sup> Planning Policy for Traveller Sites (2015) policy E.



47. The revised Green Belt boundaries in all of the locations are based on physical features that are readily recognisable and likely to be permanent.
48. For the above reasons, I am satisfied that there are exceptional circumstances to justify the changes to the Green Belt in five locations that are made in the Plan.
49. All of the other land in the Green Belt serves Green Belt purposes and much of it is also well-used public open space, has significant value for biodiversity, or is separated from the town by the M1 motorway. Other than allocation HS06, no sites that are available and suitable for housing or industrial development have been identified in the Green Belt.

### **Conclusion**

50. Subject to the modifications that I have referred to above and elsewhere in this report, the spatial strategy set out in the Plan is justified having regard to reasonable alternatives, and the approach to Green Belt is consistent with national policy.

### **Issue 4 – Are the policies relating to, and the allocated sites in, the Watford Gateway Strategic Development Area justified and will they be effective in achieving sustainable development?**

51. The Watford Gateway Strategic Development Area covers 31 hectares of land a short distance to the north of the town centre. It comprises Clarendon Road, which is defined as the Primary Office Location in the Borough, along with Watford Junction railway and bus stations, associated areas of car parking, a rail aggregates depot and concrete batching plant, and a variety of industrial and commercial uses.
52. Policy CDA2.1 aims to transform the Area over the plan period to create a mixed-use urban quarter of high quality design and place making with excellent connectivity and a mix of housing, employment and other subsidiary land uses and community orientated facilities. Seven sites are allocated on the basis that they are suitable and are, or will be, available for development. Collectively these are expected to provide around 2,500 homes, a primary school, a hotel, a significant amount of office floorspace, a multi-storey car park, and



The Planning Inspectorate

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## **Report to Maidstone Borough Council**

**by David Spencer BA(Hons) DipTP MRTPI**

an Inspector appointed by the Secretary of State

Date: 8 March 2024

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Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

## **Report on the Examination of the Maidstone Local Plan Review**

The Plan was submitted for examination on 31 March 2022

The examination hearings were held between 6-8 September 2022, 8-24 November 2022, 16-25 May 2023 and 5-9 June 2023

File Ref: PINS/U2235/429/10

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## Abbreviations used in this report.

AA	Appropriate Assessment
AONB	Area of Outstanding Natural Beauty <sup>1</sup>
BNG	Biodiversity Net Gain
Dpa	Dwellings per annum
DfT	Department for Transport
DtC	Duty to Cooperate
EDA	Economic Development Area
EDNS	Economic Development Needs Study
EIA	Environmental Impact Assessment
GTTSDPD	Gypsy, Traveller and Travelling Showpeople Development Plan Document
GTTSAA	Gypsy, Traveller and Travelling Showpeople Accommodation Assessment
Ha	Hectares
HRA	Habitats Regulations Assessment
IDP	Infrastructure Delivery Plan
ITS	Integrated Transport Strategy
KCC	Kent County Council
KDNL	Kent Downs National Landscape <sup>2</sup>
LBL	Lenham Broad Location
MM	Main Modification
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SAC	Special Areas of Conservation
SEA	Strategic Environmental Assessment
SHMA	Strategic Housing Market Assessment
SLAA	Strategic Land Availability Assessment
SOBC	Strategic Outline Business Case
SoCG	Statement of Common Ground
SPA	Special Protection Areas
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
SUDS	Sustainable Urban Drainage Systems
WWTW	Waste Water Treatment Works

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<sup>1</sup> See Footnote 2 below.

<sup>2</sup> On 22 November 2023 Areas of Outstanding Natural Beauty (AONBs) were re-branded as "National Landscapes". The legal designation and policy status of these areas remains unaffected.

## Non-Technical Summary

This report concludes that the Maidstone Local Plan Review provides an appropriate basis for the planning of the Borough, provided that a number of main modifications [MMs] are made to it. The Borough Council has specifically requested that I recommend any MMs necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared schedules of the proposed modifications and, where necessary, carried out sustainability appraisal and habitats regulations assessment of them. The MMs were subject to public consultation over a six-week period. In some cases I have amended their detailed wording and/or added consequential modifications where necessary. I have recommended their inclusion in the Plan after considering the sustainability appraisal and habitats regulations assessment and all the representations made in response to consultation on them.

The Main Modifications (MMs) can be summarised as follows:

- Extend plan period from 1 April 2021 to 31 March 2038 with consequential amendments to both the housing, employment and retail requirements to be planned for.
- Increased detail in the strategic policies for the two garden settlement proposals at Lenham Heathlands and Lidsing, in relation to: (i) the delivery and phasing of infrastructure to support sustainable growth; (ii) how development should address the proximity of the Kent Downs National Landscape (KDNL); and (iii) the specific measures required to ensure potential impacts on protected habitats are appropriately mitigated as required by the Habitats Regulations. A number of other MMs to these policies are also recommended.
- Removal of the proposed safeguarding area for a Leeds-Langley Relief Road and associated strategic policy because it is not justified.
- Additional detail in the strategic policy for the redevelopment of the Invicta Park Barracks site in Maidstone.
- A new strategic policy on housing delivery to reaffirm the minimum housing requirement (19,669 dwellings over plan period) and its delivery through a revised stepped housing trajectory.
- Additional policy content for various site allocations and for larger and more complex sites the insertion of concept framework plans to clarify net developable areas where significant areas of green infrastructure is required by the site policy.
- A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

## **Issue 1 – Whether the Spatial Strategy would be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.**

### The Submitted Plan

47. On submission there was variable clarity on which parts of the 2017 Local Plan would be superseded. To assist decision-makers I recommend **MM108** for effectiveness, which would insert a new appendix to the Plan setting out those policies of the 2017 Local Plan which would not be superseded when the Local Plan Review is adopted. I also recommend **MM1** which would amend the introduction to the Plan to provide clarity on the 2017 Local Plan policies which have not been superseded by this Plan. Additionally, **MM62** would update Table 8.1 of the Plan and would remove those 2017 Local Plan site allocations that had been completed between plan submission and end of March 2023, and therefore not contributing to deliverable supply at the point of plan adoption. I recommend these modifications for effectiveness.
48. The Plan, when adopted, would form part of the wider development plan for the area, alongside KCCs Minerals and Waste Local Plan, Neighbourhood Plans and other development plan documents. Part of the River Medway in the Borough is tidal (to Allington Lock) and so regard should be given to the Marine Management Organisation's South East Marine Plan in this part of the Borough. **MM2** would address this omission and provide necessary referencing in the Plan, and I recommend it for effectiveness.
49. The individual site allocation policies in the Plan need to be modified to remove references to be being "draft" and to make clear they are as shown on the Policies Map. I recommend **MM61** as a collective change to the wording of all the site allocation policies in this regard. This MM would be necessary to ensure the Plan is positively prepared and effective.

### **Plan Period and strategic policies**

50. The Plan was submitted in March 2022 and anticipated to be adopted by the end of 2022 such that the proposed plan period to 2037 would have looked ahead for 15 years as sought by paragraph 22 of the NPPF. Given the complexity of the examination that has not happened. Accordingly, it was proposed early in the examination to extend the plan period by one year to 31 March 2038. The reality is that with plan adoption now in 2024, even on this extended basis there would be a small undershoot on a 15 year period. I do not, however, consider that to be a further soundness issue. For reasons set out later in this report, the submitted plan seeks to put in place key components of a spatial strategy that will endure well beyond a 2038 plan period.

51. The start date of the plan period will need to be amended from 1 April 2022 as submitted. Adjusting the start date to 1 April 2021 would align with much of the submitted evidence base, including the SHMA<sup>12</sup> and EDNS. It would also reflect that the Plan was submitted for examination before 1 April 2022. Furthermore, it would enable an initial two years monitoring data on housing delivery in 2021/23 to be accounted for in the housing trajectory. Accordingly, I recommend **MM7** which would adjust the plan period and so ensure the Plan would be justified in terms of aligning with the evidence base against which it was prepared.
52. For consistency with national planning policy at paragraph 22 of the NPPF<sup>13</sup> the Spatial Vision in the submitted Plan needs to look further ahead than 2037 given there are components of the plan, such as the new garden communities, where delivery would extend beyond this timeframe. **MM4** would address this by removing the reference to 2037 and acknowledging elements of the spatial strategy look further ahead than the plan period. I recommend the MM for consistency with national planning policy at NPPF paragraph 22.
53. The vision for the Lidsing garden community in the submitted plan recognises its long-term perspective (to 2057) but similar is required for the over-arching vision for the Heathlands garden settlement. **MM13** would do this, and so I recommend it to ensure consistency with national planning policy at NPPF paragraph 22.
54. NPPF paragraph 20 identifies what strategic policies should cover and paragraph 21 of the NPPF says these should be explicitly identified. Strategic policies are also relevant in terms of the basic conditions test for Neighbourhood Plans, in terms of ensuring necessary general conformity. A number of the policies in the Plan are identified as strategic policies. Other policies, notably the site allocation policies, are also to be considered strategic policies to ensure any Neighbourhood Plans consistently reflect them. **MM109** would insert a new appendix into the Plan clearly identifying the 'Strategic Policies'. This would be necessary for consistency with NPPF paragraph 21. **MM3** would provide required clarity in the introductory section of the Plan, in terms of confirming the policies in the new appendix are those strategic policies for the purpose of neighbourhood planning and I recommend it for similar reasons as **MM109**.

## Housing Need and Requirement

55. The Plan was submitted for examination on 31 March 2022 based on an assessment of housing need using the advocated standard method for calculating need. The 2021 Strategic Housing Market Assessment (SHMA) update appropriately applies the formula of the standard method in accordance

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<sup>12</sup> The SHMA 2021 Update Local Housing Need calculation is based on 2020 Affordability inputs as per PPG paragraph 2a-008-20190220

<sup>13</sup> Further amplified at PPG paragraph 61-083-20211004

with the PPG. At the time of the SHMA the affordability ratio derived a minimum annual housing need figure of 1,157 dpa as set out in the submitted Plan, as consulted on in late 2021. Immediately prior to submission, however, revised median workplace-based affordability ratios were published<sup>14</sup> on 23 March 2022 (8 days prior to submission) resulting in a modest increase for Maidstone Borough to 1,194dpa.

56. Whilst I appreciate the PPG states at paragraph 2a-004-20201216 that the most recent affordability ratios should be used, the test of soundness applies to the plan as submitted. The plan that had been consulted on at Regulation 19, only a short time period before submission had applied the recent 2020 affordability ratios available at that time, as per the latest 2021 SHMA update. As submitted the Plan has sought to significantly boost the supply of homes consistent with NPPF paragraph 60 (a 31% uplift from the 2017 Local Plan figure of 883dpa). As set out further under Issue 7 below, the Plan would comply with other provisions of the NPPF to significantly boost housing supply, in terms of a deliverable supply for first five year period and a developable supply in years 6-10.
57. The PPG at paragraph 2a-008-20190220 advises that the local housing need figure should be kept under review and changes in the inputs are variable and this should be taken into consideration. In considering the 2022 adjustment to affordability, this would equate to less than half a year of supply, in a plan which would firmly deliver a significant boost in housing supply. As such I do not consider it necessary to revise the local housing need figure on this basis. The Plan is required to be reviewed within five years and this would be the appropriate point at which to carefully revisit the local housing need figure.
58. Through the Dtc process no adjoining authority, including within the wider housing market area, has requested assistance to help meet any unmet housing needs. Reference is made to wider unmet housing need in the Greater London area. Whilst I recognise there were concerns on the adoption of the 2021 London Plan regarding the ability to deliver sufficient housing, there is little before me that matters have moved forward during the preparation of this Plan. Accordingly, it would not be necessary for soundness for this Plan to accommodate an arbitrary quantum of unmet housing need in the absence of any agreed strategic approach between Greater London and the wider South-East authorities, if indeed, that is ultimately deemed to be required.
59. In terms of translating the housing need into a separate housing requirement figure, it would not be necessary for plan soundness for the housing requirement to be higher than the housing need figure. In terms of whether the figure should be lower, there is little doubt that the scale of growth will have some negative environmental impacts, as demonstrated in the SA report.

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<sup>14</sup> Resulting in an uplift in the affordability ratio for Maidstone from 10.0 (38%) to 10.85 (43%).



These include harms to landscape quality, a further demand on stressed water resources, the loss of areas of best and most versatile agricultural land and potential impacts on protected habitats. These harms are not unique to the proposed spatial strategy. They are the consequence of a significant level of growth in a predominantly rural Borough.

60. There is, however, no evidence through the SA or HRA processes or the various SoCGs with bodies such as Natural England or the Environment Agency, that potential adverse effects arising from the proposed levels of growth are such that environmental capacity would be unacceptably breached. Various mitigations are proposed in the Plan such that when balancing residual environmental harms, they would not significantly and demonstrably outweigh the benefits of providing much needed homes and supporting a strong, competitive economy in the Borough. As such housing numbers would not need to be lowered in the terms envisaged at NPPF paragraph 11b).
61. When taken over the extended plan period, the overall housing requirement would need to increase from 17,355 to 19,669. This requirement would need to be expressed as a minimum (i.e. 'at least') consistent with national planning policy at paragraph 61 of the NPPF, which states that housing needs assessments determine the minimum number of homes needed. Accordingly, I recommend **MM7** which would adjust the housing requirement in the spatial strategy at submitted Policy LPRSS1 so that the Plan would be consistent with national policy, justified and positively prepared.

### **Requirements for Employment and Retail**

62. The Plan is underpinned by a comprehensive evidence base on the need for economic development over the Plan period. The initial assessment was undertaken in the Economic Development Needs Study (EDNS) in two stages in 2019 and 2020. This work, consistent with the NPPF and PPG, defines a justified functional economic market area. It appropriately examines the baseline evidence in terms of the existing commercial activity, the labour market and wider economic drivers. I am satisfied that the Plan sets out clear spatial objectives for sustainable economic growth over the plan period consistent with the EDNS evidence which fits with the Council's Economic Development Strategy 2021, the South East Local Enterprise Partnership's Economic Recovery and Renewal Strategy and the Kent and Medway Enterprise and Productivity Strategy.
63. In terms of assessing the requirements for employment space, the EDNS has appropriately looked at scenarios of labour demand (derived from Experian economic forecasts), past trends in completions and estimates of local labour supply based on demographic modelling in the SHMA update. The EDNS Addendum in 2021 has revisited the scenarios to take account of recent changes to the Use Classes Order, impacts of Brexit and Covid-19 and to apply

# Land Availability Assessment 2023

## Elmbridge Local Plan



Base date: 31 March 2023



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## **Acronyms**

AMR – Authority Monitoring Report

BLR – Brownfield Land Register

EBC – Elmbridge Borough Council

HDTAP – Housing Delivery Test Action Plan

LAA – Land Availability Assessment

LHN – Local Housing Need

NHBC – National Housing Building Council

NPPF – National Planning Policy Framework

PPG – Planning Practice Guidance

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## Disclaimer

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- 1.1 The identification of land with potential for development in the Land Availability Assessment (LAA) does not imply that the council will grant planning permission for the development, or the site will be allocated through the Local Plan. All planning applications will continue to be determined against the Local Plan and material planning considerations, including the National Planning Policy Framework.
- 1.2 The LAA is a living document which the council intends to update annually.
- 1.3 The inclusion of land for residential development in the LAA does not preclude it being developed for uses other than residential.
- 1.4 The exclusion of sites from the LAA (either because they were discounted or not identified) does not preclude the possibility of obtaining planning permission. The council acknowledges that appropriate sites will continue to come forward as planning applications even if they have not been identified in the Land Availability Assessment.
- 1.5 The identified site boundaries in the LAA are based on the best information available at the time of the study. The LAA does not limit an expansion or contraction of these boundaries for a planning application or future allocation through the Local Plan process.
- 1.6 The determination of a site's deliverability / developability is based on the best information available at the time of writing. Assumptions made in the LAA will not prevent planning applications being submitted at any time.
- 1.7 The estimation of housing potential is based on the best information available at the time of writing. The housing potential indicated in this report does not preclude densities being increased on sites, subject to further information and assessment at such a time as a planning application is made.
- 1.8 The council does not accept liability for any inaccuracies or omissions in the LAA. It should be acknowledged that there may be additional constraints on sites that are not identified within this document, and that planning applications will continue to be determined on their own merits rather than on the information contained within this document. Issues may arise during the planning application process that were not, or could not, have been foreseen at the time of publication of the LAA. Applicants are advised to carry out their

own analysis of site constraints before submitting a planning application and that they should not rely on the information contained within this LAA.

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# Introduction

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## What is a Land Availability Assessment (LAA)?

- 2.1 The LAA is a technical study which informs the Elmbridge Local Plan. Specifically, it provides the information needed for the 5-year land supply calculation and housing trajectory which are published in the Authorities Monitoring Report (AMR) and Housing Delivery Test Action Plan (HDTAP)<sup>1</sup> produced each year. The Brownfield Land Register (BLR) is another tool that is used to investigate how much brownfield land that has been made available from the grant of planning permission for future housing development. The BLR and LAA coexist together to assess urban land for its development potential. In this LAA, sites can be chosen to be included in the Local Plan to help meet the Local Housing Need (LHN) and inform future planning policy.
- 2.2 National guidance on producing LAAs is provided in the Planning Policy Guidance (PPG) section on 'Housing and Economic Land Availability Assessment'. The guidance sets out a five-stage methodology which is based on identifying sites and broad locations with potential for development, assessing their development potential, their suitability for development and the likelihood that they will come forward.
- 2.3 The assessment of land availability identifies land that is suitable, available and achievable for housing, economic development and other uses over the plan period. In the case of Elmbridge Borough, this includes:
- New homes (Use class C3)
  - Older persons accommodation (Use class C2)
  - Gypsy and Traveller accommodation<sup>2</sup>
  - Commercial, Business and Services (Use class E)
  - Light / general industrial and storage) (Use classes B2 and B8)
  - Learning and non-residential institutions (Use class F1)
  - Assembly and Leisure (Use class F2)
- 2.4 For some of the above uses there is a national policy requirement to identify local need (for example, new homes, retail and employment land). However, the need for other uses (such as leisure, education etc) is identified through the

<sup>1</sup> Elmbridge has an undersupply of housing and therefore is statutorily required to create a HDTAP every year setting out how this can be resolved. The most up to date HDTAP can be found here on our [evidence page](#).

<sup>2</sup> Refer to [Gypsy, Roma and Traveller Site Assessment 2022](#)

infrastructure evidence, local knowledge, consultation and responding to the individual needs of larger development sites. This is also dependent on the availability of land for such uses.

