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

STATEMENT FOR:

MATTER 5 – HOUSING DELIVERY

WRITTEN STATEMENT

Prepared by:

Woolf Bond Planning Ltd

On behalf of:

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

March 2024

User ID: 41185601

WBP Ref: 8094



Woolf Bond Planning
Chartered Town Planning Consultants

CONTENTS

	Page
Executive Summary	2
Context and Background	3
Matter 5 Response	4

Appendices

Documents submitted to the pending appeal (PINS ref APP/K3605/W/23/3334391)

Appendix A.1: Chronology of assessment of housing land supply for April 2023

Appendix A.2: Statement of Common Ground on Housing Land Supply at 31st March 2023 with Elmbridge Borough Council

Appendix A.3: Copy of email of 22nd February 2024 from Elmbridge Borough Council confirming mis-calculations in AMR and LAA for 2023 concerning total of sites with permission (appendix B of LAA (extract within Appendix C)).

Appendix A.4: Copy of emails of 18th & 19th March 2024 detailing further adjustments to Council supply, beyond those within the Statement of Common Ground

Appendix A.5: Extract of Planning Proof of Evidence (March 2024)

Appendix A.6: Extract of Green Belt Proof of Evidence (March 2024)

Other relevant Documents

Appendix B.1: Extract of Watford Borough Local Plan Inspector's Report (8th March 2022)

Appendix B.2: Extract of Watford Borough Local Plan (17th October 2022)

Appendix C: Extract of Elmbridge LAA 2023 (published February 2024)

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)¹.

¹ 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 5 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 & MHSI 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.

- 1.7. Our Representations referenced the SA-59 omission site which was advanced as an allocation for up to 60 dwellings in an earlier Regulation 18 draft version of the Local Plan, and which continued to be supported by the evidence base as a Site to be allocated for housing (and removed from the Green Belt).

- 1.8. Since the submission of our Representations, an outline application was submitted on 24th March 2023 for the erection of up to 60 dwellings (LPA Ref 2023/0962). This was refused by the Council on 22nd September 2023 and an appeal was subsequently submitted (PINS ref APP/K3605/W/23/3334391). This appeal is due to be heard through an Inquiry which opens on 16th April 2024.

- 1.8. In providing a response to Matter 5, evidence and statements submitted to the Appeal are referenced, as indicated (see **Appendices A.1 to A.6**).

MATTER 5: HOUSING DELIVERY

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

Question 4.1: - Please can the Council update the housing trajectory (Appendix A5 of the Plan) with the latest figures from the AMR and to reflect the updated Plan period (see Inspector's initial letter ID-001).

- 2.1. Although this is a matter for the Council, the attached Chronology document (**Appendix A.1**) details the timeline for the publication of information detailing the position at 1st April 2023. Whilst the contents of these documents are referenced in the Statement, it is the responsibility of the Council to supply them to the Examination.
- 2.2. Furthermore, and as indicated in the appeal particulars², the Council's assessment is not justified given the various errors within its 1st April 2023 based assessment. Where these relate to earlier data already within the Examination library, this is referenced in this Statement.

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

- 2.3. No.
- 2.4. As indicated in the Housing Land Supply Statement of Common Ground included as **Appendix A.2** (as subsequently refined in respect of the position of the Council (**Appendix A.4**)), the known deliverable sites are purported to deliver between 2,279 and 2,297 dwellings within the five year period ending on 31st March 2028. Compared to the LHN of 647dpa, this is a maximum of 3.52 years and is a shortfall of at least 956 dwellings.³

² Copies included as Appendices A.2-A.4.

³ 2,279 – (5 x 647)

-
- 2.5. Our earlier Representations (paragraph 5.46 refers) highlighted double counting within the Council's supply between allocated sites accommodating up to 4 dwellings and the windfall allowance. As this is an integral part of the Council's land supply (including its five year position) as shown in **HOU002** for years 1-5⁴, our concern equally applies to this.

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

- 2.6. The information in **HOU002** is clear that the Council cannot demonstrate a five year supply. Whilst this related to the position as at 1st April 2022, as indicated in the information for the appeal on the omission site (see **Appendices A.1-A.4**), this position has not been addressed when reviewed using a 1st April 2023 base date.
- 2.7. This is in clear breach of paragraph 74 of the NPPF. Moreover, were it to be adopted, a Plan that fails to identify at least a five year supply would not benefit from paragraph 76 of the December 2023 version of the NPPF. The inability to demonstrate a five year supply would also mean, by virtue of footnote 8 and paragraph 11(d) of the December 2023 version of the NPPF, that the most important policies for determining housing applications would immediately be out of date. Given the primacy of Development Plans pursuant to Section 38(6) of the PCPA 2004, it cannot be sound to adopt a new Plan which fails to demonstrate a five year supply at adoption and is immediately out of date.
- 2.8. The Plan is therefore not positively prepared.

⁴ Site US159 (Garages to the rear of 6-24 Lockhart Road, Cobham (4 dwellings)) (page 43)

Question 4.6 – Is the identified housing supply contained within the Plan and set out in the trajectory based on a sound understanding of the evidence? In responding to this question, the Council should provide an updated housing response which identifies the completions, existing commitments, site allocations and any other sources of supply it is seeking to rely upon.

2.9. No.

2.10. Whilst **Appendices A.1 – A.4** confirm that the Council’s April 2023 based assessment is not underpinned by a sound understanding of the evidence, this also applies to the appraisal for April 2022, as set out in the LAA (**HOU002**).

2.11. This is illustrated by the accepted duplication of records within the LAA (**HOU002**), thereby resulting in the results being artificially inflated. An illustration of this is shown by the inclusion of a site at 145 Hersham Road, Hersham, Walton-on-Thames twice⁵.

2.12. We have not undertaken a thorough assessment of the robustness of the Council’s April 2022 land supply evidence given a more recent review has been undertaken at April 2023⁶.

2.13. As indicated in **Appendix A.2**, the Council has accepted that this more recent and thorough review has confirmed that their assessment was not robust and we therefore contend that this should be taken as an accepted comprehensive analysis of the position.

⁵ See application 2017/1323 (19 dwellings net) on page 33 (2nd row) which is the same site as 2020/1222 (16 dwellings net) on page 41 (fourth row). This duplication is confirmed by the Council in second row of Table B (page 11) of Appendix A.2.

⁶ Extract included as Appendix C.

Question 4.7 – In addition to the trajectory required by the Framework, the Council should prepare a spreadsheet to support the trajectory which confirms how many dwellings each site allocation is expected to deliver in each year of the Plan period, and identify any windfall allowance which is being relied upon. This information should be supported by cross references to the evidence base where necessary.

2.14. Although this is a matter for the Council, as indicated in **Appendix A.2**, we also sought this information with respect to the sources of supply at April 2023 (email of 16th January 2024).

2.15. The Council's response is detailed in **Appendix A.2** with the schedules provided within Appendix C. Whilst an extract is included as Appendix C, we rely upon the Council to submit it to the Examination, especially as it was released on 9th February 2023.

Question 4.8 – The Planning Practice Guidance provides advice in relation to the preparation of housing and economic land availability assessments, and sets out that when carrying out a desktop review, Plan-makers need to be proactive in identifying as wide a range of sites and broad locations for development as possible. It goes on to note that identified sites, which have particular constraints (such as Green Belt), need to be included in the assessment for the sake of comprehensiveness but these constraints need to be set out clearly, including where they severely restrict development. An important part of the desktop review, however, is to identify sites and their constraints, rather than simply to rule out sites outright which are known to have constraints. Is the approach adopted by the Council in terms of the Land Availability Assessments completed consistent with this and if not why not?

2.16. No.

2.17. As indicated in our earlier Representations (paragraph 5.47 & 5.48 refer), the PPG guidance is clear that LAA's should identify how any constraints applying to sites can be addressed. This is not included in the Council's LAA. Accordingly, and as recognised by the Inspector, the evidence informing the Local Plan is not consistent with national policy.

The Green Belt

Question 4.13 - Do the exceptional circumstances identified at paragraph 6.18 Topic Paper 1: How the Spatial Strategy was formed (TP001) represent all of the exceptional circumstances which the Council have taken into account?

2.18. This is principally a matter for the Council.

2.19. However, as indicated in the Representations (paragraphs 6.17 – 6.32 refer), there are other factors beyond those listed which the Council should have taken into account.

Question 4.14 – What is the relevance of the fact that the current housing need is significantly higher than the existing target set within the Core Strategy (Paragraph 6.24 of TP001)?

2.20. The fact that the Council delivered the housing target set out in the Core Strategy is not evidence against the existence of exceptional circumstances.

2.21. Not only is the LHN (647dpa) higher than the Core Strategy figure (225dpa), the output from the SHMA at (**HOU014 & HOU015**) was also above the earlier plan⁷. The Core Strategy, which was prepared in the context of a different approach to Plan making, including a regional plan for South East England, has therefore underdelivered against the housing needs (see our answer to question 1.1 in our Matter 2 Statement).

2.22. Topic Paper 1 (paragraph 6.24) indicates that average delivery in the borough has been 330dpa. The LHN is therefore nearly double past delivery.

2.23. As a comparison, for Watford Borough, its Local Plan requires 784dpa, which is more than double its past delivery (380dpa)⁸. As such an uplift has been found sound and consistent with the NPPF elsewhere, and it is reasonable that it can readily be achieved in Elmbridge.

⁷ 474dpa as indicated in paragraph 5.8 of Topic Paper 1.

⁸ See paragraph 35 in Appendix B

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

- 2.24. There is no justified rationale for Elmbridge following a more restrictive approach to Green Belt releases.
- 2.25. Of direct relevance to this question is the approach of Watford Borough⁹.
- 2.26. As indicated in **Appendices B.1 and B.2**, although Watford Borough's housing requirement was 13,328 dwellings (paragraph 27), it was still necessary to remove a single site from the Green Belt for 93 dwellings (Site Ref HS06¹⁰). This was necessary in order to ensure the housing requirement derived from LHN could be achieved.
- 2.27. This means that in Watford Borough, a shortfall of 0.07% was sufficient to provide the necessary exceptional circumstances to justify a Green Belt boundary change. The corresponding figure in Elmbridge is 30%.
- 2.28. The shortfalls in the other Surrey authorities also justified Green Belt boundary revisions.
- 2.29. Consequently, given the very significant shortfall in the Borough's land supply position, and the exceptional affordability issues¹¹, it is not considered that there is any justification to fail to provide for Green Belt boundary revisions in Elmbridge Borough, especially as the necessary exceptional circumstances can be justified¹².

⁹ See extracts of Inspector's Report (Appendix B.1) and Adopted Local Plan (Appendix B.2).

¹⁰ See paragraph 45 in Appendix B.1 and page 165 in Appendix B.2

¹¹ As confirmed in the Matter 3 statement (paragraph 2.19) which notes that Elmbridge now has fourth highest affordability ratio in country.

¹² See paragraphs 6.17-6.32 of Representations.

Question 4.16 - In general terms, the Framework seeks to support the Governments objective of significantly boosting the supply of homes. Paragraph 35 states that Plans should provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs. Paragraph 11 of the Framework sets out the approach to Plan making. In what way does the Green Belt in Elmbridge provide a strong reason for restricting the overall scale, type or distribution of development?

2.30. The Green Belt in Elmbridge does not provide a strong reason for restricting development. Indeed, there are strong exceptional circumstances for amending the Green Belt boundaries to meet needs, as we set out in paragraphs 6.17-6.32 of our Representations.

2.31. Following a thorough assessment of the Green Belt, with expert assistance from Ove Arup and Partners Ltd, Council Officers came to a clear conclusion that exceptional circumstances existed to make certain Green Belt releases (including the omission site) (OTH043).

2.32. The Council has ignored that advice, not only in concluding (without any proper assessment) that exceptional circumstances do not exist, but also conducting an extraordinary volte face in reassessing sites previously proposed to be released (OTH041). The politically driven reappraisal of SA-59 in OTH041 is wholly unconvincing, as explained in the evidence for CHI and MJSI in the appeal for the omission site (extracts at **Appendices A.5 and A.6**).

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

2.33. We are not aware of such an assessment. Our position is that release of SA-59 from the Green Belt will not have a negative effect on the settlement pattern or harm existing communities (see the extracts from the evidence for the appeal on the omission site at **Appendices A.5 and A.6**).

Question 4.19 - With reference to paragraph 143 (e) of the Framework, are the Council able to demonstrate that Green Belt boundaries will not need to be altered at the end of the Plan period?

2.34. No.

2.35. The very significant need for housing and other development cannot be accommodated within the areas currently inset from the Green Belt.

2.36. Whilst our Representations are clear that adjustments to this are necessary to accommodate these needs (paragraph 5.60 refers), there is no indication that demand will decline in the future, especially given the worsening affordability ratio. Therefore, it is essential that in adjusting Green Belt boundaries as advocated, sufficient scope to accommodate future growth is provided.

Windfall Allowance

Issue 9: Is the approach to the windfall allowance justified and consistent with national policy.

Question 4.20 - Paragraph 71 of the Framework advises that where an allowance is made for windfall sites as part of the 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.

2.37. Our Representations highlighted the extent of double counting between allocations and windfalls (paragraphs 5.45 & 5.46).

2.38. The information in **Appendix A.2** confirms that numerous sites within the supply (including from those within the size threshold of a windfall (up to 4 dwellings)) have unjustifiably been included in the April 2023 assessment.

2.39. As indicated, this is likely to be replicated in the April 2022 Assessment (**HOU002**). Therefore, it is not considered that the Council has provided the necessary evidence required by the NPPF (paragraph 71).

Question 4.21 - The Housing trajectory includes a windfall allowance of 987 dwellings over the Plan period, 15% of the overall housing land supply. As 32 of the proposed site allocations contained within the Plan are on sites of 5 units or less, is this approach justified?

2.40. No.

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

25MAR2024

Land off Raleigh Drive, Claygate
Chronology of the Council's Housing Land Supply Position

19th March 2024

Date	Information
14 th September 2023	Local Plan Inspector posed number of questions (CDE.45) to inform preparation for examination of the emerging Local Plan (CDE.16). Paragraphs 24 to 26 related to the trajectory in the draft submission Local Plan and the request for clarification over deliverability.
28 th September 2023	The Council provided an initial response to the Inspector's letter (CDE.46). Whilst this did not answer queries in paragraphs 24 to 26 of the letter, it indicated that "The Council will provide a full response and the additional documents no later than 10 November 2023" .
10 th November 2023	Council's full response to Local Plan Inspector's initial letter (CDE.47). In answer to the queries in paragraphs 24 to 26 of CDE.45, page 6 of the letter indicates that the "most up to date trajectory and LAA evidence that informs this is anticipated for publication in January 2024" .
December 2023	Publication of Authority Monitoring Report 2022/23 (CDE.13) Tables 28 & 29 provide summary of sources of housing land supply and assessment of 5 year provision. Council claimed a deliverable supply of 2,977 dwellings.
16 th January 2024	Appellants request copies of the site specific schedules which informed the analysis within Tables 28 & 29 of the AMR.
30 th January 2024	The Council indicates "aim to publish LAA on 9th February" .
9 th February 2024	The Council publishes LAA (CDE.14) with detailed schedule of sites by source of supply listed in Tables 28 & 29 of AMR (CDE.13). Council claimed a deliverable supply of 2,977 dwellings.
20 th February 2024	Appellants seek clarity from the Council as the total of all sites with permission (Appendix 2 of LAA (CDE.14)) at 1,386 dwellings is less than the 1,556 dwellings specified in the AMR and LAA. (Copy of email in WB2).
22 nd February 2024	Council confirms error in total of sites with permission. It should be 1,386 dwellings as advanced by Appellants. A 10% non-implementation

Date	Information
	rate should then be applied (copy of email confirmation in WB2). Council confirmed corrected deliverable supply is 2,808 dwellings.
4 th March 2024	Initial draft Housing Land Supply Statement of Common Ground sent to Council. Appellants advanced that deliverable supply was 2,221 dwellings.
5 th March 2024	The Council sent first response on draft Statement of Common Ground. Deliverable supply from the sources listed in AMR and LAA reduced to 2,343 dwellings . The Council also seeks to include 397 dwellings from sites granted after 31 st March 2024. Overall total (including permissions granted after 31 st March 2023) would be 2,740 dwellings .
7 th March 2024 (12:14)	Appellants supplied a revised draft Statement of Common Ground and considered the Council's response. Appellants' revised position on deliverable supply increased to 2,270 dwellings . This is from the sites listed in the schedules contained in Appendices 1-3 of the LAA (CDE.14). Appellants state sites approved after 31 st March 2023 must be omitted.
7 th March 2024 (16:17)	The Council provides a response to the revised draft Statement of Common Ground. The revised deliverable supply from the sources listed in AMR and LAA increased to 2,357 dwellings . The Council also seeks to include 404 dwellings from sites granted after 31 st March 2024. Overall total (including permissions granted after 31 st March 2023) would be 2,761 dwellings .
8 th March 2024 (10:16)	Further revised draft Statement of Common Ground prepared. Appellants further revise position on deliverable supply to 2,279 dwellings , from the sites listed in the Appendices 1-3 of LAA (CDE.14). Appellants reaffirm view that sites approved after 31 st March 2023 must be omitted.
8 th March 2024 (11:03)	Council agrees Land Supply Statement of Common Ground. This confirms that deliverable supply from sources in LAA is 2,357 dwellings . The Council also seeks to include 489 dwellings from sites granted after 31 st March 2024. The overall total (including permissions granted after 31 st March 2023) is therefore 2,846 dwellings .
8 th March 2024 (11:31)	Agreed and signed Statement of Common Ground submitted to Planning Inspectorate (CDD.4). This confirms Council supply from sources listed in LAA is 2,357 dwellings and that the Appellants' view is that it is 2,279 dwellings . The Council seeks to include 489 dwellings from sites granted after 31 st March 2023 which is disputed by the Appellants.

Date	Information
18 th March 2024 (17:20)	Council email Appellants to update on their revised Housing Land Supply position (WB7). Council have amended their position and indicate that there is no longer any dispute with the Appellants over the total deliverable supply from sites which were under construction (CDD.4 , Table B). The figure in this table is accepted to be 845 dwellings. The revised total from the sites listed in Appendices 1-3 of the LAA (CDE.14) is therefore now 2,297 dwellings . There would only be a single site where deliverability is disputed between the Council and Appellants – this is Sundial House (fifth row on page 15 of CDD.4) where there remains a difference of 18 dwellings. The Council also revise their position on the inclusion of permissions granted after 31 st March 2023, indicating this should now be 299 dwellings. The overall total (including permissions granted after 31 st March 2023) is therefore 2,596 dwellings , or a 3.99 year supply.
19 th March 2024 (09:13)	Council issue a correction to their position on Housing Land Supply (WB7). No change to the figure associated with the sites listed in Appendices 1-3 of the LAA (confirmed still 2,297 dwellings). However, the total figure for permissions granted after 31 st March 2023 is raised to 396 dwellings. The revised total (including permissions granted after 31 st March 2023) would be 2,693 dwellings .

Chronology Summary

Stage	Council		Appellant
	LAA (Appendices 1-3) (CDE.14)	LAA (Appendices 1-3) + permissions since 31/3/23	LAA (Appendices 1-3) (CDE.14)
AMR (CDE.13) & LAA (CDE.14)	2,977	n/a	n/a
Corrected LAA (WB2)	2,808	n/a	n/a
First draft SoCG	2,343	2,740	2,221
Second Draft SoCG	2,357	2,761	2,270
Final SoCG (CDD.4)	2,357	2,846	2,279
Council email 18 th March 2024 (WB7)	2,297	2,596	2,279
Council email 19 th March 2024 (WB7)	2,297	2,693	2,279



Land north of Raleigh Drive, Claygate
PINS Ref: APP/K3605/W/23/3334391
Statement of Common Ground: Housing Land Supply

8th March 2024

1. Introduction

- 1.1. This Housing Land Supply (“HLS”) Statement of Common Ground (“SoCG”) has been prepared by Mr Steven Brown (of Woolf Bond Planning), on behalf of the Appellants, Claygate House Investments Ltd & MJS Investments Ltd and Mr Paul Falconer on behalf of Elmbridge Borough Council (“EBC”). It sets out both the agreed and disputed matters having regard to the five year housing land supply position.
- 1.2. This HLS SoCG identifies the requirement to be met during the five year period, the respective positions on the disputed components of supply; and the respective five year housing land supply positions.
- 1.3. This HLS SoCG is to be read alongside the separate Planning SoCG and the Affordable Housing SoCG).

2. The Agreed Position

- 2.1. It is agreed between the parties that the five year period to be used for the purpose of calculating the five year housing land supply position for this appeal is 1st April 2023 to 31st March 2028.
- 2.2. Whilst there is agreement that the Council cannot demonstrate a five year supply of housing land, there is disagreement as to whether the Council can demonstrate a four year supply of housing land.
- 2.3. In the circumstances where a housing land supply deficit is confirmed through the appeal, it is agreed for the purposes of paragraph 11(d) of the NPPF that the presumption in favour of sustainable development would be engaged.

