

Planning Policy
Elmbridge Borough Council
Civic Centre
High Street
Esher
KT10 9SD

Date: 25 March 2024

Dear Sir / Madam

Land East of Blundel Lane, Oxshott | Written Representations to Stage Two of the Elmbridge Local Plan Examination

Knight Frank submitted this representations letter to the Council on behalf of the landowner at Land East of Blundel Lane ('the site') to the Elmbridge Local Plan Examination Stage Two.

These representations provide a summary of our responses to some of the issues raised by the Inspector. This is within the context of our overall objective to promote the site for future residential development and potential SANGs provision. As we have previously set out in our representations to the emerging Local Plan, the site is deliverable, it is available and suitable for development and development is achievable. Development at the site would also contribute towards achieving sustainable patterns of development and boost the delivery of new homes in accordance the update National Planning Policy Framework (December 2023).

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

We recommend that the plan period should look ahead for a minimum of 15 years. It should be extended to 2039/40 to be in accordance with paragraph 22 of the NPPF.

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

We recommend that the housing target should be updated to reflect the change in plan period.

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

We recommend that the spatial strategy considers a wider range of sources of housing land supply e.g. Green Belt, to help boost the supply of new homes in accordance with paragraph 60 of the NPPF which states: *"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community"*.

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

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With reference to our comments above, the Council's strategy will not provide a boost to housing supply (including affordable housing) and therefore should be reconsidered.

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

The Plan does not justify not meeting the full LHN. There are clear benefits of some Green Belt release for housing (particularly family housing and affordable housing) and therefore Council should reconsider it's approach.

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

The Plan is not effective because it does not meet the needs of Elmbridge, particularly in relation to housing (including affordable housing).

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?

We consider exceptional circumstances can exist to justify Green Belt release and that these should also consider site-specific factors as well as strategic factors.

We trust that these comments are useful and feed into the Examination.

Yours faithfully



Roland Brass
Partner