- 2.5 The benefit of a wider assessment of land uses is that it ensures that all land is assessed together to consider all possible uses. Many of the sites included in this assessment will retain some of its existing use such as community centres, libraries and shops but could be redesigned to include housing units.
- 2.6 The inclusion of land for residential development in the LAA does not preclude it being developed for uses other than residential.
- 2.7 Whilst the LAA is an important source of evidence to inform plan making, it does not make decisions about the future of sites. It is the Local Plan that identifies the quantum of development being planned for and its spatial distribution. The inclusion of land in the LAA does not mean that it will be granted planning permission.
- 2.8 The LAA is base dated the **31 March 2023** and includes extant planning permissions and those under construction.

### **Format of this document**

- 2.9 The LAA has been prepared using the methodology set out in the Planning Practice Guidance (PPG) Housing and economic land availability assessment 22 July 2019. The key stages of the assessment are described further in section 3 of this report. This document does not repeat the PPG. It is recommended that this document is read alongside the detailed methodology in the PPG.
- 2.10 The main document sets out the findings of the LAA. The LAA is primarily concerned with sites in the urban area and the majority of these comprise housing units. The following explains the appendices:
  - Appendix 1: List of sites under construction (committed sites) at 31 March 2023.
  - Appendix 2: List of sites with planning permission at 31 March 2023.
  - Appendix 3: List and proformas for the urban LAA sites in settlement area order that are deliverable in 1-5 years, developable in 6-10 years and 11-15 years.
  - Appendix 4: List of excluded and discounted sites

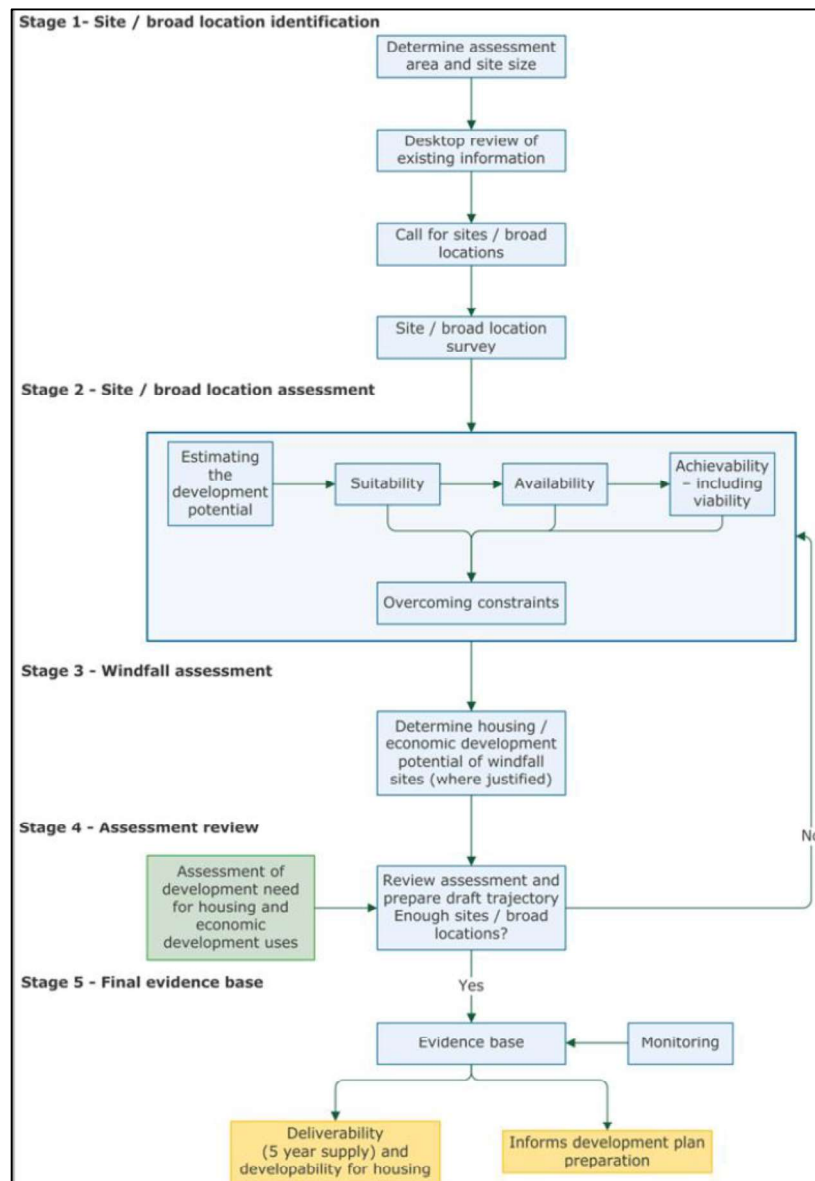


- Appendix 5: Sustainability Appraisal scoring system.

- 2.11 Detailed urban site proformas are included in the LAA appendix 3. These are in settlement and timescale order for ease of use. Each site has had a Sustainability Appraisal (SA) which is included in the proforma. The scoring system for the SA for this is available at appendix 5.
- 2.12 All other urban sites that have been discounted are included in appendix 4.
- 2.13 A Gypsy, Roma and Traveller Site Assessment has been written which helps to identify deliverable and developable sites to meet the borough's Gypsy, Roma and Traveller accommodation needs. It provides the information needed for the council to make the decision on how and where to meet this need in line with [National Government Planning policy for traveller sites \(PPTS\) \(2015\)](#).
- 2.14 The LAA is presented by site, rather than land use. This avoids the repetition of sites, as some sites can accommodate more than one land use.

# Methodology

3.1 This section sets out the methodology for the Elmbridge LAA, which shows how this relates to the five stages in the Planning Practice Guidance (PPG). The PPG states that plan makers should have regard to this guidance in preparing their assessments, and that where they depart from the guidance, the reasons for doing so should be set out. The council has closely followed the methodology as set out in the flowchart in the PPG.



## Stage 1: Site Identification

- 3.2 The PPG states that the area selected for the assessment should be the plan-making area. However, the assessment needs to be undertaken and regularly reviewed by the relevant housing market area and functional economic market area in line with the duty to cooperate. Elmbridge is within a housing market area that includes the Royal Borough of Kingston upon Thames, Epsom and Ewell Borough Council and Mole Valley District Council. Elmbridge is also in the Enterprise M3 Local Enterprise Partnership (EM3 LEP) area which includes Runnymede, Spelthorne, Woking, Guildford, Epsom and Ewell, Mole Valley and the London Boroughs of Kingston and Richmond upon Thames.
- 3.3 This LAA covers sites within Elmbridge only, as the other local planning authorities within the housing market area are preparing their own Local Plans to their own timescales. The three other authorities however use a similar methodology, based on national guidance. The methodology behind the LAA has not changed significantly since previous published LAAs.
- 3.4 Early engagement took place with a targeted call for sites exercise taking place during 2017 and continuing into 2018. Feedback from the Regulation 18 Strategic Options Consultation 2016/17 stated that residents knew of urban sites that had not been identified and that the Council had not looked hard enough.
- 3.5 Prior to the Regulation 18 Options Consultation 2019 a specific community call for sites was undertaken to ensure that all known sites were included in the search for sites. Internal workshops were also undertaken where Councillors were able to identify urban sites on maps for officers to investigate further as part of the Urban Capacity Study. During the Options Consultation in 2019 a further call for sites was undertaken to gather available sites that were not known to the officers.
- 3.6 The regulation 19 representations period held from the 17 June until 29 July 2022, allowed landowners to provide further information regarding site availability and additional sites were also suggested. This information has informed this LAA.
- 3.7 The council has worked closely with developers, site promoters and those with land interests, to discuss sites and development opportunities. These discussions have helped understand matters such as market forces, viability and land availability. Due to this on-going engagement with the development community, a specific Development Market Panel has not been necessary for this LAA.

- 3.8 The LAA has identified all sites promoted / identified regardless of the amount of development needed, in accordance with the PPG. It has then considered all sites and broad locations capable of delivering 5 or more dwellings or economic development on sites of 0.25 hectares (or 500 square metres of floor space) and above<sup>3</sup>.
- 3.9 The council has been proactive in identifying as wide a range of sites as possible, including sites and broad locations for development that could be improved, intensified or changed. Sites that have policy constraints<sup>4</sup> were included in the assessment but have been discounted where they impact on the deliverability and developability.
- 3.10 All available types of sites and sources of data have been investigated. The following sources of information were used to identify land for housing or economic development:
- Sites promoted at the Strategic Options 2016/17 consultation.
  - Sites promoted at the Options Consultation 2019
  - Sites submitted from the Call for Sites in 2017 and 2019
  - Sites promoted at the Regulation 19 representations stage 2022.
  - Sites highlighted at Councillor workshops.
  - Sites in public ownership.
  - Previous LAA sites.
  - Pre-application sites.
  - Refused and withdrawn planning application sites.
  - Sites identified through the Urban Capacity Study, 2018.
- 3.11 A database is maintained of all sites considered in the LAA and these are mapped on the council's GIS system.
- 3.12 The PPG states that the comprehensive list of sites derived from data sources and call for sites should then be assessed to establish which have reasonable potential for development. The council undertook a filtering / sieving process so that only sites that have a realistic potential were assessed in more detail. This approach is in line with the PPG that states that site surveys should be proportionate to the detail required for a robust appraisal. Sites with absolute constraints were excluded at this stage as the absolute constraint would prevent

<sup>3</sup> There is one exception to this rule. A pre-application query from PA Housing includes some sites that are 4 units and under and as this is part of a large development project these have been included. These are for affordable housing units as PA housing is a registered provider.

<sup>4</sup> Policy constraints relate to the current policies in the Core Strategy such as employment land provision, green infrastructure and social and community infrastructure.

development from taking place as it would not be possible to mitigate the impacts.

#### **Absolute Constraints<sup>5</sup>:**

- Sites within functional floodplain (Flood zone 3b)
- Sites of Special Scientific Interest (SSSI) or Special Protection Area (SPA)
- Ramsar Site
- Registered town and village greens, and Commons
- Suitable Accessible Natural Greenspace
- Ancient Woodland and Veteran Trees
- Park and Garden of Special Historic Interest
- Irreplaceable Habitats

3.13 Sites that remained after this sieve have been surveyed. This ensures that the council has ratified information gathered through the call for sites (and through other sources), gained a better understanding of the character of the site and its surroundings, physical constraints, and any barriers to deliverability.

#### **Stage 2: Site Assessment**

3.14 This stage comprised an assessment of the suitability, availability, and achievability of sites, as well as an estimation of their development potential.

3.15 The factors that were considered in the assessment of the **suitability** of each site included:

- Policy constraints
- Environmental constraints
- Physical limitations- access, ground conditions, tree cover, the risk of flooding
- Accessibility / Sustainability of the site (within 800m from state schools, train stations, bus stops, health centres, and town, district, or local centres).
- The existing use of the site. Where a site is currently in a different use to housing and there is evidence that there is a need for that site to remain in that use, and this cannot be re-provided in the scheme, then the site has been considered to be unsuitable for housing.

<sup>5</sup> Green Belt is not considered an Absolute Constraint, although national and local planning policy opposes inappropriate development within the Green Belt, development is not wholly prevented by national legislation and policy.

- 3.16 Emerging policy designations such as Local Greenspace have not been included in the assessment because these are not formally designated. However, the last bullet above covers this issue as many of the borough's green spaces are in important community uses such as pocket parks, allotments and recreation grounds and hence would be unsuitable for housing.
- 3.17 The **availability** of the site was then assessed. A site is considered to be available when based on the best information available, there is confidence that there are no legal or ownership problems and that the land is controlled by a developer/ landowner who has expressed an interest in developing the site. Sites promoted in the response to the regulation 19 Local Plan consultation, or recently submitted as a planning application or pre-application query are assumed to be available.
- 3.18 For other potentially suitable sites, letters were sent to owners in 2023 asking them if they intend to develop the land. They were also asked to indicate when they expect the site to be available for development.
- 3.19 Wherever potential problems have been identified, a proportionate assessment of whether these could realistically be overcome has been carried out. For those sites where a landowner has been contacted and no response has been made, the timescale of development has been increased allowing greater time to confirm ownership.
- 3.20 The council also assessed **achievability**, including whether the site can be developed viably. Sites have been assumed to be achievable and viable unless the specific evidence of particular constraints (such as contamination) is known to be so significant that it will prevent or delay the development of the site. The [Viability Assessment 2022](#) confirms that the housing market in the borough is resilient, although house prices in the borough have fallen by 3.4% in the last year<sup>6</sup>. A site is considered to be achievable where there is a reasonable prospect that it will come forward for development at a particular point in time.
- 3.21 The development potential of each site has been estimated. The council has provided an estimate for the site, based on a range of factors, including:
- The nature of the area
  - A consideration of historic development yields achieved on comparable schemes within the locality.

<sup>6</sup> House Price Index, July 2023

- National Planning Policy on achieving appropriate densities<sup>7</sup>, DM advice note 2 on optimising densities<sup>8</sup> and emerging local plan policy.
  - Other factors, including the shape and access to the site, and any likely on-site infrastructure requirements including open space.
- 3.22 The information on suitability, availability and achievability (and overcoming constraints) was then used to assess the timescales for the delivery of each site. Each site is categorised as deliverable (i.e. it is expected to be delivered in years 1 to 5), developable (years 6 to 10, or years 11 to 15) or not developable.
- 3.23 The estimation of housing potential is based on the best information available at the time of writing. The housing potential indicated in this report does not preclude densities being increased on sites, subject to further information and assessment at such a time as a planning application is made. Densities that were increased on sites were made to make an efficient use of land within the most sustainable locations i.e. close to principal roads, site within / adjacent town and local centres and train stations.
- 3.24 It is expected that whatever the level of housing that is provided on each site, the housing mix and affordable housing contribution is in accordance with current policy, and guidance.
- 3.25 The council does not accept liability for any inaccuracies or omissions in the LAA. It should be acknowledged that there may be additional constraints on sites that are not identified within this document, and that planning applications will continue to be determined on their own merits rather than on the information contained within this document. Issues may arise during the planning application process that were not, or could not, have been foreseen at the time of publication of the LAA. Applicants are advised to carry out their own analysis of site constraints before submitting a planning application and that they should not rely on the information contained within this Land Availability Assessment.

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

- 3.26 Although not included in the government's housing and economic land availability assessment guidance, the 2022 and this 2023 LAA has included sustainability appraisals for each site. These SAs are available to read in each urban site proforma (appendix 3).

<sup>7</sup> [Paragraphs 124-125 National Planning Policy Framework, Sept 2023.](#)

<sup>8</sup> [Development Management Advice Note 2: Optimising development land.](#)

- 3.27 A SA for each site helps with identifying the sites suitability in terms of its accessibility and impact on the environment and prevents duplication of information across evidence base documents. The scoring sheet explains the SA objectives and reasoning for the impact expected. For more information on SA, please see the [SA scoping report](#) and [draft plan SA](#).

### **Stage 3: Windfall Assessment**

- 3.28 Paragraph 71 of the National Planning Policy Framework (NPPF) 2023 states that 'Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends'.
- 3.29 Historic delivery rates show that garden land continues to be a source of sites for windfall development. The relatively suburban nature of the borough, with low density housing and larger gardens mean that in Elmbridge sites can accommodate additional homes. This land continues to contribute towards the borough's housing supply. The council's policy approach acknowledges that developing residential land to build houses requires extra sensitivity to prevent harm to the character and appearance of the area and loss of amenity to residents.
- 3.30 As in previous years this LAA will make an allowance for windfalls, which are sites that deliver 1 to 4 net dwellings. Historic delivery rates demonstrate that windfall development does consistently form a significant part of the housing land supply in the borough and is likely to continue to do so. There is also little sign of this reducing and figures have stayed consistent for the last ten years.
- 3.31 The evidence in table 1 shows that there is an average of 86 units per annum in windfall sites for the period between 20 July 2011 (the adoption date of the Core Strategy) and 31 March 2023.
- 3.32 The windfall figure includes prior notification completions which is an additional source that reinforces the need to include a windfall allowance across the 15 years without factoring in a step decline at this stage. This is likely to be needed after the 15 years as land supply reduces.
- 3.33 A yearly average windfall allowance will be used across the 11 years for the trajectory and to prevent double counting the total of 1 to 4 net dwellings that are under construction will be discounted as these are committed and will be completed. In addition to this, all 1 to 4 net dwellings with planning permission will also be discounted. This will then produce a more realistic allowance of



windfall in the borough. Table 2 includes the final windfall figure for the indicative housing trajectory.

**Table 1. Windfall evidence**

<b>Year</b>	<b>Windfalls completed EBC</b>	<b>Windfalls completed NHBC</b>	<b>Completion certificates</b>	<b>Total</b>
20 <sup>th</sup> July 2011- 31 <sup>st</sup> March 2012	55	33	0	88
1 <sup>st</sup> April 2012 – 31 <sup>st</sup> March 2013	60	23	2	85
1 <sup>st</sup> April 2013 – 31 <sup>st</sup> March 2014	67	17	0	84
1 <sup>st</sup> April 2014 – 31 <sup>st</sup> March 2015	38	44	14	96
1 <sup>st</sup> April 2015 – 31 <sup>st</sup> March 2016	24	22	32	78
1 <sup>st</sup> April 2016 – 31 <sup>st</sup> March 2017	49	8	31	88
1 <sup>st</sup> April 2017 – 31 <sup>st</sup> March 2018	55	16	2	73
1 <sup>st</sup> April 2018 – 31 <sup>st</sup> March 2019	39	31	79	149
1 <sup>st</sup> April 2019 – 31 <sup>st</sup> March 2020	22	23	2	47
1 <sup>st</sup> April 2020 – 31 <sup>st</sup> March 2021	24	32	28	84
1st April 2021 – 31st March 2022	27	34	36	97
1st April 2022 – 31st March 2023	21	20	25	66
<b>Total</b>	<b>481</b>	<b>303</b>	<b>251</b>	<b>1035</b>
<b>Average</b>	-	-	-	<b>86</b>

- 3.34 Windfall assessments are made and published annually through the council's Authority's Monitoring Report (AMR). This will include an assessment of historic windfall delivery rates as well as the expected future trend for windfall delivery. No windfall allowance is made for employment sites.

#### **Stage 4: Assessment Review**

- 3.35 Once the sites and broad locations were identified, the development potential of the sites was assessed and used to produce an indicative trajectory. The individual assessments set out each site's development potential for residential development and/or economic development and when these sites could be developed (in years 1 to 5, years 6 to 10 and years 11 to 15).