3. The Housing Requirement and Five Year Period

- 3.1. In so far as the strategic policies from the Elmbridge Core Strategy 2011-2026 (July 2011) are more than five years old, it is agreed, by operation of paragraph 77 and footnote 42 of the NPPF, that **the housing requirement falls to be measured against the local housing need figure calculated using the standard method.**
- 3.2. As such, the starting point when calculating the five year requirement is the minimum 650 dwelling annual requirement derived from the application of the Standard Method. This equates to a minimum of 3,250 dwellings over the five years from 1st April 2023 to 31st March 2028.

- 3.3. As Elmbridge Borough Council have prepared a Regulation 19 version of their Local Plan (consulted upon from 17th June to 29th July 2022) paragraph 226 of the NPPF applies. This requires that the Council must demonstrate a minimum 4 years supply (against the 5 year requirement), especially as the Local Plan was submitted for examination on 10th August 2023. The examination is underway and Housing Land Supply will also be considered as part of this process.
- 3.4. As a result of the Housing Delivery Test (“HDT”) results published in December 2023, it is agreed that no buffer is necessary, as the HDT result was above the 85% figure specified in footnote 43. This produces a 650dpa annualised requirement (rounded). The HDT Results for Elmbridge since 2018 have been as follows:

Table 1. Housing Delivery Test Measurements and Results for Elmbridge Borough

Year	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	HDT Measurement
	1	2	3		1	2	3		
2022 HDT	573	421	641	1,635	396	310	768	1,474	90%
2021 HDT	623	573	421	1,618	427	396	310	1,133	70%
2020 HDT	443	623	573	1,639	130	427	396	953	58%
2019 HDT	355	443	623	1,421	267	130	427	824	58%
2018 HDT	225	362	443	1,030	240	267	130	637	62%

Source: DLUHC

- 3.5. The agreed minimum five year requirement for the period **1st April 2023 to 31st March 2028 is 3,250 dwellings.**
- 3.6. The minimum five year requirement is 3,250 dwellings, calculated as follows:

650dpa x 5 years = 3,250.
Total Requirement = 3,250 dwellings

4. Agreed Definition of Deliverable

- 4.1. It is agreed that the definition of deliverable is explained in the Glossary to the NPPF (page 66), and the PPG (ID 68-007-20190722). The definition and test for demonstrating deliverability is also considered in the relevant appeal decisions in Core Document series . The parties agree that the definition of deliverable in the Glossary to the NPPF is not restricted to categories a) and b) because “in particular” means that it is not a closed list.

5. The Respective Housing Land Supply Positions

- 5.1. The Council’s position is set out in its Paper ‘Authority Monitoring Report 2023’ (December 2023) . The position was revised following a clarification received via email from Mr Paul Falconer on 22nd February 2024. This followed the appellants interrogation of the LAA which listed the sites relied upon by the Council for each component of its supply.

- 5.2. The Council has reviewed the Appellant's comments on the LAA and agrees that in some instances there was double counting and that since the base date a number of sites have been refused planning permission or have been granted permission, but for fewer units.
- 5.3. The Appellants' assessment is based upon the information on the sources of sites and deliverable supply contained in the Council's Land Availability Assessment ("LAA") issued in January 2024 (Appendices 1-3). With respect to the sites with planning permission (listed in appendices 1 & 2 of the LAA), the Appellants have reviewed each proposal and examined whether they could be regarded as deliverable as at the base date. The Appellants position is that they have discounted sites with permission where they were covered by a duplicate permission (extant at the base date), where the conditions imposed on the scheme required completion before the base date (31st March 2023) or where evidence from the Council Tax register indicates that the dwellings were completed before the base date.
- 5.4. The Appellants have also reviewed the schedule of sites within Appendix 3 of the LAA. This review has used the most up to date evidence to assess the deliverability of the components of supply relied upon by the Council.

Matters of Disagreement

- 5.5. The Council considers that as the Appellant has used information not available at the time of the base date to assess the deliverability of the sources of supply contained in the LAA. Consequently, the Council considers that sites that have been granted planning permission since 1st April 2023 that were not included within the LAA should be considered as part of this Appeal, these are set out in Table E.
- 5.6. The Appellant disputes such an approach as they consider that the inclusion of permissions granted after the base date skews the supply, especially as it does not make any corresponding adjustment of completions in the intervening period alongside removal of any permissions which have lapsed/expired or been superseded.
- 5.7. The parties will set out their respective positions in evidence.
- 5.8. The **Council** considers it is appropriate to include these sites as they are able to be considered deliverable within five years of this appeal. This results in a **shortfall of 404 dwellings against the 3,250 minimum dwelling requirement and a supply of 4.38 years.**
- 5.9. **The Appellants identify a maximum supply of 2,279 dwellings. This results in a shortfall of 971 dwellings against the 3,250 minimum dwelling requirement and a supply of 3.51 years.**
- 5.10. The respective positions are summarised in Table 1 below.

Table 1: Respective Five Year Housing Land Supply Positions

Step in calculation	Council	WBP
Local Housing Need for 2023 (dpa)	650	650
Requirement for 5 years (Apr 2023 – Mar 2028)	3,250	3,250
Deliverable supply at 1 st April 2023	2,357	2,279
Units granted planning permission since 1 st April 2023 not included in LAA	489	0
Years supply	4.38yrs	3.51yrs
Difference compared to 5 years requirement	-404	-971
Difference compared to 4 years requirement	+246	-321

- 5.11. The supply differences from Table 1 above are set out in **Appendix 1** (attached).
- 5.12. Following the Council's review of the Appellants' assessment, the difference between the parties for the sites contained in the LAA is now only 78 dwellings (LPA supply of 2,357 dwellings and the Appellant's supply of 2,279 dwellings). The difference relates to three sites in Table B (St Georges House, 162 Portsmouth Road and 1 Wolsey Road) and one site in Table D (Sundial House).

6. The Respective Five Year Positions

- 6.1. The agreed position between the Council and Appellants is that the Council is unable currently to demonstrate a five year supply of deliverable housing land for the period 1st April 2023 to 31st March 2028. There is disagreement over the extent of shortfall.
- 6.2. **It is the Council's case that there is a 4.38 year supply of deliverable housing land and a shortfall of 404 dwellings against five years of supply.**
- 6.3. **It is the Appellants' case that there is 3.51 year supply and a 971 dwelling shortfall.**
- 6.4. When considered against the requirement to show a four year supply of deliverable housing land (pursuant to paragraph 226 of the NPPF), there is disagreement between the Council and the Appellant as to whether this is achieved.
- 6.5. **The Council's position is that it can show a four year supply with a surplus of 246 dwellings, given that its overall position is a 4.38 years supply.**
- 6.6. **The Appellants' position is that there is a shortfall of 321 dwellings compared to that necessary to demonstrate a four year supply of 2,600 dwellings (4 x 650dpa). This is because the Appellants' assessed supply of 2,279 dwellings equates to a 3.51 years provision – this is 321 dwellings short of that necessary to demonstrate a four year supply.**

Signatures

On behalf of the Appellants:

Signed: *Steven Brown*

Name: Steven Brown BSc Hons DipTP MRTPI (Woolf Bond Planning obo Claygate House Investments Ltd & MJS Investments Ltd)

Date: 8th March 2024

On behalf of Elmbridge Borough Council

Signed: *P Falconer*

Name: Mr Paul Falconer (Elmbridge Borough Council)

Date: 8th March 2024

APPENDIX 1 TO FIVE YEAR HOUSING LAND SUPPLY SOCG: SITE DELIVERY

Land north of Raleigh Drive, Claygate

PINS Ref: APP/K3605/W/23/3334391

8th March 2024

1.0 Introduction

- 1.1. Table A below sets out the respective positions in relation to the deliverability of the components of supply as listed in the Land Availability Assessment (LAA) for 31st March 2023 published in January 2024. Table A also includes a Council updated position having considered the comments by Woolf Bond Planning.

Table A: The Supply Positions

NPPF Category	Source	Council ¹	Revised Council Position in SoCG	Difference between Council positions	WBP for appellant	WBP Difference from revised Council position
A	Under construction (appendix 1 of LAA)	966	905	-61	845	-60
	Planning permissions (appendix 2 of LAA)	1,368	1,263	-105	1,263	0
	Less 10% of permissions	-137	-126	11	-126	0
B	LAA 1-5 (Appendix 3 of LAA)	524	228	-296	210	-18
	Windfall (Stage 3 of LAA)	87	87	0	87	0
	Total	2,808	2,357	-451	2,279	-78

¹ The Council's calculation in the AMR 2022-23 shows a total deliverable supply of 2,977 dwellings. The difference arises as the Council states that the total of planning permissions (including 10% non-implementation) is 1,400. However, the total for this source in Appendix 2 of the LAA is 1,368, albeit this is without any non-implementation allowance. The Council (22/2/24) have accepted that their figures were incorrect, and the figures in Table A are accurate.

- 1.2. The disputed sites within each source are identified in tables B to D below. The Appellants do not accept the inclusion of the sites in Table E.
- 1.3. They relate to the Sites under Construction (as listed in Appendix 1 of the LAA (January 2024) (Table B), Sites with Planning Permission (as listed in Appendix 2 of the LAA) (Table C) and LAA sites for delivery in years 1-5 (as listed in Appendix 3 of the LAA) (Table D) as relied upon by the Council.
- 1.4. The Council has included Table E which shows sites granted planning permission since 1st April 2023 that were not identified in the LAA and consequently the Council considers to be deliverable and reasonable to include as the Appellant has assessed the deliverability of the sites in Appendix 3 of the LAA using the most up to date evidence which includes information post 31st March 2023. The Appellant disputes the inclusion of these sites as set out above.

Table B: Sites Under Construction (at 1st April 2023) (LAA Appendix A)

1.5. From the list of detail sites with permission under construction – the disputed sites are:

LPA ref	Location	Dwellings (net)			Summary of reasons for the Appellant's difference	Council's Comments	Revised Council figure	Difference between Revised Council and WBP	Council's agreed change on LAA (Appendix A)
		Council in LAA	WBP	Difference					
2017/2534	St Georges House, 24 Queens Road, Weybridge, KT13 9UX	43	0	-43	Site was completed before 31 st March 2023. Google Streetview indicates the apartments were completed before April 2022 and this reflects the inclusion of all 43 apartments on the Council Tax Register (added October 2021 (listed as Campbell House, 24 Queens Rd, Weybridge, KT13 9UX)). As the site was built out/completed before the base date of the current five year housing land supply assessment, it is not 'under construction'	Not agreed as in our monitoring as under construction and have not received a completion certificate from Building Control.	43	-43	0
2016/1066	162 Portsmouth Road, Thames Ditton, KT7 OXR	16	0	-16	Site was completed before 31 st March 2023. Google Streetview indicates the apartments were completed at Oct 2022 and this reflects the inclusion of all 17 apartments on the Council Tax Register (added January 2022 (listed under Martini Apartments, 1 Thorkhill Rd, Thames Ditton, KT7 OUS)). As the site was built out/completed before the base date of the current five year housing land supply assessment, it is not 'under construction'	Not agreed as in our monitoring as under construction and have not received a completion certificate from Building Control.	16	-16	0
2020/1020	Upper Court, Portsmouth Road, Esher, KT10 9JH	55	30	-25	The scheme is for 56 C2 bedroom suites and are not self-contained dwellings. Therefore, need to apply the conversion factor from the Housing Delivery Test (1.8 bedrooms in C2 use equates to a dwelling). The scheme therefore provides equivalent of 31 dwellings (30 net). The appellants reference to the scheme providing 56 bedroom suites accords with that detailed in paragraphs 8 to 10 of the Council's Planning Officers Report concerning application 2020/1020. This states: 8. The application seeks planning permission for the partial demolition of the existing main building to create a central atrium, the demolition of all of the existing ancillary outbuildings and their replacement with a part single and part two-storey building with a basement served by lightwells, and the conversion of the main building and use of the replacement building and site for the provision of accommodation for persons with dementia requiring nursing or personal care, together with all ancillary facilities, including staff accommodation, car parking and landscaping. The Listed Building works are considered under application ref: 2020/1109.	Agreed	30	0	-25

LPA ref	Location	Dwellings (net)			Summary of reasons for the Appellant's difference	Council's Comments	Revised Council figure	Difference between Revised Council and WBP	Council's agreed change on LAA (Appendix A)
		Council in LAA	WBP	Difference					
					<p>9. The proposed accommodation would provide for a total of 56 bedrooms. The main building, known as Upper Court, would provide for a total of 38 bedrooms together with a lounge, dining rooms, sensory rooms, beauty salon, kitchen, servery area, TV room, library, pharmacy, offices, reception and staff rooms.</p> <p>10. The ancillary care home building will provide for an additional 18 bedrooms together with a lounge, dining room, treatment rooms, kitchen, servery area, cinema/media room, reception, staff room and staff accommodation. There would also be the total provision of 28 off-street car parking spaces, including 6 spaces with electric charging points, and 12 cycle parking spaces for use by visitors and staff.</p> <p>The appellant maintains its position that the scheme only includes the equivalent of 30 dwellings.</p>				
2016/4076 & 2017/2433	11 Oakfield Glade, Weybridge	2	1	-1	Two applications for a single dwelling on the same footprint listed as being under construction at 11 Oakfield Glade (LPA ref 2016/4076 & 2017/2433). As only one dwelling can be completed, omit 1 dwelling.	Agreed 2016/4076 not 2012/4076 – allowed on appeal	1	0	-1
& 2020/1222	145 Hersham Road, Hersham	19	16	-3	Application 2017/1323 for 21 dwellings (19 net) and application 2020/1222 for 18 dwellings (16 net). Application 2020/1222 was allowed on appeal on 24 th November 2021. Paragraph 3 of appeal decision states that permission 2017/1323 had expired before it was determined. Application 2017/1323 included as scheme under construction (in LAA appendix A) with application 2020/1222 included as site with permission (in LAA appendix B). As site under construction, albeit for 16 dwellings (under 2020/1222), the total units in this source reduced by 3. A further reduction of 16 dwellings included in schedule of sites with permission to address double counting since only 16 dwellings (net) can be completed on the site.	Agreed	16	0	-3
2021/3595 & 2021/3596	A C Court, High Street, Thames Ditton	38	13	-25	Application 2021/3595 (approved 8 th December 2021) only permits conversion of Block 2 at A C Court to 8 dwellings. Accept application 2021/3596 (approved 8 th December 2021) permits conversion of block 6 at A C Court to 5 dwellings. Appellant had assumed this scheme had been implemented as not listed as site with extant permission in earlier 2022 LAA. As LPA state 13 under construction (from 2021/3595 and	Agreed 2021/3595 – Prior approval for Block 2 – Agreed it is for 8 units. 2021/3596 - Prior approval for Block 6 - 5 units 13 units in total under construction.	13	0	-25

LPA ref	Location	Dwellings (net)			Summary of reasons for the Appellant's difference	Council's Comments	Revised Council figure	Difference between Revised Council and WBP	Council's agreed change on LAA (Appendix A)
		Council in LAA	WBP	Difference					
					2021/3596), this is the revised figure accepted by appellant. Application 2023/1791 was submitted on 26 th June 2023 (after base date) and approved on 17 th August 2023. Application 2023/1791 relates to block 7 and proposed 6 flats. This scheme only included if the base date is set as on or after 17 th August 2023. See also comments regarding skewing of results. No explanation of how total of 38 dwellings was derived.				
2016/3908 & 2021/2254	Copsem Manor, 50 Copsem Lane, Esher, Surrey	8	6	-2	Application 2016/3908 approved for 2 dwellings. On same site, application 2021/2254 approved for 6 dwellings. Both these schemes are included in the Council's schedule (LAA appendix A). However as both schemes cannot be implemented, have omitted older permission (2016/3908 for 2 dwellings).	Agreed	6	0	-2
2016/3864	Rear Ground Floor Office Suite 1 Wolsey Road East Molesey Surrey KT8 9EL	1	0	-1	A prior approval which had to be completed within 3 years of its permission. Deadline for completion was 30 th May 2019 pursuant to condition 1. Therefore cannot still be under construction at 31 st March 2023. It must either have already been completed before 31 st March 2023 or consent has expired. If not completed (as advanced by Council), it is not an extant permission since condition 1 is clear completion had to be achieved by 30 th May 2019.	Not agreed as still in our monitoring as under construction and have not received a completion certificate from Building Control.	1	-1	0
2018/3468	5 The Quintet Churchfield Road Walton-On-Thames KT12 2TZ	3	0	-3	A prior approval which had to be completed within 3 years of its permission. Deadline for completion was 11 th February 2022. Therefore cannot still be under construction at 31 st March 2023. It must either have already been completed before 31 st March 2023 or consent has expired.	Agreed	0	0	-3
2018/2389	290 Walton Road West Molesey KT8 2HT	1	0	-1	A prior approval which had to be completed within 3 years of its permission. Deadline for completion was 36 th September 2021. Therefore cannot still be under construction at 31 st March 2023. It must either have already been completed before 31 st March 2023 or consent has expired.	Agreed	0	0	-1
2017/3444	77 Queens Road Weybridge Surrey KT13 9UQ	1	0	-1	A prior approval which had to be completed within 3 years of its permission. Deadline for completion was 4 th December 2020. Therefore cannot still be under construction at 31 st March 2023. It must either have already been completed before 31 st March 2023 or consent has expired.	Agreed	0	0	-1
	Total	187	66	- 121			126	- 60	- 61

1.6. The Appellants dispute the delivery of 60 dwellings from sites under construction compared to the Council's revised position.

1.7. The information in Table B indicates that the sites disputed by the Appellants fall into one of the following broad categories:

- (i) They were completed before 31st March 2023,
- (ii) The number of dwellings relied upon by the Council is greater than the actual planning permission; or
- (iii) The permission has expired (where consent was through a prior approval).

Table C: Sites with planning permission not yet commenced at 1st April 2023 (LAA Appendix B)

1.8. The disputed sites from the list of sites with planning permission (not under construction at 1st April 2023) were as follows:

LPA ref	Location	Dwellings (net)			Summary of reasons for the Appellant's difference	Council's Comments	Revised Council figure	Difference between revised Council and WBP	Council's agreed change on LAA (Appendix B)
		Council in LAA	WBP	Difference					
2020/2095	4 Littleworth Road, Esher	62	0	-62	Under application 2020/2095, the Council includes 62 dwellings as being under construction at 31 st March 2023 (site of Claygate House, Littleworth Road, Esher (included in LAA appendix A)). It is also included as a site with permission (also ref 2020/2095) for 62 dwellings (in LAA appendix B). Therefore included twice in Council's figures. This is double counting.	Agreed – double counting	0	0	-62
2017/1323 & 2020/1222	145-149 Hersham Road, Hersham, Walton-on-Thames	16	0	-16	Application 2017/1323 and 2020/1222 apply to same site. As 2020/1222 included for 16 dwellings in sites under construction (as correction to 2017/1323 which had expired as confirmed in paragraph 3 of the per appeal decision), omitted from sites with permission to avoid double counting with allowance from site in under construction category (table B).	Agreed – double counting	0	0	-16
2021/3551 & 2021/4342	32-34 High Street, Walton-on-Thames	4	2	-2	Application 2021/3551 approved conversion of the first to third floors of 32-34 High Street, Walton-on-Thames to 2 dwellings. In application 2021/4341, conversion of these same floors to two HMO. To address double counting, have reduced by 2 dwellings since this is the minimum contribution from the site.	Agreed – double counting	2	0	-2
2021/3417, 2021/1403 & 2022/0091	Auckland House, New Zealand Avenue, Walton-on-Thames	20	10	-10	Application 2021/3417 (a prior approval) approved for two additional floors providing 10 apartments. This is shown as under construction (LAA appendix A). Under prior approval applications 2021/1403 and 2022/0091 (listed together), the Council has included	Agreed – double counting 2021/3417 – 3 rd and 4 th floor – 10 units	10	0	-10

LPA ref	Location	Dwellings (net)			Summary of reasons for the Appellant's difference	Council's Comments	Revised Council figure	Difference between revised Council and WBP	Council's agreed change on LAA (Appendix B)
		Council in LAA	WBP	Difference					
					in the schedule the provision of two floors on the building supplying 10 apartments (LAA appendix B). This is a duplicate with 2021/3417 and as only 10 apartments approved through these applications, have made necessary adjustment to avoid double counting.				
2020/2680 & 2021/3072	363-367 Molesey Road, Walton-on-Thames	14	6	-8	There are two separate schemes approved on the site. These are applications 2020/2680 for 9 dwellings (approved on 16 th November 2020) and 2021/3072 for 7 dwellings (approved on 8 th June 2022). The former is included in the supply as 8 dwellings (net) with the latter as 6 (net) (both in LAA appendix B). Given application 2021/3072 is the most recent approval, this is the scheme relied upon as a source of supply by the appellant, especially as this is also the lower figure and therefore avoids any optimism bias.	Agreed	6	0	-8
2019/2381	Station House The Parade Claygate Esher Surrey KT10 0PB	11	8	-3	Permission is for a terrace of 4 two-storey flats and conversion of existing detached house into 1 shared dwelling (HMO which includes 5 bedrooms) and 2 flats. Therefore net provision is 4 + 2 + (5/1.8 ²) - 1. This is total of 8.	Agreed	8	0	-3
2020/1502 2020/2483 2020/3278 2021/2695	Abbey House Wellington Way Weybridge KT13 OTT	52	48	-4	Of the 4 listed applications prior approval proposals, the Following applies: <ul style="list-style-type: none"> • 2021/2695 approved 15th October 2021 for 34 dwellings. • 2020/3278 approved 1st April 2021 for 48 dwelling. • 2020/2483 was refused on 17th November 2020 (52 dwellings). • 2020/1502 approved 30th October 2020 for 28 dwelling. As no ability to implement more than 1 of the prior approval consent, max is 48 dwellings. Furthermore, scheme for 52	Agreed. Current application 2022/1272 – 12 March Planning Committee. 106 flats.	48	0	-4

² This is based upon the standard conversion of communal accommodation to dwellings of bed spaces / 1.8.

