Appendix 4: Schedule of Responses (final consultation)

1. Would you like to add any movement related design requirements in addition to those set out on pages 37 & 38?		
	Respondent's comment	*Council's response*
1.	We need more public transport options to encourage residents to leave their cars at home. E.g., in Claygate, there is only one bus route (K3). I have to walk 20 mins to the bus stop to catch the bus to the Station/Surbiton/Kingston. More bus services (e.g., community buses) would help. Possibly linking to Chessington. Please be aware that not everyone can walk or cycle, especially elderly & disabled people & people with buggies or heavy shopping. Secure parking facilities for cycles would encourage more electric bikes. Introduce a 20mph speed limit through Claygate to protect pedestrians & cyclists & discourage through traffic.	Provision of more public transport is a matter for Surrey County Council as the County Highway Authority and more broadly of the Local Plan in seeking to secure infrastructure provision in association with the new development. Design Code is concerned with the design of new development and therefore cannot require additional infrastructure, but if any such infrastructure was proposed, it includes guidance on how this should be designed. Designing secure parking is required by Code C in chapter 4.4.1. Introduction of speed limits falls within the remit of SCC.
2.	With particular reference to design of cycle routes the focus must be on safety as this is the major factor in deterring people from riding bikes. Historically the car has priority, and the recent update of the highway code could improve the situation but the changes have not been sufficiently publicised. For example, cycle lanes are introduced where there are no yellow lines or other parking restrictions, so the cycle lane becomes a car park - which is very dangerous	These matters are covered in section 11 Cycling of the 'Healthy Streets for Surrey', a Surrey-wide design code for highways adopted by SCC in 2022. **A guidance point suggesting new cycle infrastructure to be designed in line with this document has been included in chapter 4.2.1.** [1]
3.	KT11 3cDR will be KT 11 Longboyds Rr for *****	N/A
4.	off street parking must be maintained to accommodate electric cars in the future.	New developments must provide adequate parking provision in line with the standards set out in the Local Plan

[1] Council's responses in **bold** indicate changes in the Draft Design Code that have been made in response to the representation.

	public transport in Elmbridge is poor so people will continue to rely on cars. cyclists continue to ride dangerously on roads and must be separated. not everyone can or wants to cycle.	– please see Appendix 1 to the Development Management Plan 2015. Provision of public transport infrastructure falls within the remit of Surrey County Council as the County Highway Authority. Matters associated with cycling are covered in section 11 Cycling of the 'Healthy Streets for Surrey', a Surrey-wide design code for highways adopted by SCC in 2022. **The link to it has been added to chapter 4.2.1.**
5.	Consideration for car drivers must be front and centre. Using the car is essential for most people to efficiently and effectively run their lives. Walking/cycling all takes considerably more time to execute and as such is economically less viable. Time is money, the economic impact of slower movement of people and goods is significant. The council must have a remit to consider the economic impact of movement speed reduction.	This matter falls outside of the Design Code remit.
6.	Car parking is a great problem in Hersham especially now double yellow lines have been increased	New developments must provide adequate parking provision in line with the standards set out in the Local Plan – please see Appendix 1 to the Development Management Plan 2015. Design Code is concerned with new developments only, as it cannot affect the existing situation in association with built form, transport or any other matters.
7.	No, though links between stations and town hubs could be improved further, as many of our towns have rail station	Area wide cycle networks are being planned through the development of Local Cycling Walking Infrastructure Plans (LCWIPs). Surrey County Council are working with District

	>1mile from the town location, many of these require cycling or walking on busy roads.	and Borough councils to roll out LCWIPs across the county.
8.	Incentivise use of public transport over cars. Mini-buses/vans should connect local centres and high streets to the train stations in areas where train stations are far from the local centres. The timings of these mini-buses/vans should dovetail with the train frequency.	Matter related to the provision of additional public transport is for Surrey County Council as the County Highway Authority; and more broadly a matter of the Local Plan in seeking to secure infrastructure provision and falls outside of the Design Code remit. Design Code is concerned with the design of new development and therefore cannot require additional infrastructure, but if any such infrastructure is proposed, it includes guidance on how this should be designed.
9.	Yes: 4.1.1 4th bullet point: Nice idea, but raised table and continuous footway sounds great, until you try to use one! In Surbiton, in my experience with young children, raised and continuous footway concept is extremely dangerous in the way it has been carried out there. Because there are no "kerbs", no-one but especially children have any idea that they need to stop and wait at a side road, and motorists coming from the side road DO NOT stop before entering the raised area, but continue to where the driver gets a sightline on the major road. Suggestion: If they are to be introduced, there must be a compulsory "stop" road marking across the side road, prior to the raised table, plus an agonising rumble strip and this must be policed vigorously. Children with a scooter or a bike, will stop at a kerb if trained (which they are, in general). But with the raised table, there is no indication at all, so they carry on. My experiences with my grandsons were	Thank you for sharing this experience. We have passed your comments to Surrey County Council as the County Highway Authority for their consideration.

	TERRIFYING. I am absolutely opposed unless well thought out from a child's eyeline. Fig 4.1 Station links. This is pie-in-the-sky stuff! Nice to have but unrealistic. Hersham Station to Hersham centre: neither the roads nor the footpaths are sufficiently wide to have a dedicated cycle way, while at the same time keeping pavements safe for pedestrians, even though I would like to see it. Figure 4.3. I have used that! Pedestrian crossing across 2cycle-tracks plus 2-way road is a very very long way to cross without an intervening refuge, and when pushing a buggy with an under-5 walking alongside. Especially crossing cycle paths, cyclists never slow down, and it takes a long time to cross from the far kerb. Looks good on paper, but not actually safe for parents with children: my daughter-in-law (who is a cyclist and driver) always walked somewhere else to cross, deeming to far too dangerous to use. Not a solution. Suggestion: These probably need pedestrian controlled lights on such crossings, with plenty of time to cross. Suggestion: If on-street car parking was banned for new developments, then roads might be sufficiently wide to allow dedicated cycleways.	Majority of the train stations are located away from the town centres. Area wide cycle networks are being planned through the development of the Local Cycling Walking Infrastructure Plans (LCWIPs). Surrey County Council are working with District and Borough councils to roll out LCWIPs across the county. Thank you for sharing this experience and your suggestions. We have passed these to Surrey County Council as the County Highway Authority for their consideration.
10.	One of the key constraints impacting on safe movement within Elmbridge - and in particular, Esher - is the congestion created by cars and commercial vehicles using the town as a through route, both east-west and north-	Thank you for your comment and suggestion. Hook interchange falls within the remit of National Highways as part of the Strategic Road Network (SRN).

