

## **16,000 NEW HOMES PROPOSED – POTENTIALLY 40,000 NEW RESIDENTS!**

**Elmbridge Council's New Housing Consultation 19 Aug – 30 Sep 2019**

**SAVE OUR VILLAGES, COMMUNITIES & GREEN BELT**

**We suggest you choose 'Option 4' when having your say**

As you probably know Elmbridge Borough Council is currently in consultation about their Local Plan which includes five possible options for future housing in the borough. It is really important that as many residents as possible complete their Options Consultation Questionnaire because this will profoundly affect our area in the years to come. To do this you will first have to register at [www.consult.elmbridge.gov.uk/consult.ti/system/register?](http://www.consult.elmbridge.gov.uk/consult.ti/system/register?) and the Options Consultation Questionnaire itself is at [www.consult.elmbridge.gov.uk/consult.ti/system/listConsultations?type=0](http://www.consult.elmbridge.gov.uk/consult.ti/system/listConsultations?type=0)

The Cobham Greenbelt Group, which includes a representative of the CDRA as well as other local groups, has been spent a lot of time reviewing the Local Plan and you will find more information and excellent guidance on how to complete the Options Consultation Questionnaire on their website at [www.cobhamgreenbelt.org.uk](http://www.cobhamgreenbelt.org.uk). However the CDRA has some suggestions on how to answer question 6 of the questionnaire.

If you have any queries please contact [contact@cobhamgreenbelt.org.uk](mailto:contact@cobhamgreenbelt.org.uk) or, for queries about our suggested responses to question 6, please contact [planning@cdra.co.uk](mailto:planning@cdra.co.uk).

In terms of question 4a, the CDRA is in agreement with the Cobham Green Belt Group that option 4 is the best alternative for our area.

### **CDRA specific advice when answering Point 6**

#### **Why Comment on Changes to Detailed Planning Policies?**

They will govern decisions on individual planning applications in your neighbourhood for the next 15 years within the overarching new Local Plan. The earlier views are expressed in the new Local Plan process the more likely they are to be effective.

We need to be very careful in our responses to the questionnaire as current policies are leading to development with no differentiation for character, amenity, traffic or parking requirements of our residential areas. Many residents will have seen examples in the last 18 months.

#### **Why is Change Needed?**

For the last two years EBC's existing Local Plan has been officially deemed out of date and therefore ineffective in controlling development. Central Government Planning Policy now guides interpretation of existing local policies with a presumption in favour of developers and with limited local context.

The green belt should be saved but large numbers of residents will also be affected by the resulting increases in density in our communities. The only way to control this with acceptable impact is to insist on changes to EBC's detailed planning policies.

### **Which Policies Need to Change?**

Until the new preferred strategic option is chosen for the new Local Plan, based on responses to this questionnaire, it is not possible to identify all of them. However some policy changes can be identified now. EBC recognise this, hence inclusion of point 6 in the questionnaire.

### **Answering Question 6**

Each response is limited to 400 characters. Comment has to be hugely simplified and extremely selective.

Please tick YES to point 6a, then you have the question: *'If yes, please specify which planning issues'* and 10 tick boxes, followed by a 400 character comments box.

To make the point that change is needed it is valid to tick all of the 10 boxes then be selective in the comments box. No need to cover each of the 10 in the comments just the more frustrating ones such as design, character, amenity, car parking and access.

We have nine suggested comments, covering different planning issues to choose from to insert into the question 6 comments box. These options are below and are in no particular order. Please choose the issue you are most concerned about or affects you the most and if you can use your own words wherever possible.

Infrastructure policies will follow once a preferred option is identified.

### **The Nine Sample Responses to Q6**

Policy references to 'maximising' use of land should be removed and 'optimise' inserted, with a clear definition, to comply with national policy. Optimisation is important to achieve proportionate control of density, character, car parking, and access for new development. A density that increases the current character area average should be both optimal and proportionate with the prime policy role of protecting existing character and amenity

Individual density limits should apply across character areas not blanket settlement or Borough wide. Windfall sites less than 0.3Ha in residential areas should be guided by the existing average density of that area to preserve the quality of residential amenity and the ability to absorb all generated parking without street spillage. Character and the areas it applies to be redefined to account for access, amenity and public transport availability.

Character areas with logical boundaries should be defined and described by wording directly referenced from revised policies on access, parking, design, density, sustainability, open spaces, public amenity, historic & heritage features. Blanket

standards across the Borough or settlement produce suboptimal development which erodes existing character. Parking, amenity and density standards with numbers relevant to that area are essential.

Affordable housing policy must be clear and enforceable with allocated sites across the Borough in sustainable locations. New housing development must provide %age affordable to meet stated need which private sector won't deliver, so public sector led delivery policy is needed. Housing mix must address need and respect local character which must be preserved by parking, design, density and amenity standards which allow development to be governed effectively.

Optimising use of sites needs unambiguous policies with criteria for parking, access, sustainability, design, massing and density within clear local character description. Affordable housing policy and viability tests must be transparent. Policies should give residents and developers confidence of quality outcomes with no loopholes, preserving existing character, parking, environment, amenity and access standards for long term quality development.

Character, density, design policy with parking and access governs site coverage, relationship to neighbouring properties, amenity space and waste arrangements. They should produce developments with optimal and comfortable fit on site regardless of its size. Traffic disputes occur where County level highway policies lack local credibility. EBC should have policy standards for site access and on street parking. Cobham's effective bus capacity is over estimated.

Parking policy is driven by the desire to reduce car use. This works in town centres but not in our suburban areas where car usage is increasing. Electric or fuel cell vehicles will replace petrol power one for one with dramatic environment benefits. Token additions like Chatterbus and cycle parks will not persuade a shift from cars in an area where remote supermarkets, schools and jobs generate trips. Parking ratios should be a fixed number per dwelling not a maximum.

Surrey local authorities set number of car spaces per type of property with on street parking standards. All parties know where they stand, reducing friction with and between residents. EBC uses parking policy to reduce car use which is ineffective and demand will continue to rise with population as a result of the new plan with electric or fuel cell power an added attraction. Higher densities in town centres and reduced densities elsewhere would also reduce cars.

Parking, amenity, environmental and design standards should be set which control densities and preserve the character of residential areas and enhance the success of our commercial ones.