LPA ref	Location	Dwellings (net)			Summary of reasons for the Appellant's difference	Council's Comments	Revised Council figure	Difference between revised Council and WBP	Council's agreed change on LAA (Appendix B)
		Council in LAA	WBP	Difference					
					dwellings was refused by the Council.				
	Total	179	74	- 105		-105 agreed.	74	0	- 105

1.9. The Appellants dispute the delivery of 105 dwellings from sites with permission and but not under construction. Through the Statement of Common Ground, the Council has accepted the adjustments associated with the sites with planning permission as at 31st March 2023, but which were not under construction at this date.

1.10. The information in Table C indicates that the sites disputed by the Appellants fell into one of the following broad categories:

- (i) The number of dwellings relied upon by the Council is greater than the actual planning permission; or
- (ii) Duplication of dwellings numbers on a single site.

1.11. As indicated, the Council have accepted the adjustments to the sites listed in Table C (those listed in Appendix B of the LAA which had a planning permission but were not under construction at 31st March 2023):

Table D: LAA sites for delivery in years 1 - 5 (LAA Appendix C)

1.12. The Appellant initially disputed the inclusion of the expected delivery of 367 dwellings within the current five year period from the sites in the LAA that did not have an extant planning permission at the base-date and would have been included in appendices 1 and 2 of the LAA.

1.13. From the sites listed in Appendix C of the LAA, the Council initially indicated that 524 dwellings were deliverable. Following preparation of the Statement of Common Ground, the Council reduced their contribution of deliverable supply from LAA sites (appendix C) to 228 dwellings.

1.14. Taking account of the Council's revised position of a supply of LAA sites totalling 228 dwellings (as explained in the Statement of Common Ground), the appellant now disputes the contribution of 18 dwellings. This means that the Appellant' accepts the delivery of 210 dwellings from this source of supply.

1.15. The Appellants have applied the advice in the NPPF, associated PPG as well as appeal decisions regarding the nature of evidence necessary to substantiate deliverability, and consider that only 210 dwellings are deliverable from sites listed in the LAA which did not have permission at the base date.

1.16. Table D provides a review of all the sites listed in appendix C of the LAA which the Council envisages will be built out within the five years (April 2023-March 2028). Table D then provides the Appellants' view on the expected number of dwellings which could be delivered on each site within the five year period. It also includes the Council's update position on expected deliverability from the LAA sites (without a planning permission at 31st March 2023).

Site ref	Site name	Dwellings within 5 years			WBP comments	Council's Comments	Revised Council figure	Difference between revised Council and WBP	Council's agreed change on LAA (Appendix C)
		Council in LAA	WBP	Difference					
US155	Garages to the rear of Holroyd Road, Claygate	3	3	0	Application for 3 dwellings (2021/0349) validated 1/2/21. Draft LP allocation. As pending at base date, this provides evidence of deliverability. Awaiting decision.	Agreed	3	0	0
US3	Torrington Lodge Car Park, Hare Lane, Claygate	8	0	8	On 27/9/23, the Council withdrew from agreement for proposed mixed used development of site ³ . Whilst site is on the brownfield register (ref 44 for 8 dwellings), the Council's withdrawal from developer agreement with no alternative mechanism agreed to bring site forward, it is not deliverable.	Agreed	0	0	-8
US6	Crown House, Church Road, Claygate	12	12	0	An application 2023/0798 received on 16/3/23 and validated on 24/4/23 for conversion of offices to 14 flats with two storey front extension. Whilst not on brownfield register, the pending	Agreed	12	0	0

³ [Torrington Lodge car park in Claygate | Elmbridge Borough Council](#)

Site ref	Site name	Dwellings within 5 years			WBP comments	Council's Comments	Revised Council figure	Difference between revised Council and WBP	Council's agreed change on LAA (Appendix C)
		Council in LAA	WBP	Difference					
					application (still awaiting determination) provides element of evidence of deliverability as site is draft allocation in LP.				
US159	Garages to the rear of 6-24 Lockhart Road, Cobham	4	3	1	An application for 3 dwellings 2020/1612 was validated 20/7/20. Draft LP allocation. As pending at base date, this provides evidence of deliverability. Awaiting decision.	Agreed – 2020/1612 is only 3 units.	3	0	-1
US160	Garages at Bennett Close, Cobham	3	3	0	Application for 3 dwellings (2022/1400) was validated on 10/6/22 and approved 19/7/23. Draft LP allocation. As pending at base date, this provides evidence of deliverability.	Agreed	3	0	0
US467	Ambleside, 3 The Spinney, Queens Drive, KT22 0PL	8	1	7	An application for 2 dwellings (net 1) (2022/2811) validated on 20/9/22 and approved 31/5/23. Draft LP allocation. As pending at base date, this provides evidence of deliverability, although just for 1 dwelling.	Agreed	1	0	-7
US472	40 Fairmile Lane, Cobham, KT11 2DQ	13	0	13	Application for two buildings containing 18 flats following demolition of existing dwelling (net 17 dwellings) validated 7/12/22 (2022/3547). Refused 11/8/23. Whilst pending application at base date might illustrate deliverability, subsequent refusal of application confirms this is not achieved. Therefore allowance is 0.	Agreed	0	0	-13
US492	Cedar House, Mill Road, Cobham, KT11 3AL	7	3	4	An application for conversion of existing building and extension to provide 3 dwellings (2021/3348) validated on 27/5/22. Application approved 1/6/23. Draft LP allocation. As pending at base date, this provides evidence of deliverability.	Not agreed – 3 units have been granted. Existing use is as a hotel so no loss of residential on-site.	3	0	-4
US493	Selden Cottage and Ronmar, Leatherhead Road, KT22 0EX	18	3	15	At Ronmar, application for four dwellings following demolition of existing submitted on 16/8/23 (2023/2316) and validated on 12/9/23 (would be net 3). Also application for replacement dwelling at Ronmar (2023/2007) approved 3/10/23 (was validated on 9/8/23). No applications at Selden Cottage. As all applications after base date, no evidence to show deliverability and consequently exclude. Whilst allocation in draft LP, page 95 indicates phasing was envisaged as years 6-10. Therefore not deliverable	Agreed 2023/2316 is ongoing and likely to be delivered in 5 year time period. Net 3 units.	3	0	-15
US521	4 Fernhill, Oxshott, KT22 0JH	5	3	2	An application for 7 flats after demolition of existing dwelling refused 12/11/21 (2021/2194). Application for two pairs of semis (4 dwellings) following demolition of existing house (2022/2376) validated on 28/7/22 and approved 13/7/23 (net 3 dwellings). Draft LP allocation. As pending at base date, this provides evidence of deliverability, although for 3 dwellings.	Agreed 2022/2376 for 4 dwellings (3 net)	3	0	-2
US530	Garage block, Middleton Road, Downside	3	3	0	Application for 3 dwellings approved 1/6/23 (2020/1626). Application was valid from 7/7/20. Draft LP allocation. As pending at base date, this provides evidence of deliverability.	Agreed	3	0	0
US551	White Herons, Fairmile Park Road, Cobham	5	0	5	Application for three pairs of semis following demolition of existing dwelling (net 5) received on 15/9/23 and validated on 19/10/23 (2023/2543). As not on brownfield register, need other evidence to explain why included as potential site as application not pending at base date.	Agreed Site put forward by owner indicating it was deliverable prior to base date. 2023/2543 refused 15/2/24.	0	0	-5
US552	1 Holtwood Road, Oxshott	7	7	0	Several applications for 4 pairs semis (8 dwellings) following demolition of existing dwelling (net 7) have been submitted:	Agreed	7	0	0

Site ref	Site name	Dwellings within 5 years			WBP comments	Council's Comments	Revised Council figure	Difference between revised Council and WBP	Council's agreed change on LAA (Appendix C)
		Council in LAA	WBP	Difference					
					<ul style="list-style-type: none"> 2021/4160 refused 31/5/22. 2022/2338 refused 13/12/22 and appeal dismissed 10/10/23. 2023/3286 validated 12/1/24. Whilst no pending application at base date and site not on brownfield register, Council have provided sufficient evidence to prove deliverability.	Based on planning history that owner intends to develop Application 2022/2338 was only dismissed on lack of satisfactorily completed S106 agreement. Application 2023/3286 is pending which seeks to address this. Therefore, considered to be deliverable			
US158	Garages to the rear of Blair Avenue, Esher	4	2	2	An application 2020/2566 for pair of semi (2 dwellings) validated 2/10/20 and approved 23/5/23. Site draft LP allocation. As pending at base date, this provides evidence of deliverability, although for 2 dwellings.	Agreed	2	0	-2
US230	Car Park south of Southbank, Thorkhill Road, Thames Ditton	7	0	7	No applications	Agreed	0	0	-7
US245	Brook House, Portsmouth Road, Thames Ditton, KT7 OEG	30	0	30	No applications. No evidence of delivery.	Agreed	0	0	-30
US443	47 Portsmouth Road, Thames Ditton, KT7 OTA	0	0	0	Site include for retail within 5 years. No dwellings expected. No evidence of delivery.	Agreed Appeal for Aldi store dismissed – 2021/3857	0	0	0
US462	Sundial House, The Molesey Venture, Orchard Lane, East Molesey, KT8 0BN	61	38	23	An application for three buildings containing 74 apartments following demolition of existing buildings containing 18 dwellings (net 56 units) validated on 29/11/22 (2022/3525). Whilst application remains pending. EA objection to FRA with application. Site included on brownfield register (ref 106) for 38 dwelling. As site on brownfield register and pending application, included for 38 dwellings notwithstanding EA objection.	Not agreed Application is pending and officers consider site is capable of net 56 units. Issue with EA is considered to be resolvable. Building is outside river buffer zone.	56	18	-5
US503	89-90 Woodfield Road, Thames Ditton, KT7 ODS	7	0	7	Application for conversion and extension of 90 Woodfield Rd to provide 5 flats (2021/4281). Refused 1/2/23 and appeal dismissed 18/12/23. As no pending application at base date, not deliverable.	Agreed	0	0	-7
US516	Bransby Lodge, St Leonard's Road, Thames Ditton	5	0	5	Application for 7 flats after demolition of existing dwelling (net 6) (2020/0865) refused 8/12/20 and appeal dismissed 5/4/22. Application for 6 flats and 2 houses after demolition of existing house (net 7) received 16/3/23, validated 13/4/23 (2023/0794). Was refused 1/9/23. Whilst application pending at base date, subsequent refusal indicates not deliverable.	Agreed	0	0	-5

Site ref	Site name	Dwellings within 5 years			WBP comments	Council's Comments	Revised Council figure	Difference between revised Council and WBP	Council's agreed change on LAA (Appendix C)
		Council in LAA	WBP	Difference					
US524	Torrington, 18-20, St Mary's Road, Long Ditton, KT6 5EY	9	11	-2	Application for extensions and alterations to provide 11 additional apartments (2023/0665). Existing building contains 12 apartments. Application received 3/3/23 and validated 14/6/23. Committee resolution in favour on 9/1/24. Site on brownfield register (ref 170) for 9 dwellings. As on brownfield register and pending application at base date, deliverable for 11.	Agreed – application was for 11 additional flats and considered to be deliverable.	11	0	2
US548	12 and land rear of 10-26, Claygate Lane, Esher	5	0	5	No applications. No evidence of delivery.	Agreed	0	0	-5
US127	30 Copsem Lane, Esher, KT10 9HE	21	25	-4	Application for 26 flats after demolition of existing dwelling (net 25) (2021/4149). Validated 18/1/22 and still pending. Site on brownfield register (ref 155) for 21 dwellings. As on brownfield register and pending application at base date, include for 25 dwellings.	Agreed – application is pending and was registered prior to base date.	25	0	4
US146	35 New Road, Esher, KT10 9DW	5	3	2	Application for 6 flats after demolition of existing dwelling (net 5) (2020/0026) refused 25/6/20 and appeal dismissed 29/4/21. Additional dwellinghouses on existing dwelling prior approval app (2021/0509) refused 8/4/21. Application for two pairs of semi (4 dwellings) validated 27/2/23 and refused 13/9/23 (2023/0302). Application for two pairs of semi (4 dwellings) following demolition of existing dwelling (net 3) (2023/2776) validated 9/10/23 and approved 9/1/24. Site on brownfield register (ref 65) for 8 dwellings. Draft LP allocation for 5 dwellings (years 1-5) Whilst pending application at base date, as this was refused not deliverable. As draft allocation, subsequent approval of 3 dwellings (net) means this is the figure regarded as deliverable.	Agreed 2023/2776 – 3 net dwellings granted. Therefore consider that it is deliverable.	3	0	-2
US276	Cafe Rouge, Portsmouth Road, Esher, KT10 9AD	20	0	20	Application for mix Class E and up to 38 flats withdrawn (2021/2814). Application for mix class E and up to 28 flats withdrawn (2022/2191) on 18/10/22. No applications proving deliverability.	Agreed	0	0	-20
US526	40 New Road, Esher, KT10 9NU	6	0	6	Application for 9 dwellings after demolition of existing house (net 8) (2022/2086). Validated 22/5/23 (received 4/7/22). Refused 10/10/23. Whilst pending application at base date, as then refused not deliverable.	Agreed	0	0	-6
US441	63 Queens Road, Hersham, KT12 5LA	5	0	5	No applications	Agreed	0	0	-5
US489	19 Old Esher Road, Hersham, KT12 4LA	5	2	3	Application for 9 flats after demolition of existing dwelling (net 8) (2021/0366) refused 28/6/21 and appeal dismissed 23/6/22. Application for pair of semi (net 2) (2023/2366) validated 15/9/23 (received 23/8/23) and pending. As site is allocation in draft LP (delivery expected in years 1-5) for 5 units, the subsequent application confirms 2 dwellings deliverable..	Agreed 2023/2366 under consideration – 2 units	2	0	-3
US152	Garages to the rear of Island Farm Road, West Molesey	3	3	0	Application for 3 dwellings (2020/3004) validated 10/11/20 and pending. Draft LP allocation. As pending application at base date, included for 3 dwellings.	Agreed	3	0	0
US507	133-135 Walton Road, East Molesey, KT8 0DT	8	0	8	No applications. No evidence of delivery.	Agreed	0	0	-8

Site ref	Site name	Dwellings within 5 years			WBP comments	Council's Comments	Revised Council figure	Difference between revised Council and WBP	Council's agreed change on LAA (Appendix C)
		Council in LAA	WBP	Difference					
						However, pre-application in 2021 and Site owner has confirmed availability for 1 to 5 years in 2023.			
US509	2 Beauchamp Road, East Molesey, KT8 0PA	9	0	9	Application for 10 flats after demolition of existing house (net 9) (2021/2942. Refused 31/3/22. Appeal lodged 4/1/23 and dismissed 3/7/23. As no pending application, not deliverable.	Agreed	0	0	-9
US529	Garage block west of 14 and north of 15 Brende Gardens, West Molesey	4	2	2	Application for pair of semi (2 dwellings) (2021/0345) validated 25/2/21. Pending. Site draft LP allocation. As pending at base date, this provides evidence of deliverability, although for 2 dwellings.	Agreed	2	0	-2
US168	Garages at Sunnyside, Walton-on-Thames	5	2	3	Application for pair of semi (2 dwellings) (2022/1271. Validated 22/4/22 and pending. Site draft LP allocation. As pending at base date, this provides evidence of deliverability, although for 2 dwellings.	Agreed	2	0	-3
US326	9-21a High Street, Walton-on-Thames	71	61	10	Application for erection of 61 dwellings and class E floorspace (2022/1680) validated 13/7/22. Resolution to grant 13/6/23 Plan Com. Approved 9/2/24. Land at 13-19a High St on brownfield register (ref 69) for 30 dwellings. The pending application at base date and inclusion on brownfield register indicates deliverable for 61, given this is the figure in the permission.	Agreed 2022/1680 granted permission for 61 units, therefore evidence that site is deliverable.	61	0	-10
US339	Walton Park Car Park, Walton Park, KT12 3ET	17	0	17	No applications. No evidence of delivery.	Agreed	0	0	-17
US528	Garages to rear of 84-92 and 94-96 Rodney Road, Walton-on-Thames	4	1	3	An application for 1 dwelling (2020/3450) validated 12/1/21. Pending. Site draft allocation in LP. As pending at base date, this provides evidence of deliverability, although for 1 dwelling.	Agreed	1	0	-3
US550	41 High Street, Walton-on-Thames	5	0	5	No applications. No evidence of delivery.	Agreed	0	0	-5
US395	Weybridge Hospital and car park, 22 Church Street Weybridge KT13 8DW	30	0	30	Site included on brownfield register (ref 144) for 30 dwellings. No application. Whilst NHS support allocation in LP (through rep to Draft Submission Plan) their statement does not provide guarantee of estimate of delivery timeframe, especially as inter-related with enhanced/alternative health care provision. Without clear certainty, especially on timing of replacement healthcare not deliverable	Agreed	0	0	-30
US417	Garages to the rear of Broadwater House Greside Road Weybridge KT13 8PZ	20	2	18	Application for pair of semis (2 dwellings) (2022/0395) validated 20/4/22. Pending. Site draft allocation in LP. As pending at base date, this provides evidence of deliverability, although for 2 dwellings.	Agreed	2	0	-18
US424	Weybridge Bowling Club 19 Springfield Lane Weybridge KT13 8AW	22	0	22	Outline application for 30 dwellings (2022/2598) refused 22/11/22. As no pending application, no evidence of deliverability.	Agreed	0	0	-22
US438	Land rear of Leverton, St Georges Avenue, Weybridge	5	0	5	An application for 17 flats (2021/3654) refused 21/3/22. No subsequent application.	Agreed	0	0	-5
US505	75 Oatlands Drive, Weybridge, KT13 9LN	9	4	5	Site is on brownfield register (ref 108) with capacity for 9 dwellings. An application for two pairs semi (4 dwellings) (2023/1784) was	Agreed	4	0	-5

Site ref	Site name	Dwellings within 5 years			WBP comments	Council's Comments	Revised Council figure	Difference between revised Council and WBP	Council's agreed change on LAA (Appendix C)
		Council in LAA	WBP	Difference					
					received on 26/6/23 and validated on 6/7/23. As application illustrates evidence of deliverability and site is on brownfield register, have included 4 dwellings based upon pending application.				
US527	9 Cricket Way, Weybridge, KT13 9LP	5	5	0	Application for 5 dwellings after demolition of existing (net 4) (2023/2396) was validated 25/8/23 and pending. There was earlier application for 5 houses after partial demolition of existing dwelling (5 dwellings) (2022/2631) which had been validated on 2/9/22 and approved 10/7/23. Site is on brownfield register (ref 139) for 8 dwellings. The pending application for 5 dwellings at base date provides evidence of deliverability.	Agreed	5	0	0
US546	34 Queens Road, Weybridge	7	0	7	An application for 10 flats after demolition of existing house (net 9) (2022/0944) was refused 14/10/22. Appeal lodged 1/6/23 and dismissed 6/9/23. An application for 4 dwellings after demolition of existing (net 3) (2023/0445) valid 7/3/23 and refused 20/7/23. Application for 4 dwellings and demolition of existing (net 3) (2023/2868) valid 18/10/23. Site on brownfield register (ref 40) for 50 dwellings). As all applications submitted to date refused, not deliverable.	Agreed	0	0	-7
US547	Valiant House, 10 Church Street, Weybridge	6	0	6	No applications. No evidence of delivery.	Agreed Pre-application enquiry 2023/0102 for 6 flats. No subsequent application.	0	0	-6
US549	270 Brooklands Road, Weybridge	8	8	0	An application for 9 flats after demolition of existing dwelling (net 8) (2023/0291) was received on 31/1/23 and validated 30/6/23. Application approved 17/1/24.	Agreed	8	0	0
		524	210	314			228	18	- 296

1.17. The Appellants now dispute the delivery of 18 dwellings from Appendix C the Council's revised schedule from LAA sites (within the current five year period). The dispute relates to Sundial House.

Table E: Planning Permissions since April 1st 2023 with a net gain of dwellings

1.18. Table E sets out sites that have been granted planning permission since 1st April 2023 that were not identified in the LAA and consequently the Council considers to be deliverable. Table E does not include sites granted planning permission for 1-4 units to avoid any potential double counting of windfall sites.

1.19. The Appellants dispute the inclusion of all these sites. Their inclusion, without corresponding adjustments to supply (omitting completions in intervening period together with any lapses/expiries or those which have been superseded) skews the housing land supply position.