	south. If the Hook interchange on the A3 was adjusted this through traffic could be substantially reduced and thus allow safer cycle and pedestrian routes around Esher, Claygate and Thames Ditton. Also, please note that Claygate Network Rail station is a lot closer to a large percentage of Esher residents than Esher rail station. Those active links should be recognised and enhanced	Area wide cycle networks are being planned through the development of Local Cycling Walking Infrastructure Plans (LCWIPs). Surrey County Council are working with District and Borough councils to roll out LCWIPs across the county.
11.	Yes - care needs to be taken to ensure vegetation and street furniture does not impede visibility of users. For instance, a proper and reasonable maintenance plan need to be in place to ensure shrubs and trees are kept in check, signage should not be installed in places where it will become obscured by vegetation, thought needs to be given to disabled users of shared paths to ensure safety of all users.	**Guidance on landscaping management associated with part of, or adjacent to, the new active links has been added in chapter 4.1.1.** This will then link to the guidance in the first bullet point in Chapter 4.2.1, specifically the highlighted paragraphs 15.4.2 and 15.6.1 of the LTN 1/20.
12.	street furniture can be an impediment to movement, keep it to a minimum - most people ignore signs anyway!	Third guidance point in Chapter 4.1.1 seeks links to have a continuous footway with at least 2 metres of unobstructed width that are considered to provide sufficient space for movement.
13.	Why are buses not mentioned? Reliable, frequent bus services are required. These should be affordable, and trackable through an app.	Provision of more public transport is a matter of Surrey County Council as the County Highway Authority; and more broadly of the Local Plan in seeking to secure infrastructure provision. Design Code is concerned with the design of new development and therefore cannot require additional infrastructure, such as bus services, but if any infrastructure such as cycle lane is proposed, Design Code includes guidance on how this should be designed.
14.	Suitable trees and green verges should be added to steer people/vehicles in certain directions	Guidance on appropriate tree planting is included in chapter 7 of the 'Healthy Streets for Surrey', a county-wide

		design code for highways adopted by Surrey County Council in 2022. **Link to this document has been added in section 5.1.1.**
15.	Active Travel Links should ideally segregate cycling and walking space	Chapter 4.2.1 covers both options – shared paths and lanes separated by function.
16.	No, but please remember it's not all about cyclists.	Noted.
17.	What movement related design, the ones shown locally will not inspire me to cycle or use alternative transport. drawing a blue line on a main road area is not a design for safety.	Culture change and appropriate infrastructure are needed to encourage people to use active modes of transport.
18.	Please don't squeeze cars off the road. Create new spaces for cyclists rather than taking it from car driving spaces.	Thank you for your comment. We have passed it on to SCC as the County Highway Authority.
19.	Yes. As mentioned on numerous occasions, the turning off streetlights in local areas should be timed to coincide with how long it would take to walk from the last train every evening. It is not safe to be walking home from the last train in pitch darkness, and significantly discourages active travel in both directions as who will walk or cycle earlier in the day if they are faced with an unlit walk or cycle home? Who was consulted with when the decision to turn off the streetlights so early was decided? Certainly not local residents! Turn the lights off 1 hour after the last train leaves the nearest station, and more people would feel safe walking or cycling at night. Also make sure off-road routes are well lit until the same time.	Thank you for this comment. We have passed on your message to SCC as the County Highway Authority. This requirement falls beyond the remit of the Design Code.
20.	There is a problem for pedestrians in Claygate. A main route to schools, the shopping Parade and Station to and from the	Thank you for your observation. We have passed on your message to SCC as the County Highway Authority who is

	direction of Esher is via Hare Lane. However, for a stretch of Hare Lane from the Swan Pub to the Telephone Exchange there is only one narrow pavement (70 cm wide in parts) currently also impeded by uncut brambles. Wheelchairs and mobility scooters cannot be used, pushing a buggy is difficult and the route feels treacherous for pedestrians and cyclists as the road is very narrow and cars at 30 mph feel intimidating. Of course, some cars travel breaking the limit and travel much faster. The pavement is in desperate need of widening and the road needs a 20mph limit. This all relates to section 4.1 movement	responsible for maintenance of the existing adopted highway infrastructure.
21.	car parking is required by most movements - must be included in strategy, not as an after-thought.	Appendix 1 to the Development Management Plan 2015 sets out parking standards in terms of their quantity. These are considered in determination of all relevant planning applications.
22.	No all seems sensible	Support is noted.
23.	The whole section is full of “should” statements which do not make the points mandatory. It will be too easy for developers to avoid complying with these. As far as possible the design standards must be made mandatory, or they will not be followed.	Design requirements could be made mandatory within the Elmbridge Design Code only where these support the delivery of a specific requirement of an existing policy. If they have not been suggested as such, they are not specifically required by the existing planning policy and therefore could be only set as a guidance, i.e., optional, ‘should’.
24.	Increase cycle lanes in the area. Particularly Cobham to Esher to Kingston, please put in a cycle lane or shared path for school children and getting to Kingston (especially now vehicles are restricted with ULEZ)	Area wide cycle networks are being planned through the development of Local Cycling Walking Infrastructure Plans (LCWIPs). Surrey County Council are working with District and Borough councils to roll out LCWIPs across the county.

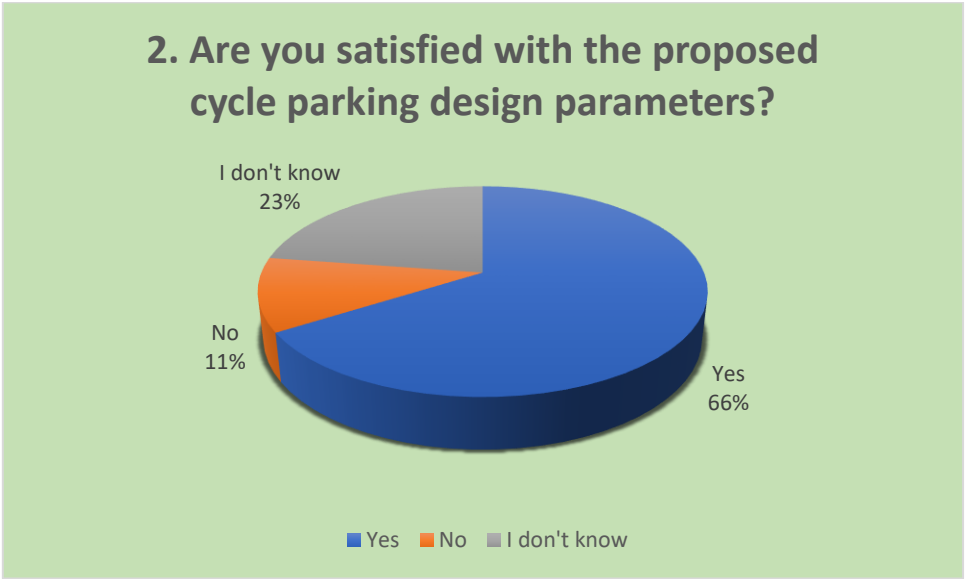
	Improve the path near the middle pond in Cobham for cyclists and walkers, it gets very muddy.	We have passed on your comment to the Council's Countryside team.
25.	Sufficient and large enough access ways must be provided such that there is no need for on-street parking.	Provision of sufficient parking is set out in Appendix 1 to the Development Management Plan 2015. Parking design and layout, and access roads are covered in sections 4.6.1 and 4.3.1 of the draft Design Code respectively.
26.	Require better East-West public transport in Elmbridge. Good if you're travelling northeast to London, but poor for getting around locally.	Matters that relate to the provision of more public transport fall within the remit of Surrey County Council as the County Highway Authority; and more broadly of the Local Plan in seeking to secure infrastructure provision in association with new development. Design Code is concerned with the design of new development and therefore cannot require additional infrastructure, but if any such infrastructure is proposed, it includes guidance on how this should be designed.
27.	On the plan in section 4.1 you have failed to recognize that the distance from Walton-on-Thames railway station to Hersham village centre is slightly shorter than that when traveling from Hersham railway station so, this alternative route needs to be added as an active link and measures taken to enable the footway to be a minimum of 2m wide, as stated in the document, when a development planning application is submitted, so that the property boundary to the pavement is moved back to accommodate a widened pavement.	Thank you for your observation. **The link between Walton-on-Thames railway station and Hersham centre has now been added to Fig 4.1.**
28.	I do not understand the objective of better links from a station to the nearest town centre. That seems to only address the need for someone to travel to somewhere other than their nearest town centre by train. I do this occasionally	Thank you for your observation. This is a matter of a strategic approach and therefore we have passed on your comment to Surrey County Council as the County Highway