#### **Deliverable Sites**

- 3.36 This includes sites of 5 or more units with planning permission whereby the development is under construction, sites which have planning permission, but construction has not yet commenced, and sites which do not have planning permission but there is a reasonable degree of certainty that they will come forward within the 5 years. This includes confirmation of their deliverability in the 1-5-year timescale from the relevant landowner.

#### **Developable Sites**

- 3.37 The NPPF in paragraph 68 requires Local Authorities to identify developable sites as part of the assessment. These are sites which can accommodate 5 or greater net new units and are in a suitable location with a reasonable prospect that the site is available and could be achievable within years 6 to 15. These sites have a lower degree of certainty attached to them and are not expected to come forward in the next 5 years.
- 3.38 Landowners have been contacted to confirm the availability of sites, however a number have yet to be confirmed. Where sites have been confirmed as available for development these sites have been included in the timescale they have indicated. Where the availability hasn't been confirmed, these sites have been included within the 11-15-year supply. The LAA is a live document and will be reviewed regularly to take account of any new information that may emerge. Some sites in multiple ownership have been included in the LAA depending on the circumstances of their availability.

#### **Discounted Sites**

- 3.39 Any sites that were under the appropriate thresholds (unable to accommodate 5 net dwellings or economic development on sites of 500sqm floor space), were

confirmed as unavailable by landowners or had complexities that would limit the achievability of a site were excluded. The list of discounted sites with the specific reasons for discounting are featured at appendix 4.

- 3.40 Many broad locations that were originally identified through the urban capacity work, have been discounted. This is because they often include a number of smaller sites in different ownership. The difficulties associated with developing areas with so many owners make these sites undeliverable within a 15-year period.

### **Non-implementation Calculation**

- 3.41 In order to help identify a realistic housing supply, non- implemented planning applications have been considered over a set period, to determine an 'under delivery discount'.
- 3.42 To establish the actual percentage of sites that have not been delivered, a review of sites with planning permission was conducted from the period 1 April 2019 to 31 March 2020. It was important to use this timeframe as planning permissions are live for 3 years, which means the latest some of these permissions can be implemented is March 2023.
- 3.43 The review of sites with planning permission concluded that 12% of housing in the pipeline is not developed during this year. Historically, previous years calculations resulted in a 10% discount rate for non-implemented planning permissions. Although 2% lower in 2019/20, it is considered applicable to continue a 10% discount rate to the sites with planning permission as the 2% drop in delivery is likely to be due to the turbulence experienced in the 3 years after permission due to 2020/21 pandemic.
- 3.44 This year, a greater 15% non-implementation percent has not been applied to all the LAA Sites in each of the delivery periods. This is because there is certainty of delivery in the 1-5 delivery period via ownership confirmation, pre-applications, and live planning submissions. Developable sites in the later 6-10 and 11- 15 time periods are less certain but there is no established formula to justify the use of a percentage decrease. The certainty of these sites will change annually as the document is reviewed and availability is confirmed.
- 3.45 Table 2 sets out the indicative trajectory using the 10% non-implementation discount for sites with planning permission in approach 2.

### **Counting specialist housing for older people.**

- 3.46 The delivery of units within use class C2 can count towards the supply of new

homes. The PPG states that,

‘Plan-making authorities will need to count housing provided for older people against their housing requirement. For residential institutions, establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of living in households, using the published Census data.’ Paragraph: 016a Reference ID: 63-016a-20190626

3.47 The census data (2011) confirms that there were 52,918 households with 97,812 adults living in those households in the borough. To work out the average number of adults per household, 97,812 is divided by 52,918, which results in 1.85. In order to work out the amount of accommodation (number of units) released by a single person leaving C3 to a C2 setting the following formula is used:  $1 / 1.85 = \mathbf{0.54054}$  (this is then rounded down to **0.5**)

3.48 Where C2 accommodation is proposed the following calculations are made.

- If the C2 accommodation includes self-contained units, these count as one dwelling per unit.
- Where a unit is not self-contained but a bed space in a care home (a bedroom with en-suite and other communal facilities), these count as half (0.5 dwelling) as this many units would be released by a single person in Elmbridge moving into such a setting.

3.49 This formula has been used for the C2 units under construction, those with planning permission and any LAA sites which are promoted for C2 use. Additionally, there are sites that result in a loss of a nursing home or older people accommodation and the same calculation will be used to calculate the loss of housing.

### **Indicative Trajectory**

3.50 Paragraph 74 of the NPPF states that once the sites and broad locations have been assessed, the development potential of all sites can be collected to produce an indicative trajectory. This should set out how much housing can be provided, and at what point in the future. An overall risk assessment should be made as to whether sites will come forward as anticipated.

3.51 Table 2 sets out two approaches. Approach 1 sets out the land supply figures taken from the assessment including a windfall site allowance<sup>9</sup>. Approach 2

<sup>9</sup> Explained at paragraphs 3.28 to 3.34

includes a non-implementation calculation across the sites with planning permission<sup>10</sup>.

- 3.52 The windfall allowance for both approaches discount all 1-4 units for under-construction and those units with planning permission. It does not apply a further non-implementation discount for approach 2 as this has already been taken off the planning permissions. A surplus figure and percentage are given for the shortfall.
- 3.53 The land supply figures are for the 15-year period as of 31 March 2023. The Local Plan will need to cover a period of 15 years from adoption. The current [Local Development Scheme 2023-2026](#) estimates that adoption will be in 2024.

<sup>10</sup> Explained at paragraphs 3.41 to 3.45.

**Table 2. Housing Land Supply 2023-2038 (Indicative Trajectory)**

Approach	Under Construction at March 31 2023	Planning Permissions not yet implemented at 31 March 2023	LAA sites August 2023-2028 (1-5 years)	LAA sites August 2028- 2033 (6-10 years)	LAA sites August 2033- 2038 (11-15 years)	Small Site Windfall Allowance*	Total Estimated Capacity	Local Housing Need (LHN)	Surplus / Shortfall
1	966	1556	524	1489	1698	957	7,190	9,750	-2560 -26%
2	966	1400**	524	1489	1698	957	7,034	9,750	-2716 -28%

\*Windfall figure - refer to paragraph 3.28 for calculation and assumptions

\*\* Non-implementation discount rates applied - refer to paragraph 3.41 for assumption.

## Stage 5: Final Evidence Base

- 3.54 This section of the report presents the overall findings of the LAA 2023. There was a total of 483 sites identified and following assessment, 168 urban sites were considered suitable, available and deliverable.
- 3.55 Although many are solely housing, some of these sites consist of different and mixed uses. The table 3 below sets out the findings from the land availability assessment only for all uses and this will help inform housing and commercial needs in the Local Plan preparation.

**Table 3: Net Land Supply for all uses (LAA sites only)**

Type/ Use Class	Amount of Units / Floorspace
Housing (C3)	3,609 net units (including mixed-use sites)
Older People Accommodation (C2)	102 net units
Employment (E, B2, B8, F1, F2)	19,479 sqm (net additional floorspace)
Sites that can be provided as mixed-used development and capable of increasing/ maintaining their floorspace.	35 sites

## Housing

- 3.56 There are 3,046 deliverable housing units through committed planning permissions, sites that are under construction, sites that have been promoted or sites under consideration, subject to pre-application queries and those that have previously been refused / withdrawn that could gain permission in the future subject to amendments. In Table 4 there are 1,489 net units from sites developable in 6-10 years and 1,698 net units from sites developable in 11 to 15 years.
- 3.57 The Local Housing Need (LHN) derived from the Government's standard method identifies a need of 650<sup>11</sup> dwellings per annum in Elmbridge. The table

<sup>11</sup> The Council's latest calculation of housing need (based on the standard method) uses the household projections for the period 2023 – 2033 (from the 2014 projections) and applies the affordability ratio published March 2023.



below helps the council to identify how much LHN can be met in the urban area.

- 3.58 The LAA assessment shows that there is a shortfall of housing and the borough’s housing need of 650 per year cannot be met in the urban area. This finding is based on the assessment carried out and densities indicated for this version of the LAA.

**Table 4: Estimated delivery of LAA Sites**

<b>Sources</b>	<b>Units (Housing)</b>	<b>Units (Housing) with non-implementation discount applied*</b>
Under construction up until 31.03.2023 (Deliverable)	966	966
Planning permissions at 31.03.2022 (Deliverable)	1556	1400*
LAA 1-5 years (Deliverable)	524	524
LAA 6-10 years (Developable)	1489	1489
LAA 11-15 years (Developable)	1698	1698
Windfall allowance	957	957
<b>Total</b>	<b>7190</b>	<b>7034</b>
<b>Per year delivery (average over 15 years)</b>	<b>479</b>	<b>468</b>

- 3.59 The PPG suggests that if insufficient sites/ broad locations have been identified against objectively assessed needs, then ‘Plan makers will need to revisit the assessment, for example changing the assumptions on the development potential on particular sites’ paragraph 025 Reference ID: 3-025-20190722.
- 3.60 For this LAA 2023 version, assumptions were changed through increasing densities and intensification of larger sites or sites that are in sustainable locations. As demonstrated in table 2 and 4 there continues to be a shortfall against housing need through the delivery of urban sites.

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## Conclusions, monitoring and next steps

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- 4.1 The LAA has considered the development potential of urban land in the borough for housing and economic purposes. The assessment has identified land in the borough that could deliver 19,479 sqm of employment land and up to 7,190 new homes over the plan period including sites currently under construction, extant permissions and windfall sites. If a non-implementation ratio is applied to sites with planning permission, this results in 7,034 urban sites.
- 4.2 The LAA shows that up to 3,046 new homes are expected to be delivered within the first five years of the plan period. This alongside the 20% buffer results in a five-year housing supply position of 3.81 years.
- 4.3 The LAA assessment shows that there is a shortfall of housing and the borough's housing need of 650 per year cannot be met in the urban area over a 15-year period. Approach 1 results in a shortfall of 2,560 (-26%) and approach 2 with a non-implementation ratio applied results in a shortfall of 2,716 (-28%).
- 4.4 Therefore, there will be insufficient land coming forward within the borough's urban areas to meet its development needs over the plan period.
- 4.5 The LAA was produced with the best information available at 31 March 2023. It is an iterative process and as such, any future reviews will incorporate any new information available to the council. This will include any new sites and additional information about the existing identified sites. Further consideration will also be given to windfalls and non-implementation rates.
- 4.6 The council intends to update the LAA annually to take account of new information. Given that new information may be submitted to, and considered by, the council at any time, conclusions on the suitability, availability and achievability of the identified sites may be subject to change, as are assumptions on whether sites are deliverable or developable.
- 4.7 The Authorities Monitoring Report (AMR) also provides details of the council's land supply position including the current 5-year land supply calculation. This is available to view [online](#).

## Appendices

### Appendix 1: Sites under construction at 31 March 2023.

Application Number	Address	Settlement Area	Current Land use	Units (Gross)	Units (Net)	Net floorspace/ GIA (if applicable sqm)	Permitted Land Use Class
2011/0280	4 Heath Road Weybridge Surrey KT13 8TB	Weybridge	C3	2	2	N/A	C3
2010/2593	Site Of 42 To 44, Molesey Road, West Molesey, Surrey, KT8 2HF	Molesey	C3	7	4	N/A	C3
2011/6360	Land between 5 & 7 High Street Esher Surrey KT10 9QL	Esher	Vacant	6	6	N/A	C3
2012/1849	Stokesheath Barn & Stables Stokesheath Road Oxshott KT22 0PS	Cobham & Oxshott	C3	1	1	N/A	C3
2018/1087	Ditton Lea & 1 Grants Cottages Portsmouth Road Esher Surrey KT10 9AB	Esher	C3	2	2	N/A	C3
2013/4968	Land at Horsley Bungalow Old Avenue Weybridge Surrey KT13 0PS	Weybridge	Vacant	1	1	N/A	C3
2014/1246	Paddock View 35A Blair Avenue Esher Surrey KT10 8BQ	Dittons	C3	1	1	N/A	C3
2014/4340	Land adjoining Edward House Island Farm Road West Molesey KT8 2LQ	Molesey	Vacant	5	5	N/A	C3
2015/3014	Touchwood 9 Broom Close Esher Surrey KT10 9ET	Esher	C3	4	4	N/A	C3
2015/2398	Upper Farm Blue Bell Lane Stoke D'Abernon Cobham Surrey KT11 3PW	Cobham & Oxshott	C3	1	1	N/A	C3
2015/3110	Crickets Hill & Single Oak Golf Club Road Weybridge Surrey KT13 0NJ	Weybridge	C3	1	-1	N/A	C3
2015/3571	Land north of Grove House Devonshire Road Weybridge Surrey KT13 8HB	Weybridge	C3	1	1	N/A	C3
2015/3450	Ruxley Mount Mountview Road Claygate Esher KT10 0UD	Claygate	Sui Generis	1	1	N/A	C3

2015/3992	133A Hersham Road Walton-on-Thames Surrey KT12 1RW	Walton-on-Thames	Class E	2	2	No change	C3
2016/0277	13 Park Road Esher Surrey KT10 8NP	Esher	Class E	1	1	-38	C3
2015/3518	1 Glebelands Claygate Esher Surrey KT10 0LF	Claygate	C3	2	1	N/A	C3
2016/1999	Land north of Oakmead Lodge Seven Hills Road Cobham Surrey KT11 1EU	Weybridge	B8	1	1	-267	C3
2016/2057	Constantia and Tancreds South Road St Georges Hill Weybridge KT13 0NA	Weybridge	C3	1	-1	N/A	C3
2016/3864	Rear Ground Floor Office Suite 1 Wolsey Road East Molesey Surrey KT8 9EL	Molesey	Class E	1	1	-39	C3
2016/1066	162 Portsmouth Road Thames Ditton Surrey KT7 0XR	Dittons	Sui Genris	17	16	-298.2	C3
2017/1199	Rosemary House Portsmouth Road Esher Surrey KT10 9AA	Esher	Class E	11	11	-322	C3
2019/2556	Site of Stompond Lane Sports Ground Stompond Lane Walton-On-Thames KT12 1HF	Walton-on-Thames	Class E	10	10	-186	C3
2017/3069	Site of Tara Cavendish Road Weybridge Surrey KT13 0JT	Weybridge	Class C3	1	1	N/A	C3
2018/0896	159 Hersham Road Hersham Walton KT12 5NR	Walton-on-Thames	Class E/C3	-1	-1	36.10	C1 and Class E
2017/3337	Land to the South of Old Oak March Road Weybridge Surrey KT13 8XA	Weybridge	C3	1	1	N/A	C3
2017/2433	11 Oakfield Glade Weybridge Surrey KT13 9DP	Weybridge	C3	1	1	N/A	C3
2018/0160	16 Monument Green Weybridge KT13 8QT	Weybridge	C3	4	3	N/A	C3
2017/0632	11 Goldrings Road Oxshott Leatherhead Surrey KT22 0QP	Cobham & Oxshott	C3	2	1	N/A	C3
2018/3468	5 The Quintet Churchfield Road Walton-On-Thames KT12 2TZ	Walton-on-Thames	Class E	3	3	-249	C3
2018/0222	30 Arbrook Lane Esher Surrey KT10 9EE	Esher	C3	1	1	N/A	C3
2019/0016	15 Westcar Lane Hersham Walton-On-Thames KT12 5ER	Walton-on-Thames	C3	5	4	N/A	C3
2015/1327	1 Eastmont Road Esher Surrey KT10 9AY	Dittons	C3	1	1	N/A	C3
2017/3984	Land rear of 4 & 6 Castleview Road Weybridge Surrey KT13 9AB	Weybridge	Vacant	1	1	N/A	C3

2015/2217	Site of Molesey Centre for the Community School Road Sandra House and Radnor House Hansler Grove East Molesey Surrey KT8 9JL	Molesey	Class E	50	6	-260	C3
2016/1770	Loreto The Fairway Weybridge Surrey KT13 0RZ	Dittons	C3	2	1	N/A	C3
2017/2774	15 Portsmouth Road Thames Ditton KT7 0SY	Dittons	C3	1	1	N/A	C3
2018/1627	28 Esher Green Esher Surrey KT10 8AF	Esher	C3	2	1	N/A	C3
2016/2877	Land Southeast Of Chestnut Cottage 5 Goldrings Road Oxshott KT22 0QP	Cobham & Oxshott	C3	1	1	N/A	C3
2018/2389	290 Walton Road West Molesey KT8 2HT	Molesey	Class E	1	1	-55	
2018/2471	Two Trees St Leonards Road Thames Ditton KT7 0RR	Dittons	C3	2	1	N/A	C3
2019/1287	Willow House Copse Road Cobham KT11 2TN	Cobham & Oxshott	C3	1	1	N/A	C3
2018/3782	Claygate House Littleworth Road Esher KT10 9PN	Claygate	Class E	15	15	Unknown	C3
2016/2460	1 Holtwood Road Oxshott Leatherhead Surrey KT22 0QL	Cobham & Oxshott	C3	2	1	N/A	C3
2019/2670	Land to Rear of 41 Oatlands Chase Weybridge KT13 9RP	Weybridge	C3	3	3	N/A	C3
2017/1940	Land adjacent to 21 Castlevue Road Weybridge Surrey KT13 9AB	Weybridge	C3	1	1	N/A	C3
2019/2884	Land Southeast of Woodside House Cockrow Hill St Mary's Road Long Ditton KT6 5HE	Dittons	C3	1	1	N/A	C3
2019/0792	1 Green Lane Cobham KT11 2NN	Cobham & Oxshott	C3	6	5	N/A	C3
2020/0554	500 Walton Road West Molesey KT8 2QF	Molesey	Class E	1	1	N/A	C3
2017/4155	Site of 38 Knowle Park Cobham Surrey KT11 3AA	Cobham & Oxshott	C3	1	1	N/A	C3
2019/2492	10 Woodland Grove Weybridge KT13 9EQ	Weybridge	C3	2	1	N/A	C3
2017/0401	61-63 More Lane Esher KT10 8AR	Esher	C3	17	17	N/A	C3
2016/4076	11 Oakfield Glade Weybridge KT13 9DP	Weybridge	C3	1	1	N/A	C3
2019/2308	Crow Gables Cottage 133 Fairmile Lane Cobham KT11 2BU	Cobham & Oxshott	C3	4	3	N/A	C3
2020/1775	60 High Street Esher KT10 9TX	Esher	Class E	2	2	-142	C3
2019/2470	152 High Street West Molesey KT8 2LX	Molesey	C3	2	1	N/A	C3
2019/1703	Site to Rear of 136 Beauchamp Road KT8 2PH	Molesey	Sui Generis	1	1	N/A	C3