Planning Permission Reference	Site Name	Council Net Gain of dwellings	WBP Net Gain of dwellings
2023/1791	AC Court Unit 7 7 High Street Thames Ditton KT7 0SR	6	0
2023/2091	103 Ashley Road Walton-On-Thames Surrey KT12 1HL	5	0
2023/0324	Copsem Manor 50 Copsem Lane Esher Surrey KT10 9HJ	13	0
2023/2311	63 Bridge Road East Molesey Surrey KT8 9ER	5	0
2023/1359	Brooklands College, Heath Road, Weybridge, KT13 8TT Considered at Planning Committee meeting on 5 th December and Committee resolved to grant permission subject to Section 106 agreement. S106 is nearly complete and the Council have received a phasing plan detailing that 300 of the 320 units would be complete in years 1-5.	300	0
2023/0491	142 High Street Esher KT10 9QJ	6	0
2023/0714	Building B 205 St Georges Business Park Brooklands Road Weybridge Surrey KT13 0BG	16	0
2023/1382	Ikona Court Weybridge Surrey KT13 0DW	7	0
2022/2746	Members Hill Brooklands Road Weybridge Surrey KT13 0QU Planning permission granted for 205 C2 self contained units under application 2022/2746 on 18/07/2023. Current application to reduce the number of units to 176 under consideration under 2023/3294. Have used the 176 figure and have reduced figure to 119 to take into account the 57 units identified in the LAA for applications 2020/3345 and 2021/2626 to avoid double counting	119	0
2023/3355	AC Court Unit 1 7 High Street Thames Ditton KT7 0SR	12	0
		Total= 489	0

Graham Ritchie

From: Paul Falconer <[REDACTED]>
Sent: 22 February 2024 16:20
To: Steven Brown; Graham Ritchie
Cc: Suzanne Parkes; Bob Shattock; Adam Constantinou; Sarah Pharoah; Jack Trendall
Subject: RE: ELMBRIDGE HLS DATA - CLAYGATE APPEAL

Dear Steven

I have just heard back from our Policy colleagues. Your figures are correct, there is an error in the AMR and LAA.

An amended version of the table used for the AMR's 5YHLS and the new 4YHLS calculation is below.

The planning permissions figure is 1368, not 1,386 so would reduce to 1231 with the 10% non-implementation discount.

We are looking to get an addendum for the AMR and change the LAA 2023 asap.

Updated 5YHLS with buffer calculation -pre NPPF changes.

Column ID	Housing Requirement 1 April 2023- 1 April 2028	Results
A	Local Housing Need (LHN)	650
B	Total LHN - 1 April 2023- 1 April 2028 A*5years	3250
	Buffer	
C	20% Buffer B* 20%	650
D	Total housing requirement B +C	3900
E	Annual requirement D/5	780
	Housing supply	
F	Commencements	966
G	Planning permissions with 10% discount*	1231
H	LAA 1-5	524
	Windfalls in year 5	87
I	Expected supply for 2023-2028 (F+G+H)	2808
J	Expected supply surplus/deficit (I-D)	-1092
K	Supply in years I/E	3.6

4 Year housing Land Supply Calculation post NPPF changes

Column ID	Housing Requirement 1 April 2023- 1 April 2028	Results
A	LHN	650
B	Total LHN - 1 April 2023- 1 April 2028 A*5years	3250
C	Total housing requirement	3250
D	Annual requirement C/5	650
	Housing supply	
E	Commencements	966
F	Planning permissions with 10% discount*	1231
G	LAA 1-5	524
	Windfalls in year 5	87
H	Expected supply for 2022-2027 (E+F+G)	2808
I	Expected supply surplus/deficit (H-C)	-442
J	Supply in years H/D	4.32

Kind regards

Paul

Paul Falconer | Development Manager | Planning and Environmental Health

Elmbridge Borough Council Civic Centre High Street Esher Surrey KT10 9SD



From: Steven Brown <[REDACTED]>

Sent: 22 February 2024 16:09

To: [REDACTED]

Subject: RE: ELMBRIDGE HLS DATA - CLAYGATE APPEAL

Hi Paul

How are you getting on?

We would like to issue the draft HLS SoCG to the LPA on Monday/Tuesday.

We have also prepared a separate Affordable Housing SoCG.

Thanks

Best wishes

Steven Brown BSc Hons DipTP MRTPI

Woolf Bond Planning
The Mitfords
Basingstoke Road
Three Mile Cross
Reading
RG7 1AT

Tel: 01189 884923

Mobile: [REDACTED]



From: Paul Falconer <[REDACTED]>

Sent: Tuesday, February 20, 2024 3:34 PM

To: [REDACTED]

Subject: RE: ELMBRIDGE HLS DATA - CLAYGATE APPEAL

Dear Graham

We'll look into this with colleagues and come back to you asap.

Kind regards

Paul

Paul Falconer | Development Manager | Planning and Environmental Health

[REDACTED]
Elmbridge Borough Council Civic Centre High Street Esher Surrey KT10 9SD



From: Graham Ritchie [REDACTED]

Sent: 20 February 2024 10:23

To: Paul Falconer [REDACTED]

Subject: RE: ELMBRIDGE HLS DATA - CLAYGATE APPEAL

Dear Paul,

I am writing with a query following your email of 9th February supplying us with the links to the Council's April 2023 LAA (below).

The LAA included schedules of sites within each of the various categories of supply sources .

I have reviewed the contents of the schedules and have a specific query regarding the list of "sites with planning permission at 31 March 2023" as detailed in appendix 2 of the LAA. My review of the schedule is attached, and this confirms that the total of all sites with planning permission at 31 March 2023 as listed in appendix 2 of the LAA is 1,386 (see cell I274 in spreadsheet).

However, the Authority Monitoring Report (table 28) indicates that the total of "planning permissions not implemented at 31st March 2023" is 1,556 or 1,400 if a 10% non-implementation discount is applied. Table 29 of the Monitoring Report also references the 1,400 figure as a source within the 5 year land supply assessment from sites with permission.

Table 29: The Council's 5 Year Housing Land Supply

Column ID	Housing Requirement 31 March 2023- 1 April 2027	Result
a	Local Housing Need Figure (LHN)	650
b	LHN x 5 years - 1 April 2023- 1 April 2027	3250
	Buffer	
c	20% Buffer b x 20%	650
d	Total housing requirement b + c	3900
e	Annual requirement d/5	780
	Housing supply	
f	Commencements	966
g	Planning permissions*	1400
h	LAA 1-5	524
i	Windfalls in year 5	87
i	Expected supply for 2023-2027 (f+g+h+i)	2977
j	Expected supply surplus/deficit (i-d)	-923
k	Supply in years i/e	3.81

*A 10% discount has been applied for non-implementation

I have checked the schedules in the LAA (appendices 1 and 3) and the totals of these are consistent with that detailed for the respective source in Table 29 (for sites under construction this is shown in cell J149 of the attached spreadsheet).

Can you please explain what other sites are relied upon by the Council to provide the 1,556 dwellings figure since as set out in the Monitoring Report since the detailed schedule within the LAA only shows a total of 1,386 dwellings (a difference of 170 dwellings)? Alternatively, should the correct figure in the Monitoring Report be 1,386 dwellings with the 10% non-implementation rate then applied. This would then reduce the figure to 1,247.

I look forward to receiving your clarification of this point.

Regards,

Graham Ritchie BSc(Hons) MA MRTPI

Woolf Bond Planning
The Mitfords
Basingstoke Road
Three Mile Cross
Reading
RG7 1AT

Tel: 0118 988 4923

www.woolfbond.co.uk



From: Paul Falconer <[redacted]>

Sent: Friday, February 9, 2024 2:19 PM

To: [redacted]

Subject: RE: ELMBRIDGE HLS DATA - CLAYGATE APPEAL

Hi Steven

Apologies the link has been changed:

<https://www.elmbridge.gov.uk/planning/planning-policy-and-guidance/monitoring-reports>

Kind regards

Paul

Paul Falconer | Development Manager | Planning and Environmental Health

[redacted]

Elmbridge Borough Council Civic Centre High Street Esher Surrey KT10 9SD



From: Paul Falconer

Sent: 09 February 2024 13:58

To: [redacted]

Subject: RE: ELMBRIDGE HLS DATA - CLAYGATE APPEAL

Hi Steven

Sarah and Jack are not working today. Please find attached a link to the updated LAA 2023 with the updated HLS data as requested in case you've not received it already.

<https://www.elmbridge.gov.uk/planning/new-local-plan/new-local-plan-supporting-evidence/housing-supporting-evidence>

Kind regards

Paul

Paul Falconer | Development Manager | Planning and Environmental Health

Elmbridge Borough Council Civic Centre High Street Esher Surrey KT10 9SD



From: Steven Brown [redacted]

Sent: 09 February 2024 08:28

To: Sarah Pharoah <[redacted]>
[redacted]

Subject: RE: ELMBRIDGE HLS DATA - CLAYGATE APPEAL

Importance: High

Morning Sarah

I would be grateful if you could send the HLS data across this morn.

My colleagues and I then need to interrogate the data having regard to the deliverability tests.

Time is tight given the requirement for a SoCG to be submitted by 5th March.

I look forward to hearing from you.

Best wishes

Steven Brown BSc Hons DipTP MRTPI

Woolf Bond Planning
The Mitfords
Basingstoke Road
Three Mile Cross
Reading
RG7 1AT

Tel: 01189 884923



Woolf Bond Plan

From: Steven Brown
Sent: Tuesday, January 30, 2024 4:48 PM
To: Sarah Pharoah [REDACTED]

Subject: RE: ELMBRIDGE HLS DATA - CLAYGATE APPEAL

Thanks Sarah. Much appreciated.

Best wishes

Steven Brown BSc Hons DipTP MRTPI

Woolf Bond Planning
The Mitfords
Basingstoke Road
Three Mile Cross
Reading
RG7 1AT

Tel: 01189 884923

[REDACTED]



Woolf Bond Plan

From: Sarah Pharoah <[REDACTED]>
Sent: Tuesday, January 30, 2024 3:39 PM
To: Steven Brown [REDACTED]

Subject: RE: ELMBRIDGE HLS DATA - CLAYGATE APPEAL

Hi Steve,

We are aiming to publish the LAA on 9th February, all being well with internal sign off.

Many thanks,

Sarah

From: Steven Brown [REDACTED]
Sent: 30 January 2024 07:40
To: Sarah Pharoah <[REDACTED]>

Subject: RE: ELMBRIDGE HLS DATA - CLAYGATE APPEAL

Morning Sarah

I'd welcome a response to my below email please.

We need to programme our review of the LPA's HLS figures once they are made available.

Timescales are getting ever tighter, including as a result of ½ term.

I look forward to hearing from you.

Thanks

Best wishes

Steven Brown BSc Hons DipTP MRTPI

Woolf Bond Planning
The Mitfords
Basingstoke Road
Three Mile Cross
Reading
RG7 1AT

Tel: 01189 884923

[REDACTED]



Woolf Bond Plan

From: Steven Brown

Sent: Friday, January 26, 2024 3:05 PM

To: Sarah Pharoah [REDACTED]

Subject: RE: ELMBRIDGE HLS DATA - CLAYGATE APPEAL

Thanks Sarah.

Is that likely to be the first week of Feb?

I am keen to understand the timescales due to the workload involved in reviewing the data which would then inform a HLS SoCG and evidence on the topic as necessary.

The Inspector is also likely to want to know ahead of the CMC.

I look forward to hearing from you.

Thanks again.

Best wishes

Steven Brown BSc Hons DipTP MRTPI

Woolf Bond Planning
The Mitfords
Basingstoke Road
Three Mile Cross
Reading
RG7 1AT

Tel: 01189 884923

[REDACTED]



Woolf Bond Plan

From: Sarah Pharoah <[REDACTED]>
Sent: Friday, January 26, 2024 1:51 PM
To: Steven Brown [REDACTED]
Subject: RE: ELMBRIDGE HLS DATA - CLAYGATE APPEAL

Hi Steven,

We are just going through internal processes for the publication of this document. We anticipate it will be published in early February. I can you let you know when it is published on our website.

Many thanks,

Sarah

From: Steven Brown <[REDACTED]>
Sent: 24 January 2024 09:56
To: Jack Trendall <[REDACTED]>
Subject: RE: ELMBRIDGE HLS DATA - CLAYGATE APPEAL

Again, thanks. I look forward to hearing from Sarah.

Best wishes

Steven Brown BSc Hons DipTP MRTPI

Woolf Bond Planning
The Mitfords
Basingstoke Road
Three Mile Cross
Reading
RG7 1AT

Tel: 01189 884923

[REDACTED]



Woolf Bond Plan

From: Jack Trendall <[REDACTED]>

Sent: Wednesday, January 24, 2024 9:55 AM

To: Steven Brown <[REDACTED]>

Subject: RE: ELMBRIDGE HLS DATA - CLAYGATE APPEAL

Hi Steven,

I have asked Sarah Pharoah to respond on this matter.

Regards,

Jack Trendall | Principal Planning Officer | East Team

[REDACTED] | elmbridge.gov.uk

Elmbridge Borough Council, Civic Centre, High Street, Esher, Surrey, KT10 9SD



From: Steven Brown <[REDACTED]>

Sent: 24 January 2024 08:33

To: Jack Trendall <[REDACTED]>

Subject: RE: ELMBRIDGE HLS DATA - CLAYGATE APPEAL

Morning Jack

Another request for an update, this time about the HLS data.

When will the LPA be able to provide the requested information (see my below requests)?

I look forward to hearing from you.

Best wishes

Steven Brown BSc Hons DipTP MRTPI

Woolf Bond Planning
The Mitfords
Basingstoke Road
Three Mile Cross

Reading
RG7 1AT

Tel: 01189 884923



Woolf Bond Plan

From: Steven Brown
Sent: Friday, January 19, 2024 4:07 PM
To: Jack Trendall <[redacted]>

[redacted]

Subject: RE: ELMBRIDGE HLS DATA - CLAYGATE APPEAL

Afternoon All.

Grateful if you could get back me on my below request for HLS data (Helen to note).

I look forward to hearing from you.

Thanks and have a good weekend.

Best wishes

Steven Brown BSc Hons DipTP MRTPI

Woolf Bond Planning
The Mitfords
Basingstoke Road
Three Mile Cross
Reading
RG7 1AT

Tel: 01189 884923



Woolf Bond Plan

From: Steven Brown
Sent: Wednesday, January 17, 2024 10:02 AM
To: Jack Trendall <[redacted]>

[redacted]

Subject: RE: ELMBRIDGE HLS DATA - CLAYGATE APPEAL

Morning All

Grateful if you could let me have an indication as to when the HLS inf will be made available.

I look forward to hearing from you.

Thank you.

Best wishes

Steven Brown BSc Hons DipTP MRTPI

Woolf Bond Planning
The Mitfords
Basingstoke Road
Three Mile Cross
Reading
RG7 1AT

Tel: 01189 884923



From: Steven Brown

Sent: Tuesday, January 16, 2024 10:51 AM

To: Jack Trendall <

Subject: ELMBRIDGE HLS DATA - CLAYGATE APPEAL

Morning All

I would be grateful if you could send me the annualised schedules for all of the sites relied upon for your housing land supply assessment. Tables 28 and 29 of the attached AMR refer.

The LPA will have annualised trajectories broken down by site e.g. 2023/24, 2024/25, 2025/26, 2026/27 etc. However, they have not been published with the AMR.

The LPA's Response to the Local Plan Inspector's Initial Letter (attached) states as follows:

"The most up to date trajectory and the LAA evidence that informs this is anticipated for publication in January 2024. The trajectory will be extended to reflect a 16-year period so that it covers a 15-year time frame from the date of adoption which is anticipated for 2024."

I would be grateful if you could let me know when the information will be available.

Thanks

Best wishes

Steven Brown BSc Hons DipTP MRTPI

Woolf Bond Planning
The Mitfords
Basingstoke Road

Three Mile Cross
Reading
RG7 1AT

Tel: 01189 884923



Woolf Bond Plan

IMPORTANT: This e-mail (including any attachments) is intended only for the recipient(s) named above. It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person. If you are not a named recipient please contact the sender and delete this e-mail from your system.

Cybercrime Alert: Please be aware that we will not notify you of any changes to important information, such as and specifically bank account details, by email. If you receive any email suggesting there has been such a change, please talk to us by telephone as soon as you can.

Click [here](#) to report this email as spam.

IMPORTANT: This e-mail (including any attachments) is intended only for the recipient(s) named above. It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person. If you are not a named recipient please contact the sender and delete this e-mail from your system.

Cybercrime Alert: Please be aware that we will not notify you of any changes to important information, such as and specifically bank account details, by email. If you receive any email suggesting there has been such a change, please talk to us by telephone as soon as you can.

IMPORTANT: This e-mail (including any attachments) is intended only for the recipient(s) named above. It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person. If you are not a named recipient please contact the sender and delete this e-mail from your system.

Cybercrime Alert: Please be aware that we will not notify you of any changes to important information, such as and specifically bank account details, by email. If you receive any email suggesting there has been such a change, please talk to us by telephone as soon as you can.

IMPORTANT: This e-mail (including any attachments) is intended only for the recipient(s) named above. It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person. If you are not a named recipient please contact the sender and delete this e-mail from your system.

Cybercrime Alert: Please be aware that we will not notify you of any changes to important information, such as and specifically bank account details, by email. If you receive any email suggesting there has been such a change, please talk to us by telephone as soon as you can.

IMPORTANT: This e-mail (including any attachments) is intended only for the recipient(s) named above. It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person. If you are not a named recipient please contact the sender and delete this e-mail from your system.

Cybercrime Alert: Please be aware that we will not notify you of any changes to important information, such as and specifically bank account details, by email. If you receive any email suggesting there has been such a change, please talk to us by telephone as soon as you can.

IMPORTANT: This e-mail (including any attachments) is intended only for the recipient(s) named above. It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person. If you are not a named recipient please contact the sender and delete this e-mail from your system.

Cybercrime Alert: Please be aware that we will not notify you of any changes to important information, such as and specifically bank account details, by email. If you receive any email suggesting there has been such a change, please talk to us by telephone as soon as you can.

Steven Brown

From: Paul Falconer <[REDACTED]>
Sent: 19 March 2024 09:10
To: Steven Brown
Cc: Jack Trendall
Subject: RE: Raleigh Drive - Housing Land Supply

Hi Steven

Apologies, there was an error in the table, I had made a deduction from the permissions since 1st April 2023 which wasn't necessary. The Permissions since 1st April 2023 should have been 396, therefore 4.14 years.

	Council	Appellant
Requirement		
Annual housing requirement	650	650
4 year housing requirement (A x 4 years)	2,600	2,600
Supply		
Sites under construction (LAA Appendix 1, Table B)	845	845
Sites with planning permission (LAA Appendix 2, Table C)	1263	1263
Sites with planning permission with 10% discount	1137	1137
LAA Sites for delivery in years 1-5 (LLA Appendix 3, Table D)	228	210
Windfalls	87	87
4 YHLS at 1 st April 2023	2,297	2,221
Supply in years	3.53 years	3.42 years
Undersupply against 4 year housing requirement and buffer	-303	-379
Permissions and resolution to grant since 1 st April 2023 not included in LAA	396	n/a
Deliverable supply including permissions since 1 st April 2023	4.14 years	n/a

Kind regards

Paul

Paul Falconer | Development Manager | Planning and Environmental Health

[REDACTED]
 Elmbridge Borough Council Civic Centre High Street Esher Surrey KT10 9SD



From: Steven Brown [REDACTED]
Sent: Tuesday, March 19, 2024 8:02 AM
To: Paul Falconer [REDACTED]
Subject: RE: Raleigh Drive - Housing Land Supply

Morning Paul

OK. Thanks.

I will have to amend my evidence to address the Council's revised position.

We can agree a supplementary HLS SoCG post the exchange of evidence.

Best wishes

Steven Brown BSc Hons DipTP MRTPI

Woolf Bond Planning Ltd
The Mitfords
Basingstoke Road
Three Mile Cross
Reading
RG7 1AT

Tel: 01189 884923

[REDACTED]



From: Paul Falconer <[REDACTED]>
Sent: Monday, March 18, 2024 5:20 PM
To: Steven Brown [REDACTED]
Subject: Raleigh Drive - Housing Land Supply

Dear Steven

Apologies for the late notice but having reviewed the data further, the Council will be conceding on some of the other sites in dispute and will be suggesting an addendum to the Statement of Common Ground on Housing Land Supply.

SOCG Table B: Sites under construction

Removal of:

- The Quintet, Churchfield Road, Walton on Thames
- 290 Walton Road, West Molesey
- 77 Queens Road, Weybridge
- St George's House, 24 Queens Road, Weybridge
- 162 Portsmouth Road, Thames Ditton

- . Rear ground office suite, 1 Wolsey Road, East Molesey

This results in the following summary of supply:

	Council	Appellant
Requirement		
Annual housing requirement	650	650
4 year housing requirement (A x 4 years)	2,600	2,600
Supply		
Sites under construction (LAA Appendix 1, Table B)	845	845
Sites with planning permission (LAA Appendix 2, Table C)	1263	1263
Sites with planning permission with 10% discount	1137	1137
LAA Sites for delivery in years 1-5 (LLA Appendix 3, Table D)	228	210
Windfalls	87	87
4 YHLS at 1 st April 2023	2,297	2,221
Supply in years	3.53 years	3.42 years
Undersupply against 4 year housing requirement and buffer	-303	-379
Permissions and resolution to grant since 1 st April 2023 not included in LAA	299	n/a
Deliverable supply including permissions since 1 st April 2023	3.99 years	n/a

Kind regards

Paul

Paul Falconer | Development Manager | Planning and Environmental Health

Elmbridge Borough Council Civic Centre High Street Esher Surrey KT10 9SD



IMPORTANT: This e-mail (including any attachments) is intended only for the recipient(s) named above. It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person. If you are not a named recipient please contact the sender and delete this e-mail from your system.