	if I am meeting someone in Oxshott or Stoke D'Abernon and get the train to/from Claygate. Surely 95% of the time people access their nearest town centre and so don't travel by train. I don't see any need to improve pedestrian links between a station and the nearest town centre. The pavements work well for that I find. The bigger issue is that train lines (and stations) in Elmbridge are typically not that well located for the actual town centres. Cobham being a good example. So, if you don't walk then what? I just can't see cycling as the solution. Our trains have limited space (and none at peak times). Then you need to find somewhere secure to leave a cycle. It seems the chances of anyone keeping a quality (expensive) cycle for long is small. Then the issue is carrying whatever you have been to get at the shops on a cycle. And then manhandling your shopping and the cycle back onto public transport. And if there is a requirement for this, the best solution would be to have local and free hopper buses that run to/from the station and town centre.	Authority, responsible for the provision of cycle infrastructure.
29.	Agree that wherever possible, sustainable active travel should be encouraged by providing safe and attractive routes between public transport hubs (such as Esher train station) and town centres such as Esher. By improving cycle lanes and pedestrian routes along arterial routes such as the A307 Portsmouth Road, more people will be incentivised to travel actively. By reducing the dominance of the car, centres such as Esher can become more inviting areas to visit and thrive. Transport hubs such as train stations are critical in Elmbridge and sustainable methods of delivering development and safe routes around these hubs must be improved.	We have passed on your comment to the Council's regeneration officer who is overseeing the current Esher Vision project.

30.	Response by Sport England: Sport England has co-produced its updated Active Design guidance with the Office for Health Improvement and Disparities (OHID). This sets out 10 principles for designing healthy and active communities and developments. Our comments on this Design Code are considered against our Active Design guidance. Sport England welcomes the movement related design requirements set out on page 37. Sport England would wish to add the importance of ensuring that consideration is given to ensuring that active travel routes (walking and cycling) are designed and laid out in a way which promotes safety and security for users e.g., through the use of lighting. Further, these active travel routes should be well maintained and managed to ensure they remain attractive options for encouraging a healthy and active lifestyle.	**We have now included this guidance point and the link to the document in chapter 4.1.1.** **Landscaping management of the new active links have been added to the guidance points in chapter 4.1.1.** This relates to the guidance in the first guidance point in Chapter 4.2.1, specifically the highlighted paragraphs 15.4.2 and 15.6.1 of the LTN 1/20.
31.	Response from the Designing Out Crime Officer, Surrey Police: Cycle storage where possible should be incorporated into the existing security plan near to the station footprint.	**This suggestion has now been included in chapter 4.1.1.**
32.	Response by Inspired Villages:	

	We strongly support the station to centre links proposed at section 4.1. However, we raise concern over the level of prescription for off-road routes made in section 4.2. While we acknowledge this is advisory, there are several factors which need to be taken into consideration. The dimensions of the route are very specific and constraints such as topography, existing trees and utilities can impact the ability of this to be delivered. A three-meter shared route will only be appropriate in areas of primary routing. This should be amended to be less prescriptive.	The requirement for the minimum width of shared off-route routes at 3m is in line with the LTN1/20 and as noted, it is a guidance. However, where the new off-route routes are being proposed, these should ensure this minimum width is achieved for the reasons of their useability and safety of all users.

2. Are you satisfied with the proposed cycle parking design parameters?		
	Respondent's comment	*Council's response*
1.	Yes (66%)	Two thirds of respondents were satisfied with the proposed cycle parking design parameters.
2.	No (11%)	Noted.
3.	I don't know (23%)	Noted.



3. Would you like to add any additional cycle parking design requirements?		
	Respondent's comment	*Council's response*
1.	Whilst I approve of off-road cycle routes, there needs to be a discouragement of 'sport cyclists' on these routes. I cycle on bridleways at weekends & am often in dangerous situations with other cyclists who are faster & stealthily approach other users.	Thank you for your observation. Unfortunately, this is a matter of behaviour, and the Design Code is not the right place to address this issue. Design Code is to guide design of facilities and places, but how these are used once implemented is beyond its remit.
2.	proper provision for cycle parking must be provided. too many bikes are left in the way of pedestrians especially hire bikes.	A requirement for sufficient cycle parking is set out in the current Local Plan in Appendix 1 to the Development Management Plan 2015. Design Code is specifically concerned with design and layout of the proposed parking.
3.	No, bicycles don't cause the problems in comparison to insufficient car parking spaces	Noted. A requirement for sufficient car/cycle parking is set out in the current Local Plan in Appendix 1 to the Development Management Plan 2015.
4.	Not everyone can cycle so don't see why we should in force this & how safe are the bicycles in these storage sheds as so many get stolen at the railway station sheds.	Design Code offers guidance points on making the cycle stores/parking areas secure. **We have now added a link in chapter 4.4.1 to Secured By Design that seeks new developments to be safe.**
5.	New secure cycle parking by the station	A requirement for new infrastructure is outside of the Design Code remit. However, should a proposal for such provision come forward as part of a planning application, Design Code offers guidance on how it could/should be designed.
6.	TFL-style Bike Hangars are pretty ugly items of street furniture. For new developments more integrated solutions should be explored to reduce street clutter. They are particularly jarring in Conservation Areas and should be more sympathetically designed.	Design code and guidance relating to street furniture is included in chapter 8.1.4.