2020/0976	2 Quinton Road Thames Ditton KT7 0AX	Thames Ditton	C3	2	1	N/A	C3
2019/3430	28 Esher Road Hersham Walton-On-Thames KT12 4LG	Hersham	C3	3	2	N/A	C3
2018/1531	14 Egmont Road Walton-On-Thames KT12 2NW	Walton-on-Thames	C3	1	1	N/A	C3
2017/0419	Site of 18 19 And 21 St Johns Drive Walton-On-Thames Surrey KT12 3NH	Walton-on-Thames	Class E	3	2	N/A	E/C3
2019/1969	37 The Parade Claygate Esher KT10 0PD	Claygate	Class E	1	1	N/A	C3
2016/3908	Copsem Manor 50 Copsem Lane Esher Surrey KT10 9HJ	Cobham & Oxshott	C3	2	2	N/A	C3
2019/1032	Land Northeast of 49 to 51 High Street Cobham	Cobham & Oxshott	Class E	7	7	-65	C3
2018/2989	Bridge House 41-45 High Street Weybridge KT13 8BB	Weybridge	Class E	28	28	-937	C3 and Class E
2017/2405	Land South of 54 Foxholes Weybridge Surrey KT13 0BN	Weybridge	C3	1	1	N/A	C3
2020/0308	Merrileas leatherhead Road Oxshott Leatherhead KT22 0EZ	Cobham & Oxshott	C3	67	66	N/A	C3
2017/3870	Weybridge Hall Church Street Weybridge Surrey KT13 8DX	Weybridge	Sui Generis	5	4	-101.7	E/C3
2017/2534	St Georges House 24 Queens Road Weybridge Surrey KT13 9UX	Weybridge	Class E	43	43	-3459.2	C2
2017/3444	77 Queens Road Weybridge Surrey KT13 9UQ	Weybridge	Class E	1	1	Unknown	C3
2018/0244	28-30 High Street Weybridge Surrey KT13 8AB	Weybridge	C3	3	2	N/A	C3
2014/4564	Land adjacent to 21 Icklingham Road Cobham Surrey KT11 2NQ	Cobham & Oxshott	Vacant	2	2	N/A	C3
2020/1020	Upper Court Portsmouth Road Esher KT10 9JH	Esher	C3	56	55	N/A	C2 <sup>12</sup>
2019/3471	Bevendean Cottage Warren Lane Oxshott Leatherhead KT22 0SU	Cobham & Oxshott	C3	15	14	N/A	C3
2020/1243	The Lodge 29A Palace Road East Molesey KT8 9DJ	Molesey	C3	8	7	N/A	C3
2018/1933	Oxford House Leatherhead Road Oxshott Leatherhead Surrey KT22 0ET	Cobham & Oxshott	C3	3	2	N/A	C3

<sup>12</sup> Permission is granted for a 112-bed nursing home. After applying the formula, this would result in a housing supply of 56 units

2019/3370	Hillview Nusery Seven Hills Road Walton-On-Thames KT12 4DD	Weybridge	Class E	32	32	-1828.6	C2 <sup>13</sup>
2020/1540	15A Castleview Road, Weybridge, KT13 9AB	Weybridge	C3	3	3	N/A	C3
2019/2211	Land Northwest of 215 to 217 Portsmouth Road Cobham KT11 1JR	Cobham & Oxshott	C3	1	1	N/A	C3
2018/1805	Land Southwest of 9 Lower Sand Hills Long Ditton KT6 6RP	Dittons	C3	1	1	N/A	C3
2020/3112	Former 10 Ashley Road Walton-On-Thames KT12 1HU	Walton-on-Thames	C2	2	2	N/A	C2 <sup>14</sup>
2019/2553	4 Fairmile Lane Cobham KT11 2DJ	Cobham & Oxshott	C3	2	2	N/A	C3
2019/0398	212 Walton Road East Molesey KT8 0HR	Molesey	C3	2	1	N/A	C3
2021/0834	Land Rear of 2 Littleheath Farm Cottage Steels Lane Oxshott Leatherhead KT22 0RX	Cobham & Oxshott	C3	1	1	N/A	C3
2020/2883	Hunters Lodge Horsley Road Downside Cobham KT11 3NY	Cobham & Oxshott	Agricultural	2	2	N/A	C3
2020/2614	106 Walton Road East Molesey KT8 0HP	Molesey	C3	4	4	N/A	C3
2020/3048	1 Portsmouth Avenue Thames Ditton KT7 0RW	Dittons	C3	4	3	N/A	C3
2018/2819	Tandem House Queens Drive Oxshott Leatherhead KT22 0PH	Cobham & Oxshott	C3	2	1	N/A	C3
2020/3223	8-14 Oatlands Drive Weybridge KT13 9JL	Weybridge	C3	51	47	N/A	C3
2019/0386	St Catherines Thames Street Weybridge KT13 8JR	Weybridge	C3	28	2	N/A	C3
2021/3595	A C Court High Street Thames Ditton KT7 0SR	Dittons	Class E	38	38	Unknown	C3
2019/3163	Garage Block Ikona Court Weybridge	Weybridge	Garages	7	7	N/A	C3
2020/2572	70 Embercourt Road Thames Ditton KT7 0LW	Dittons	C3	4	3	N/A	C3
2021/0056	19 Dale Road Walton-On-Thames KT12 2PY	Walton-on-Thames	C3	2	1	N/A	C3
2019/3228	Land Northeast of 15 Courtlands Avenue Esher KT10 9HZ	Esher	C3	1	1	N/A	C3
2018/0492	28 Red Lane Claygate Esher KT10 0ES	Esher	C3	2	2	N/A	C3

<sup>13</sup> Permission is granted for a 64-bed nursing home. After applying the formula, this would result in a housing supply of 32 units

<sup>14</sup> Permission is granted for 4-bedroom children's home. After applying the formula, this would result in a housing supply of 2 units

2017/3397	55 Weston Avenue West Molesey KT8 1RG	Molesey	C3	6	5	N/A	C3
2017/3496	Car Park Site, Rear of Bridge Road, East Molesey KT8 9ER	Molesey	Sui Generis	4	4	N/A	C3
2018/2132	Land to the South of Old Oak March Road Weybridge KT13 8XA	Weybridge	C3	1	1	N/A	C3
2018/2520	Elmer Dene 95 Queens Road Hersham Walton-On-Thames Surrey KT12 5LA	Hersham	C3	6	5	N/A	C3
2018/0632	Lincoln Court Old Avenue Weybridge Surrey KT13 0PH	Weybridge	C3	28	19	N/A	C3
2018/2476	6A High Street Claygate Esher Surrey KT10 0JG	Esher	Class E	1	1	-58	C3
2018/3193	70 Baker Street Weybridge Surrey KT13 8AL	Weybridge	C3	5	5	N/A	C3
2018/0175	Grantchester House 5 Hinchley Way Esher KT10 0BD	Esher	Class E	1	1	90.2	Class E and C3
2017/1323	145-149 Hersham Road Hersham Walton-On-Thames KT12 5NR	Hersham	C3 and Class E	21	19	-78	Class E and C3
2018/3812	Land South of 46 Molesey Park Road West Molesey Surrey KT8 2JZ	Molesey	C3	1	1	N/A	C3
2019/1160	Ansell Hall Oakbank Avenue Walton-On-Thames KT12 3RB	Walton	D1	10	10	-114	Class D1 and C3
2020/2423	42 High Street Walton-On-Thames KT12 1BZ	Walton-on-Thames	Garage	1	1	N/a	C3
2021/3417	Auckland House New Zealand Avenue Walton-On-Thames Surrey KT12 1PL	Walton-On-Thames	Class E	10	10	N/A	C3
2018/2263	Land East Of 13a Station Avenue Walton-On-Thames Surrey KT12 1NF	Walton-on-Thames	Vacant	1	1	N/A	C3
2019/0187	Warehouse 47 Thames Street Weybridge Surrey KT13 8JG	Weybridge	B8	1	1	Unknown	C3
2021/1923	18 Heath Ridge Green Cobham KT11 2QJ	Cobham & Oxshott	C3	2	1	N/A	C3
2021/1399 2022/3124	Heath Lodge St George's Avenue Weybridge Surrey KT13 0DA	Weybridge	C215	2	2	N/A	C3

<sup>15</sup> 13 new C3 units are under construction but as the demolished care home contained 23 care rooms and after applying the formula this results in a loss of 11 C3 units and a gain of 2 C3 units.



2021/3991	Land to South of 94 Manor Road North Esher Surrey KT10 0AE	Dittons	C3	1	1	N/A	C3
2019/2378	5 Central Avenue West Molesey KT8 2QX	Molesey	C3	2	2	N/A	C3
2021/3517	Oak House 19 Queens Road Weybridge Surrey KT13 9UE	Weybridge	C216	2	2	597	C3
2019/3601	Thamesview House Felix Road Walton-On-Thames KT12 2SL	Walton-On-Thames	C3	97	33	N/A	C3
2019/3494	Horsley Bungalow Old Avenue Weybridge KT13 0PS	Weybridge	C3	4	3	N/A	C3
2021/4104	Foxholes Stokesheath Road Oxshott Leatherhead KT22 0PP	Cobham & Oxshott	C3	3	2	N/A	C3
2018/0254	88 Hurst Road East Molesey KT8 9AH	Molesey	C3	2	1	N/A	C3
2019/2309	9 Leigh Court Close Cobham KT11 2HT	Cobham & Oxshott	C3	5	4	N/A	C3
2019/2005	Units1 & 2 Hampton Court Estate Summer Road Thames Ditton KT7 0RG	Dittons	B2/B8	78	78	-2612	C3
2021/2127	Linbridge Oatlands Avenue Weybridge KT13 9TR	Weybridge	C3	4	3	N/A	C3
2021/3946	Land West of 1 to 3 High Street and Trenchard Arlidge Oakshade Road Oxshott Leatherhead Surrey KT22 0JU	Cobham & Oxshott	Class E	3	3	-80	C3
2020/1084	Land adjacent to 58 The Roundway Claygate KT10 0DW	Claygate	C3	1	1	N/A	C3
2021/3413	9 Water Lane Cobham KT11 2PA	Cobham & Oxshott	C3	3	2	N/A	C3
2021/2254	Copsem Manor 50 Copsem Lane Esher Surrey KT10 9HJ	Cobham & Oxshott	C3	6	6	N/A	C3
2018/3678	1-5 Hillside Portsmouth Road Esher KT10 9LJ	Esher	C3	18	13	N/A	C3
2019/2119	Warling Dean 33 New Road Esher KT10 9PG	Esher	C3	19	12	N/A	C3

<sup>16</sup> 10 flats are under construction. After applying the formula to the previous 16 care bed loss - this results in an C3 loss of 8 and a C3 gain of 2 units.

2018/3671	Site of 45 to 55 Waverley Road 1 and 3 Lyfield and 4 to 10 Webster Close Oxshott	Cobham & Oxshott	C3	23	11	N/A	C3
2021/4194	142 High Street Esher Surrey KT10 9QJ	Esher	Sui Generis	5	5	473	C3
2022/1998 2021/2764	16 Sandy Lane Walton-on-Thames Surrey KT12 2EQ	Walton-on-Thames	C3	6	5	N/A	C3
2020/2095	Site of Claygate House Littleworth Road Esher KT10 9PN	Claygate	Class E	62	62	Unknown	C3
2021/3269	Cold Norton Farm Ockham Lane Cobham Surrey KT11 1LW	Cobham & Oxshott	Agricultural	7	7	-84	C3
2021/2006	6 Thrupps Lane Hersham Walton-On-Thames Surrey KT12 4NF	Hersham	C3	5	4	N/a	C3
2022/3441	Beacon House Beacon Mews South Road Weybridge Surrey KT13 9DZ	Weybridge	C3	1	1	N/A	C3
2022/0086	Beechcroft Manor Weybridge KT13 9NY	Weybridge	C3	11	11	N/A	C3
2021/0395	Two Oaks Castleview Road Weybridge KT13 9AA	Weybridge	C3	12	12	N/A	C3
2021/1194	2A Criterion Buildings Portsmouth Road Thames Ditton KT7 0SS	Dittons	Class E	1	1	Unknown	C3
2019/1588	Land Adjacent to 39 Charlton Avenue Hersham Walton-On-Thames KT12 5LE	Hersham	C3	2	2	N/A	C3
2020/2814	The Waffrons Woodstock Lane South Chessington Surrey KT9 1UF	Dittons	C3	3	2	N/A	C3
2022/2776	130-132 Hersham Road Hersham Walton-On-Thames Surrey KT12 5QJ	Hersham	Class E & C3	1	1	N/a	C3
2019/2569	412 Walton Road West Molesey KT8 2JG	Molesey	F2 & C3	50	38	-614	C3
2019/1258	Nyumbani Ruxley Crescent Claygate Esher KT10 0TZ	Claygate	C3	2	1	N/a	C3
2019/1939	41 Onslow Road Hersham Walton-On-Thames KT12 5BA	Hersham	C3	2	1	N/a	C3
2018/2260	Land South of 50 Primrose Road Hersham Walton-On-Thames KT12 5JD	Hersham	C3	1	1	N/A	C3

## Appendix 2: Sites with planning permission at 31 March 2023

Application Number	Address	Settlement Area	Current Land Use	Number of Dwellings Permitted (gross)	Number of dwellings permitted (Net)	Net floorspace/ GIA (sqm)	Permitted Land Use
2019/3606	Land South of 8 Arnison Road East Molesey KT8 9JJ	Molesey	C3	1	1	N/A	C3
2019/3248	11 Oatlands Close Weybridge KT13 9ED	Weybridge	C3	2	1	N/A	C3
2019/1257	10 Old Farmhouse Drive Oxshott Leatherhead KT22 0EY	Cobham & Oxshott	C3	1	1	N/A	C3
2020/0747	96 Walton Road East Molesey KT8 0DL	Molesey	Class E	5	5	Unknown	C3
2019/0329	Site of Crow Gables 131 Fairmile Lane Cobham KT11 2BU	Cobham & Oxshott	C3	74	74	N/A	C2
2020/0153	Dalveen Lodge Sandy Lodge Cobham KT11 2EP	Cobham & Oxshott	C3	1	1	N/A	C3
2019/1764	35 Ashley Drive Walton-On-Thames KT12 1JT	Walton-on-Thames	C3	3	2	N/A	C3
2020/0145	Admiral Rodney House 17 Church Street Walton-On-Thames Surrey KT12 2QT	Walton-on-Thames	Class E	3	3	Unknown	C3
2019/2469	32 Green Lane Cobham KT11 2NN	Cobham & Oxshott	C3	4	3	N/A	C3
2019/0575	Land East of 82 Island Farm Road West Molesey KT8 2LQ	Molesey	C3	5	5	N/A	C3
2019/1575	Land South of 75 and North of Copse Mews St Marys Road Weybridge KT13 9PZ	Weybridge	C3	1	1	N/A	C3
2019/2381	Station House The Parade Claygate Esher Surrey KT10 0PB	Claygate	C3	11	11	N/A	C3
2020/0627	21 Station Avenue Walton-On-Thames KT12 1NF	Walton-on-Thames	C3	1	1	N/A	C3

2020/1450	Crown House 2 Church Street Walton-On-Thames KT12 2QS	Walton-on-Thames	Class E	3	3	Unknown	C3
2019/3272 2021/4279	Britannia House Pool Road West Molesey KT8 2AB	Molesey	Class E	87	87	-10000	C3
2020/1502 2020/2483 2020/3278 2021/2695	Abbey House Wellington Way Weybridge KT13 0TT	Weybridge	Class E	52	52	Unknown	C3
2018/3239	27 Meadow Road Claygate Esher KT10 0RZ	Claygate	C3	2	1	N/A	C3
2020/2680	Site of 363 to 367 Molesey Road Walton-On-Thames	Walton-on-Thames	C3	9	8	N/A	C3
2020/2552	1 High Street Oxshott Leatherhead KT22 0JN	Cobham & Oxshott	Class E	2	2	-41	C3
2019/2745	Birch Mead The Ridgeway Oxshott Leatherhead KT22 0LJ	Cobham & Oxshott	C3	2	1	N/A	C3
2019/3409	22 Southview Road Thames Ditton KT7 0UL	Dittons	C3	1	-1	N/A	C3
2020/1246	61A Carlton Road Walton-On-Thames KT12 2DQ	Walton-on-Thames	C3	3	2	N/A	C3
2020/1438	10 Ship Yard Weybridge Surrey KT13 8BH	Weybridge	B2	1	1	-146.8	C3
2020/3345 2021/2626	Members Hill Brooklands Road Weybridge KT13 0QU	Weybridge	Class E	57	57	Unknown	C3
2020/2299	1 & 2 Orchard Cottages Weybridge KT13 9NW	Weybridge	C3	4	2	N/A	C3
2021/0766	27B High Street Weybridge KT13 9AX	Weybridge	Class E	2	2	Unknown	C3
2021/0862	5 High Street Esher KT10 9RL	Esher	Class E	3	3	Unknown	C3
2020/2095	4 Littleworth Road Esher KT10 9FP	Claygate	Class E	62	62	-1332	C3
2020/3340 2022/2339	32 Hersham Road Walton-On-Thames KT12 1UX	Walton-on-Thames	Class E	3	3	-267	C3
2021/1105 2021/1106 2021/1103	40 Baker Street Weybridge KT13 8AR	Weybridge	Class E	6	6	Unknown	C3

2020/1218	11 St Marys Long Ditton KT6 5EU	Dittons	C3	6	3	N/A	C2 <sup>17</sup>
2020/1708	20 The Drive Cobham KT11 2JQ	Cobham & Oxshott	C3	2	1	N/A	C3
2020/0691	8 Oatlands Drive Weybridge KT13 9JL	Walton-on-Thames	C3	51	47	N/A	C3
2021/1403 2022/0091	Auckland House New Zealand Avenue Walton-On-Thames Surrey KT12 1PL	Walton-on-Thames	Class E	11	10	Unknown	C3
2020/0832	Homebase New Zealand Avenue Walton-On-Thames KT12 1XA	Walton-on-Thames	Class E	222	209	-2482	C2 <sup>18</sup>
2020/0749	31 Hurstfield Road West Molesey KT8 1QU	Molesey	C3	2	1	N/A	C3
2021/0290	4 Churchfield Road Walton-On-Thames KT12 2TF	Walton	Class E and C3	1	1	N/A	Class E and C3
2021/2078	9 Esher Road Hersham Walton-On-Thames KT12 4JZ	Hersham	Class E	2	2	Unknown	C3
2020/1306	37 Rectory Lane Long Ditton Surbiton KT6 5HP	Dittons	C3	1	1	N/A	C3
2021/1868 2021/2803 2021/2807	241 Brooklands Road Weybridge KT13 0RH	Weybridge	Class E	38	38	Unknown	C3
2021/1870 2021/2805 2021/2808	243 Brooklands Road Weybridge KT13 0RH	Weybridge	Class E	20	20	Unknown	C3
2020/2176	Greenways 46 Copsem Lane Esher KT10 9HJ	Cobham & Oxshott	C3	22	21	N/A	C3
2019/2416	Willow Cottage Ridgeway Close Oxshott Leatherhead KT22 0LQ	Cobham & Oxshott	C3	5	4	N/A	C3
2021/1552	85 Queens Road Weybridge KT13 9UQ	Weybridge	Class E	2	2	Unknown	C3

<sup>17</sup> Planning permission is for 6 supported living units. After applying the formula, this would result in a housing supply of 3 units

<sup>18</sup> Permission is granted for 196 self-contained units and 26 care units. After applying the formula, this would result in a housing supply of 209 units.