Cybercrime Alert: Please be aware that we will not notify you of any changes to important information, such as and specifically bank account details, by email. If you receive any email suggesting there has been such a change, please talk to us by telephone as soon as you can.

Click [here](#) to report this email as spam.

**TOWN AND COUNTRY PLANNING ACT 1990
SECTION 78 (AS AMENDED)**

**LAND NORTH OF RALEIGH DRIVE,
CLAYGATE**

**Appeal against the decision of Elmbridge
Borough Council to refuse outline planning
permission for:**

**Construction of up to 60 dwellings with
associated landscaping and open space with
access from Raleigh Drive (Outline
Application with Appearance, Landscaping,
Layout and Scale reserved).**

**PROOF OF EVIDENCE RELATING TO TOWN
PLANNING MATTERS**

Prepared By:

Steven Brown BSc Hons DipTP MRTPI

For:

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

LPA REF: 2023/0962

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

MARCH 2024



Woolf Bond Planning
Chartered Town Planning Consultants

-
- 4.72. As to landscape considerations, the site is not located within any formal designations and is not a valued landscape (agreed at paragraph 3(e) of the Executive Summary to the Planning SoCG). Accordingly, paragraph 180(a) of the NPPF is not a constraint to development in this case.
- 4.73. Paragraph 180(e) requires planning decisions to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of pollution. No noise or other pollution issues have been identified as being of relevance in the determination of the Appeal.
- 4.74. As Mr Rose demonstrates in his statement (**SB1**), although the statutory requirement for biodiversity net gain does not apply to the Appeal Scheme, it will nonetheless secure net gains of over 10%. Indeed, to satisfy the Biodiversity Metric's trading rules, the gains will in fact be far higher than 10%. Although illustrative at this stage, the Scheme can secure +33.76% for hedgerow units and +86.72% for river units on-site, and although there will be on-site losses in habitat units, off-site mitigation at a site in West Clandon, Surrey (in the same National Character Area as the Appeal Site) can secure an overall gain in habitat units of 45.41%.
- 4.75. As per paragraph 4.21 of the Planning SoCG (**CDD.1**), as long as acceptable mitigation for off-site biodiversity net gain is secured through a Grampian condition / S106, the Council agrees that the Appeal Scheme is acceptable in ecology terms. The parties are working towards agreeing a Section 106 Agreement that will secure the biodiversity net gain.

The Regulation 19 Consultation Draft Local Plan

General

- 4.76. Paragraphs 5.17 to 5.20 of the Planning SoCG record the position in relation to the Regulation 19 consultation draft Local Plan which was submitted to the Secretary of State for examination on the 10th August 2023 (**CDE.16**).

-
- 4.77. The draft Local Plan does not meet the full identified housing needs in the Borough across the plan period and does not redraw the settlement and Green Belt boundaries to accommodate the future housing requirement needed in the Borough.
- 4.78. Based upon the housing requirement derived from the standard method ("SM"), paragraph 3.19 of the draft Local Plan calculates a minimum housing requirement of 9,705 homes (647 dpa) across the plan period. However, policy SS3 of the draft Local Plan only plans for at least 6,785 dwellings in the period 2021 to 2037, equating to a minimum of 424 dwellings per annum, an under provision of 30% (2,920 dwellings less than required by the SM (9,705-6,785)).
- 4.79. Taking the figures above, it is clear that housing need can only be met through development on Green Belt sites. Importantly, the extent of the housing need is so large it cannot be met through the reuse of urban land alone.
- 4.80. Given the constrained nature of Elmbridge, which comprises 57% Green Belt, and a further 10% open space, it is surprising that the draft Local Plan does not cite exceptional circumstances to justify the release of land from the Green Belt for housing. Indeed, the Council's decision that exceptional circumstances do not exist is contrary to the advice of its officers (see the *Exceptional Circumstances Case: Green Belt* paper dated January 2022 – but published by the Council in the Examination Documents section of its Local Plan Examination webpages on 10th November 2023 (OTH043) (**CDE.52**)).
- 4.81. Section 4 of **CDE.52** provides an overview of the potential development options that have evolved during the preparation of the Local Plan. Paragraph 5.1 summarises the options as relating to the following:
- Option 4a – optimisation
 - Option 5a – optimisation and small-scale Green Belt release
 - Option 6 – optimisation and intensification in more sustainable locations
- 4.82. Paragraph 5.2 explains that Option 5a includes an element of small-scale Green Belt release. It is added that exceptional circumstances need to exist for this option to form the basis of the preferred spatial strategy.

- 4.83. The remainder of the Paper considers the justification for Green Belt releases in this context.
- 4.84. As section 5 of the paper records, the 12 sites proposed to be released from the Green Belt in helping to meet identified housing needs (including the Appeal Site), could provide 50% of the total affordable housing provision across the 15 year plan period. The stark reality is, absent these site releases, the affordable housing need will simply not be addressed.
- 4.85. In selecting sites to be allocated for housing, paragraph 6.60 refers to the LPA's assessment of site accessibility in relation to facilities and services and/or public transport nodes (bus service and railway station). This paragraph refers to the Green Belt areas proposed to be allocated for housing, with Table 5 summarising their accessibility score. Of the 15 Green Belt sites included in the table, the Appeal Site is one of five sites with an overall score of "good". The remaining sites had an overall score of "fair".
- 4.86. Paragraph 6.79 identifies that the allocation of Green Belt sites would allow for a mix of housing to be delivered, and most importantly, the affordable housing needed (the need for larger units as opposed to flatted developments providing 1 & 2 bedroom units).
- 4.87. Paragraph 8.7 states that the supply of potential development sites in the existing urban area is limited.
- 4.88. Paragraph 8.9 identifies that the option relying upon intensification of built up areas to meet needs (option 6) will not deliver the type of homes required e.g. 3 and 4 bedroom affordable homes, which is said to be a significant issue for the Borough, and a priority for the Council.
- 4.89. Paragraph 8.10 summarises the LPA's consideration of the *Calverton* case in reviewing the justification for Green Belt releases.
- 4.90. Paragraph 8.11 concludes that exceptional circumstances can be "fully evidenced and justified."
- 4.91. Paragraphs 8.12 and 8.13 state in full as follows:

“In assessing Option 5a (optimisation and small scale Green Belt release) officers also consider a merit of this approach, to be providing a balance between meeting our development need, with the need to ensure that the overall integrity of the wider-strategic Green Belt is maintained. Overall, officers consider that the benefits of releasing land from the Green Belt outweigh the harm.

In considering the requirements of the NPPF, officers have sought to identify for potential allocation / development, those Green Belt areas which are accessible and / or contain previously developed land. In addition, the officers have looked at and considered carefully how each Green Belt site could build on the success of our existing communities and places, taking into account their identities and their ability to accommodate new growth.”

4.92. Appendix A comprises a schedule of “Sites to be removed from the Green Belt and allocated for development”. It includes the proposed allocation of the Appeal Site under Site Ref SA-59. I include the relevant extract below:

Local / Sub-Area Ref. & Status	Site	Settlement Area	GB Purpose 1 Score	GB Purpose 2 Score	GB Purpose 3 Score	Overall Score (Local Areas only)	Categorisation (Sub-Areas only)	Other comments (Sub-Areas only)
SA-59 (allocate)	Land east of Claygate House	Claygate	Fails	Weak	Very Weak	N/A	Meets Purpose assessment criteria weakly, and makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration	Recommended that SA-59 is considered further for release in its entirety.

4.93. The Council’s assessment concludes that the Appeal Site performs weakly in Green Belt terms and is recommended to be considered further for release in its entirety (allocated). I agree with this assessment.

4.94. Given the Council’s failure to adopt the advice of their officers (relating to the need for Green Belt releases to help meet the identified need for housing, in a scenario where exceptional circumstances have been demonstrated to exist), the persistence in pursuing a substantially reduced housing requirement in the emerging Local Plan means that the draft Local Plan only provides for approximately 70% of the 9,705 dwellings the standard method has identified the Borough Needs. This means approximately 30% of the housing requirement goes unmet.

- 4.95. That statistic provides the clearest possible demonstration that EBC has no prospect of seriously addressing current and future housing needs in the short, medium, or long-term, save by releasing Green Belt sites.
- 4.96. Policy SS3 of the emerging Local Plan identifies Claygate as a location capable of facilitating “good growth”, reaffirming the settlement’s sustainability credentials.
- 4.97. Policy SS3 anticipates the growth of Claygate for up to 320 dwellings. However, as evidenced by page 94 of the draft Local Plan, provision is only made for 64 dwellings through site allocations.
- 4.98. The evidence base to the draft Local Plan includes a number of technical reports, including, but not limited to a Green Belt Review, the LAA assessment and a Settlement Assessment. I summarise the content of the documents below.

Elmbridge Settlement Assessment

- 4.99. This Technical Study (**CDE.56**) identifies that Claygate is well serviced by public transport (paragraph 4.262) and offers excellent educational opportunities (paragraph 4.270). It also acknowledges the chronic issue of housing affordability in Claygate, stating:

“Average rents are also significantly beyond the reach of those employed in the area. This clearly highlights the issues of affordability in the housing market in the settlement.

The situation is not helped by the lack of affordable housing being in the settlement. For Claygate, this is largely due to the small sites that become available in the area. The rate of affordability and sustainability is an issue that faces the housing market in Claygate.”

- 4.100. This assessment supports my view that Claygate is an eminently sustainable location for housing that is suffering from ever increasing property prices due

to the current settlement policy boundaries being incapable of meeting housing requirements.

Green Belt Review

- 4.101. As identified in the evidence base to the Local Plan, the Appeal Site is well related to the urban area and is well contained from the wider Green Belt, which conclusion is supported by the Council's assessment of the site as set out in Appendix A of the Council's Green Belt Review (December 2018).
- 4.102. Sub-area SA-59 (which includes the Green Belt area of the Site) was assessed on pages 46-50 of the Council's Annex 1C Report (**CDE.40**) which sensibly assessed the site as a sub-area of wider site 45. This responded to the Appellants' submissions as part of the earlier issues and options consultation in 2017 where they specifically made the submission to the Council that the Site performed a completely separate function to the wider area 45.
- 4.103. Page 47 of the Council's 1C Report assessed SA-59 against Green Belt purposes 1-3. Page 48 then assessed wider impact as follows:

“Local Area 45 was identified as performing strongly against Purpose 2, preventing the merging of Claygate, Esher and Greater London (Hinchley Wood). It was noted that the gap is particularly narrow here. Local Area 45 also performs moderately against Purposes 1 and 3. The sub-area is not at the edge of the large built-up area of Greater London, neither physically nor perceptually, thus plays no role in relation to Purpose 1. Additionally, in the context of the wider Local Area, it plays a lesser role against Purposes 2 and 3 as a result of its small scale, semi-urban character and relative self-containment and separation from the wider Green Belt to the north.

SA-59 is adjacent to SA-60 to the north, both of which are part of Local Area 45. As a result of the strong separation between these sub-areas, both physically and visually, as well as the configuration of surrounding development (which wraps around SA-59 to the east, south and west), it is judged that the removal of SA-59 is unlikely to impact upon the performance of surrounding sub-areas. SA-60 to the north, as well as the wider Local Area, would continue to perform strongly against Purpose 2, maintaining separation between Claygate and Esher, and Greater London (Hinchley Wood).

Overall, SA-59 plays a lesser role in the context of the wider Green Belt and, as a result of its self-containment and severance from the Green Belt further north, would not affect the performance of surrounding Green Belt sub-areas or the wider Local Area.”

4.104. It added in relation to the consideration of Green Belt boundaries as follows:

“The northern boundary of the sub-area comprises a well - established tree belt / hedgerow, which could feasibly be subject to further strengthening to provide greater visual buffering from the Green Belt to the north.

The existing Green Belt boundary is of similar strength to the south and east, aligned with the backs of residential gardens, but is poorly defined to the west, cutting across hard-standing and through existing structures. The subarea would therefore result in the designation of a stronger and more readily recognisable boundary for the Green Belt.”

4.105. The final step in the assessment (step 5) concluded in relation to SA-59 as follows:

“Meets Purpose assessment criteria weakly, and makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.”

4.106. In addition to the above, and as confirmed in the Council’s Green Belt Boundary Review Accessibility Assessment (June 2019) (**CDE.42**), SA-59 was assessed as having ‘good’ overall accessibility. As such, it is one of the best performing Green Belt sites in sustainability terms. This lends support for the proposed development of the Site for 60 dwellings.

4.107. SA-59 was also assessed in the Council’s subsequent Green Belt Boundary Review 2019 – Assessment of Previously Developed Land (**CDE.57**).

4.108. The Site is subsequently identified (together with land to its immediate west) within the Council’s Green Belt Review 2019 – Minor Boundary Amendments (**CDE.43**), to be removed from the Green Belt, with page 86 of the Council’s study stating:

“The Green Belt does not follow a logical or recognisable feature along the western boundary (cutting through a car park, part of the building etc.). It is recommended that it is

relocated to remove the entirety of the curtilage of Claygate House, with the boundary running along the tree belt at its northern edge.”

- 4.109. The Council’s findings make it clear that the Site does not perform an important Green Belt function. This is a material consideration of particular significance in support of the development of the Site for up to 60 dwellings as proposed through this Appeal.
- 4.110. Notwithstanding the evidence base, the Council decided not to make any changes to the Green Belt boundary under the emerging Local Plan. As a consequence, the Appeal Site remains in the Green Belt and countryside in the submission version of the emerging Local Plan and is not allocated for development.
- 4.111. On 10th November 2023, the Council uploaded various additional Green Belt documents onto the emerging Local Plan Examination website (documents OTH039 to OTH043 – **CDE.48** to **CDE.53**).
- 4.112. Document OTH040 (**CDE.49**) is dated 2021 and provides Green Belt Assessment Proformas for a range of sites including the Appeal Site (Site Ref:SA-59) (pages 72-77 refer).
- 4.113. The assessment of green belt performance and integrity for SA-59 was set out on page 75 as follows:

“The sub-area plays a lesser role in the context of the wider Green Belt and, as a result of its self-containment and severance from the Green Belt further north, would not affect the performance of surrounding Green Belt sub-areas or the wider Local Area. Sub-area would result in a stronger and more readily recognisable boundary for the Green Belt. Meets purpose assessment criteria weakly and makes a less important contribution to the wider strategic Green Belt.”

- 4.114. The LPA’s assessment of the Site under the sub-heading ‘Sustainability Appraisal quantitative assessment of the development potential’ states, among other things:

“The land parcel has the capacity to considerably contribute to meeting the housing and affordable need.”

4.115. Consistent with the earlier Green Belt evidence base, the overall conclusion for SA-59 (on page 77) includes the following:

“the sub-area meets purpose assessment weakly and makes a less important contribution to the wider strategic Green Belt. Sub-area’s release would result in a string and more readily recognisable boundary for the Green Belt.”

“the land parcel could be considered for a release from the Green Belt designation”.

4.116. Document OTH042 (**CDE.51**) is entitled “Exceptional Circumstances: Green Belt” and is dated January 2022. The document, which I address in detail at paragraphs 4.80 to 4.95 above, provides a detailed justification for the view of Council officers (applying relevant policy, guidance and case law) that exceptional circumstances existed to make Green Belt releases including of SA-59. Although the Council has subsequently decided that exceptional circumstances do not exist (see paragraph 3.31 of the submission draft emerging Local Plan (**CDE.16**)) it has provided no update to document OTH042 to justify its changed position.

4.117. Document OTH041 is dated “2022 (Updated 2023)” (**CDE.50**) but as far as the Appellants are aware was not published prior to 10th November 2023, and so was not available for comment as part of the Regulation 19 consultation.

4.118. The document is entitled “Green Belt Site Assessment Proformas – Sites no longer considered suitable for release”. Among other things, it provides an updated Proforma for SA-59. The assessment of the site (at pages 89-95) is strikingly different from the Council’s previous assessments (including the assessment in OTH040 (**CDE.49**), concluding as follows:

“The sustainability appraisal of the development potential of the land parcel identifies positive impacts associated with the housing, accessibility, economic growth, water, the use of low grade quality soils and pollution objectives. However, it would also result in negative outcomes associated with the flooding and biodiversity objectives.

The land parcel sits within and contributes to a strategically important arc of Green Belt that can be traced from Heathrow Airport through to Epsom, providing a narrow

break between Outer London and several Surrey towns (including Esher, Hersham, Claygate and Walton-on-Thames within Elmbridge), and preventing further coalescence between the Greater London built-up area and settlements in the Borough and the wider Surrey area. This strategic area of Green Belt is identified in the Council's Green Belt Boundary Review, 2016 (GBBR) as 'Strategic Green Belt Area A'. The GBBR states that this area of Green Belt performs very strongly against purpose 1 and 2 of the Green Belt – checking unrestricted urban sprawl of large built-up areas and preventing neighbouring towns merging into one another.

At the Borough level, the sub area (SA-59) sits within Local Area 45 (LA-45), which also performs strongly against Purpose assessment criteria. The local area is connected to the large built-up area of Greater London along its eastern edge and prevents its sprawl into open land. LA-45 forms much of the essential gap between the non-Green Belt settlements of Hinchley Wood (Greater London), Claygate and Esher, preventing development that would significantly reduce the actual distance between the settlements. The gap is particularly narrow here and any development is likely to result in coalescence. In addition, despite a relatively urban context, only 3% of the LA-45 is covered by built development and the land parcel remains largely open, consisting of open fields and pony paddocks. And a golf course to the south. Development is restricted to a small number of farm buildings and facilities for the rugby club.

Whilst the sub-area itself is not free from development and its level of openness has been reduced, only 19% (approximately) of the sub-area is covered by built form (e.g. open car park). Development of the land parcel would therefore have a level of impact on the countryside. In addition, the LSA 2023 notes that the landscape of SA-59 has a medium to low sensitivity to change and that development would inevitably have a direct effect on the countryside and narrow the gap between settlements.

It is the Council's position that, on the whole, the Ove Arup assessment in regard to the Green Belt sites undervalues their 'performance' against the purposes of Green Belt as well as ensuring the fundamental aim of Green Belt in preventing urban sprawl by keeping land permanently open. In addition, the Council considers that, all of the sites, either via Ove Arup's assessment or the Council's own, performs some degree (weakly, moderately, strongly) of function when considered against the purposes of Green Belt. It is the Council's view that whilst some areas are considered to perform 'weakly' in the Ove Arup assessment in regard to the purposes of the Green Belt, they still perform some function. Neither the GBBR 2016 or 2018, identified any part

of the Green Belt as no longer performing against the purposes overall.

In conclusion, the land parcel is not considered suitable for a release from the Green Belt designation.”

- 4.119. As can be seen, therefore, the Council has had a recent volte-face in its consideration of SA-59.
- 4.120. The Council’s new position is without reasonable justification and is in stark contrast to the position recorded at paragraph 4.102 above (namely the Council’s new assessment fails to recognise that SA-59 performs a completely separate function to the wider area 45).
- 4.121. The Council is now contending, contrary to its previous position, that the site is not suitable for a release from the Green Belt designation. I strongly disagree with that conclusion. As Mr Self demonstrates in his Proof, the Appeal Site is an eminently suitable candidate for Green Belt release.

Land Availability Assessments

- 4.122. Land Availability Assessments were produced in 2021 (**CDE.23**), 2022 (**CDE.24**) and 2023 (**CDE.14**).
- 4.123. Whilst the Appeal Site is not assessed in the LAAs, despite the Site being submitted as part of the Council’s call for sites to inform the emerging plan, both reports conclude that current housing needs cannot be met solely within the urban area.
- 4.124. Whilst not submitted as part of the evidence base for the draft Local Plan, the Council’s 2023 LAA (**CDE.14**) also reaches the same conclusion, stating:

“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.”

- 4.125. It is clear from the three continuous LAAs that the housing requirement of Elmbridge cannot be met within the urban area.