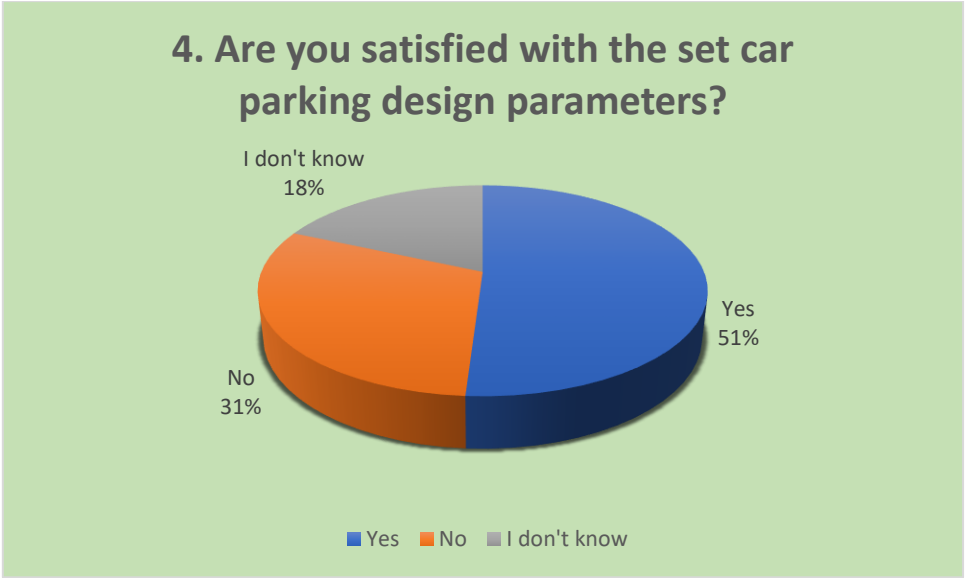
7.	Suggestion: Public and private cycle parking provision must be under cover as well as secure. Suggestion: Public charging points for electric bikes should be considered. Suggestion: Cycle provision should be in addition to car parking provision. Younger people are more likely to be cyclists, and their parents will still need the car (i.e., those who do the heavy bulky shopping, and parent-taxi service). Don't reduce car parking until car driver numbers have decreased significantly.	**We have now added a guidance point encouraging applicants to achieve Secured By Design Award in chapter 4.4.1.** This point is already included in chapter 4.4.1. A requirement for sufficient car and cycle parking is set out in the current Local Plan in Appendix 1 to the Development Management Plan 2015.
8.	electric bikes and scooters seem more popular than regular bicycles, need charging points.	This point is already included in chapter 4.4.1.
9.	Parking for vehicles should be kept to a minimum. Investment in active travel and public transport (i.e., buses) is vital.	A standard requirement for car parking is set out in the current Local Plan in Appendix 1 to the Development Management Plan 2015.
10.	Need outside electricity for electric bikes	This point is already included in chapter 4.4.1.
11.	Vertical cycle storage is inappropriate for any cycles with mudguards - required for all-weather cycling to support modal shift. Vertical cycle parking also inappropriate for e-bikes which may be heavier and used by less able riders. Cycling parking should include provision for cargo bikes, trikes and other larger cycles.	Thank you for your observation. **We have now added a guidance point to cover this issue in chapter 4.4.1.** Parking allowance for non-standard bicycles, including cargo bikes or adapted bicycles, is already included in chapter 4.4.1.

	All new developments MUST provide short-stay visitor cycle parking. Sheffield stands should be mandated and should be spaced appropriately. Cycle parking should be located near building entrances, not in the furthest corner of car parking provision.	Provision of cycle parking in convenient and secure locations, as well as the provision of Sheffield stands, are already included in chapter 4.4.1. Provision of short-stay cycle parking is not a policy requirement and therefore it cannot be made mandatory in the Design Code.
12.	There is not enough cycle parking or covered bike protection in Walton. I used to cycle to work and park my bike, not anymore. Doing the bare minimum to look good is not going to inspire people to give up cars.	Standard requirements for car parking are set out in the current Local Plan in Appendix 1 to the Development Management Plan 2015. Design Code reiterates the requirement for well-designed cycle parking in new developments, but it cannot seek a retrofit of these facilities.
13.	There isn't a specification for the type of secure rack to secure a bike to. The rack needs to ensure that the lock can be threaded through the cycle frame rather than just the wheel	A provision of Sheffield stands is highlighted in chapter 4.4.1 as a secure solution. **We have also added a link to Secured By Design with regards to safe and secure design solutions for cycle parking in chapter 4.4.1.**
14.	Who designed the affordable housing part of the Heart? The main entrance is a disgrace and there is no safe cycle parking for any of the residents! That entrance hall could be used to store bicycles, buggies, wheelchairs and scooters to support people with active travel. Cycle parking needs to be in lockable units, and not just depending on the owner having an adequate chain.	Thank you for your observation. Unfortunately Design Code relates only to the new development and therefore cannot require a retrofit of existing inadequate cycle parking facilities. However, a guidance on how to design safe and secure cycle parking in new developments is included in the Design Code.
15.	No potentially more EV charging points	There is no specific requirement in our Local Plan for the provision of electric charging points for cycles. However, a guidance point in chapter 4.4.1 seeks proposals for new development to demonstrate how cycle parking facilities cater also for electric cycles.
16.	Make them mandatory.	Mandatory requirements associated with cycle parking are included in chapter 4.4.1.

17.	Put in more cycle lanes	Area wide cycle networks are being planned through the development of the Local Cycling Walking Infrastructure Plans (LCWIPs). Surrey County Council are working with District and Borough councils to roll out LCWIPs across the county.
18.	cycle parking should be included in built form to plot ratio	Out of the ten characteristics of well-designed places, cycle parking is directly associated with movement. Depending on their type, new developments will need to satisfy the relevant codes and guidance set out across the document.
19.	Cycle parking should be included in the built form/plot ratio	Out of the ten characteristics of well-designed places, cycle parking is directly associated with movement. Depending on their type, new developments will need to satisfy the relevant codes and guidance set out across the document.
20.	I am not a cyclist. I would not cycle on the roads as it is too dangerous, and I am not as young as I was. And making better provision for cycling on the roads would be fine if you want only pedestrian and cycle usage. But walking and cycling can't entirely replace the car. What happens is that it just makes any essential use of the car more time consuming and frustrating. Cycling is not the solution for me. Better local public transport would be. I already walk to the shops and if I were unable to walk to the shops, I would be unable to walk to a bus stop.	Thank you for your observation. Matters relating to the provision of more public transport is within the remit of Surrey County Council as the County Highway Authority, and more broadly of the Local Plan in seeking to secure infrastructure provision in association with new development. Design Code is concerned with the design of new development and therefore cannot require additional infrastructure, but if any such infrastructure was proposed, it includes guidance on how this should be designed.
21.	Response from the Designing Out Crime Officer, Surrey Police: Reference Secured by Design for suitable cycle storage designs: Consideration that design does not increase the fear of crime or enhance opportunity for crime/asb to	**A link to Secured By Design has now been included in chapter 4.4.1.**

	develop. Incorporating the principles of CPTED and a Secured by Design application will ensure the fundamental areas have been considered.	
22.	Response by Inspired Villages: As one of the comments mentions within the document, it is unclear whether the 'Off-road routes' guidance refers to all roads. It would be useful to have further detail on cycle route design requirements outside of those for off-road routes. A number of further sections within LTN 1/20 such as Section 5 provide guidance on desirable minimum cycle path widths on other road types that would be useful within this document. Section 6 also provides useful information on shared use cycle / pedestrian paths that may be appropriate in certain situations and gives minimum widths based on expected number of cyclists per hour.	**We have now included a link in chapter 4.2.1 to Healthy Streets for Surrey Design Code that details considerations to be exercised in designing cycling infrastructure.**

4. Are you satisfied with the set car parking design parameters?		
	Respondent's comment	*Council's response*
1.	Yes (51%)	Just over half of respondents were satisfied with the proposed car parking design parameters.
2.	No (31%)	Almost one third of respondents were not satisfied with the set car parking design parameters.
3.	I don't know (18%)	Noted.



