



ELMBRIDGE CORE STRATEGY DOCUMENT JULY 2009

ISSUES ARISING

Sections 2.6 & 5.4, Page 20, Objective 4, CPA 6 and 7: What are the criteria upon which the Government, in its South East Plan, set the 5620 residential unit target for Elmbridge? Are copies of the text and rationale of EBC's objection to those 5,620 new residential units available for examination? What were the reasons given by the Government for rejecting EBC's objection? Where is it proposed to locate Cobham, Downside, Oxshott and Stoke D'Abernon's allocation of the Government's required 5,620 new residential units?

Section 2.8: What is actually being done to assess and plan for the effects of the significant anticipated increase in the numbers of older people?

Section 2.14: Where do Cobham and Oxshott stand in the EBC 'Vision' for Town Centres?

Sections 3.5 to 3.9: Where are the criteria set out and defined upon which the development control decisions referred to in this Section will be based?

Section 3.14: How are the housing type allocations/requirements calculated for the purposes of the SHMA?

Section 4.6 & Page 20, Objective 3: Cobham Fairmile Deprived Area – How does EBC intend to address this? Reference to proposed action should be included in CPA.15.

Section 4.7: Town Centre Community Hubs – How does EBC intend to take this forward now that SCC has resolved to sell its Cedar Road Site?

Sections 4.8 & 4.9: Where, in Cobham, Downside, Oxshott and Stoke D'Abernon is it planned to release sites for housing/affordable housing/special needs housing?

Section 4.11 and Page 20 & 21, Objective 6: Where is it planned to locate the new education, sports and health facilities which are to be created?

Section 4.20: i): What specific measures are proposed to improve bus services and reduce traffic congestion, particularly bearing in mind that the existing levels of congestion will be exacerbated by the projected population increase between now and 2026?

ii): The omission of Cobham Station from the list of those stations which are located a significant distance from the town which they serve should be rectified.

Sections 5.5 to 5.10: When will the Borough electorate be notified that the 'big decisions' (see Section 5.5) relating to this subjective element of the Core Strategy are being considered? Against what criteria will they be made and what level of public consultation and representation will be permitted?

CPA 1 – Green Infrastructure: Is there a precise definition of the land parcels comprised in the various phrases such as ‘Green Belt’, ‘green network’, ‘green infrastructure’, ‘green corridor’, ‘open space’, used in Sections 5.12 to 5.17? If not, is there a large scale version of Map 5.1 which enables such land parcels to be identified?

Section 5.24: What are the criteria by which the subjective concept of “sense of scale” is to be judged?

Sections 5.27 to 5.32: Have the results of the Envisage Report and Questionnaires been incorporated into the “Settlement Audit” referred to in these Sections? If not, will they be?

Section 5.38: When will the Infrastructure Plan be available? Without it, the Core Strategy is an incomplete document. Who will be invited to be members of the Local Infrastructure Group?

CPA 4: Environment, Social and Community Infrastructure: The delivery of this Strategy relies heavily on partnership and collaboration with commercial enterprises and utility companies in addition to public sector companies. To what extent has the Strategy been adjusted to reflect the impact of a prolonged economic recession on funding and implementation?

Section 5.42: By what legal mechanism is it intended to ensure streetscape improvement as part of new development?

CPA 5: Town Centre Hierarchy: What specific design criteria will be applied in the design of mixed development in the case of the District Centre of Cobham and what are the specific safeguards referred to in CPA5, particularly in relation to the centres of Oxshott and Cobham?

CPA 6: Housing Supply, location and distribution: Despite the overarching strategy not to allow building in the Green Belt or on ‘Open Spaces’, CPA 6 still envisages circumstances in which this could occur (2g and 3 on page 44). What criteria and method of public consultation does EBC propose to adopt in the event that such an important change of use were to be considered?

CPA 7: Housing Distribution: Where is a copy of SHLAA available for examination?

CPA 15: Cobham, Oxshott, Stoke D’Abernon, Downside:

i) Housing Supply: Of the 5620 residential units required by the South East Plan to be built in Elmbridge between 2006 and 2026, 4,333 remain to be built as at July 2009 (see page 43). Of the 600 units allocated in CPA 7 and Figure 6.1, to the CPA 15 Area, 163 have been built since 2006, leaving a total remaining of 437 to be built by 2026. (see page 78).