Other Matters Concerning the Emerging Local Plan

- 4.126. As noted above, the Submission Local Plan does not plan for the full Local Housing Need derived from the application of the Standard Method.
- 4.127. The Appellants objected to this approach in their Regulation 19 representations.
- 4.128. This is a matter that has been raised in the Local Plan Inspector's Letter of 14th September 2023 (**CDE.45**, with paragraph 10 stating as follows:

“The evidence base sets out that utilising 2022 as the base date, the standard method indicates a requirement for 9,705 dwellings to be delivered to 2037. This would equate to 647 dwellings per annum (dpa). The Council’s preferred strategy (termed option 4a within the Sustainability Appraisal) is to deliver 6,785 dwellings across the Plan period, at 452dpa, this represents a shortfall of some 2,918 dwellings¹. This would provide only 70% of the identified housing need for the borough across the Plan period. From my initial review of the evidence submitted, a fundamental issue for the examination will be whether this approach is a sound one, namely whether it has been positively prepared, is justified and is consistent with national policy.” (My emphasis underlined)

- 4.129. The Inspector's letter (at paragraph 8) also raises concerns about the plan period, "strongly" suggesting the Council consider extending it from 2037 to 2039 in order to look ahead over a minimum 15 year period from adoption. This would add a further two years' worth of housing requirement to the overall requirement figure. In its response letter of 10th November 2023 (**CDE.47**), the Council has indicated that it does not wish to extend the plan period, notwithstanding the Inspector's "strong suggestion".
- 4.130. Paragraph 11 of the Inspector's letter of 14th September 2023 (**CDE.45**) refers to the Plan's acknowledgement that the Borough is one of the most expensive places to live in the country, with too many young people and families moving

¹ A footnote here states "I note the main modifications put forward seeking to reduce this figure by a further 105 units as there are sites which the Council now consider to be not deliverable".

out of the Borough in order to have a realistic prospect of owning or renting their own home, as well as older residents struggling to downsize.

- 4.131. Paragraph 12 of the Local Plan Inspector's letter refers to affordable housing need being in the region of 269dpa, with the evidence submitted identifying that affordable housing delivery to 2018 has only averaged 64dpa.
- 4.132. As can be seen, the Local Plan Inspector has raised fundamental concerns relating to the soundness of the emerging Local Plan, which concerns are to be explored in a staged process. This will have serious implications for the ability to progress expeditiously with adoption of the emerging Local Plan.

Summary

- 4.133. What is clear is that the Local Plan is not expected to be adopted any time soon. In the interim, the existing policies for the supply of housing are out of date and the Council is not able to demonstrate a four year supply of deliverable housing land.
- 4.134. In the circumstances, I am of the view that the Regulation 19 draft Local Plan and the accompanying evidence base (in particular to include the judgments and reasoning of Council officers and Council instructed consultants as to the suitability of the Appeal Site, and as to the Council's dire predicament in seeking to meet identified housing needs) are material considerations in the determination of the Appeal. However, as is common ground, the emerging Local Plan itself commands only limited weight (paragraph 5.20 of the Planning SoCG).
- 4.135. In my opinion, any strategy in Elmbridge which aims to meet housing need must inevitably require Green Belt releases. For a Borough covered by 54% Green Belt – essentially everything outside existing settlement policy boundaries – that is no more than stating the obvious.

Five Year Housing Land Supply Statement

7.0. GREEN BELT CONSIDERATIONS

General

- 7.1. This section of my evidence considers the impact of the Appeal Scheme upon the Green Belt. My findings are supported by the evidence of Mr Self.
- 7.2. As I have identified, I accept the Appeal Scheme (as “inappropriate development”) is by definition harmful to the Green Belt and should only be allowed in very special circumstances (NPPF, paragraph 152 refers).
- 7.3. In this section I analyse the impact of the scheme in Green Belt terms. I apply the very special circumstances test in my planning balance in section 9 below.

Addressing Reason for Refusal (1)

- 7.4. The alleged conflict with the Green Belt policies can be further broken down into the following main issues:
- (i) Whether or not the proposed development would represent inappropriate development in the Green Belt;
 - (ii) The effect of the proposal on the openness of the Green Belt;
 - (iii) The effect of the proposal on the purposes of including land in the Green Belt; and
 - (iv) Whether the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations so as to amount to the very special circumstances necessary to justify the development.
- 7.5. I consider the Appeal Scheme in the context of points (i) to (iii) below. I address point (iv) in sections 8 and 9 below.

(i) Whether or not the proposed development would represent inappropriate development in the Green Belt

- 7.6. Except for the limited number of exceptions set out at paragraphs 154 and 155 of the NPPF, development within the Green Belt is to be regarded as inappropriate.

7.7. The proposed development does not fit into any of the exceptions listed in the aforementioned paragraphs. As such, I conclude **the Appeal Scheme would represent inappropriate development in the Green Belt**. In accordance with paragraph 153 of the NPPF I attach substantial weight to that harm.

7.8. However, it is an “in-principle” harm established as a matter of policy which applies to all inappropriate developments in the Green Belt regardless of their specific circumstances.

7.9. I now look at the circumstances of the Appeal Site to assess the overall Green Belt harm.

(ii) The effect of the Appeal Scheme upon the openness of the Green Belt

7.10. This matter is addressed in Mr Self’s evidence and he concludes as follows:

1. The Site is visually very well contained being surrounded by neighbouring development and boundary vegetation (which will be further strengthened) with very few opportunities for views into the site from the surrounding area.
2. The Site has a strong relationship to Claygate with housing along Rythe Road and Raleigh Drive adjoining the eastern and southern site boundaries respectively and the apartments at Esher Park contain the western boundary, all are within the settlement policy boundary of Claygate. It is only the vegetated northern boundary (which is to be retained and enhanced) that backs onto the neighbouring countryside.
3. Development of the Site will inevitably change its character from that of a grass field to that of residential development with generous areas of open space. Given the Site’s physical and visual containment and the scale and density of the Appeal Scheme, the Site is considered to be capable of accommodating a residential development in a manner causing strictly limited and localised harm to the wider landscape.
4. The new housing on the Site will read as a logical continuation of Claygate, following the existing pattern of development in a manner compatible with the scale and nature of development in the village. Retention of the Site’s boundary vegetation will be further augmented by new planting, which will further assimilate the proposals into their surroundings.
5. Public views of the Appeal Scheme will be possible from near distance vistas at Esher Park Gardens, Raleigh Drive and Rythe Road. Where there are such views the view will be heavily filtered by boundary vegetation and

surrounding development. It will therefore complement the existing pattern of development in this part of the settlement and be at a similar scale.

6. The impact on physical openness will be limited to the Appeal Site itself. In terms of the visual aspect of openness, there is currently no public access onto the Appeal Site and as such no public views from within it. Views from the wider public domain are extremely limited and as such the proposed development would have minimal visual impact on the wider Green Belt.

7.11. I therefore conclude that the harm to openness is **largely limited to the Site itself, with only strictly limited and localised impacts on visual openness beyond the Site. I consider that the overall harm to openness is therefore minor.**

(iii) The effect of the proposal on the purposes of including land in the Green Belt

7.12. Informed by my review of the Appeal Scheme, the relevant supporting documents, as well as numerous visits to the Appeal Site, I adopt Mr Self's assessment of the Site's performance against the first four of the Green Belt purposes as set out in paragraph 143 of the NPPF (paragraph 6.10-6.31 of Mr Self's evidence).

7.13. As Mr Self's evidence explains, the only conflict he has identified between the Appeal Scheme and the first four of the Green Belt purposes is a limited impact in relation to (c) (safeguarding the countryside from encroachment). However, as Mr Self shows, the site performs weakly against this purpose, and any harm from this impact is in part mitigated by virtue of the existing landscape conditions, with the site being well contained and well related to the urbanised character of the suburban influences. The harm in relation to purpose (c) is therefore minor.

7.14. On the fifth purpose (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land), Mr Self defers to me.

7.15. My view is that the fifth purpose would not be conflicted with, as there is insufficient previously developed land available to meet the Council's housing requirements, such that the Site (which is itself partly previously developed, and

recognised as such in the Council's Green Belt Boundary Review 2019) can be developed while not prejudicing the recycling of derelict and other urban land).

Summary of Green Belt Considerations

- 7.16. As the Appeal Scheme does not fit into any of the exceptions listed in paragraphs 154 and 155 of the NPPF, I conclude **the Appeal Scheme would represent inappropriate development in the Green Belt**. There would therefore be definitional harm to the Green Belt. In addition, as set out above, there would be minor harm to openness and minor harm to the third Green Belt purpose.
- 7.17. Any harm (definitional and actual) to the Green Belt must be given substantial weight under paragraph 153 of the NPPF. However, it is nonetheless important in conducting the balance to recognise that the Green Belt harm in this case is minor and also that land that is currently Green Belt will inevitably be required to meet the Council's needs for market and affordable housing.
- 7.18. Section 8 of my evidence goes on to consider whether the Appeal Scheme would result in 'any other' harms for the purposes of the paragraph 153 test.

Green Belt and Landscape Proof of Evidence

of

Clive Self Dip LA CMLI MA (Urban Design)

March 2024

**Land North of Raleigh Drive,
Claygate**

LPA Ref: 2023/0962

Pins Ref:

APP/K3605/W/23/3334391

On behalf of:

Claygate House Investments Ltd

and MJS Investments Ltd

Report No: CSA/3230/09

Green Belt Context

- 4.12 The Appeal Site lies within the Green Belt and outside of the defined settlement boundaries. The Green Belt also washes over the areas of hard standing to the immediate south west of the Appeal Site.
- 4.13 The Green Belt covers 57% of the Borough which is virtually all of the land that lies outside of the confines of the built up areas. As a consequence, if current and future housing need is to be met then it is inevitable that the Green Belt boundary will need to be reviewed or land within it released.

Elmbridge Green Belt Boundary Review

- 4.14 In 2016, a Green Belt Boundary Review (CDE 29/30) was produced by Arup on behalf of Elmbridge Borough Council. That study divided the Borough's Green Belt into a series of 78 Local Green Belt Areas, with the Appeal Site lying within the southernmost part of Local Area 45.
- 4.15 The 2016 Review was followed in December 2018 by the 'Green Belt Boundary Review - Supplementary Work' which was a refined version of the 2016 assessment. The 2018 Review (CDE. 32) sub divided the area into a series of smaller parcels and assessed their ability to accommodate potential development. The Appeal Site was identified as forming the majority of Sub Area 59 (SA-59) together with a small area of land to the immediate west.
- 4.16 Annex 1 C of the 2018 Review (CDE. 38) provided an assessment of the Sub Areas against the first 3 purposes of the NPPF.
- 4.17 Sub Area 59 was described as not lying at the edge of a large built up area and scored 0/5 against Green Belt Purpose 1.
- 4.18 The sub area scored 1/5 against Green Belt Purpose 2, with the Review describing the area as a very small, less essential part of the gap between Claygate and (London) Hinchley Wood and one that was visually detached from the overall gap. The Review went on to say that development wraps around the southern, eastern and western edges of Sub Area 59, and that its removal from the Green Belt would not result in a reduction in the physical scale of the gap between settlements. (my emphasis)
- 4.19 Against Purpose 3, the sub area scored 1/5 with the Review describing it as having a weaker relationship to the wider countryside, with 19% of the sub area comprising built form including a tennis court, swimming pool and clubhouse building.

4.20 The 2018 Review concluded that the removal of Sub Area 59 from the Green Belt is unlikely to impact on the performance of the surrounding sub areas, given its self-containment. It went on to say that the northern parcel boundary comprised a well established tree belt / hedgerow, which would form 'a stronger and more readily recognisable boundary for the Green Belt than the existing boundary which cuts across areas of hard standing (my emphasis).

4.21 Step 5 of the assessment of Parcel 59 concluded that it:

'Meets Purpose assessment criteria weakly, and makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.'

4.22 From my observations on the Site and neighbouring area I consider that the Appeal Site does not perform the first two purposes and performs weakly against the third Green Belt purpose and its removal from the Green Belt would result in a stronger and more appropriate boundary being established.

Green Belt Boundary Review 2019 – Minor Boundary Amendments (CDE.41)

4.23 In 2019 Elmbridge Borough Council published a further study as part of the preparation of the Local Plan evidence base. That study identified the Appeal Site and the small area of land to the immediate west (totalling 2.44 hectares in size (Tile 99) as an area to be potentially removed from the Green Belt. It stated:

'The Green Belt does not follow a logical or recognisable feature along the western boundary (cutting through a car park, part of the building etc.). It is recommended that it is relocated to remove the entirety of the curtilage of Claygate House, with the boundary running along the tree belt at its northern edge.'

4.24 It is apparent from the independent Green Belt Study that was undertaken by Arup, on behalf of EBC, that the Appeal Site performed poorly in respect of its Green Belt function and that it had the potential for removal from the Green Belt.

Green Belt Site Assessment Proformas - Sites no longer considered suitable for release Elmbridge Local Plan 2023

4.25 In November 2023, after it had submitted an emerging Local Plan for independent examination which proposed no changes to the Green Belt boundary, EBC provided an update to their Green Belt Site

Assessment Proformas that identified 'Sites no Longer Considered Suitable for Release' (CDE 47).

- 4.26 The proforma for SA-59 Claygate House is at pages 89 to 95 of the November 2023 proformas. Having assessed the parcel, the proforma concludes that it is not suitable for release from the Green Belt.
- 4.27 As set out in the Appellant's SoC and the Planning Proof of Evidence, there was no substantive evidence to support EBC's change of direction. It should also be noted that the character of the Appeal Site and that of the neighbouring area had not changed to any significant degree since the original Green Belt Assessment was undertaken. Moreover, the proforma contains only a limited assessment of SA-59 itself, with much of its focus being on the arc of the Green Belt that stretches from Heathrow Airport to Epsom and, at the Borough Level, LA-45. The assessment of SA-59 itself (in the fourth and fifth paragraphs of the conclusion on page 95) is largely generic. I therefore disagree with the proforma's approach, since as noted in paragraph 3.65 of the Appellant's SoC (CDC 1), parcel SA-59 performs a separate function to the wider LA-45. As I show in my evidence, the Appeal Site is visually very well contained and performs weakly against the third Green Belt purpose and not at all against the others. I therefore consider that the proforma does not provide any substantive evidence to justify departing from the previous Green Belt work undertaken by the Council that identified SA-59 a suitable candidate for release from the Green Belt.

Statutory and Non-Statutory Designations

- 4.28 The Site is not covered by any statutory or non-statutory designations for landscape character or quality. It is agreed in the Planning SoCG (Executive Summary para 3e) that the Site is not a Valued Landscape in respect of para 180a of the NPPF. It also agreed that the Appeal Scheme has no impact on designated or undesignated heritage assets.

Appeal Site Description

- 4.29 The Appeal Site comprises a broadly rectangular shaped grassland field with a strip of land extending southwards up to Raleigh Drive / Rythe Road. The field was associated with the offices at the former Claygate House (now Esher Park Gardens apartments), and contained a bowling green and tennis court. The recreational facilities have not been used for many years and are in a state of disrepair.
- 4.30 The northern boundary of the Appeal Site is marked by an outgrown, mixed species, native hedgerow with scattered mature hedgerow oak trees. A chain link fence also runs along this boundary.

6.0 RESPONSE TO REASON FOR REFUSAL AND THIRD PARTY COMMENTS

6.1 In this section I refer to the specific Green Belt related components of the reason for refusal and matters set out in the LPA's SoC.

Conflict with Policy DM17 of the Development Management Plan 2015

6.2 The wording of Policy DM17 is similar to section 13 of the NPPF, in that it sets out that inappropriate development within the Green Belt will not be approved unless very special circumstances apply, whereby these would clearly outweigh the harm (to the Green Belt and any other harms).

6.3 The Planning SoCG specifically identifies the Green Belt areas of disagreement as:

- the level of spatial harm to the openness of the Green Belt;
- the level of visual harm to the openness of the Green Belt; and
- the extent to which the proposal conflicts with the purposes of Green Belt as set out in paragraph 143 of the NPPF.

6.4 I now address these matters under the following sub headings.

Green Belt Context

6.5 The Green Belt washes over virtually all of the Borough that lies outside of the settlement boundaries. If the current and future housing needs of the Borough are to be met, then Green Belt land will need to be developed. As a consequence, there will inevitably be an impact on the openness of certain parts of the Green Belt. The planning balance section of Mr Brown's evidence weighs benefits that would arise from the Appeal Scheme against any identified harm.

6.6 I have already referred to the independent Green Belt studies that the Council commissioned. It is also worth noting that the Council's own Borough-wide Green Belt assessments found the Site to perform weakly against the purposes of the Green Belt and in fact recommended the Site be removed from the Green Belt, with the boundary redefined along the vegetated northern edge of the Site. The Council's Green Belt Review 2019 – Minor Boundary Amendments report (CDE. 41) is the most relevant as it specifically identifies the Appeal Site and a small area of hardstanding to the south west. The Review concludes that:

“The Green Belt does not follow a logical or recognisable feature along the western boundary (cutting through a car park, part of the building etc.). It is recommended that it is relocated to remove the entirety of the

curtilage of Claygate House, with the boundary running along the tree belt at its northern edge."

"This amendment would result in a greater area of land having the potential for redevelopment. However, this recommendation is concerned with having the Green Belt follow a logical boundary which it currently does not".

- 6.7 The Review made it clear that the Appeal Site had the potential for development and that the northern boundary was a logical and recognisable boundary. Those findings are entirely consistent with my own.
- 6.8 The Planning Evidence and the Appellant's SoC sets out the chronology of the various Green Belt assessments that were undertaken by Arup, on behalf of EBC, and the subsequent November 2023 Proforma update, which was prepared by EBC themselves. As previously explained, the Council's own assessment of the Appeal Site, in Green Belt terms, reached an entirely different conclusion to the earlier work that had been undertaken, namely that it was no longer considered a suitable candidate for removal from the Green Belt. As set out in section 4 above, I disagree with the Council's new position on this issue.

Inappropriate Development

- 6.9 The parties agree that the Appeal Scheme constitutes inappropriate development in the Green Belt as it does not meet the exceptions identified in para 154 or 155 of the NPPF. The harm that will arise from the Appeal Scheme and the benefits the Scheme delivers are addressed in the planning balance section of Mr Brown's Evidence. My focus here is on the harm to Green Belt purposes and openness (though I note that, as with any inappropriate development, definitional harm to the Green Belt is also deemed by paragraph 153 of the NPPF).

Assessment of the Site's performance against Green Belt purposes

- 6.10 I now assess the impact of the Appeal Scheme against the five purposes of para 143 of the NPPF. Where appropriate, I also refer to the Council's Statement of Case ('SoC') and the ODR.

a) To check the unrestricted sprawl of large built-up areas

- 6.11 The Green Belt Review of 2018 clearly stated that Parcel SA-59 (the Appeal Site) does not lie on the edge of a large built up area. There is therefore no conflict with purpose 'a'. Moreover, on any reasonable basis, the Appeal Scheme cannot be considered to be 'unrestricted' sprawl as the Site benefits from existing development on three of its boundaries with a heavily vegetated field boundary on its fourth

boundary. These features provide a high level of physical and visual containment to the Site.

- 6.12 The Appeal Scheme will occupy what is currently open land, and as I acknowledge below, development will encroach into the countryside. However, given the containment of the Appeal Site I do not consider that on any reasonable basis it can be considered to result in unrestricted sprawl.

b) To prevent neighbouring towns merging into one another

- 6.13 Para 39 of the ODR (CDB. 2) states that Claygate and Esher have not coalesced, yet the second two sentences of Paragraph 39 say:

'Esher and Claygate have not "coalesced" as stated by the Applicant at paragraph 5.21 of their Green Belt Assessment as they form distinct settlements. It is acknowledged that Esher and Claygate are linked by a small section of development around Hare Lane, Raleigh Drive and Rythe Road. What the proposed development would do is strengthen this link between the settlements by reducing the existing gap between them and increase the degree to which the settlements merge, both visually and spatially. As such there would be a conflict with Purpose 2.' (my emphasis).

- 6.14 As coalescence of the two settlements has, as a matter of fact, already occurred, then there can be no conflict with this Green Belt purpose.

- 6.15 The Council's own 2018 Green Belt assessment of the Site (sub area 59) scored it 1/5 against purpose 2.

- 6.16 However, for completeness, I now assess the function of the Appeal Site in respect of physical coalescence and perceptual coalescence and address the Council's concern that the Appeal Scheme would strengthen the existing link between Claygate and Esher.

Physical coalescence

- 6.17 The Aerial Photograph in **Appendix B** and the Site Location Plan in **Appendix A** show that Claygate and Esher have already coalesced. The principal links are at Hare Lane, Raleigh Drive and Littleworth Road.

- 6.18 The fact that the settlements have coalesced, does not necessarily mean that the separate identities of the settlements are diluted or lost. It is not uncommon to have neighbouring Boroughs or parts of settlements in close proximity to one another, or physically adjoining, but that does not necessarily mean that they lose their own sense of identity.

- 6.19 The ODR at para 39 states that the gap between Esher and Claygate would further diminish, both physically and visually, with the Appeal Scheme in place.
- 6.20 The Appeal Scheme would not result in the gap between the two settlements visually diminishing in any meaningful way in views from the public realm. Esher lies to the west of the Appeal Site and the 4 storey apartments at Esher Gardens, which border the western boundary of the Appeal Site, provide visual containment to the Site in views from the west. Similarly, the housing on Raleigh Drive and Rythe Road, that backs onto the Appeal Site, will largely screen the proposed development in views from the south and east. In any event, in the limited number of instances where the Appeal Scheme would be visible, it will clearly read as part of Claygate.
- 6.21 Whilst the Appeal Site is currently undeveloped land it does not read as part of the narrow gap that exists, in places, between Esher and Claygate. The Appeal Site clearly has a strong relationship to Claygate with the recently completed Esher Gardens development to the west and the housing on Rythe Road and Raleigh Drive bordering it to the south and east. With development in place on the Appeal Site it will not diminish the physical gap between the two settlements.