5. Would you like to see any additional design requirements for new car parking?		
	Respondent's comment	*Council's response*
1.	Will there be provision for parking for shops & the station, especially when station car parks are developed?	Majority of new developments require planning permission. As part of the application process, compliance with parking standards set out in the Local Plan is considered. This ensures that there is sufficient parking retained or alternative provision made, in line with the policy requirements. Policy DM7 states: "The cumulative impact of changes to station car park provision will be considered in terms of the possible knock-on effect with regard to the impact on number and length of car journeys, increased demand on another train station or impact on traffic safety, congestion or residential amenity in surrounding streets."
2.	Any car parking must allow free access for wheelchair users - parking on curbs should be made illegal	Thank you for your suggestion. Unfortunately, this is a matter of behaviour, and Design Code is not the right place to address this issue. The aim of Design Code is to guide design of facilities and places, but how these are used is beyond its remit.
3.	More space	Through the newer designs of cars and the inclusion of more technology the size of cars has increased over recent years. Coupled with this SUVs have become an increasingly popular choice of vehicle. Advice on car parking space dimensions in the UK has not kept up with these changes in vehicles. Reflecting recent trends and the increase in vehicle sizes, the minimum size of a car parking space size has been increased and this is set out in section 4.6.2.
4.	Yes, off street parking must be maintained to accommodate electric cars in the future.	Planning decisions on new developments include condition(s) to ensure compliance with the approved plans. These plans usually include space(s) designated for on-site parking.

	Short term parking near shops is insufficient.	Where necessary, their retention is also subject to condition(s). The number of parking spaces to be provided by new development is guided by standards set out in our Local Plan in Appendix 1 to the Development Management Plan 2015. Design Code cannot require retrofit of facilities.
5.	Car parking should have more fast chargers for electric cars. The high voltage infrastructure should be included as part of the groundworks of new developments, even if the chargers are not yet in place.	Provision of parking spaces to be served by EV charging points is guided by standards set out in our Local Plan in Appendix 1 to the Development Management Plan 2015 and by Vehicular, electric vehicle and cycle parking guidance for new developments published by Surrey County Council. It is outside of the Design Code remit to require a specific number of chargers in new development.
6.	Yes, Hersham is at capacity with car parking now since spaces have been removed	It is not within the Design Code's remit to rectify the existing situation. It offers design solutions for new developments, including how parking should be designed. The amount of parking spaces on new developments is governed by our Local Plan, in Appendix 1 to the Development Management Plan 2015.
7.	What is the proposal for EV chargers for off plot parking? Some more detail about how chargers be mandated for installation in new developments where there is no availability to have a drive while maintaining clear access on footpaths and footways for residents. "conveniently sited" is too wishy washy.	**We have now added a link to the relevant section of the Healthy Streets for Surrey Design Code that sets out detailed guidance on appropriate location and installation of EV charging facilities.**
8.	It doesn't specify how many parking spaces per development or house as there should be at least one space per flat & two for a house.	The required number of parking spaces is set out in our Local Plan in Appendix 1 to the Development Management Plan 2015. It is not within the remit of Design Code as a

		Supplementary Planning Document to specify the required quantum of parking spaces on new developments.
9.	Car ports encouraged	Design guidance for garages, car ports and car barns on new developments is included in section 4.6.3.
10.	There should be mandatory car parking space for all new builds. This should be 1.5 per dwelling, except for social and affordable homes where it should be 1 per dwelling. The lack of ~~in~~adequate car parking for residents/visitors results in street parking, which results in congestion on the roads.	The required number of parking spaces is set out in our Local Plan in Appendix 1 to the Development Management Plan 2015. It is not within the remit of the Design Code as a Supplementary Planning Document to specify the quantum of parking spaces required on new developments.
11.	New developments should have covenants placed on them to prevent people paving over front gardens. Without long-term measures in place the "soft landscaping" outlined in the guide will be lost over time. Also, parking areas should be permeable membranes rather than paving or concrete, to reduce water runoff.	Covenants are legal agreements. Imposition of legal agreements and conditions on planning permissions must be fully justified and meet the tests set out in the national policy. A replacement of soft landscaping with paving over time might not require planning permission, as in many instances this would benefit from permitted development rights. Code A in chapter 4.3.1 requires that hardstanding must be made using permeable materials, and also that its extent should be minimised.
12.	In Hersham, I think it is worth pointing out that underground parking is not possible because of a high-water table, probably also in many other settlement areas. So, of limited feasibility in many areas. Suggestion: On-street parking should not be part of any new building projects, regardless of "parking stress". In all cases, on-site parking provision should be sufficient and compulsory.	Although guidance suggests underground car parking, it is accepted that this might not be possible in all new development for various reasons, including the ground water levels or viability. However, feasibility of this option should still be explored by applicants. The acceptability of parking on a highway is a matter of a highway code. Remit of Design Code does not reach this issue.

	Reason: Roads should be used for movement of traffic. If this were the case, it would be possible to add safe cycleways (pages 37/38). Also at present, the first developers get to claim the on-road space but the second then can't. This is crazy. Roads are not provided by the state to give free parking to property developers on the basis of first-come/first-served. And walking would be safer with better sightlines for pedestrians and children.	The required number of parking spaces on new developments is set out in our Local Plan in Appendix 1 to the Development Management Plan 2015. On street parking spaces cannot be claimed by developers unless the allocation of such spaces is agreed by SCC as the County Highway Authority.
13.	The draft Code states that "where allocated parking is provided, this should be close to the front door of the residential properties." I believe that this should be more emphatic, if possible. Car parking at 'exemplar' developments such as Poundbury, Nansledan and Fairford Leys where parking is in 'courtyards' behind the premises as the architects wished to get the cars out of sight, does not work as residents park on the pavements outside their houses.	Design Code cannot make the location of allocated parking a mandatory requirement as it is not set out in the local or national policy as such. Therefore, it is included in the Design Code as guidance to be considered by applicants on new developments. Design Code as a Supplementary Planning Document can provide more detailed explanation of the existing policy and how this is to be applied in practice only. Matters which are required in the code as mandatory are set out in the planning policy.
14.	Yes - there needs to be a clear plan and responsibility for maintenance of green landscaped areas. Wider bays should be considered to allow for disabled parking particularly in visitor and communal parking areas.	**We have now included this requirement within code A in chapter 4.5.1.** **We have now included additional guidance in section 4.6.2 to cover the size of disabled parking spaces.**
15.	electric car charging points are crucial to include with any new development, and installing to existing infrastructure could be challenging. The batteries in electric cars are currently a fire hazard as well as creating excessively heavy vehicles, this must be considered - AND this	Provision of parking spaces to be served by EV charging points is guided by standards set out in our Local Plan in Appendix 1 to the Development Management Plan 2015 and in the Vehicular, electric vehicle and cycle parking guidance for new developments published by Surrey County Council.