2021/1948	205 Brooklands Road Weybridge KT13 0TS	Weybridge	Class E	28	28	Unknown	C3
2021/1954	203 and 205 Brooklands Road Weybridge KT13 0RH	Weybridge	Class E	24	24	Unknown	C3
2020/1149 2020/1657	8 Holtwood Road Oxshott KT22 0QJ	Cobham & Oxshott	C3	5	4	N/A	C3
2021/0826	360 Walton Road West Molesey KT8 2JE	Molesey	C3	1	1	N/A	C3
2021/2579	Beechwood Court Station Avenue Walton-On-Thames KT12 1LT	Walton-on-Thames	Class E	10	10	Unknown	C3
2021/2591	Walton Lodge Bridge Street Walton-On-Thames KT12 1BT	Walton-on-Thames	Class E	20	20	Unknown	C3
2021/2696 2021/4263	6 Snellings Road Hersham Walton-On-Thames KT12 5JG	Hersham	Class E	2	2	-138	C3
2021/2625	Idis House Churchfield Road Weybridge KT13 8DB	Weybridge	Class E	24	24	Unknown	C3
2020/1795	Merrywood Weston Green Thames Ditton KT7 0JZ	Dittons	C3	26	25	N/A	C3
2021/2043	Unit C St Georges Business Park Brooklands Road Weybridge KT13 0TS	Weybridge	Class E	6	6	Unknown	C3
2021/2890 2021/4167	4 Queens Road Hersham KT12 5LS	Hersham	Class E	2	2	-69	C3
2021/1950	Building C 207 Brooklands Road Elder House Weybridge KT13 0RH	Weybridge	Class E	20	20	Unknown	C3
2020/2561	Garage Block East of 12 Arran Way Esher KT10 8BE	Esher	Sui Generis	2	2	Unknown	C3
2020/2562	Garage Block West of 11 Arran Way Esher KT10 8BE	Esher	Sui Generis	2	2	Unknown	C3
2020/2563	Garage Block North of 47 and West of 49 Douglas Road Esher KT10 8BA	Esher	Sui Generis	2	2	Unknown	C3

2019/1813	The Royal Cambridge Home, 82-84 Hurst Road East Molesey KT8 9AH (C2)	Molesey	C2	92	62	N/A	C2 <sup>19</sup>
2020/2096	White Lodge Hogshill Lane Cobham KT11 2AL	Cobham & Oxshott	C3	2	1	N/A	C3
2020/1222	145 Hershams Road Hershams Walton-On-Thames KT12 5NR	Hershams	Class E and C3	18	16	+74.07	Class E and C3
2021/3551	32-34 High Street Walton-On-Thames KT12 1BZ	Walton-on-Thames	Class E	2	2	Unknown	C3
2021/2032 2021/2698	6 The Heights Weybridge KT13 0XP	Weybridge	Class E	21	21	Unknown	C3
2021/0160	16 Stevens Lane Claygate Esher KT10 0TE	Claygate	C3	3	2	N/A	C3
2021/0092	7 Ashley Road Walton-on-Thames KT12 1HY	Walton-on-Thames	Class E and C3	18	17	-387.2	C3
2021/0183	Land at Downside Road Cobham KT11 3LY	Cobham & Oxshott	C3	27	26	N/A	C3
2021/2608	Garage Block South of 33 to 45 The Roundway Claygate Esher KT10 0DP	Claygate	Sui Generis	2	2	N/A	C3
2021/4040	11 Cross Road Weybridge KT13 9NX	Weybridge	Class E	1	1	Unknown	C3
2021/0202	Waterside Hampton Court Way East Molesey	Molesey	C3	1	1	N/A	C3
2021/0944	37 Homefield Road Walton-On-Thames KT12 3RE	Walton	C3	9	8	N/A	C3
2020/1972	Nusrat Lodge 1 Assher Road Hershams Walton-On-Thames KT12 4RA	Hershams	C3	2	1	N/A	C3
2021/0201	16 Lakeside Drive Esher KT10 9EZ	Esher	C3	1	1	N/A	C3
2020/1629	Garage Block South of 2 and 4 Wyndham Avenue Cobham KT11 1AT	Cobham & Oxshott	Sui Generis	3	3	N/A	C3

<sup>19</sup> Permission is granted for a 32-bed care home (32) and 60 extra care units (C3). After taking away the existing 28 existing care units and applying the formula to the remaining 4 units, this would result in a housing supply of 62 units

2022/0439	29-31 Creek Road East Molesey Surrey KT8 9BE	Molesey	Class E	2	2	Unknown	C3
2018/2316	Land Northeast of 70 to 79 Berkeley Court Weybridge KT13 9HY	Weybridge	C3	3	3	N/A	C3
2020/3499	Garages and playground to the side and rear of 61- 69 Rodney Road 24-30 Ambleside Avenue 10-12 Edgehill Court and Flats 7- 11 12-14 St Johns Drive Surrey	Walton-on-Thames	Sui Generis	6	6	N/A	C3
2021/4359	Land to rear of 38 and 41 Twinoaks Cobham Surrey KT11 2QP	Oxshott & Stoke D'Abernon	C3	4	4	N/A	C3
2022/0653	20 New Road Esher Surrey KT10 9PG	Esher	C3	4	3	N/A	C3
2022/1231	23-27 High Street Cobham Surrey KT11 3DH	Oxshott & Stoke D'Abernon	Class E	10	10	-641	C3
2022/1239	1-15 Hillbrook Gardens Weybridge KT13 0SP	Weybridge	C3	5	5	N/A	C3
2020/1932	187A Cottimore Lane Walton-On-Thames Surrey KT12 2BX	Walton-on-Thames	C3	4	4	N/A	C3
2021/1791	45 More Lane	Esher	C3	25	25	N/A	C3
2021/4341	32-34 High Street Walton-On-Thames Surrey KT12 1BZ	Walton-on-Thames	C3	2	2	272.9	HMO Sui Generis
2021/3072	363 to 367 Molesey Road Walton-On-Thames Surrey KT12 3PF	Walton-on-Thames	Class E	7	6	-95.7	C3
2020/2500	Garages along Foxwarren to the rear of 115-125 Covert Road Claygate Esher Surrey	Claygate	Sui Generis	1	1	N/A	C3
2020/2107	111 Hershaw Road Walton-On-Thames Surrey KT12 1RN	Walton-on-Thames	Class E and C3	1	1	N/A	C3
2018/3810	Jolly Boatman and Hampton Court Station Redevelopment Area Hampton Court Way East Molesey KT8 9AE	Molesey	Sui Generis	97	97	N/A	Class E and C3
2021/2962	Land Southwest of Arenella Mountview Road Claygate Esher Surrey KT10 0UD	Claygate	C3	1	1	N/A	C3



2021/0625	Land Adjacent to 151 Rydens Road Walton-On-Thames Surrey KT12 3AS	Walton-on-Thames	Vacant land	9	9	N/A	C3
2020/1076	Pelhams Ridge 1 Copsem Lane Esher KT10 9EU	Esher	C3	8	7	N/A	C3
2021/3663	102-106 High Street Esher Surrey KT10 9QJ	Esher	Class E and C3	2	1	N/a	C3
2020/1628	13 Garages to the rear of 27 and 27a Wyndham Avenue Cobham	Cobham & Oxshott	Sui Generis	1	1	N/A	C3
2022/0698	Land South of, 3 Southwood Manor Farm Burhill Road Hersham Surrey KT12 4BJ	Hersham	Vacant land	1	1	N/A	C3
2022/1797	Barn and Land at Silvermere Farm Byfleet Road Cobham Surrey KT11 1DX	Weybridge St. George's Hill	Agricultural	1	1	N/A	C3
2022/0073	8-10 High Street Walton-On-Thames Surrey KT12 1DA	Walton-on-Thames	Class E	3	3	-40	Class E and C3
2020/1613	Garages to the rear of 132-152 Tartar Road Cobham Surrey	Cobham & Oxshott	Sui Generis	5	5	N/A	C3
2022/2815	244 Walton Road, West Molesey, KT8 2HT	Molesey	Class E	1	1	Unknown	C3
2022/2491	23-27 High Street Cobham Surrey KT11 3DH	Cobham & Oxshott	Class E	3	3	N/A	C3
2020/2626	Administration Block Octagon Road Whiteley Village Hersham Walton-On-Thames Surrey KT12 4EG	Weybridge	Class E	5	5	-269.4	C3
2022/0942	2 Lebanon Drive Cobham Surrey KT11 2PR	Cobham & Oxshott	C3	2	1	N/A	C3
2022/1212	Land Southeast of 39 Stoke Road Stoke D'Abernon Cobham Surrey KT11 3BH	Cobham & Oxshott	C3	2	2	N/A	C3
2022/3231	55 - 57 Bridge Road East Molesey Surrey KT8 9ER	Molesey	Class E and C3	2	2	Unknown	C3
2022/2129	58A High Street Walton-on-Thames Surrey KT12 1BY	Walton-on-Thames	Class E and C3	3	2	N/A	C3
2022/3795	254 Walton Road West Molesey Surrey KT8 2HT	Molesey	Class E	1	1	50	C3

2022/3246	Beech Shadows 15 Woodside Road Cobham Surrey KT11 2QR	Cobham & Oxshott	C3	2	1	N/A	C3
2022/0441	Land Northwest of Campbell Cottage & 1 Beacon Mews South Road Weybridge Surrey KT13 9DZ	Weybridge	Vacant land	2	2	N/A	C3
2020/3003	Garage block North of 54 and West of 52 Belvedere Gardens West Molesey Surrey KT8 2TD	Molesey	Sui Generis	4	4	N/A	C3
2023/0149	Blue Barn Farm Blue Barn Lane Weybridge Surrey KT13 0NH	Weybridge	C3	2	2	N/A	C3
2022/3453	96 Terrace Road Walton-on-Thames Surrey KT12 2DT	Walton-on-Thames	Class E	1	1	-75	C3
2022/1342	4A Palace Road East Molesey Surrey KT8 9DL	Molesey	C3	2	1	N/A	C3
2020/1627	Lock Up Garages Waverley Road Oxshott	Oxshott & Stoke D'Abernon	Sui Generis	4	4	N/A	C3
2020/3350	4 and 4A Castleview Road Weybridge KT13 9AB	Weybridge Riverside	C3	2	2	N/A	C3
2021/0114	Fairmile Farm Cottage Denby Road Cobham KT11 1JY	Cobham & Downside	C3	1	1	N/A	C3
2021/0744	Childs Play Centre Manor Road Walton-On-Thames KT12 2PH	Walton Central	Class E	19	19	-201	C3
2021/1431	5 Hinchley Way Esher Surrey KT10 0BD	Hinchley Wood & Weston Green	Class E	6	6	N/A- Garden	C3
2021/3769	Southlands 40 Queens Road Weybridge Surrey KT13 0AR	Weybridge St. George's Hill	C3	3	3	N/A	C3
2021/4404	39 Charlton Avenue Hersham Walton-On-Thames Surrey KT12 5LE	Hersham	C3	7	7	N/A	C3
2022/0440	33 Creek Road. East Molesey, KT8 2RY	Molesey	Class E	1	1	Unknown	C3
2021/1928	143 Molesey Avenue, West Molesey, KT8 2RY	Molesey	Class E	3	3	Unknown	C3

### Appendix 3: List of LAA sites by settlement

Please see detailed proformas which follow the order of the lists of sites.

#### Claygate

Site reference	Site name	Net units	Delivery timescale	Page No.
US155	Garages to the rear of Holroyd Road, Claygate	3	1- 5 years	53
US3	Torrington Lodge Car Park, Hare Lane, Claygate	8	1- 5 years	57
US6	Crown House, Church Road, Claygate	12	1- 5 years	61
US156	Garages to the rear of Foxwarren, Claygate	5	6- 10 years	65
US175	Claygate Centre, Elm Road, Claygate	14	6-10 years	69
US169	Claygate Station Car park, The Parade, Claygate	15	11- 15	73

#### Cobham

Site reference	Site name	Net units	Delivery Timescale	Page No.
US159	Garages to the rear of 6-24 Lockhart Road, Cobham	4	1- 5 years	77
US160	Garages at Bennett Close, Cobham	3	1- 5 years	81
US467	Ambleside, 3 The Spinney, Queens Drive, KT22 0PL	8	1- 5 years	85
US472	40 Fairmile Lane, Cobham, KT11 2DQ	13	1- 5 years	89
US492	Cedar House, Mill Road, Cobham, KT11 3AL	7	1- 5 years	93
US493	Selden Cottage and Ronmar, Leatherhead Road, KT22 0EX	18	1- 5 years	97
US521	4 Fernhill, Oxshott, KT22 0JH	5	1- 5 years	101

US530	Garage block, Middleton Road, Downside	3	1- 5 years	105
US551	White Herons, Fairmile Park Road, Cobham	5	1- 5 years	109
US552	1 Holtwood Road, Oxshott	7	1- 5 years	113
US164	Cobham Health Centre and Garages off Tartar Road	11	6-10 years	117
US187	87 Portsmouth Road, Cobham, KT11 1JH	10	6-10 years	121
US191	73 Between Streets, Cobham, KT11 1AA	8	6-10 years	125
US193	Glenelm and 160 Anyard Roads, Cobham, KT11 2LH	34	6-10 years	129
US195	Centre for the Community, Lushington Drive, Cobham, KT11 2LU	37	6-10 years	133
US460	1, 3 and 5 Goldrings Road, Oxshott, Leatherhead, KT22 0QP	32	6-10 years	137
US522	52 Fairmile Lane, Cobham, KT11 2DF	7	6-10 years	141
US523	Pineview, Fairmile Park Road, Cobham, KT11 2PG	6	6-10 years	145
US7	20 Stoke Road, Cobham	8	6-10 years	149
US121	Oxshott Medical Practice and Village Centre Hall, Holtwood Road	10	11- 15 years	153
US124	St Andrew's Church, Oakshade Road, Oxshott, KT22 0LE	0	11- 15 years	157
US186	78 Portsmouth Road, Cobham	30	11- 15	161
US189	101 Portsmouth Road, Cobham, KT11 1JN	7	11- 15	165
US194	Protech House, Copse Road, Cobham	28	11- 15	169
US201	Tiltwood Care Home, Hogshill Lane, Cobham,	24	11- 15 y	173
US214	Above Waitrose, 16-18 Between Streets,	20	11- 15	177
US215	38 Copse Road, Cobham, KT11 2TW	7	11- 15	181

US217	68 Between Streets and 7-11 White Lion Gate, Cobham	6	11- 15 years	185
US218	Coveham House, Downside Bridge Road and The Royal British Legion, Hollyhedge Road	14	11- 15 years	189
US221	Garages and parking to the rear of Cobham Gate, Cobham	8	11- 15 years	193
US497	Cedar Road Car Park, Cedar Road, Cobham	5	11- 15	197
US544	17(Former Loch Fyne Restaurant), Portsmouth Road, Cobham	25	11- 15 years	201

### Dittons

<b>Site reference</b>	<b>Site name</b>	<b>Net units</b>	<b>Delivery Timescale</b>	<b>Page No.</b>
US158	Garages to the rear of Blair Avenue, Esher	4	1- 5 years	205
US230	Car Park south of Southbank, Thorkhill Road, Thames Ditton	7	1- 5 years	209
US245	Brook House, Portsmouth Road, Thames Ditton, KT7 0EG	30	1- 5 years	213
US443	47 Portsmouth Road, Thames Ditton, KT7 0TA	0	1- 5 years	217
US462	Sundial House, The Molesey Venture, Orchard Lane, East Molesey, KT8 0BN	61	1- 5 years	221
US503	89-90 Woodfield Road, Thames Ditton, KT7 0DS	7	1- 5 years	225
US516	Bransby Lodge, St Leonard's Road, Thames Ditton	5	1- 5 years	229
US524	Torrington, 18-20, St Mary's Road, Long Ditton, KT6 5EY	9	1- 5 years	233

US548	12 and land rear of 10-26, Claygate Lane, Esher	5	1- 5 years	237
US265	5A-6A Station Road, Esher, KT10 8DY	5	6-10 years	241
US495	Corner Cottage, Portsmouth Road, KT7 0TQ	5	6-10 years	245
US518	Thames Ditton Centre for the Community, Mercer Close, Thames Ditton, KT7 0BS	18	6-10 years	249
US545	Cooper/BMW 42 Portsmouth Road, Long Ditton	112	6-10 years	253
US18	British Legion, Betts Way, Long Ditton, KT6 5HT	9	11- 15 years	257
US232	Nuffield Health Club, Simpson Way, Long Ditton	16	11- 15 years	261
US233	Nuffield Health car park, Simpson Way, Long Ditton	10	11- 15 years	265
US237	Ashley Road Car Park, Thames Ditton	14	11- 15	269
US24	Flats 9-41 and Garages on Longmead Road, Thames Ditton, KT7 0JF	37	11- 15 years	273
US250	Community centres at the junction of Mercer Close and Watts Road, Thames Ditton	29	11- 15 years	277
US251	Old Pauline Sports Ground Car Park	35	11- 15	281
US260	46 St Marys Road, Long Ditton, KT6 5EY	5	11- 15	285
US271	118-120 Bridge Road East Molesey KT8 9HW	6	11- 15	289
US272	Industrial units at 67 Summer Road East Molesey KT8 9LX	12	11- 15 years	293