Perceptual Coalescence

- 6.22 If there is intervisibility between settlements, then in certain instances it can dilute the separate identity of the settlements. In this instance, with the Appeal Scheme in place, there will be little or no intervisibility between the Appeal Scheme and Esher.
- 6.23 When travelling from one settlement to another, if there is only a small physical break between the two settlements, then in certain instances the settlements can read as one, but that will not be the case here.
- 6.24 As the Appeal Site is to have its vehicular access from Raleigh Drive, the Appeal Scheme will clearly relate to Claygate. When travelling westwards on Raleigh Drive, the neighbouring development that fronts onto Raleigh Drive will screen the Appeal Scheme from view in any event.
- 6.25 Hare Lane Green and the roadside vegetation along Arbrook Lane and Littleworth Road, which lie to the west of the Site, provide a localised break between Esher and Claygate and enable one to experience leaving one settlement and entering the other. With development in place on the Appeal Site, that experience will not be compromised, as the Appeal Scheme will not be visible from this location.

- 6.26 In terms of settlement identity, if one settlement is reliant on the other for everyday services then there is the potential for the separate identities to be diluted.
- 6.27 As I have already noted, the Appeal Scheme will be accessed off Raleigh Drive and as such will clearly read as part of Claygate. As both Claygate and Esher have their own community facilities, such as places of worship, retail outlets and schools, then with a modest development in place, such as the Appeal Scheme, I do not consider that the identity of the settlement will be compromised.
- 6.28 It is evident from visiting the Appeal Site and reviewing Aerial Photography that development on the Appeal Site will not result in the actual or perceived coalescence of Claygate and Esher.

c) To assist in safeguarding the countryside from encroachment

- 6.29 I have already described the character of the Site and its relationship to neighbouring development. While the Appeal Scheme will, as a matter of fact, encroach onto the greater part of the Site, it will have only a strictly limited effect on the wider countryside/Green Belt due to the relationship of the Site to Claygate and the containment provided by established boundary vegetation and neighbouring development. The impact on the wider Green Belt will therefore be strictly limited and localised.

d) to Preserve the setting and special character of historic towns

- 6.30 The parties agree that this criterion of the Green Belt does not come into play. Paragraph 35 of DOR states: *'In considering the proposal against the five purposes as set out above it is not necessary to consider the fourth purpose as there are no instances in the Borough where historic towns directly abut the Green Belt and where Green Belt plays a function in the setting of such historic settlements.'*

e) to assist in urban regeneration, by encouraging, by encouraging the recycling of derelict and other urban land.

- 6.31 The Appellant's SoC and Planning Evidence addresses this purpose and concludes that there is not sufficient previously developed land in the Borough to accommodate current and future housing needs. In any event, the Site itself is in part previously developed land.

Openness

- 6.32 The PPG recognises that in assessing the impact of developments on Green Belt openness, a judgement needs to be made on the

circumstance of each individual case. The PPG also recognises that openness has both a spatial and visual aspect.

- 6.33 The effect of the Appeal Scheme on both of these aspects of openness is summarised below, both in terms of the impact on the Site itself and on the wider Green Belt.

Spatial

- 6.34 In the previous section I have identified that the greater part of the Site will be occupied by development and supporting infrastructure with the remainder as publicly accessible open space. The Appeal Scheme will therefore have a direct impact on the openness of the Site and this is a matter to be considered in the planning balance. There will be no indirect physical impact on the openness of the neighbouring Green Belt.

Visual

- 6.35 Given that the majority of the external boundaries of the Site are clearly defined and already have built development, or established planting, alongside them, then the Appeal Scheme will benefit from a good degree of physical and visual containment from day 1. With the external boundaries of the Site being reinforced with additional planting, then the visual containment will improve even further.
- 6.36 The ODR (paras 48-49) states that the proposed development would result in '*substantial visual harm to the openness of the Green Belt*'. However, it also states that this harm would primarily arise from occupiers, visitors and other members of the public accessing the site's proposed public open space, who would experience '*uninterrupted and close up views of the newly introduced built form. Consequently, there would be a severe visual impact from within the site itself, as once one enters the site and is stood within the proposed development it would not be possible to identify the site as land free of development, i.e. characterised by its openness*' (my emphasis).
- 6.37 The Appeal Site is currently in private ownership and has no public access of any kind. Visual impact cannot therefore be assessed on future visitors to the Appeal Site, but instead is assessed on the views available from surrounding public vantage points including roads and public rights of way, as well as from residential properties.
- 6.38 If the approach that the LPA are suggesting (i.e. that the visual impact of development must be assessed from within the Site) was adopted, then when assessing any site, be it Green Belt or greenfield, development would inevitably result in a substantial level of visual harm.

This is not an approach which the Council has adopted in considering the visual effects of the development in LVIA terms (hence its lack of objection on non-Green Belt visual grounds) and I consider it is inconsistent for it to adopt such an approach in respect of visual openness.

- 6.39 As set out within Section 5 of the LVIA and the visual effects tables (Appendix F), there would be very few opportunities for views of the new housing on account of the highly contained nature of the Appeal Site. Where views will be possible, these will be experienced from adjoining residential properties on Rythe Road and Raleigh Drive to the east and south, and residents of the Esher Park Gardens apartments to the west. In all cases retained boundary trees and hedgerows, together with new structural boundary planting, will heavily filter these views.
- 6.40 Whilst I acknowledge that there will be a degree of visual harm to the openness of the Green Belt, this would be extremely limited for the reasons set out above and I consider that the ODR is wrong to consider it to be a substantial level of harm.
- 6.41 Taking account of the spatial and visual components of the Appeal Scheme, the impact of the development on the openness of the Green Belt would be strictly localised.

Green Belt Conclusion

- 6.42 Overall, the Appeal Scheme has the potential to deliver a relatively discreet development that would complement the existing settlement pattern of Claygate. It would not have a detrimental impact on the actual or perceived coalescence of Claygate and Esher. Similarly it would not compromise the character and identity of Claygate. There would be a limited conflict with the third Green Belt purpose, and no conflict with the others.
- 6.43 The Appeal Site is very well contained and although there would inevitably be an impact on the openness of the Site itself, the visual impact on the wider Green Belt would be strictly limited and localised and clearly would not undermine the function of the wider Green Belt. Given the highly contained nature of the proposed development it clearly would not set the precedent for further development in the locality.

3rd Parties and Other Matters Raised

- 6.44 Claygate Parish Council raised an objection in their consultation response to the application as follows:

'It is within the Council's remit to object to any development on the Green Belt;

To grant an outline application would set a very dangerous precedent for all other Green Belt land in or adjoining Claygate;

The application is not supported by the draft Local Plan.'

- 6.45 In relation to the first point raised, I will defer to the Planning Evidence of Mr Brown, which sets out the Very Special Circumstances under which development within the Green Belt is considered acceptable (in accordance with para 152 of the NPPF).
- 6.46 In relation to the second point, any future application within the Green Belt would need to be determined on its own merit. Moreover, I have set out above how the Appeal Scheme would be contained by robust and clearly identifiable boundaries on the ground, and as a result would not result in unrestricted sprawl of the built up area. This was also set out within the Council's Green Belt Boundary Review, which concluded, quite rightly, that the northern Appeal Site boundary would be '*a stronger and more readily recognisable boundary for the Green Belt*'. With the Appeal Scheme in place, it would therefore not set a precedent for further Green Belt development within this part of Claygate, quite the reverse.
- 6.47 In relation to the last point, I again defer to the Planning Evidence of Mr Brown who deals with matters relating to the draft Local Plan. I would however add that the Council's Green Belt evidence base that was prepared by Arup, which was to inform the new Local Plan, did identify the Appeal Site as an appropriate site for removal from the Green Belt to help meet the Borough's housing needs. Despite that advice, EBC chose to prepare their own Green Belt Site Assessment Pro forma in November 2023 that concluded that Parcel SA -59 (the Appeal Site) and numerous other parcels were no longer suitable for release from the Green Belt. That was a curious conclusion to reach when the character of the Site and neighbouring area had not changed to any significant extent since Arup's Original Green Belt assessment was undertaken, and as explained above I disagree with the Council's new position.

7.0 CONCLUSION

- 7.1 It is apparent from viewing the Aerial Photograph and from visiting the Appeal Site that it has a strong relationship to Claygate and is bordered by existing development on three of its four boundaries. The fourth boundary is also clearly defined by established vegetation. With development in place on the Appeal Site it would undoubtedly read as an integral part of the settlement of Claygate and would not result in actual or perceived coalescence with Esher.
- 7.2 The Appeal Site has no landscape features that would provide a constraint to development and the LPA agree that it is not a Valued Landscape in respect of para 180a of the NPPF and they have no objection to the development on landscape and visual grounds.
- 7.3 Similarly, the LPA consider that the density of development proposed is appropriate.
- 7.4 The Appeal Scheme would conflict with the third Green Belt purpose, though to a limited extent since the Site performs this purpose only weakly. There would be no conflict with the other Green Belt purposes. The Appeal Scheme would also inevitably have an impact on the openness of the Site itself, but the impact on the wider Green Belt would be strictly limited and localised and would not undermine the function of the wider Green Belt.
- 7.5 From my assessment of the Appeal Site and the wider Green Belt, I fully agree with the conclusion in the Council's 2018 Green Belt Assessment that the Appeal Site was an appropriate candidate for release from the Green Belt. Moreover, although by paragraph 153 of the NPPF, substantial weight must be given to any harm to the Green Belt, it is relevant that the Green Belt harms in this case are limited, as set out in this Proof of Evidence.



The Planning Inspectorate

Report to Watford Borough Council

by William Fieldhouse BA (Hons) MA MRTPI

an Inspector appointed by the Secretary of State

Date: 20 September 2022

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

Contents

Abbreviations used in this report	3
Non-Technical Summary.....	4
Introduction.....	5
Context of the Plan	7
Public Sector Equality Duty	8
Assessment of Duty to Co-operate.....	9
Assessment of Other Aspects of Legal Compliance	9
Assessment of Soundness.....	11
Issue 1 – Amount of housing and economic development required	11
Issue 2 – Viability	13
Issue 3 – Spatial strategy and Green Belt.....	14
Issue 4 – Watford Gateway Strategic Development Area	17
Issue 5 – Town Centre Strategic Development Area	20
Issue 6 – Colne Valley Strategic Development Area	21
Issue 7 – Housing land supply.....	24
Issue 8 – Residential development requirements	29
Issue 9 – Industrial, warehouse and office development.....	35
Issue 10 – Transport and access	37
Issue 11 – Infrastructure.....	40
Issue 12 – Design.....	41
Issue 13 – Historic environment	42
Issue 14 – Natural environment and green infrastructure	43
Issue 15 – Health and community facilities	44
Other soundness matters	45

Overall Conclusion and Recommendation..... 47

Schedule of Main ModificationsAppendix

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 2021¹, 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

¹ 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 evidence¹³ 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.

¹³ 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 2021¹⁴ 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 below¹⁵.
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 met¹⁶. 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.

¹⁴ VIA1.

¹⁵ Oral evidence by the Council at the hearing session on 9 February 2022.

¹⁶ 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 Assessments¹⁷ 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

¹⁷ 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 reasons¹⁸. Based on that, and other site specific information, the Plan removes a limited amount of land from the Green Belt in five locations.

¹⁸ 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 accommodation¹⁹.
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.

¹⁹ 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

A Sustainable Town

Watford Local Plan 2021-2038





Strategic Policy SS1.1: Spatial Strategy



From 2021 to 2038, the Local Plan makes provision for 13,328 net additional homes and 110,514 sqm of net employment floorspace consisting of 25,206 sqm of industrial uses as classified by the B2, B8, E(g)(ii) and E(g)(iii) Use Classes and 85,488 sqm of office uses as classified by the E(g)(i) Use Class between 2021 and 2038, along with supporting infrastructure and facilities. Proposals for new development will be supported, where they demonstrate that they will contribute towards the Local Plan's economic, social and environmental objectives.

Growth will be focused in the Core Development Area, which has excellent access to public transport and facilities, and where development can be accommodated sustainably, creating a high quality place to live, work and visit by 2038. Heritage assets and areas of green space will continue to be protected.

Development will make an effective and efficient use of land. This will need to support a mix of uses compatible with each other, with high quality design, and innovative technology to address climate change and reduce carbon emissions.

Proposals will contribute towards a modal shift, greener travel patterns and minimising the impact on the environment. Pedestrian, cycling and passenger transport will be prioritised.

These high standards and a positive and integrated approach to development will be expected across the whole of the borough. This will contribute towards creating attractive and inclusive neighbourhoods, supporting people to be more active, healthy and encourage greater social inclusion as part of a balanced community.

Across the borough, new infrastructure and improvements to existing infrastructure will be delivered to support development. Infrastructure proposals will be progressed collaboratively with relevant stakeholders and providers to maximise the benefits and success of any scheme.

Inappropriate development, as defined in national planning policy, in the Metropolitan Green Belt will not be approved except in very special circumstances.

The Core Development Area

The Core Development Area is expected to support 80% of allocated development in the borough and provides opportunities for further redevelopment. Proposals in this area will be supported where they optimise the use of land in this location through mixed-use high-density development, with excellent access to services, facilities and public transport. Development should deliver positive social and environmental gains, incorporating high quality design and innovation to ensure high environmental standards are achieved.

The scale of change will be transformational in places. Collaboration between development partners and stakeholders on larger sites will be the key to unlocking the potential of the area. Ongoing and effective community engagement will also be required. Proposals should demonstrate a holistic approach to development, optimise opportunities for higher density development, create linkages to adjacent areas and ensure proper infrastructure provision.

Areas outside the Core Development Area

Outside the Core Development Area, proposals will be supported where they optimise densities to make efficient use of land and manage change with greater regard to the existing context and local character. Development should make the most of its location, such as access to public transport, cycling and walking and seek to provide off-site infrastructure to enhance them, and facilitate access to services and facilities.

High quality connections between people and destinations within the Core Development Area, wider town and locations outside of the borough will be sought.

The Core Development Area is defined on the Policies Map.

Homes for a Growing Community

- 3.1 The Spatial Strategy seeks to deliver at least 13,328 net additional new homes between 2021 and 2038. This is equivalent to the delivery of at least 784 new homes each year and forms the baseline figure to calculate the five year housing supply. The figures that make up the housing supply in the Local Plan is set out in Figure 3.1. Figure 3.2 provides an overview of site allocations for residential use and their distribution across the borough. For more detailed information about these sites, refer to Table 13.1 and for site boundaries refer to the Policies Map.
- 3.2 The Housing and Economic Land Availability Assessment (2021) identified 56 sites suitable for residential and mixed-use development that includes new homes. The location of these sites are shown in Figure 3.2. This assessment sets out the number of homes that will come forward. This includes sites identified for development and how many homes will come forward on sites that are either not identified as a site allocation, or come forward with a housing density that is different from the indicative capacities calculated in the Housing and Economic Land Availability Assessment.
- 3.3 The number of homes to be delivered on site allocations during the plan period is 8,604 units. This figure is the sum total of the indicative yields for all of the allocations as listed in Chapter 13 which are derived from the size of each site and standard density assumptions depending on its location. As of 1 April 2021, a total of 1,218 units on site allocations have been granted planning consent. These units are not included in the maximum of 2,507 units that could come forward on sites with extant planning permission as represented in Figure 3.1.

Figure 3.1 Housing figures in the Local Plan

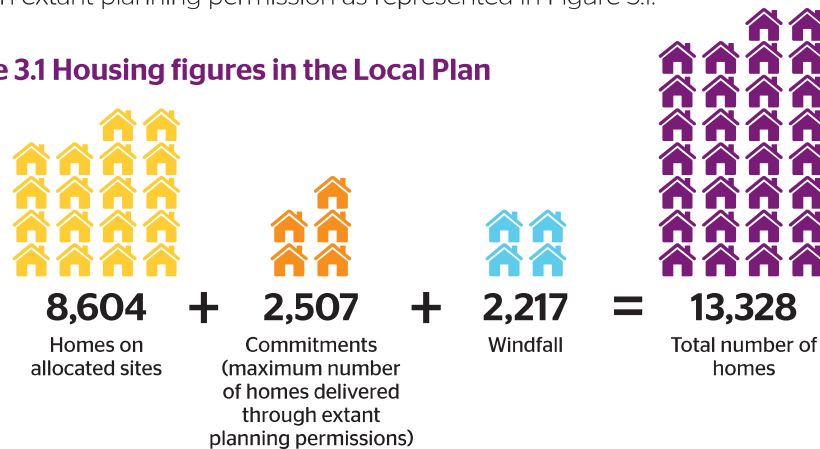
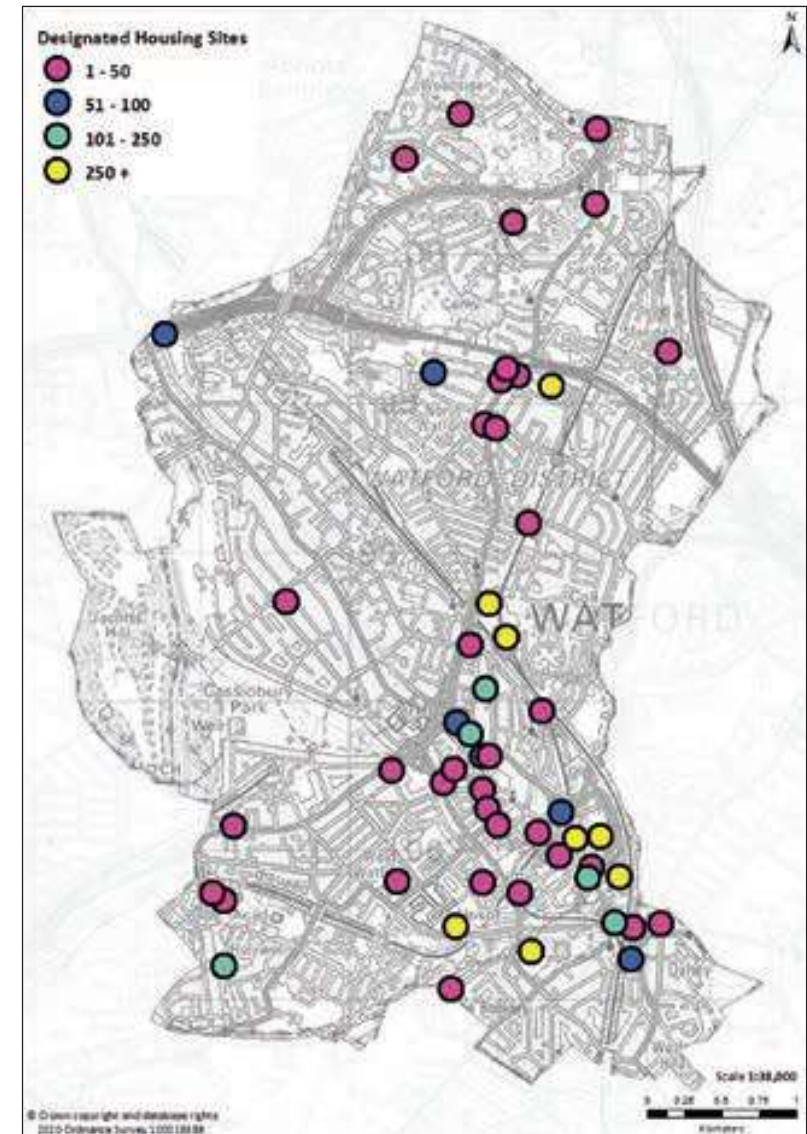


Figure 3.2: Housing sites in the Local Plan



- 3.4 As part of the housing to be provided to 2038, a total of 2,217 homes are included in the housing supply as windfall. This is based on a combination of three factors including the historical annual average of 70 dwellings per year completed on sites of less than five units; development sites coming forward within the density range identified in the Housing and Economic Land Availability Assessment, but higher than projected; and unidentified sites larger than five dwellings gaining planning permission. Combined, it is expected that windfall development will contribute, on average, 158 new homes per year over the plan period with the windfall contribution as part of the housing trajectory from 2024/25.
- 3.5 The South West Hertfordshire Local Housing Needs Assessment (2020) identified the local authorities of Dacorum Borough Council, Hertsmere Borough Council, St Albans City and District Council, Three Rivers District Council and Watford Borough Council as forming the South West Hertfordshire Housing Market Area. It demonstrates a relationship between housing need and movement between the five authority areas. The Council's all face challenges to meet their housing need, however they have agreed to continue to work together to deliver the housing required across the wider area.
- 3.6 The delivery of new homes over the plan period is set out in the housing trajectory (Appendix B). This forecasts the anticipated delivery of new homes each year to 2038 and provides a mechanism to evaluate the performance of the Plan. It also highlights when the provision of supporting facilities

and infrastructure are required. The housing trajectory will be kept up to date and monitored as part of the Council's Authority Monitoring Report.

- 3.7 To provide more certainty about when schemes will be coming forward and assist with projecting when other types of supporting development may be required, such as infrastructure, as part of their proposals, applicants are expected to provide a year by year housing trajectory setting out when new homes will be completed.
- 3.8 The commitments figure of 2,507, as quoted in Figure 3.1, assumes that all sites with planning permission on 1 April 2021, which are not site allocations in the Local Plan, will be developed. This means that any permissions which are not implemented will lead to a reduction in this source of supply. Since the adoption of the Core Strategy in 2013, the Council has seen an average annual lapse rate of 15%. If this rate was to be replicated across all permissions as of 1 April 2021, this supply of 2,507 dwellings would be reduced by 376 dwellings to 2,131 dwellings.