	applies to commercial vehicles as well as privately owned ones.	
16.	Car parking on a residential plot should be made of porous or honeycomb material to allow surface water drainage; this should be mandatory. New communal parking areas must incorporate an appropriate proportion of EV charging points.	**We have now included this point in code A in chapter 4.3.1.** Provision of parking spaces to be served by EV charging points is guided by standards set out in our Local Plan in Appendix 1 to the Development Management Plan 2015 and in the Vehicular, electric vehicle and cycle parking guidance for new developments published by Surrey County Council.
17.	Yes parking should be to a minimum standard and on street parking that harms the visual amenity of an area (I.e. Claremont Road in Claygate) should be constrained. There should be free station parking to relieve parking pressure on surrounding streets.	Quantum of parking spaces is guided by standards set out in our Local Plan in Appendix 1 to the Development Management Plan 2015. Visual amenity, as a result of new development, is considered as part of the planning application process. This requirement falls beyond the remit of the Design Code.
18.	The draft says "Where allocated parking is provided, this should be close to the front door of residential properties." This is a big mistake. Walking to a car is the only fresh air and exercise that some people get - and it is good for their mental and physical health. Cars should be parked out of view, and less conveniently. Then it would not be such as big step for residents to take up active travel or use public transport.	Thank you for your observation. It is not the intention of the planning policies to provide inconveniently laid out developments.

	Car parking surfaces, where provided should be nature friendly and porous to help with drainage (i.e., use of SUDS).	**We have now included this point in code A in chapter 4.3.1.**
19.	Greenery to define areas	Code A in chapter 4.5.1 requires that soft landscaping is included at least after every 3rd parking bay.
20.	On-street parking should be eliminated over time, providing more space for greening and active travel.	This suggestion falls beyond the remit of the Design Code.
21.	Yes. Clause 4.6.4 Additional requirements for non-residential development.... Why is this restricted to non-residential? This clause should be extended to include residential development as well. For example, residential development in private roads (many are with no parking) should have additional off street for visitors and tradespeople.	Sufficient parking provision in residential development (homes, flats, and residential institutions) is ensured through the standards set out in our Local Plan. Commercial and other non-residential premises are subject to different parking standards. All of these can be found in Appendix 1 to the Development Management Plan 2015. Design Code as a Supplementary Planning Document cannot introduce new parking standards in terms of parking quantum.
22.	Whilst appreciating their expense I do think in more expensive developments, underground car parking should be heavily encouraged to increase green spaces around developments and reduce the feeling of a car park wing added to a development. This was used brilliantly in 3 Holtwood Road Oxshott and was felt a gold standard for the Bevendean estate and something that all Elmbridge new developments should consider where practicable.	Guidance point to this extent is included in chapter 4.5.1.
23.	Yes - There is a tendency to not allow enough parking for new developments which increases street parking and traffic congestion.	Quantum of required parking spaces on new developments is set out in our Local Plan in Appendix 1 to the Development Management Plan 2015.
24.	you need to consider those who do not have a road outside their house. people using restaurants should park	This is a matter of behaviour and falls beyond the remit of the Design Code.

	in local car parks and WALK (god forbid!) and not take up valuable parking in residential roads.	
25.	All properties should have parking for 2 vehicles to prevent parking congestion on roads.	Quantum of required parking spaces on new developments is set out in our Local Plan in Appendix 1 to the Development Management Plan 2015. This is based on the location of the property and its size.
26.	Yes - why isn't chevron style parking considered, it is surely easier to access particularly for cars that don't have parking sensors/ cameras	Suggestion for echelon (angle parking) and its dimensions is made in chapter 4.6.2.
27.	Yes, most families have 2 to 3 cars often due to children staying at home longer due to the cost of renting or buying their own homes	It is not within the remit of the Design Code to suggest lower or higher parking provision requirements than those made in the Local Plan in Appendix 1 to the Development Management Plan 2015.
28.	There should be electric car charging points provided to every parking bay.	Provision of parking spaces to be served by EV charging points is guided by standards set out in our Local Plan in Appendix 1 to the Development Management Plan 2015 and in the Vehicular, electric vehicle and cycle parking guidance for new developments published by Surrey County Council.
29.	Make sure spaces are wide enough for modern cars	Through the newer designs of cars and the inclusion of more technology the size of cars has increased over recent years. Coupled with this SUVs have become an increasingly popular choice of vehicle. Advice on car parking space dimensions in the UK has not kept up with these changes in vehicles. Reflecting recent trends and the increase in vehicle sizes, the minimum size of a car parking space size has been increased and this is set out in section 4.6.2.
30.	Car parking is needed as we have much parking on residential roads	It is outside of the Design Code remit to set the quantum of parking spaces to be provided in new developments. This is

		set in our Local Plan in Appendix 1 to the Development Management Plan 2015.
31.	Controls should be in place to prevent parking being a source of revenue generation and to be a service to the local community	This matter falls beyond the Design Code remit.
32.	Ensure electric charging points are available. For village areas, offer resident parking permits.	Provision of parking spaces to be served by EV charging points on new developments is guided by standards set out in our Local Plan in Appendix 1 to the Development Management Plan 2015 and in the Vehicular, electric vehicle and cycle parking guidance for new developments published by Surrey County Council. Elmbridge Borough Council is also implementing EV charging points within its car parks across the borough. Surrey County Council as the County Highway Authority is dealing with parking permits. This is beyond the remit of the Design Code.
33.	New developments must avoid the need for people to park partly on the footway.	As part of planning applications parking spaces in the new developments are designed in such a way that they do not take up the pavement space. However, the issue where the highway users choose to park partly on the pavement is a matter of behaviour, which is outside of the planning remit.
34.	If you have to build a new house, make sure there is underground parking or a garage	A specific type of parking space, whether it is underground, surface parking or in a garage, is not required by the planning policy and therefore cannot be made mandatory through the Design Code. Planning policy is flexible enough to give the applicant a choice of parking provision, however it requires a certain quantum that must be met.

35.	Yes. Car parking areas must disincentivise additional parking near to, but outside the designated areas.	It is not clear what this suggestion seeks to achieve and by what means.
36.	Wheelchair and parent/child parking spaces should be included in communal parking layouts. Electric parking widths should include space for cables and connectors	Parking standards set out in our Local Plan (Appendix 1 to the Development Management Plan 2015) do not include a requirement for parent/child parking spaces. As such, Design Code cannot require their provision. Parking standards however specify parking requirements for people with disabilities. **Size of a disabled parking space as well as consideration of its location on the site has now been included in section 4.6.2**. Design guidance on the EV charger equipment is included in section 9.9 of 'Healthy Streets for Surrey', a county-wide design code for highways adopted by Surrey County Council in 2022. **We have now added a reference to it in chapter 4.6.6 of the Design Code.**
37.	There should be parent and child parking and wheelchair parking spaces in all communal parking layouts. Electric car parking width space should include space for cables and the charging connector.	Parking standards set out in our Local Plan (Appendix 1 to the Development Management Plan 2015) do not include a requirement for parent/child parking spaces. As such, Design Code cannot require their provision. Parking standards however specify parking requirements for people with disabilities. **Size of a disabled parking space as well as consideration of its location on the site has now been included in section 4.6.2**. Design guidance on the EV charger equipment is included in section 9.9 of 'Healthy Streets for Surrey', a county-wide design code for highways adopted by Surrey County Council