## Esher

Site Reference	Site name	Net units	Delivery Timescale	Page No.
US127	30 Copsem Lane, Esher, KT10 9HE	21	1- 5 years	297
US146	35 New Road, Esher, KT10 9DW	5	1 -5 years	301
US276	Cafe Rouge, Portsmouth Road, Esher, KT10 9AD	20	1- 5 years	305
US526	40 New Road, Esher, KT10 9NU	6	1- 5 years	309
US157	Garages at Farm Road, Esher	3	6-10 years	313
US274	Two Furlongs and Wren House, Portsmouth Road, Esher, KT10 9AA	10	6-10 years	317
US282	42 New Road Esher KT10 9NU	6	6-10 years	321
US283	1-5 Millbourne Lane, Esher, KT10 9DU	25	6-10 years	325
US32	Windsor House, 34-40 High Street, Esher, KT10 9QY	8	6-10 years	329
US33	River Mole Business Park, Mill Road, Esher, KT10 8BJ	200	6-10 years	333
US38	Units C and D, Sandown Industrial Park, Mill Road, Esher	60	6-10 years	337
US481	6 Bracondale and 43 Claremont Lane, KT10 9EN	16	6-10 years	341
US519	Esher Library and land adjoining, Church Street, Esher, KT10 9NS	15	6-10 years	345
US134	Hanover Cottage 6 Claremont Lane Esher KT10 9DW	12	11- 15 years	349
US280	St Andrews and Hillbrow House, Portsmouth Road, Esher, KT10 9SA	30	11- 15 years	353

US286	Highwaymans Cottage Car Park, Portsmouth Road, Esher	9	11- 15 years	357
US287	15 Clare Hill Esher KT10 9NB	55	11- 15 years	361
US531	Civic Centre, High Street, Esher, KT10 9SD	400	11- 15 years	365

## Hersham

<b>Site reference</b>	<b>Site name</b>	<b>Net units</b>	<b>Delivery Timescale</b>	<b>Page No.</b>
US441	63 Queens Road, Hersham, KT12 5LA	5	1- 5 years	369
US489	19 Old Esher Road, Hersham, KT12 4LA	5	1- 5 years	373
US379	Hersham Shopping Centre, Molesey Road, Hersham	100	6- 10 years	377
US380	New Berry Lane car park, Hersham	7	6-10 years	381
US43	Hersham Technology Park (Air Products)	300	6-10 years	385
US374	Hersham Library, Molesey Road, Hersham	13	11- 15	389
US375	Volkswagen Ltd Esher Road Hersham	27	11- 15	393
US376	Trinity Hall and 63-67 Molesey Road, Hersham	47	11- 15 years	397
US378	All Saints Catholic Church hall, Queens Road Hersham KT12 5LU	8	11- 15 years	401
US40	Hersham Day Centre and Village Hall, Queens Road, Hersham, KT12- 5LU	15	11- 15 years	405
US435	Car Park next to Waterloo Court	62	11- 15	409
US45	Car park to the south of Mayfield Road	9	11- 15	413



## Molesey

<b>Site reference</b>	<b>Site name</b>	<b>Net units</b>	<b>Delivery Timescale</b>	<b>Page No.</b>
US152	Garages to the rear of Island Farm Road, West Molesey	3	1 to 5	417
US507	133-135 Walton Road, East Molesey, KT8 0DT	8	1 to 5	421
US509	2 Beauchamp Road, East Molesey, KT8 0PA	9	1 to 5	425
US529	Garage block west of 14 and north of 15 Brende Gardens, West Molesey	4	1 to 5	429
US153	11-27 Down Street, West Molesey, KT8 2TG	7	6 to 10	433
US456	Molesey Community Hospital, High Street, KT8 2LU	70	6 to 10	437
US498	7 Seymour Close and Land to rear of 103-113 Seymour Close, East Molesey, KT8 0JY	5	6 to 10	441
US296	5 Matham Road East Molesey KT8 0SX	23	11 to 15	445
US309	Water Works south of Hurst Road, West Molesey	14	11 to 15	449
US312	Henrietta Parker Centre, Ray Road, West Molesey	13	11 to 15	453
US315	Parking /garages at Grove Court Walton Road East Molesey KT8 0DG	7	11 to 15	457
US319	Pavilion Sports Club car park Hurst Lane East Molesey KT8 9DX	9	11 to 15	461
US56	Joseph Palmer Centre, 319a Walton Road	60	11 to 15	465

Walton-on-Thames

<b>Site ref</b>	<b>Site name</b>	<b>Net units</b>	<b>Delivery Timescale</b>	<b>Page No.</b>
US168	Garages at Sunnyside, Walton-on-Thames	5	1 to 5	469
US326	9-21a High Street, Walton-on-Thames	71	1 to 5	473
US339	Walton Park Car Park, Walton Park, KT12 3ET	17	1 to 5	477
US528	Garages to rear of 84-92 and 94-96 Rodney Road, Walton-on-Thames	4	1 to 5	481
US550	41 High Street, Walton-on-Thames	5	1 to 5	485
US112	20 Sandy Lane, Walton-on-Thames, KT12 2EQ	7	6 to 10	489
US135	12 to 16a High Street, Walton-on-Thames	24	6 to 10	493
US166	Garages to the rear of 17-27 Field Common Lane Walton-On-Thames, KT12 3QH	3	6 to 10	497
US323	Bradshaw House Bishops Hill and Walton Centre for the Community, Manor Road, Walton-On-Thames KT12 2PB	18	6 to 10	501
US327	Bridge Motor Works, New Zealand Avenue, Walton-On-Thames, KT12 1AU	35	6 to 10	505
US361	Garages adjacent to 1 Tumbling Bay, Walton-On-Thames	2	6 to 10	509
US471	147 Sidney Road, KT12 3SA	8	6 to 10	513
US84	Elm Grove, 1 Hershams Road, Walton-on-Thames, KT12 1LH	0	6 to 10	517
US321	Case House 85-89 High Street Walton On Thames KT12 1DZ	28	11 to 15	521
US324	Manor Road Car Park, Manor Road,	31	11 to 15	525

	Walton-on-Thames, KT12 2QN			
US325	Garages to the rear of 8 Sidney Road, Walton-on-Thames	8	11 to 15	529
US331	Land to the rear of 60-70 Sandy Lane, Walton-on-Thames	8	11 to 15	533
US335	Garages at Home Farm Gardens, Walton-on-Thames	6	11 to 15	537
US348	Cornerstone Church, 38 Station Avenue, Walton-On-Thames, KT12 1NU	30	11 to 15	541
US351	Land north of Mellor Close, Walton-on-Thames, KT12-3RX	5	11 to 15	545
US353	Fernleigh Day Centre Fernleigh Close Walton-On-Thames KT12 1RD	19	11 to 15	549
US354	P G S Court, Halfway Green, Walton-on-Thames, KT12 1FJ	23	11 to 15	553
US357	Rylton House, Hersham Road, Walton-On-Thames	8	11 to 15	557
US363	Unit Rear of and 12-14 Sandy Lane Walton-On-Thames KT12 2EQ	9	11 to 15	561
US370	The Heath Centre, Rodney Road, Walton-on-Thames, KT12 3LB	36	11 to 15	565
US372	1 Cleveland Close Walton-On-Thames KT12 1RB	8	11 to 15	569
US464	63-69 High Street, Walton-on-Thames	28	11 to 15	573
US59	Halfway Car Park, Hersham Road	8	11 to 15	577
US72	Courtlands & 1-5 Terrace Road, Walton-on-Thames	63	11 to 15	581
US79	Regnolruf Court, Church Street, Walton-on-Thames, KT12 2QT	7	11 to 15	585

## Weybridge

Site ref	Site name	Net units	Delivery Timescale	Page No.
US395	Weybridge Hospital and car park, 22 Church Street Weybridge KT13 8DW	30	1 to 5	589
US417	Garages to the rear of Broadwater House Greside Road Weybridge KT13 8PZ	20	1 to 5	593
US424	Weybridge Bowling Club 19 Springfield Lane Weybridge KT13 8AW	22	1 to 5	597
US438	Land rear of Leverton, St Georges Avenue, Weybridge	5	1 to 5	601
US505	75 Oatlands Drive, Weybridge, KT13 9LN	9	1 to 5	605
US527	9 Cricket Way, Weybridge, KT13 9LP	5	1 to 5	609
US546	34 Queens Road, Weybridge	7	1 to 5	613
US547	Valiant House, 10 Church Street, Weybridge	6	1 to 5	617
US549	270 Brooklands Road, Weybridge	8	1 to 5	621
US108	Weybridge Library, Church Street, Weybridge		6 to 10	625
US117	9 and rear of 11 and 13 Hall Place Drive	7	6 to 10	629
US397	Floors above Waitrose, 62 High Street, Weybridge KT13 8BL	9	6 to 10	633
US403	HFMC House, New Road and 51 Prince's Road Weybridge KT13 9BN	6	6 to 10	637
US416	Garages west of 17 Greside, Weybridge	5	6 to 10	641
US482	24-26 Church Street, Weybridge	15	6 to 10	645
US496	Quadrant Courtyard, Weybridge, KT13 8DR	15	6 to 10	649

US520	Weybridge Centre for the Community, Churchfield Place, Weybridge, KT13 8BZ	8	6 to 10	653
US525	8 Sopwith Drive, Brooklands Industrial Park, Weybridge, KT13 0YX	0	6 to 10	657
US538	Manor Court, Weybridge	51	6 to 10	661
US92	GlaxoSmithKline, St. Georges Avenue	120	6 to 10	665
US94	Locke King House, 2 Balfour Road, Weybridge	12	6 to 10	669
US110	The Heights, Weybridge		11 to 15	673
US125	Baker Street Car Park, Weybridge	7	11 to 15	677
US393	The Old Warehouse, 37A Church Street, Weybridge KT13 8DG	5	11 to 15	681
US394	58 Church Street, Weybridge	19	11 to 15	685
US398	1-8 Dovecote Close, Weybridge, KT13 8PW	7	11 to 15	689
US404	2-8 Princes Road Weybridge KT13 9BQ	10	11 to 15	693
US406	179 Queens Road Weybridge KT13 0AH	9	11 to 15	697
US407	Foxholes, Weybridge KT13 0BN	78	11 to 15	701
US419	35-47 Monument Hill, Weybridge KT13 8RN	20	11 to 15	705
US420	59-65 Baker St, Weybridge KT13 8AH	14	11 to 15	709
US421	181 Oatlands Drive, Weybridge KT13 9DJ	12	11 to 15	713
US429	Garages at Brockley Combe, Weybridge	7	11 to 15	717
US93	Horizon Business Village, Brooklands Road, Weybridge, KT13 0TJ	0	11 to 15	721



The Planning Inspectorate

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# **Report to Woking Borough Council**

**by G J Fort BA PGDip LLM MCD MRTPI  
an Inspector appointed by the Secretary of State**

Date 06 August 2021

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Planning and Compulsory Purchase Act 2004 (as amended)  
Section 20

## **Report on the Examination of the Site Allocations Development Plan Document**

The Plan was submitted for examination on 31 July 2019

The examination hearings were held between 3 and 11 December 2019

File Ref: PINS/A3655/429/10

96. In addition to new secondary school provision on the GB7 site, additional primary capacity at Greenfield School arising as a result of its relocation would provide further educational infrastructure to support increased development in the town centre. The County Council, as the local education authority, has confirmed that any additional educational need within the Borough would be met through expansion of existing premises as required, and that established school forecasting processes and the review of the IDP would inform future activities in this regard.
97. There are a number of allocated sites which are close to the Basingstoke Canal. Whilst these may lead to increased use of the towpath by future occupants of related developments, there is no evidence to suggest this could not be accommodated, with mitigation measures secured at the planning application stage, as required by, site-specific transport assessments and travel plans. Policy CS18 of the Core Strategy makes it clear that developer contributions would be sought to implement transport mitigation schemes. Accordingly, I consider that the SADPD and wider development plan provide a sound basis for consideration of the effects of development on the Canal and its towpath, and that no further amendments are necessary to ensure soundness in these regards.
98. Whilst I return to more site and location specific infrastructure matters, where relevant, in relation to Issues 3, 4 and 5 below, the above considerations lead me to the view that the SADPD would ensure that infrastructure needed to support development would be provided in a timely manner, and thus would accord with Policy CS16 of the Core Strategy. For these reasons too, the SADPD is positively prepared in these terms.

### *Conclusion*

99. For the reasons set out above, and subject to the MMs mentioned in this Report, I conclude that the SADPD's approach to employment, infrastructure and European protected sites is robustly based and consistent with the Core Strategy and national policy

### **Issue 3 - Whether exceptional circumstances exist to justify the SADPD's proposed revisions to Green Belt boundaries; and is the SADPD's approach to allocations and safeguarded land in the Green Belt justified, effective and consistent with national policy?**

#### *Policy Background*

100. As the Framework makes clear, strategic policies should establish the need for any changes to Green Belt boundaries<sup>89</sup>; and whether exceptional circumstances exist to justify changes to Green Belt<sup>90</sup> boundaries is a matter to be assessed through the examination of strategic policies. As set out above, the relevant strategic policies are contained in the Core Strategy. Policy CS10 of the Core Strategy sets out the spatial distribution of the Borough's housing requirement over the plan period. Although the majority of

the requirement would be met in the town centre and other parts of the urban area of the Borough, Policy CS10 includes an indicative requirement for 550 homes to be delivered in the Green Belt after 2021/2. Policies CS1 and CS6 require a Green Belt boundary review to be carried out with the specific objective of identifying land to meet the Borough's development requirements.

101. The Core Strategy emphasises<sup>91</sup> that sites in the Green Belt would be needed to meet both "the national requirement for housing land supply and *the nature of housing* that is needed. The nature of the sites that are considered to be developable in the medium - long term are primarily in town centre locations that are likely only to be suitable for high density flatted developments. The implication of this is that the Council would not be able to achieve *an appropriate mix of housing types and tenures to meet all types of local need and demand*" (with my emphasis). Furthermore, Policy CS6 is clear that the Green Belt is identified as a potential future direction of growth to meet housing need, in particular, the need for family homes. It is relevant also that the Inspector's Report on the Core Strategy<sup>92</sup> acknowledges the risk that the focus on higher density town centre development would not realise a suitably balanced housing mix. In these regards, it is clear that the release of Green Belt sites for residential development is justified by the Core Strategy not only in quantitative, but also in qualitative terms. This approach is clearly consistent with the Framework insofar as it requires planning policies to identify a sufficient supply *and mix* of sites<sup>93</sup>; and that the *size, type and tenure* of housing needed for different groups should be assessed and reflected in planning policies<sup>94</sup> (with my emphases).
102. Critically, as set out above, the Council has reviewed the Core Strategy and found that it does not require updating, meaning that the SADPD is required to be consistent with its policies (including those relating to Green Belt boundary alterations) by virtue of Regulation 8 (4) and (5) of the 2012 Regulations
103. Through the above-referenced policies, the Core Strategy identifies the need to change Green Belt boundaries. However, as the Framework<sup>95</sup> sets out, detailed changes to Green Belt boundaries may be made through non-strategic policies – such as those contained in the SADPD. I turn to whether exceptional circumstances have been demonstrated in respect of these detailed changes below.

#### *Housing requirements and supply*

104. My conclusions on Issue 1 above set out the Council's healthy position in terms of meeting (and potentially exceeding) its broad quantitative requirements for housing over the plan period. In this context it is relevant that the Core Strategy's overall requirement for the plan period is expressed in Policy CS10 as "*at least 4,964 net additional dwellings*" (with my emphasis).

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<sup>91</sup> At paragraph 5.56

<sup>92</sup> WBC/SA/E017A

<sup>93</sup> At paragraph 67

<sup>94</sup> At paragraph 61

<sup>95</sup> At paragraph 136



105. Moreover, as monitoring shows, whilst in purely quantitative terms this may well be the case, high density urban sites, which have been, and will continue to be, a focus for residential development in the Borough, provide on the whole smaller houses (predominantly with one or two bedrooms). In the past due to a number of factors (including for example the amount of commercial to residential conversions arising from permitted development, and site-specific viability issues on other schemes) urban and town centre sites in the Borough have not delivered either the quantity or range of affordable and general needs housing anticipated in the Core Strategy, or shown to be needed in terms of the SADPD's supporting evidence.
106. In these regards the Council's Annual Monitoring Report<sup>96</sup>(AMR) is of particular note, which shows<sup>97</sup> that the 38% need for 3 bed market dwellings identified in the SHMA<sup>98</sup> was not met in any of the monitoring years between 2010/11 and 2018/19 – with proportions ranging between 6% and 30% in the monitoring years over that period. In a similar vein, there was under-delivery against the need identified for 4-bedroom market dwellings in the SHMA (22%) in all but 3 of those monitoring years. This provides clear evidence that delivery thus far over the plan period is skewed heavily towards the provision of smaller dwellings. Policy CS11 of the Core Strategy makes clear that the mix of housing types and sizes to be delivered on sites would need to address the nature of local needs as evidenced in the latest SHMA – which are the proportions set out above.
107. Elsewhere, the AMR<sup>99</sup> makes it clear that the 35% overall target for affordable housing has been met in only two of the monitoring years between 2008/09 and 2018/19 – in some cases falling to below 10% of overall completions. Whilst I have outlined above the Council's positive steps to accelerate the delivery of affordable housing in the Town Centre, due to the high densities anticipated on sites there, they would be unlikely to meet the full range of affordable housing requirements, as the SHMA estimates that some 25% of the affordable housing delivered should provide 3 or more bedrooms to meet identified needs.
108. The SADPD's allocations do not specify a mix of dwelling types and sizes, and their contributions in these regards cannot therefore be accurately quantified or assessed. However, taken together Policies CS10, CS11 and CS12 of the Core Strategy set out an indicative density range of 30 to 50 dwellings per hectare on Green Belt sites; require proposals to address the nature of needs as evidenced in the latest SHMA; and expect 50% of housing on greenfield land to be affordable. In these terms, the Core Strategy provides a strong policy basis to ensure any proposals coming forward on the allocated Green Belt sites would provide a mix of housing to meet the wider qualitative needs of the Borough.
109. Evidence presented in the SHLAA<sup>100</sup> shows a site-capacity surplus of around 582 units when completions, allocated Green Belt land, and other SHLAA sites

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<sup>96</sup> WBC/SA/052

<sup>97</sup> At Figure 7

<sup>98</sup> WBC/SA/E022 At Table 60

<sup>99</sup> At Figure 9

<sup>100</sup> WBC/SA/E020 AT Table 1

are taken into account over the plan period. It also finds further developable capacity in the Borough, which could come forward in the five years following the plan period. Whilst it is of note that updates to the SHLAA over the plan period have shown greater potential for the urban area to absorb residential development than earlier assessments, any additional urban capacity that may be found in future updates to the SHLAA would in all probability fall to be delivered outside of the current plan period. Similarly, although the HIF programme may well yield further housing in the Town Centre in the plan period, a considerable proportion of this supply, on current estimates, would come forward after the plan period has concluded.