Strategic Policy HO3.1: Housing Provision



To meet housing need, at least 13,328 net additional homes, equivalent to at least 784 new homes per year, will be delivered, in Watford between 2021 and 2038. Proposals for residential development will be supported where they contribute positively towards meeting local housing needs and achieving sustainable development.

Residential developments should demonstrate how they will make an optimal use of land and provide a mix of homes including size, tenure and specialist adaptations to support people with different needs to ensure good quality homes are provided for all, both now and in the future.

Site allocations for housing and mixed-use, where residential use would be supported, are defined on the Policies Map.



Site allocations and new development

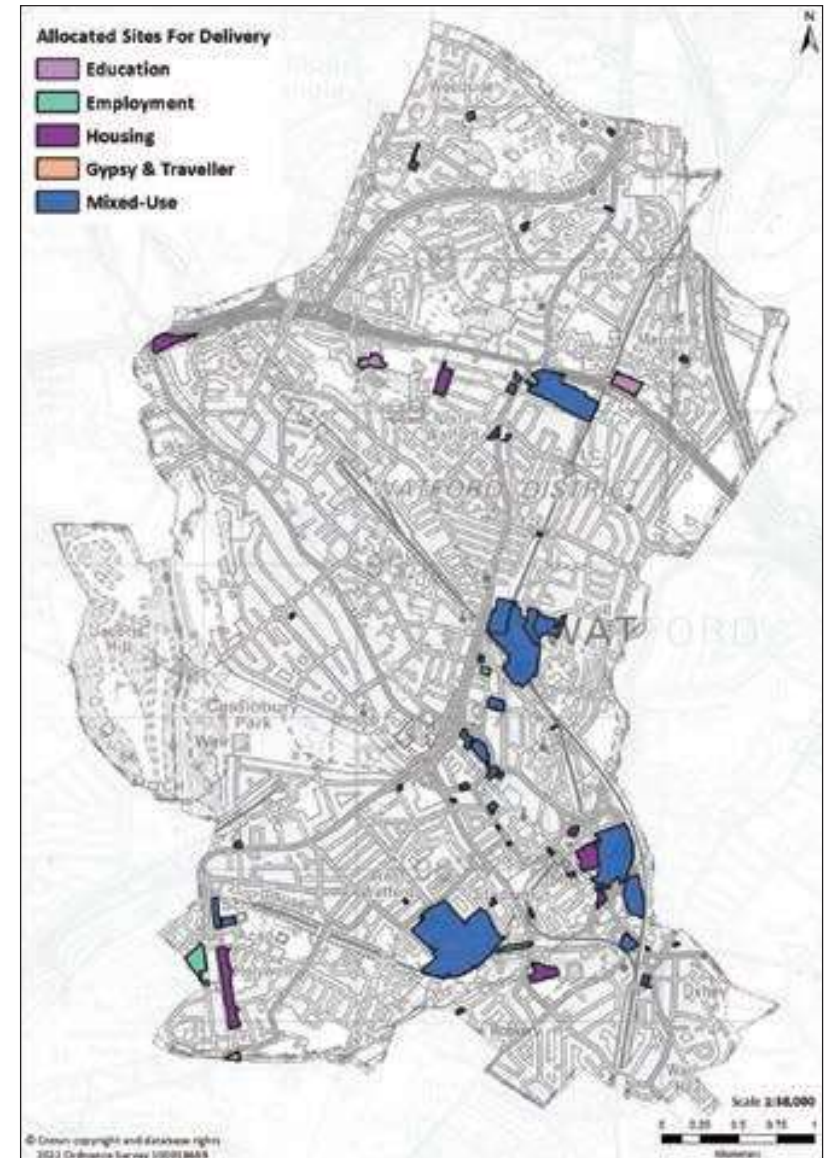
13.1 Demographic pressures, a national housing shortage and unbalanced regional development on a national level create significant demand for housing in Watford and the South East more generally. The borough's proximity to London (with high housing costs in the city pushing people out into the surrounding areas) has resulted in challenging housing targets over the plan period.

13.2 There is a need to plan for these homes. The Watford Housing and Economic Land Availability Assessment (HELAA) (2021) involved an exhaustive search of the borough for land available for development and sought to assess the capacity of the urban area. The administrative area of Watford has a capacity for providing 13,328 units over the plan period, with current estimates indicating a 784 units per annum requirement.

13.3 These sites are defined on the Policies Map and set out in Figure 13.1. The policy is applicable to those sites identified in Tables 13.1 (housing), 13.2 (Gypsies and Travellers), 13.3 (mixed-use), 13.4 (employment) and 13.5 (education) which include the following information:

- site name and map
- the land use allocated for
- site size
- whether the site is part of the Core Development Area
- timescales
- key development requirements and considerations
- indicative yield (including net additional employment floorspace)

Figure 13.1: Allocated sites for delivery



13.4 The process for calculating the indicative yields of the site has been set out in the Housing and Economic Land Availability Assessment, as has the wider process for site selection. It is important to emphasise that the indicative yields set out are purely baseline scenarios used to estimate the number of units to be provided within the plan period, based on site size and the sustainability of the surrounding area. Ultimately, the scale of development should be guided by design quality, character and any heritage sensitivities which may affect the site, having regard to the full suite of policies in the Plan including Policies HO3.2: Housing Mix, Density and Optimising Use of Land and QD6.5: Building Height.

13.5 For each site allocation, the types of uses that are considered appropriate have been set out. Proposals for uses classified as sui generis will be supported where these are consistent with the uses set out in Tables 13.1 to 13.5, support the wider objectives for the area, particularly on sites that are located within a Strategic Development Area, and will make a positive contribution towards achieving these. Where proposals include an ancillary use that is not within a Use Class set out in a site allocation, applicants should demonstrate how this is consistent with the allocation and the positive contribution it will make to the area.

Where there is a potential negative impact, applicants should demonstrate how this will be appropriately mitigated.

13.6 In addition to meeting the requirements set out in a site allocation, proposals will need to be prepared in accordance with policies in the Local Plan. For sites located within a Strategic Development Area, they will need to comply with policies set out in Chapter 2 'Core Development Area'.

13.7 The development requirements and considerations detailed in Tables 13.1, 13.2, 13.3, 13.4 and 13.5 are not exhaustive. Accompanying the development considerations for each site allocation is an outline map of the site. This information reflects the spatial extent of the allocation as defined on the Policies Map. They consist of a mix of requirements for on site provision and considerations to aid scheme design by identifying key constraints and are bespoke to specific sites. All allocated sites have a presumption in favour of development in principle. However, all proposals need to comply with the full suite of policies in the Local Plan. Absence of reference to a study or mitigation measure does not mean that it would not be required if a planning application was submitted.





Strategic Policy SA13.1: Allocated sites for delivery

The sites listed in Tables 13.1 'Allocated sites for housing development', 13.2 'Allocated site for Gypsies and Travellers', 13.3 'Allocated sites for mixed-use development', 13.4 'Allocated sites for employment development' and 13.5 'Allocated sites for education development' are defined on the Policies Map.

Appropriate types of development or land uses are identified for each site allocation. Where mixed-use development is proposed, this may refer to specific identified uses and also consist of one or more of the uses set out in Table 13.3. Other ancillary uses and sui generis will be acceptable where they are compatible and positively contribute towards the objectives of the area, particularly where a site is located within a designated Strategic Development Area.

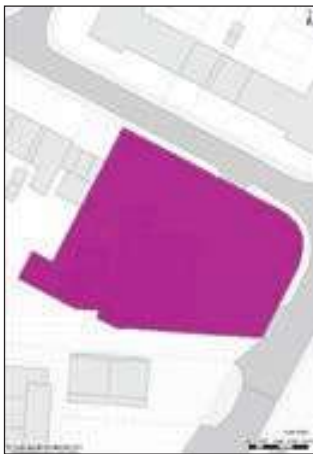
Planning Permission will be granted for proposals that:

- a) Accord with the policies in the Local Plan;
- b) Have regard to any Supplementary Planning Document, masterplan or development brief that affects the site;
- c) Deliver the uses identified and address the key development considerations for each site; and
- d) Provide appropriate mitigation measures for issues identified where the development considerations set out the need for an assessment.



Site: HS05 Land at the Badger Public House

Size (ha): 0.15	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 9 units
------------------------	---------------------------------	-----------------------------	-----------------------------------



Development requirements and considerations

The site is considered suitable for residential development, Use Class C3.

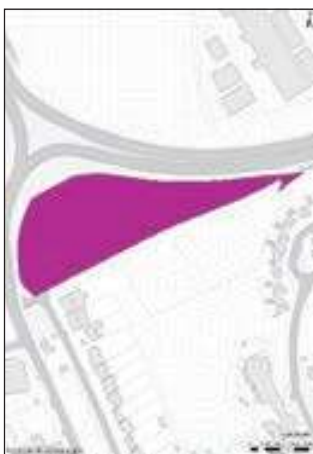
Redevelopment of the site should be in line with Policy HC12.3 'Built Cultural and Community Facilities'.

Development proposals should:

- a) Be accompanied by a Preliminary Roost Assessment; and
- b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings adjacent to the west of the site.

Site: HS06 Land at Russell Lane

Size (ha): 1.61	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 93 units
------------------------	---------------------------------	-----------------------------	------------------------------------



Development requirements and considerations

The site is considered suitable for residential development, Use Class C3.

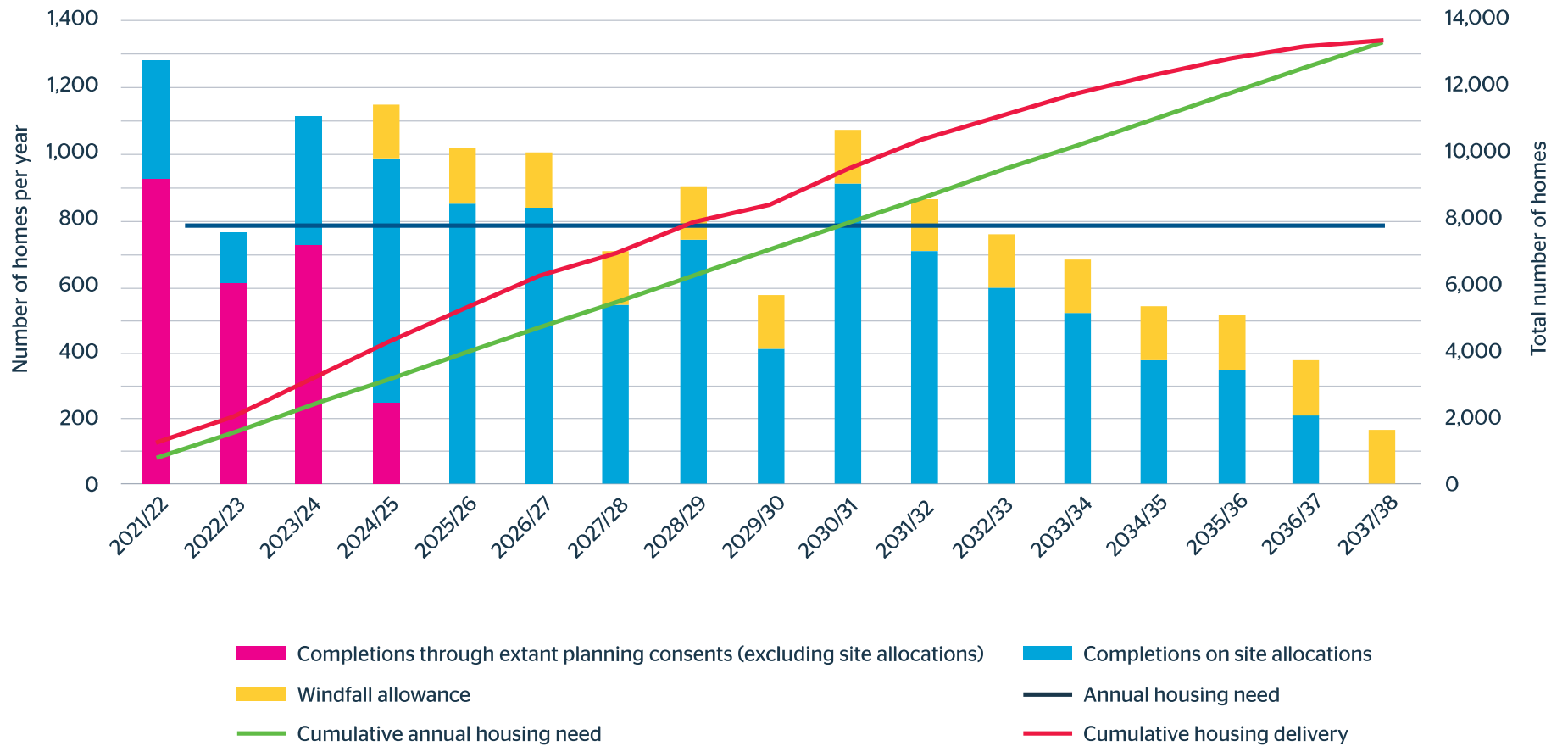
Development proposals should:

- a) Demonstrate that safe access has been provided to the site;
- b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings and open space adjacent to the south of the site;
- c) A proportionate contribution for compensatory improvements to the environmental quality and accessibility of the remaining parts of Watford's Green Belt which include areas of existing open space and green infrastructure via a Section 106 agreement; and
- d) Be accompanied by a Noise Assessment and provide the appropriate mitigation for noise associated with the road network.

Appendix B: Housing Trajectory

Year	Commitments (completions and extant permissions)	Housing completions from site allocations	Windfall allowance	Annual housing completions	Cumulative housing completions
2021/22	925	344	0	1,269	1,269
2022/23	609	144	0	753	2,022
2023/24	725	374	0	1,099	3,121
2024/25	248	732	158	1,138	4,259
2025/26	0	848	158	1,006	5,265
2026/27	0	835	158	993	6,258
2027/28	0	540	158	698	6,956
2028/29	0	735	158	893	7,849
2029/30	0	407	158	565	8,414
2030/31	0	905	158	1,063	9,477
2031/32	0	703	158	861	10,338
2032/33	0	590	158	748	11,086
2033/34	0	515	159	674	11,760
2034/35	0	374	159	533	12,293
2035/36	0	347	159	506	12,799
2036/37	0	211	159	370	13,169
2037/38	0	0	159	159	13,328
Total	2,507	8,604	2,217	13,328	13,328

Housing Trajectory 2021-2038



Land Availability Assessment 2023

Elmbridge Local Plan



Base date: 31 March 2023



Contents

Disclaimer	4
Introduction	6
What is a Land Availability Assessment (LAA)?	6
Methodology.....	9
Stage 1: Site Identification	10
Stage 2: Site Assessment.....	12
Stage 3: Windfall Assessment	15
Stage 4: Assessment Review	18
Stage 5: Final Evidence Base.....	23
Conclusions, monitoring and next steps.....	25
Appendices	26
Appendix 1: Sites under construction at 31 March 2023.	26
Appendix 2: Sites with planning permission at 31 March 2023.....	34
Appendix 3: List of LAA sites by settlement.....	42
Appendix 4: Discounted urban sites	725
Appendix 5: Sustainability Appraisal Scoring Sheet	730

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

Disclaimer

- 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.

Introduction

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)¹ 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 accommodation²
 - 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

¹ 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](#).

² 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

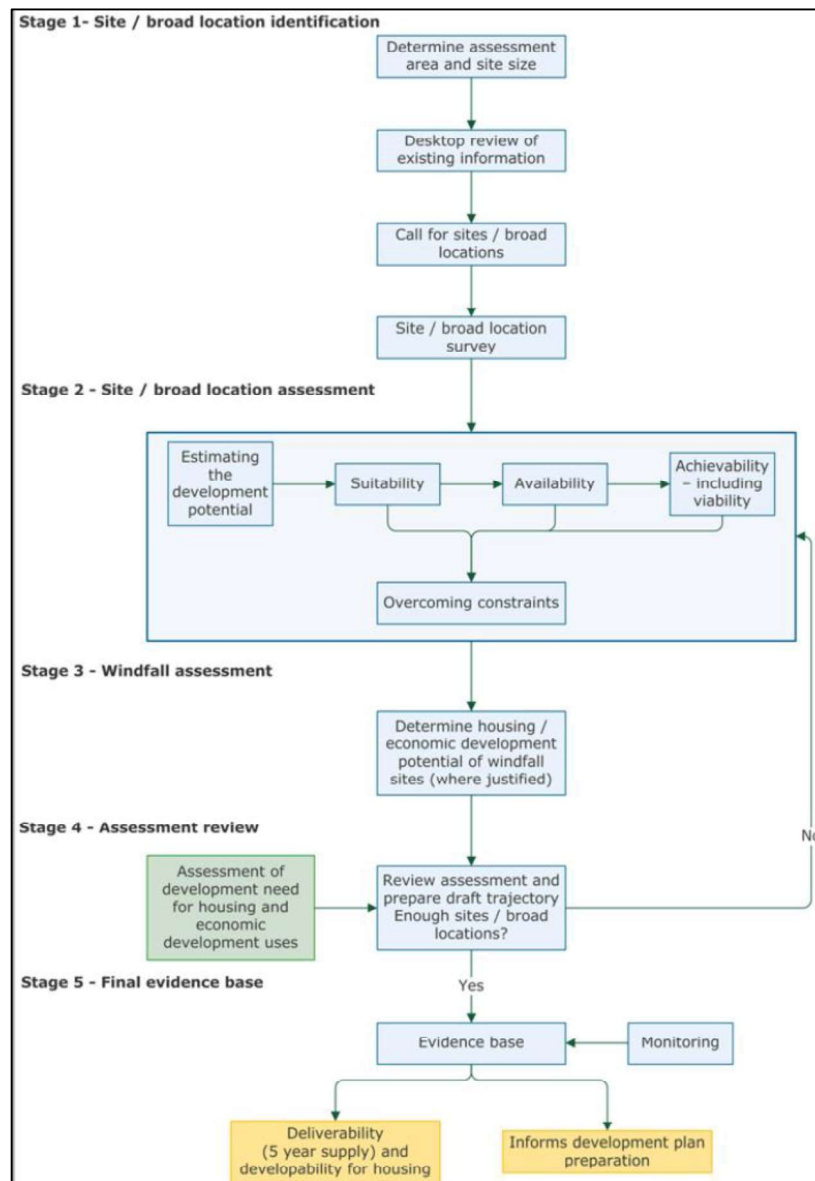
- 2.9 The LAA has been prepared using the methodology set out in the Planning Practice Guidance (PPG) Housing and economic land availability assessment 22 July 2019. The key stages of the assessment are described further in section 3 of this report. This document does not repeat the PPG. It is recommended 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 above³.
- 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 constraints⁴ 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

³ 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.

⁴ 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 Constraints⁵:

- 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.

⁵ 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 year⁶. 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.

⁶ House Price Index, July 2023

- National Planning Policy on achieving appropriate densities⁷, DM advice note 2 on optimising densities⁸ 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).

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

⁸ [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

Year	Windfalls completed EBC	Windfalls completed NHBC	Completion certificates	Total
20 th July 2011- 31 st March 2012	55	33	0	88
1 st April 2012 – 31 st March 2013	60	23	2	85
1 st April 2013 – 31 st March 2014	67	17	0	84
1 st April 2014 – 31 st March 2015	38	44	14	96
1 st April 2015 – 31 st March 2016	24	22	32	78
1 st April 2016 – 31 st March 2017	49	8	31	88
1 st April 2017 – 31 st March 2018	55	16	2	73
1 st April 2018 – 31 st March 2019	39	31	79	149
1 st April 2019 – 31 st March 2020	22	23	2	47
1 st April 2020 – 31 st 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
Total	481	303	251	1035
Average	-	-	-	86

- 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 allowance⁹. Approach 2

⁹ Explained at paragraphs 3.28 to 3.34

includes a non-implementation calculation across the sites with planning permission¹⁰.

- 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.

¹⁰ 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 650¹¹ dwellings per annum in Elmbridge. The table

¹¹ 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

Sources	Units (Housing)	Units (Housing) with non-implementation discount applied*
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
Total	7190	7034
Per year delivery (average over 15 years)	479	468

- 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.

Conclusions, monitoring and next steps

- 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 ¹²
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

¹² 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 ¹³
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 ¹⁴
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

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

¹⁴ 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

¹⁵ 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

¹⁶ 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 Hershams 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 ¹⁷
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 ¹⁸
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

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

¹⁸ 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 ¹⁹
2020/2096	White Lodge Hogshill Lane Cobham KT11 2AL	Cobham & Oxshott	C3	2	1	N/A	C3
2020/1222	145 Hersham Road Hersham Walton-On-Thames KT12 5NR	Hersham	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 Hersham Walton-On-Thames KT12 4RA	Hersham	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

¹⁹ 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 Hershams 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

Site reference	Site name	Net units	Delivery Timescale	Page No.
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

Site reference	Site name	Net units	Delivery Timescale	Page No.
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

Site reference	Site name	Net units	Delivery Timescale	Page No.
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

Site ref	Site name	Net units	Delivery Timescale	Page No.
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, Hershams 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, Hershams 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