Firstly, What was the rationale for the number of new residential units allocated to the CPA 15 Area of Elmbridge?

Secondly, Where, precisely is it planned that the land releases necessary to meet that target will be located?

Representation: That CPA 15 should include precise details of, or, if that should not prove possible, at least clear guidance as to where the outstanding 437 houses are to be located.

ii) Bus Service: The responses received as a result of the ‘Envisage Survey’ do not endorse the statement in Section 6.77 that “bus services in Cobham are relatively good”.

Representation: That a policy to provide better bus services to assist in reducing traffic congestion, ameliorating car parking pressures and easing access to schools, shops, businesses, railways stations, key Council services (eg Xcel Centre) and medical centres be included in CPA 15.

iii) Balance between Use Classes:

a) What specific steps will be taken in the CPA 15 area to protect retail uses and limit the shift to A3, Estate Agency and other A2/A3/A4/A5 uses? (see CPA 19).

Representation: That a policy statement identifying such proposed steps should be included in CPA 15.

b) What steps, within the CPA 15 area in general, but particularly in the Cobham Town Centre, will be taken to create a better provision of accommodation for community, leisure and other D2 uses and generally to improve its “multi-functional role”? (see CPA 19 and, in particular CPA 19.4).

Representation: That a policy statement identifying such proposed steps should be included in CPA 15.

iv) Community Infrastructure/ Schooling:

a) **Section 7.42:** For Cobham, Downside, Oxshott and Stoke D’Abernon, all of which experience severe traffic congestion, particularly at the beginning and end of the school day, how is the policy of “ensuring that children are able to attend a school within their local area” (see Section 7.42) to be addressed?

Representation: That a statement setting out how this policy is to be addressed and, in particular, undertaking to pursue vigorously and in collaboration with The Surrey County Council, the construction of a new secondary school to serve the community living within the CPA 15 area, be included in CPA 15.

b) **CPA 22:** On page 104, support is expressed for “the expansion and protection of existing community facilities to meet growing demand”. Surrey County Council’s decision to close the community facilities at its Cedar Road site in Cobham and sell it predominantly for residential purposes is clearly at odds with this policy, notwithstanding that a new Library and a modest, but insufficient amount of ‘community space’ is also to be built. How does EBC plan to address the provision of adequate space for community, leisure and sporting activities in Cobham?

Representation: That a policy statement setting out how the Elmbridge Borough Council intends to expand and protect existing community facilities in the CPA 15 area be included in CPA 15.

v) **Design and Character – CPA 26 & Section 7.88:** When will Appraisal and Management Proposal documents be produced for the Cobham, Downside, Oxshott and Stoke D’Abernon Conservation Areas?

Representation: That the Appraisal and Management Proposal documents for the Conservation Areas within the CPA 15 area should be completed and adopted for the CPA 15 area before the Core Strategy is submitted to the Secretary of State for approval.

vi) Travel and Accessibility: CPA 27:

a) Section 7.101: The Envisage Survey revealed a strong local desire to help to reduce traffic congestion by the improvement of footpaths and the creation of cycle tracks. This is reflected in Section 7.101. This should be reflected in CPA 15.

Representation: That a policy statement specifically promoting the improvement of footpaths and the creation of cycle tracks in the CPA 15 area be included in CPA 15.

b) **Parking Strategy:** As a result of the meetings Envisage has had with senior EBC Officers, Envisage is currently working with the Cobham Chamber of Commerce and other local groups to produce an overarching parking strategy for all local car parks in the CPA 15 area, which it is hoped, will have the endorsement of local traders and residents. It is expected that this will form part of the ‘further consideration’ of this issue referred to in CPA 15.

Representation: That text will be added in the appropriate place within CPA 15 stating that, in formulating its parking policy for the CPA 15 area, the Elmbridge Borough Council will acknowledge and reflect the desires of the local community as expressed in the local community parking strategy document referred to above.

c) **Railway Stations:** Envisage is currently in discussions with the relevant Railway operators to improve provisions for ‘Disabled Access’ to the Cobham and Oxshott Railway Stations.

Representation: That text should be included in CPA 15, expressing the support of the Elmbridge Borough Council for the achievement of such improvements.

vii) **Cobham Fairmile Area of Deprivation:** Proposed action to be included in CPA 15.