	Carparking layout should be included in built form/plot ratio	in 2022. **We have now added a reference to it in chapter 4.6.6 of the Design Code.** Out of the ten characteristics of well-designed places, parking is directly associated with movement. Depending on their type, new developments will need to satisfy the relevant codes and guidance set out across the document.
38.	Yes - All designs must be such that there will be no need for on street parking for owners or delivery vehicles. There must be sufficient space for one car plus room for one delivery vehicle per two bedrooms.	It is outside of the Design Code remit to set the quantum of parking spaces to be provided on new developments. This is set in our Local Plan in Appendix 1 to the Development Management Plan 2015.
39.	Sites to include additional spaces to accommodate visitor's vehicles	It is outside of the Design Code remit to set the quantum of parking spaces to be provided on new developments. This is set in our Local Plan in Appendix 1 to the Development Management Plan 2015.
40.	But please don't make residential car parking a tool to force people from car ownership. Make the alternatives to the car better - not owning a car worse	Alternatives - area wide cycle networks, encouraging active travel, are being planned through the development of Local Cycling Walking Infrastructure Plans (LCWIPs). Surrey County Council is working with District and Borough councils to roll out LCWIPs across the county.
41.	Response by Inspired Villages: We believe point A of 4.5.1 should be made as an advisory point rather than mandatory. Dependant on site constraints, the planting of evergreens every 3rd bay is not always a possibility. Also, the suggestion for the use of parking spaces for other uses, needs further clarification as to what these uses could be.	Policy DM7 sets out that where parking provision is made the use of soft landscaping should be maximised. As a result, this code will be retained in the Design Code as a mandatory requirement. However, as outlined in paragraph 1.1.4, where there is a deviation through exception, a robust justification will need to be made in the application submission, i.e., in the

		Design & Access Statement accompanying the planning application.
	The reduction of surface parking for undercroft, garage and underground parking comes with large associated costs attached which need to be fully viability tested by the Council prior to its inclusion within any design code.	Undercroft car parking is discouraged in the draft Design Code, as it creates inactive street frontages. As per the comment above, where there is a deviation through exception, a robust justification will need to be made in the Design & Access Statement accompanying the planning application, which can include reasons associated with viability. However, a provision of a garage or an underground car parking is not a code and therefore does not require viability testing.
	Finally, we believe that the available space for soft landscape and tree planting needs to be considered against the need for parking whilst prioritising BNG requirements and the need to strike a balance between function and quality of space and the landscape setting.	The aim of the Design Code is to improve design quality of new development. Should there be any instances where these cannot be met, through pre-application discussions with officers appropriate alternative solutions could be sought. Ultimately, where there is a deviation, a robust justification will need to be made in the Design & Access Statement accompanying the planning application.
	We are supportive that the car parking design requirements cover appropriately the dimensions necessary for a minimum parking space size, parallel spaces, car barns/ports and garages. It is however noted that a garage with a minimum internal dimension of 6m x 3m will struggle to store anything additional to a car. We believe it would be useful to include that parking spaces require a minimum reverse distance of 6m.	We will discuss this point with the County Highway Authority and consider the suggested alternative dimensions.

6. Do you have any other suggestions for changes to the Movement chapter (pages 36 - 47)?		
	Respondent's comment	*Council's response*
1.	Consideration of 20mph zones to discourage speeding & through traffic & to protect cyclists & pedestrians.	Introduction of speed limits falls within the remit of SCC as the County Highway authority, and outside of the Design Code reach.
2.	I would like some recognition that cars are an effective and efficient means of transport for most people, and that a balance needs to be struck between the needs of that mode of transport and other modes (public transport, cycling, walking). Very often, design requirements that favour one mode will hinder another.	The aim of Design Code is to improve the design quality of new developments, whatever type of development it is. It is not its role to favour one type of movement over another or set out their pros and cons.
3.	Any new development on a road, should always have a footpath in front of it. Even if there are no connecting paths, over the years, the redevelopments will eventually lead to a new footpath, separate from vehicles and with no impact on the free flow of vehicular traffic.	Pedestrian and pavement design is covered in section 6 of the 'Healthy Streets for Surrey', a county-wide design code for highways adopted by Surrey County Council in 2022. **We have now added a reference to it in chapter 4.3.1 of the Design Code.**
4.	Is any work being done to see how each community can access key services without the use of the car, for example looking at is Cobham a 15-minute neighbourhood, where areas can be accessed on foot.	Specific 15-minute neighbourhood project has not been conducted in Elmbridge. However, as part of the new Local Plan preparation, the sites put forward for development were assessed in terms of sustainability, specifically with regards to their location and the distance to the nearest services and infrastructure.
5.	More discussion with Kingston regarding Clayton road in Hook	Geographically, this area falls beyond Elmbridge Borough and Surrey and outside the Elmbridge Design Code's remit.
6.	I think that in suburban settings, off-street car parks should be retained, both council-owned and private-owned. 4.6.6 Many older houses do not have front gardens that	This matter is outside of the Design Code remit.

	are long enough to park a car. Therefore, Electric Vehicle Charging Points will need to be provided in all car parks. Trailing lines from house to kerb are dangerous for most pedestrians, but especially the elderly, unsteady, limited-vision, wheelchair and buggy users, etc. There is insufficient attention given to pedestrians and the pavements that they walk on. Pavements need to be much improved. Pedestrians need to have priority on pavements. Dropped kerbs for driveway crossovers should be exactly that, not dropped pavements. Pavements themselves should be level over at least 1.7 of the 2metre width. For an example of thoughtless pavement construction, go to the new housing estate at Three Rivers Academy and try walking on the footpath on Bell Farm Way.	Design guidance on the EV charger equipment is included in section 9.9 of the 'Healthy Streets for Surrey', a county-wide design code for highways adopted by Surrey County Council in 2022. **We have now added a reference to it in chapter 4.6.6 of the Design Code.** Pedestrian and pavement design is covered in section 6 of the 'Healthy Streets for Surrey', a county-wide design code for highways adopted by Surrey County Council in 2022. This states: The design of pavements, pedestrian paths and spaces for people take precedence over other street design elements. **We have now added a reference to this document in chapter 4.3.1 of the Design Code.**
7.	Where off-road routes are contemplated through public open spaces, especially the many woodland areas within Elmbridge, they should not be too formal and 'urban' - although they should be safe for all potential users, including those in wheelchairs.	It is not clear what this comment is specifically seeking to achieve. A matter or 'urban'/'not too formal' is a subjective perception and unfortunately no clear indication or suggestion of any specific design parameters were made.
8.	Yes, Esher should reduce the number of lanes through the town centre from 4 to 2	Thank you for the suggestion. We have passed your comment to the Council's regeneration officer who is overseeing the current Esher Vision project.
9.	Para 4.6.3 states "Where cycle storage is expected...." Cycle storage should be expected as a default.	This guidance point relates to the dimensions of garages, car ports and car barns, where integral cycle storage is expected to be provided. Some new developments provide separate cycle storage solutions.