110. Whereas additional housing delivery over and above the SHLAA estimates may be delivered on sites with a capacity for fewer than five dwellings within the plan period, such sites would not be liable to provide affordable housing contributions<sup>101</sup>. Moreover, given inherent uncertainties about the location and context of such sites, the mix of dwellings that might be delivered in terms of size is a matter on which there is little or no substantive evidence or certainty. Similarly, any increases in the plan period occurring as a result of the HIF programme would be on high-density sites in the urban area – again likely to supply dwellings with two bedrooms or fewer based on past delivery trends.
111. There has been a recent trend of housing delivery in the urban area pursuant to changes of commercial uses as a result of permitted development rights. Whilst some working arrangements and shopping patterns which occurred as a result of the COVID-19 pandemic may become more entrenched over time and thus lead to a larger supply of such commercial sites, it is too early to predict the longer term effect on such trends. In any event, consultation responses received on the MM Schedule from those promoting uses in the urban area, remain focused on the delivery of office and other town centre uses. Moreover, such prior approval changes of existing commercial buildings would be unlikely to result in the mix of sizes and types of dwellings which Policy CS11 seeks – and they are exempt from the requirement to deliver affordable housing.
112. Taking the indicative housing capacities of the other Green Belt allocations together, subject to MMs set out under issue 5, gives a figure of 766 dwellings. I accept that the indicative capacities of the Green Belt housing allocations, taken together with the housing and other residential uses permitted/delivered on the Broadoaks site would exceed the 550 unit requirement set out in the Core Strategy.
113. However, the SADPD makes clear that “at least” 550 units should be delivered on Green Belt sites – which is consistent with the Core Strategy’s phrasing relating to the overall requirement. Moreover, as set out above in relation to Issue 1, indicative capacities are to be tested further at the planning application stage, at which point site constraints and policy requirements including for items such as appropriate landscaping, retention of protected trees and other biodiversity measures may well result in development quanta

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<sup>101</sup> In accordance with paragraph 63 of the Framework

lower than those indicative capacities.

114. Furthermore, evidence presented in respect of the GB10 site at the Regulation 19 stage<sup>102</sup>, based on RTPI research and experience of similar schemes, anticipates that prior to a start on-site it would take 2 to 3 years to gain detailed permission; 6 to 8 months dealing with pre-commencement conditions and planning obligation matters; 2 to 4 months for site start-up, and 6 to 8 months for delivery of infrastructure including drainage and accesses. Development of the site would then continue with delivery of around 60 dwellings per year.
115. It is clear from this that whilst some dwellings could come forward during the plan period on the GB10 site, that its full residential yield may only be built out after the plan period has ended. Whilst this may be the case, the findings of the GBR in respect of the site, taken together with the Framework which expects<sup>103</sup> planning policies to support development that makes effective and efficient use of land, weigh in favour of its allocation. In these respects, any residual development beyond the plan period on this site, in excess of the Core Strategy requirement, would assist in relieving pressure for further Green Belt release and assist, when taken together with identified safeguarded land, in demonstrating that Green Belt boundaries may not need to be altered at the end of the plan period. In arriving at this view, I am mindful that the GBR<sup>104</sup> does not consider "any other parcels to be suitable for removal from the Green Belt to accommodate new strategic development".
116. Moreover, should more than the 550 requirement come forward on the Green Belt allocations, the potential for these to help to address the general under-supply of affordable housing that has accrued thus far over the plan-period, and to meet qualitative needs for larger houses (both market and affordable) would be significant benefits of this type of site. These positive aspects of the proposed Green Belt allocations are particularly relevant as monitoring shows that such a mix of house types and tenures would be very unlikely to be delivered on the high-density sites identified in the Town Centre. Moreover, if the 550 requirement were to be exceeded on allocated Green Belt sites over the plan period, the increased margin would be relatively modest in the context of overall requirements, and dispersed across a range of sites.
117. Taken together, these factors justify planning for the release of sites with a higher indicative housing capacity than the Core Strategy requirement. As such, the SADPD is positively prepared in these terms, as there would be a reasonable prospect that the quantity and quality of development sought by the Core Strategy could be delivered across the range of sites allocated during the plan period. For these reasons, I find the SADPD's approach to be soundly based in these terms and in arriving at this view I have taken into account relevant Court judgements<sup>105</sup> referenced in consultation responses.

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<sup>102</sup> Regulation 19 consultation response of West Hall Ltd

<sup>103</sup> At paragraphs 117 and 122

<sup>104</sup> At paragraph 3.5.22

<sup>105</sup> Including *Cooper Estates Strategic Land Ltd v Royal Tunbridge Wells BC* [2017] EWHC 224 (Admin)

118. Taking the above points together with my findings on Issue 1, it is clear that, in prioritising and intensifying uses in the Town Centre and other urban areas, the Council's strategy makes as much use as possible of suitable brownfield sites and underutilised land and optimises the density of development. It is also clear that the Council's overall strategy has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development – and indeed needs have been accommodated as far as reasonable and practicable in Waverley and Guildford's local plans. In short, all other reasonable options for meeting the Borough's identified need for development have been examined, and as a consequence, exceptional circumstances which justify changes to Green Belt boundaries continue to pertain. In these strategic terms the SADPD is clearly in accord with the Core Strategy and the Framework<sup>106</sup>.

### *Green Belt Review*

119. Policies CS1 and CS6 of the Core Strategy include a requirement to carry out a Green Belt boundary review to identify the land requirements of the Core Strategy in a way consistent with the purpose and integrity of the Green Belt.

120. The GBR<sup>107</sup> conducted a multi-stage assessment of the Borough's Green Belt, which initially 'sieved out' locations subject to high level environmental constraints such as European designations and areas in Flood Zone 3. Stage 2 divided the Green Belt free from these environmental constraints into 31 parcels, which were each assessed for their performance against the Green Belt purposes. This phase concluded that the majority of parcels in the Borough were of a "low" or "very low" suitability of removal from the Green Belt. Taken together with the requirement for Green Belt release set out in the Core Strategy, I consider the GBR to be reasonable in finding that it would "inevitably have to consider parcels with low or even very low suitability for removal from the Green Belt"<sup>108</sup> in terms of their potential to accommodate development requirements.

121. Against this background, Stage 2 of the GBR's assessment further tests the parcels against a set of sustainability criteria. In this regard, I am particularly mindful of the Framework<sup>109</sup>, which sets out that when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. I am satisfied that the methodology of the GBR<sup>110</sup> is fully consistent with this aspect of the Framework – and is also a justified basis of assessment. Although, I accept that the sustainability of the parcels is a measure that is relative to the performance of other Green Belt sites in the Borough, rather than an absolute measure, this is an inherently reasonable approach given the development plan's identification of the

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<sup>106</sup> At paragraph 137

<sup>107</sup> WBC/SA/E018

<sup>108</sup> WBC/SA/E018 at paragraph 3.5.5

<sup>109</sup> At paragraph 138

<sup>110</sup> Set out in paragraph 1.1.2 of the *Green Belt Method Statement* (WBC/SA/E018N)

Borough's Green Belt as an area of search. In these terms the overall GBR approach is justified.

122. The GBR's above analyses are combined with an assessment of the landscape sensitivity of sites, and their potential to accept change. Taken together, these aspects of the GBR provide a robust and reasonable basis to support its overall findings on the parcels recommended for removal from the Green Belt. The GBR goes on to assess the deliverability and availability of sites within the parcels. Again, these aspects of the GBR are soundly based and consistent with the Framework insofar as it expects planning policies to identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability<sup>111</sup>; and to recognise the intrinsic character and beauty of the countryside<sup>112</sup>.
123. For these reasons the GBR provides a proportionate and reasonable evidence base. Consequently, it provides clear justification for the SADPD's approach to site allocations in the Green Belt.
124. Other methodologies for reviewing the Green Belt have been suggested during the course of plan preparation and examination, including suggestions of a more granular analysis that would focus on the release of smaller sites, particularly those with a potential yield of less than 5 dwellings, and thus excluded from assessment by the SHLAA, rather than the parcel assessment undertaken in the GBR. However, for the reasons set out above, I consider that the GBR is consistent with national policy and consequently provides a sound and reasonable basis for assessment. Moreover, I am mindful that Stage 3 of the GBR considers not only options for strategic development, but also the availability and deliverability of individual sites (which could include those outside of parcels considered suitable for release). It "does not therefore rule out the consideration of individual smaller sites around the urban area for removal from the Green Belt, provided that they are considered to be in sustainable locations and where their removal will have little conflict with Green Belt purposes"<sup>113</sup>.
125. Although I am mindful of comments that a considerable proportion of Green Belt identified either for development or safeguarding would be in Byfleet and West Byfleet, the above considerations, taken together, indicate that the selected sites are those that are preferable for release according to the GBR. I am also mindful that some consider the Martyrs Lane site to be preferable for release to meet general housing and Gypsy and Traveller accommodation needs as opposed to some of the sites that are allocated in the plan. Nevertheless, the owners of significant portions of the Martyrs Lane site are clear that their landholdings are not available for residential uses, and considerable site assembly would be required for its comprehensive development. Additionally, the GBR finds that it would be difficult to accommodate development on the site without significant adverse effects

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<sup>111</sup> At paragraph 67

<sup>112</sup> At paragraph 170(b)

<sup>113</sup> WBC/SA/E018 at paragraph 3.5.25

occurring to the landscape pattern and features<sup>114</sup>, and recommends that it is retained in the Green Belt.

### *Gypsy and Traveller Accommodation*

126. Policy CS14 of the Core Strategy sets out a sequential approach to the allocation of sites to meet the needs of Gypsies and Travellers – with sites in the urban area considered before the release of any Green Belt locations. No urban sites have been put forward for this purpose as part of the SHLAA process, and I am mindful of the Council's view that high residential land values in the urban area would render the development of Traveller sites unviable. Moreover, it is of note that temporary and other permissions relating to Traveller accommodation over recent years in the Borough have been within the Green Belt. These considerations, taken together with a lack of any other substantive evidence which points to the availability of any specific deliverable or developable sites for Traveller accommodation in the urban area, indicate that sites in the Green Belt could be assessed in terms of their potential to accommodate identified needs, in accordance with Policy CS14. Taken together, the clear evidenced need for this type of accommodation over the plan period, and the benefits that would flow from meeting these requirements in a planned way, in conjunction with the lack of non-Green Belt sites, amount to exceptional circumstances which justify the alteration of Green Belt boundaries to meet these needs.

127. The SADPD includes a number of sites to meet the identified needs of Travellers set out above, including a mix of extensions to existing sites (GB2), the intention to make temporary permissions permanent (set out in relation to specific sites within Policy SA1), and the provision of a new site as part of the proposed development of West Hall (Policy GB10). Moreover, the GBR screened out sites susceptible to flooding and other environmental constraints from its assessment of the potential of Green Belt sites to meet the needs for Travellers, which ensures consistency with the PPTS in this respect. I return to site-specific aspects of these allocations and policies, where relevant, below.

### *Policy SA1: Overall policy framework for land released from the Green Belt for development*

128. For the above reasons, it is clear that exceptional circumstances to justify the alteration of Green Belt boundaries exist and are set out in strategic policies in accordance with the Framework<sup>115</sup>. As submitted, Policy SA1 indicates that the release of the residential elements of allocations GB1, GB7 and GB10 would occur between 2022 and 2027 only "if there is evidence of significant under provision against the housing requirement and there is no indication that the shortfall could be met on previously developed land in the urban area". However, as set out above, both the Core Strategy and the SADPD are clear that Green Belt sites would need to be released not only to deliver the quantitative requirement, but also to meet demonstrated qualitative needs.

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<sup>114</sup> WBC/SA/E018 at paragraph 3.5.11

<sup>115</sup> At paragraph 137

129. Moreover, it is unclear what the precise scope or timing of such a test would be and what level of shortfall would constitute "significant under-provision". This would leave the sites allocated for housing in an ambiguous and uncertain position, which would inhibit their delivery during the plan period should the test indicate that their release would be justified. In arriving at this view, I am mindful that elsewhere Policy SA1 states that *all land* allocated for release would be "removed from the Green Belt upon adoption" (with my emphasis) – a statement which does not align with the concept of Green Belt release based on a significant under-delivery of housing in the urban area. For these reasons, the policy is neither justified nor effective in these terms and **MM200** is therefore necessary, which would delete the requirement test, in order to provide clarity in terms of the status of the allocations, consistency with Policies CS1, CS6 and CS10 of the Core Strategy, and to ensure that the SADPD would be positively prepared in this respect.
130. Policy SA1 sets out the general approach to the release of sites to provide Traveller accommodation. However, as drafted it is unclear how the timing of delivery would be managed as the policy states this would be done in accordance with "any phasing that the Council will introduce". Consequently, **MM200** and **MM201** would introduce clarity in terms of these phasing arrangements to ensure the effectiveness of Policy SA1 in this respect.
131. Aside from allocated sites for Traveller provision Policy SA1 identifies sites with temporary permission where an application for permanent use would be supported in principle. However, as submitted, the policy refers to granting "permission in principle". Permission in principle is a specific form of development consent provided by s58A of the Town and Country Planning Act 1990 (as amended), and during the course of the examination the Council confirmed that it did not intend to use this term in respect of the Policy SA1 Traveller sites. Consequently, **MM200** and **MM201** clarify the SADPD's intent in respect of these sites, and ensure effectiveness in this regard.
132. As presented Policy SA1 states that the small temporary sites where permanent permission would be supported would remain washed over by the Green Belt – however, the PPTS is clear that Traveller sites in the Green Belt would constitute inappropriate development. Consequently, Policy SA1 as drafted would be ineffective, as any applications coming forward in relation to those small sites would still need to demonstrate very special circumstances at the planning application stage. Accordingly, to ensure effectiveness, and to ensure consistency with national policy, insofar as it expects any land removed from the Green Belt for this purpose to be specifically allocated in the development plan<sup>116</sup> **MM200** and **MM201** are necessary.
133. The clear and evidenced need for Traveller accommodation over the plan period, taken together with the Council's approach to finding sites to meet these needs are exceptional circumstances which justify these very limited alterations to the Green Belt boundary required in these cases. The policy, as modified, and in combination with Policy CS14 of the Core Strategy which safeguards authorised Traveller sites from development that would preclude their continued occupation, would accord with the PPTS insofar as it relates to

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<sup>116</sup> At paragraph 17 of the PPTS

allocations in the Green Belt. The Policies Map would need to be amended to ensure that the spatial implications of the MMs are adequately captured. It is clear from Policy SA1 that the SADPD, subject to the MMs set out in relation to this issue, includes a mix of Traveller sites in terms of both their scale and their location in the Borough.

134. References to general Green Belt policies in the reasoned justification and supporting text have been amended by **MM201** to ensure consistency with national policy in these terms. I have made an alteration to the wording of **MM201** as published for consultation to correct a typographical error relating to consented care home provision on the Broadoaks site. As this minor correction is a factual update and the point has been adequately covered in consultation responses, no prejudice would occur to the interests of any parties as a result of its inclusion at this stage.

#### *Housing, Traveller and Mixed Use Sites*

*Policy GB1: Land South of Brookwood Lye Road, Brookwood GU24 0EZ and Policy GB2: Land at Five Acres, Brookwood Lye Road, Brookwood, GU24 0HD*

135. Criteria contained in Policies GB1 and GB2 require development proposals to be supported by comprehensive transport evidence, to inform the delivery of essential transport infrastructure and mitigations relating to the proposed uses of the sites. For these reasons, I consider that highways implications of these sites would be adequately considered at the development management stage.
136. The largely previously developed nature of these sites, taken together with their accessible location and the demonstrated needs for housing and Traveller accommodation amount to the exceptional circumstances necessary to justify amendment of the Green Belt boundaries as proposed.

*GB7: Nursery Land adjacent to Egley Road, Mayford, GU22 0PL*

137. The GBR recommends that a wider parcel of land within which the GB7 site sits should be removed from the Green Belt but recognises<sup>117</sup> the risk that development of the GB7 site would compromise the integrity of the gap between Woking and Mayford. Since the completion of the GBR, a school has been developed on the southern part of the GB7 site, and the SADPD seeks to designate the northern part of the site as an "area of local separation", a part of the site which is "not for built development".
138. As drafted, the area of local separation element of Policy GB7 would be more restrictive than national policy relating to Green Belts, a designation which the plan, supported by the GBR, seeks to remove from the GB7 site. I recognise the importance of the gap between Woking and Mayford, as set out in the GBR, but this does justify such a restrictive approach. Also the Council has not indicated that it considers that the northern part of the site should remain in the Green Belt, given the desirability of creating a clearly defined Green Belt boundary using physical features that are readily recognisable and likely to be

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<sup>117</sup> At paragraph 4.3.14



**TOWN AND COUNTRY PLANNING ACT 1990**

**AFFORDABLE HOUSING STATEMENT OF COMMON  
GROUND IN RESPECT OF AFFORDABLE HOUSING  
NEEDS AND DELIVERY ACROSS ELMBRIDGE  
BOROUGH**

**SECTION 78 APPEAL**

**Outline application for up to 60 dwellings, associated  
landscaping, and open space with access from  
Raleigh Drive (For access).**

**Land North of Raleigh Drive, Claygate, Esher, Surrey,  
KT10 9DF**

**Claygate House Investments Ltd & MJS Investments  
Ltd**

**March 2024**

**PINS REF: APP/K3605/W/23/3334391**

**LPA REF: 2023/0962**

## **1.0 Affordable Housing Offer**

- 1.1 The appeal proposals seek outline planning permission for up to 60 dwellings, of which 50% are proposed as affordable homes, equivalent to up to 30 affordable dwellings. This level of provision meets the requirements of Policy CS21 of the Core Strategy (2011) which requires 50% affordable housing provision on greenfield sites delivering 15+ dwellings.
- 1.2 The provision is also in excess of the emerging requirements under policy HOU4 of the emerging Local Plan 2037 (which prescribes 30% for brownfield sites of 10 or more units and 40% for greenfield sites of 10 or more units).
- 1.3 The agreed tenure split is 25% First Homes (up to 8 dwellings), 12% social rented (up to 3 dwellings), 41% Affordable Rented (up to 12 dwellings) and 22% intermediate (up to 7 dwellings), (subject to being agreed between both parties in the Section 106).
- 1.4 The proposed affordable housing will be secured by way of a Section 106 ("S106") planning obligation.