Representation: That a statement setting out the manner in which the Elmbridge Borough Council intends to address the perceived deprivation in the area described as “Cobham Fairmile” be included in CPA 15.

viii) **Development Type: Employment:** Empirical evidence would indicate that an over-supply of offices exists in the CPA 15 area at present. On what basis does the Employment Land Review conclude that more office stock should be created?

ix) **Recognition of ‘Envisage’:** It would be helpful if some recognition were to be given of the fact that the findings of the Envisage project have informed the deliberations of the Elmbridge Borough Council and that several of the desires expressed in the Envisage Report and Action Plan have been included in its Core Strategy. Some positive statement in the Core Strategy indicating this and welcoming the efforts of the local community of Cobham, Downside, Oxshott and Stoke D’Abernon would be helpful in overcoming the apathy and cynicism which affects society today and in encouraging members of our local community and across the entire Borough to realise that their positive involvement can achieve a real impact in influencing local decision making.

Representation: That suitable wording, to reflect the above, be included in CPA 15 and that “The Envisage Report and Action Plan” be added to the list set out in Appendix 4, headed “Evidence Base”.

CPA 20: Housing Mix:

Sections 7.13, 7.14 & 7.15: The Strategic Review of Older People’s Housing is said to state that 200 units of private sheltered housing and 250 units of extra-care housing are needed in Elmbridge. What proportion of these is earmarked for Cobham, Downside, Oxshott and Stoke D’Abernon and where are they likely to be located? What specific steps are planned “to support older people living independent lives in their own homes” (CPA 20.4)?

Section 7.18: Which organisation undertook the East Surrey Strategic Housing Market Assessment and on what criteria were the needs outlined in it based?

Section 7.19: The policy that “market and affordable housing should be fully integrated to prevent social exclusion” will inevitably involve an element of ‘social engineering’ and subjective judgement. What are the guidelines and criteria upon which the judgements necessary to implement this policy will be made?

CPA 21: Affordable Housing:

i) What is the precise definition adopted by EBC of the following terms used in the final paragraph of CPA 21?:-

- a) Affordable Housing.
- b) Social Rented Housing
- c) Intermediate

ii) What is the rationale behind the varying percentages chosen in this policy? Are they scientifically selected to bring about the actual target number of affordable units likely to be generated by the likely land releases or are they chosen at random?

iii) The application of this policy is qualified by the words “where viable”. To ensure ‘transparency’ in the planning process, does EBC intend to publish general criteria for a viability test and to accompany each residential planning decision with a viability appraisal and an explanation of how this has influenced the decision? If not, why?

iv) Section 7.37 sets out the intention to keep the Affordable Housing stock in that category in perpetuity. What form of legal agreement will be devised to achieve this and how will it be monitored and enforced?

CPA 22: Community Infrastructure: If, as appears likely, delivery of the target number of residential units continues to occur via a multiplicity of small land releases and therefore “without the scale of development to ensure the provision of new infrastructure” (see Section 7.39), how is it expected that the necessary infrastructure is to be provided/funded?

CPA 23: Gypsies, Travellers and Travelling Showpeople: Are copies of PPG2, Circular 01/2006 and Circular 04/2007 available for examination?

CPA 26: Design and Character:

i) **Section 7.89:** Where is it possible to examine the Residential Design Guidelines adopted by EBC?

ii) **Development Management and Site Allocation DPD and Sustainable Design DPD:** Where can these guidelines be examined and what are the precise mechanisms by which they will be enforced?

CPA 29: Sustainable construction, renewable energy and energy conservation:

i) **Sections 7.115 and 7.116:** It is felt that EBC should seek to frame its planning policy in a manner which would allow it the discretion, when considering applications to replace an existing single residential unit with a new one, to refuse consent if the carbon footprint and water usage of the new one exceeded that of the one it was replacing.

ii) **Section 7.123:** The concept of ‘stepped increases’ is too vague. Its meaning needs to be more closely defined if it is to be adopted as a ‘Core Strategy’.

CPA 30: Green Infrastructure Assets: This Section contains laudable aspirations, but should only be adopted subject to the Greenspace Strategy being acceptable. When is this to be published and what public consultation will there be?