## **2.0 Affordable Housing Needs**

- 2.1 Policy CS21 of the adopted Core Strategy (2011) sets a target to deliver at least 1,150 affordable dwellings between 2011/12 and 2025/26, equating to **77 affordable dwellings per annum** during this period.
- 2.2 The Kingston upon Thames and North East Surrey SHMA 2016 ("2016 SHMA") identifies a need for **332 affordable dwellings (net) per annum** between 2015/16 and 2034/35 (Table 8.10, page 163).
- 2.3 The Elmbridge Borough Council Local Housing Needs Assessment 2020 (2020 LHNA") identifies a need for **269 affordable dwellings per annum** between 2019/20 and 2038/39 (paragraph 5.106, page 90).
- 2.4 The supporting text to Emerging Policy HO4 refers to the 2020 LHNA need figure of 269 affordable dwellings per annum (paragraph 6.27, page 67). Furthermore, the Council's evidence base includes an Affordable Housing Topic Paper (ref. TOP002) which also refers to the need figure contained within the 2020 LHNA.

## **3.0 Housing Register**

- 3.1 DLUHC Live Table 600 confirms that as of 31st March 2023 there were 2,306 households on the Council's Housing Register. This represents a 17% increase in a single year from 1,976 households on 31st March 2022.

#### **4.0 Temporary Accommodation**

4.1 DLUHC statutory homelessness data highlights that on 31 March 2023 there were 99 households housed in temporary accommodation by Elmbridge Borough Council. Of these 64 households (65%) were households with children. The Council has a responsibility to house these households.

4.2 DLUHC data indicates that Elmbridge Borough Council spent £2,737,000 on temporary accommodation between 1 April 2022 and 31 March 2023, 56% (£1,523,000) of which was spent on bed and breakfast hotels (including shared annexes).

#### **5.0 Homelessness**

5.1 DLUHC statutory homelessness data shows that in the 12 months between 1 April 2022 and 31 March 2023, the Council accepted 288 households in need of assistance pursuant to homelessness prevention duty<sup>1</sup>, and a further 170 households eligible for assistance under relief duty<sup>2</sup> from the Council.

#### **6.0 Gross Additions to Affordable Housing Stock**

6.1 Figure 1 below illustrates the gross delivery of affordable housing across Elmbridge Borough since the start of the Core Strategy (2011) period in 2011/12.

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<sup>1</sup> The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homeless. The prevention duty applies when a local authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

<sup>2</sup> The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a local authority is satisfied that an applicant is homeless and eligible for assistance.

Figure 1: Additions to Affordable Housing Stock (Gross), 2011/12 to 2022/23

Monitoring Year	Total Housing Completions (Net)	Additions to AH stock (Gross)	Gross affordable additions as a %age of total completions
2011/12	333	67	20%
2012/13	292	34	12%
2013/14	287	125	44%
2014/15	286	115	40%
2015/16	276	40	14%
2016/17	303	40	13%
2017/18	159	61	38%
2018/19	463	26	6%
2019/20	432	100	23%
2020/21	346	128	37%
2021/22	768	50	7%
2022/23	240	99	41%
<b>Total</b>	<b>4,185</b>	<b>885</b>	<b>21%</b>
<b>Avg. Pa.</b>	<b>349</b>	<b>74</b>	

Source: DLUHC Open Data.

6.2 Figure 1 demonstrates that in the 12-year period between 2011/12 and 2022/23 Elmbridge Borough Council delivered a total of 4,185 net dwellings, equivalent to 349 per annum. Of these, 784 dwellings were affordable tenures, equivalent to 74 per annum. This equates to 21% affordable housing delivery.

## 7.0 Net of Right to Buy Affordable Housing Delivery

7.1 Figure 2 below calculates the additions to affordable housing stock on a per annum basis since the start of the Core Strategy (2011) period in 2011/12, net of Right to Buy sales.

Figure 2: Net of Right to Buy Additions to Affordable Housing Stock, 2011/12 to 2022/23

Monitoring Period	Total housing completions (Net)	Additions to AH Stock (Gross)	RP RtB sales	Additions to AH Stock (Net of RtB)	Additions to AH Stock (Net of RtB) as a %age of total completions
	A	B	C	D (B – C)	E (D / A) X 100
2011/12	333	67	3	64	19%
2012/13	292	34	9	25	9%
2013/14	287	125	14	111	39%
2014/15	286	115	4	111	39%
2015/16	276	40	11	29	11%
2016/17	303	40	4	36	12%
2017/18	159	61	2	59	37%
2018/19	463	26	6	20	4%
2019/20	432	100	2	98	23%
2020/21	346	128	3	125	36%
2021/22	768	50	12	38	5%
2022/23	240	99	1	98	41%
<b>Total</b>	<b>4,182</b>	<b>885</b>	<b>71</b>	<b>814</b>	<b>19%</b>
<b>Avg. Pa.</b>	<b>349</b>	<b>74</b>	<b>6</b>	<b>66</b>	

Source: DLUHC open data; and Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2011/12 to 2022/23).

7.2 Figure 2 demonstrates that, on average between 2012/13 and 2021/22, Elmbridge Borough Council has delivered 66 affordable dwellings per annum net of Right to Buy sales equivalent to 19% of the total average number of net housing completions.

## 8.0 Net of Right to Buy Additions to Affordable Housing Stock Compared to Net Affordable Housing Needs

### 2016 SHMA

8.1 Figure 3 illustrates net of RtB affordable housing delivery compared to the affordable housing need of 332 net affordable dwellings per annum between 2015/16 and 2022/23, as set out in the 2016 SHMA.

Figure 3: Additions to Affordable Housing Stock (Net of Right to Buy) Compared to Affordable Needs Identified in the 2016 SHMA, 2015/16 to 2022/23

Monitoring Period	Additions to AH Stock (Net of RtB)	2016 SHMA AH Needs Per Annum (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2015/16	29	332	-303	-303	9%
2016/17	36	332	-296	-599	11%
2017/18	59	332	-273	-872	18%
2018/19	20	332	-312	-1,184	6%
2019/20	98	332	-234	-1,418	30%
2020/21	125	332	-207	-1,625	38%
2021/22	38	332	-294	-1,919	11%
2022/23	98	332	-234	-2,153	30%
<b>Total</b>	<b>503</b>	<b>2,656</b>	<b>-2,153</b>		<b>19%</b>
<b>Avg. Pa.</b>	<b>63</b>	<b>332</b>	<b>-269</b>		

Source: DLUHC Open Data; Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2011/12 to 2022/23); and 2016 SHMA.

- 8.2 Since the start of 2016 SHMA period in 2015/16, affordable housing completions have averaged 63 net affordable dwellings per annum, compared with a need of 332 net affordable dwellings per annum. A shortfall of -2,153 affordable dwellings has arisen over this period, equivalent to an average annual shortfall of -269 affordable dwellings.

#### 2020 LHNA

- 8.3 Figure 4 illustrates net of RtB affordable housing delivery compared to the affordable housing need of 269 net affordable dwellings per annum between 2019/20 and 2022/23, as set out in the 2020 LHNA.

Figure 4: Additions to Affordable Housing Stock (Net of Right to Buy) Compared to Affordable Needs Identified in the 2020 LHNA, 2019/20 to 2022/23

Monitoring Period	Additions to AH Stock (Net of RtB)	2020 LHNA AH Needs Per Annum (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2019/20	98	269	-171	-171	36%
2020/21	125	269	-144	-315	46%
2021/22	38	269	-231	-546	14%
2022/23	98	269	-171	-717	36%
<b>Total</b>	<b>359</b>	<b>1,076</b>	<b>-717</b>		<b>33%</b>
<b>Avg. Pa.</b>	<b>90</b>	<b>269</b>	<b>-179</b>		

Source: DLUHC Open Data; Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2011/12 to 2022/23); and 2020 LHNA.

- 8.4 Since the start of 2020 LHNA period in 2019/20, affordable housing completions have averaged 90 net affordable dwellings per annum, compared with a need of 269 net affordable dwellings per annum. A shortfall of -717 affordable dwellings has arisen over this period, equivalent to an average annual shortfall of -179 affordable dwellings.

Core Strategy (2011) Policy CS21 Target

- 8.5 Figure 5 illustrates net of RtB affordable housing delivery compared to the affordable housing need of 77 net affordable dwellings per annum between 2011/12 and 2022/23, as set out in the Core Strategy (2011).

Figure 5: Additions to Affordable Housing Stock (Net of Right to Buy) Compared to Affordable Needs Identified in the Core Strategy (2011), 2011/12 to 2022/23

Monitoring Period	Additions to AH Stock (Net of RtB)	Core Strategy Policy CS21 AH Needs Per Annum (Net)	Annual Shortfall / Surplus	Cumulative Shortfall	Additions as a %age of Needs
2011/12	64	77	-13	-13	83%
2012/13	25	77	-52	-65	32%
2013/14	111	77	34	-31	144%
2014/15	111	77	34	3	144%
2015/16	29	77	-48	-45	38%
2016/17	36	77	-41	-86	47%
2017/18	59	77	-18	-104	77%
2018/19	20	77	-57	-161	26%
2019/20	98	77	21	-140	127%
2020/21	125	77	48	-92	162%
2021/22	38	77	-39	-131	49%
2022/23	98	77	21	-110	127%
<b>Total</b>	<b>814</b>	<b>924</b>	<b>-110</b>		<b>88%</b>
<b>Avg. Pa.</b>	<b>68</b>	<b>77</b>	<b>-9</b>		

Source: DLUHC Open Data; Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2011/12 to 2022/23); and Core Strategy (2011).

- 8.6 Since the start of Core Strategy period in 2011/12, affordable housing completions have averaged 68 net affordable dwellings per annum, compared with a need of 77 net affordable dwellings per annum. A shortfall of -110 affordable dwellings has arisen over this period, equivalent to an average annual shortfall of -9 affordable dwellings.



## 9.0 Affordability Indicators

### Private Rental Market

- 9.1 Valuation Office Agency (“VOA”) and Office for National Statistics (“ONS”) data (first produced in 2013/14)<sup>3</sup> show that median private rents in Elmbridge Borough stood at £1,350 per calendar month (“pcm”) in 2022/23. This represents a 17% increase from 2013/14 where median private rents stood at £1,150 pcm.
- 9.2 A median private rent of £1,350 pcm in 2022/23 is 35% higher than the South East figure of £998 pcm and 64% higher than the national figure of £825 pcm.
- 9.3 The average lower quartile monthly rent in Elmbridge Borough in 2022/23 was £1,100 pcm. This represents a 22% increase from 2013/14 where average lower quartile monthly rents stood at £900 pcm.
- 9.4 A lower quartile rent of £1,100 pcm in 2022/23 is 36% higher than the South East figure of £810 pcm and 76% higher than the national figure of £625 pcm.

### Median House Prices

- 9.5 The ratio of median house prices to median incomes in Elmbridge Borough now stands at 20.04, a 61% increase since the start of the Core Strategy (2011) period in 2011 where it stood at 12.42.
- 9.6 A ratio of 20.04 in Elmbridge Borough stands significantly above the national average of 10.75 (+86%) and significantly above the South East average of 8.28 (+142%).
- 9.7 The appeal site is situated within Claygate Ward. In 2023 median house prices in Claygate Ward stood at £860,000 which is 29% higher than Elmbridge Borough (£665,000), 123% higher than the South East figure of £385,000 and 197% higher than the national figure of £290,000.

### Lower Quartile House Prices

- 9.8 For those seeking a lower quartile priced property (typically considered to be the ‘more affordable’ segment of the housing market), the ratio of lower quartile house price to incomes in Elmbridge Borough now stands at 18.28, a 49% increase since the start of the Core Strategy (2011) period in 2011 where it stood at 12.25.

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<sup>3</sup> VOA/ONS Private Rental Data Source:  
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/privaterentalmarketsummarystatisticsinengland>

- 9.9 Once again it remains the case that the lower quartile ratio in Elmbridge (18.28) stands significantly above the national average of 10.69 (+71%) and significantly above the South East average of 7.37 (+148%).
- 9.10 Please note that lower quartile house price data at Ward level has not been published for 2023. As such, for consistency we have compared the 2022 Ward figures with 2022 data for Elmbridge Borough, the South East region and England.
- 9.11 In 2022 lower quartile house prices in Claygate Ward (£525,000) were 18% higher than across Elmbridge Borough (£445,000), 98% higher than across the South East (£265,000) and 188% higher than the national figure (£182,500).

## **10.0 Agreement of the Parties**

- 10.1 The parties agree that the affordable housing offer of 50% (up to 30 affordable dwellings) is in accordance with Policy CS21 of the Core Strategy (2011) and exceeds the requirements of Emerging Policy HOU4 (which prescribes 30% for brownfield sites of 10 or more units and 40% for greenfield sites of 10 or more units).
- 10.2 The parties agree that the tenure split accords with Policy CS19 of the Core Strategy 2011.
- 10.3 The parties agree that Policy CS21 of the adopted Core Strategy (2011) sets a target to deliver at least 1,150 affordable dwellings between 2011/12 and 2025/26, equating to **77 affordable dwellings per annum** during this period.
- 10.4 The parties agree that the 2016 SHMA identifies a need for **332 affordable dwellings (net) per annum** between 2015/16 and 2034/35.
- 10.5 The parties agree that the 2020 LHNA identifies a need for **269 affordable dwellings per annum** between 2019/20 and 2038/39.
- 10.6 As shown in Figure 2, the parties agree that between 2012/13 and 2021/22, Elmbridge Borough Council has delivered a total of 814 affordable dwellings (net of Right to Buy), equivalent to 66 affordable dwellings per annum net of Right to Buy sales which equates to 19% of the total average number of net housing completions.
- 10.7 The parties agree that since the start of 2016 SHMA period in 2015/16, affordable housing completions have averaged 63 net affordable dwellings per annum, compared with a need of 332 net affordable dwellings per annum. A shortfall of -2,153 affordable dwellings has arisen over this period, equivalent to an average annual shortfall of -269 affordable dwellings.

- 10.8 The parties agree that since the start of 2020 LHNA period in 2019/20, affordable housing completions have averaged 90 net affordable dwellings per annum, compared with a need of 269 net affordable dwellings per annum. A shortfall of -717 dwellings has arisen over this period, equivalent to an average annual shortfall of -179 affordable dwellings.
- 10.9 The parties agree that since the start of Core Strategy period in 2011/12, affordable housing completions have averaged 68 net affordable dwellings per annum, compared with a need of 77 net affordable dwellings per annum as per Policy CS21. A shortfall of -110 affordable dwellings has arisen over this period, equivalent to an average annual shortfall of -9 affordable dwellings.
- 10.10 The parties agree that using the Sedgefield approach to determine the future supply of affordable housing is appropriate as supported by a recent appeal decision at Sondes Place Farm, Dorking (ref. APP/C3620/W/23/3324631). For example, if the accumulated shortfall of -717 against the 2020 LHNA is to be addressed within the next five years then Elmbridge Borough Council would need to deliver 412 affordable dwellings per annum between 2023/24 and 2027/28, as opposed to 269 per annum.
- 10.11 The parties agree that a median private rent of £1,350 pcm in 2022/23 is 35% higher than the South East figure of £998 pcm and 64% higher than the national figure of £825 pcm.
- 10.12 The parties agree that a lower quartile rent of £1,100 pcm in 2022/23 is 36% higher than the South East figure of £810 pcm and 76% higher than the national figure of £625 pcm.
- 10.13 The parties agree that a median affordability ration of 20.04 in Elmbridge Borough stands significantly above the national average of 10.75 (+86%) and significantly above the South East average of 8.28 (+142%).
- 10.14 The parties agree that in 2023 median house prices in Claygate Ward stood at £860,000 which is 29% higher than Elmbridge Borough (£665,000), 123% higher than the South East figure of £385,000 and 197% higher than the national figure of £290,000.
- 10.15 The parties agree that a lower quartile ratio in Elmbridge (18.28) stands significantly above the national average of 10.69 (+71%) and significantly above the South East average of 7.37 (+148%).

- 10.16 The parties agree that in 2022 lower quartile house prices in Claygate Ward (£525,000) were 18% higher than across Elbridge Borough (£445,000), 98% higher than across the South East (£265,000) and 188% higher than the national figure (£182,500).
- 10.17 The parties agree there is an acute national housing crisis.
- 10.18 The parties agree there is a significant need for affordable housing across Elmbridge Borough and the wider south of England, and annual need has not been delivered to date.
- 10.19 The parties agree that the provision of up to 30 affordable units at the appeal site is a separate material consideration weighing in favour of the appeal scheme.
- 10.20 The Council accepts that the benefits arising from providing affordable housing accord with the sustainable development definition in the NPPF and the provision of the affordable housing, to deal with the identified need, is a benefit weighing in favour of the development, the extent of which is not agreed.
- 10.21 The parties agree that a proposal's contribution to meeting affordable housing need is a matter that can be taken into account as an "other consideration" when assessing whether there are Very Special Circumstances. The appellants consider that very substantial weight should be afforded to the delivery of up to 30 affordable dwellings. The LPA consider that substantial weight should be afforded to the delivery of up to 30 affordable dwellings.

## **11.0 Matters in Dispute**

- 11.1 The parties disagree on the weight to affordable housing:
- 11.1.1 The Appellants say that the weight to be afforded to 30 affordable housing dwellings, should be very substantial.
- 11.1.2 The LPA contend that substantial weight should be afforded rather than very substantial on the basis that the percentage provided is policy compliant and would provide only up to 30 affordable dwellings.

**Signed on behalf of the LPA:**

**Signed on behalf of the Appellant:**

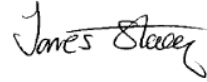
Signature:



Name: Jack Trendall

Date: 5<sup>th</sup> March 2024

Signature:



Name: James Stacey

Date: 5<sup>th</sup> March 2024