	The surface of all parking etc should be nature friendly and porous to help with drainage.	**We have now included this in code A in chapter 4.3.1.**
10.	No. Very good work!	Support is noted.
11.	Parking in private roads should be addressed, e.g., the planning application for Ramli in Beech Close Cobham will result in visitors / trades persons parking in a no parking road.	It is outside of the Design Code remit to set the quantum of parking spaces to be provided on new developments. This is set in our Local Plan in Appendix 1 to the Development Management Plan 2015.
12.	Cycle lanes should not be on pavements, this is dangerous to pedestrians. Cycle lanes should be on both sides of a road a decent width and clearly marked. Better cycling parking should be made in towns if you truly wish for people to leave vehicles behind. Parking should not be on or in place of pavements if you want people to walk keep pavements safe for pedestrians. With electric scooters and bikes, cycles and cars on pavements even walking is taking your life in your hands when you have to walk in the road to avoid obstructions on the pavements. Yes, I cycle, walk and drive.	Cycling related matters are covered in section 11 of the 'Healthy Streets for Surrey', a Surrey-wide design code for highways adopted by SCC in 2022. **A guidance point suggesting new cycle infrastructure to be designed in line with this highway design code has been included in chapter 4.2.1.**
13.	The assertion that Claygate is protected from through traffic is incorrect. Oaken in particular is often used as a high speed "rat run" full width speed bumps would seem sensible and provide safer crossing and cycling spaces as a bonus.	**The point on the through traffic has been amended in section 3.1.** Your suggestion for speed bumps in Oaken Lane has been passed onto County Highway Authority for consideration.
14.	All active travel infrastructure must comply with LTN1/20. Surrey currently has a lot of advisory cycle lanes which are useless as people just park cars in them. We need better active travel facilities if we really want more people to walk and cycle.	Local Transport Note 1/20 published in July 2020 provides guidance and good practice for the design of cycle infrastructure. As it is not a policy, it cannot form the basis for a mandatory code within the Elmbridge Design Code.

15.	Make the car park in Cobham free again so residential roads are not congested with parked cars making it difficult for residents to get parked	This matter falls outside of the Design Code remit.
16.	Active travel – Traffic calming is required to encourage walking and safe cycling and paths must be wide enough to enable their safe coexistence. Demarcation of cycle lanes on already narrow high streets is not a solution. Parking Guidance – Car clubs are a poor option to reduce parking space requirements as recognised on the SCC table of options. The parking requirement in the DMP 2015 is already unrealistic in meeting today's car usage and realistic options must be delivered.	Area wide cycle networks are being planned by Surrey County Council through the development of the Local Cycling Walking Infrastructure Plans (LCWIPs). **We have now added a guidance point in section 4.2.1 that new cycling infrastructure should be designed in line with Healthy Streets for Surrey Design Code.** It is outside of the Design Code remit to set the quantum of parking spaces to be provided on new developments. This is set in our Local Plan in Appendix 1 to the Development Management Plan 2015.
17.	In the 'movement' section, there is discussion within the draft design code off-road routes i.e. cycling. More could be made here with regards to the natural environment, for example cycling routes can also be green corridors (this could also usefully link to (u)BOAs) or part of the Nature Recovery Network. We encourage referencing biodiversity in all sections of the code.	Section on urban greening is included in Chapter 5 – Nature.
18.	Response by Inspired Villages: When reviewing this document and comparing to other design guides in relation to parking standards, including our own internal set of requirements and others we have seen in our sector. It would be useful within this document a breakdown of street hierarchies, to ensure that those	Street hierarchy is included in the 'Healthy Streets for Surrey' Design Code that was adopted by Surrey County Council in 2022. This also includes the dimension and design requirements. Elmbridge Design Code will not repeat these

	designing developments are able to have a clear understanding of what type of street it is and how they are required to design that street, including the minimum width requirements, what the footpath / cycle path requirements are and other key design requirements.	requirements, but **we have now included a link to the document in section 4.1.1.**
	The mandatory use of permeable surfaces at section 4.3 is not realistic and will not be possible in all ground conditions due to suitability. This should be amended to be an advisory point. We are however supportive of access roads serving more than one property.	Policy DM7 sets out that hardstanding should be designed and constructed with permeable (or porous) surfacing. As a result, this code will be retained in the Design Code as a mandatory requirement. However, as set out in paragraph 1.1.4, where there is a deviation through exception, a robust justification will need to be made in the application submission, i.e., in the Design & Access Statement accompanying the planning application.
	We would also like to see reference to mobility scooters parking and wording which addresses specialist housing schemes, as residents often have reduced mobility due to age and associated issues. These must carefully consider the parking regime to ensure it is in line with these residents' needs. We would be happy to provide assistance on this point.	A requirement for a bespoke parking provision setting out the requirements for specialist parking spaces to be provided on new developments is outside of the Design Code remit. The current requirements are set in our Local Plan in Appendix 1 to the Development Management Plan 2015.

7. Would you like to include any other nature related design requirements?		
	Respondent's comment	*Council's response*
1.	Reference needs to be made to preserving existing trees to prevent the felling of healthy, old or historic trees for no reason. Not all trees have TPOs & many provide useful noise & pollution barriers, as well as the usual environmental benefits.	The importance and benefits of trees, including existing and older/mature trees is recognised throughout section 5 of the design code. The need to retain existing trees is included as guidance in section 5.2. This is also a policy requirement set out in the Council's Draft New Local Plan, which was submitted for Examination in August 2023 (see draft policy ENV2).
2.	grass verges should be considered. although they require maintenance, long term it is cheaper that hard landscaping to maintain.	Guidance provided under section 5.1 and 5.2 is clear that soft landscaping should be utilised over hard landscaping. Some examples are provided such as trees, hedges, green walls and roofs. Grass verges fall under the definition of soft landscaping. The design code does not provide an exhaustive list of the possible urban greening solutions an applicant can use.
3.	Generally, there are many old trees now overgrown and need pruning, not felling or totally removed, just topping and crown raised. This would add to the quality of their look improve light transmission in streets and roads	The importance and benefits of trees, including existing and older/mature trees is recognised throughout section 5 of the design code. The need to retain existing trees is discussed in section 5.2. This is also a policy requirement set out in the Council's Draft New Local Plan, which was submitted for Examination in August 2023 (see draft policy ENV2). Paragraph 12.2.1 of the design code sets out requirements for management plans to be in place for development of over 50 dwellings or where they include publicly accessible assets

		such as open space, streets and community facilities. These must set out the management regime and structures in place to support the long-term high-quality management of the development.
4.	More care taken with Hersham riverside with paths & litter clearance. The playing field is not cared for as well as Coronation rec - insufficient cuts of grass & playing field in a rough condition	Section 12.2.1 of the design code sets out requirements for management plans to be in place for development of over 50 dwellings or where they include publicly accessible assets such as open space, streets and community facilities. These must set out the management regime and structures in place to support the long-term high-quality management of the development.
5.	Not to build on flood plains	It would not be appropriate to place a blanket ban on development on flood plains in the Borough. Development must follow the sequential approach to flood risk and the location of development set out in the NPPF and PPG on flood risk and coastal change. This requires development to be steered towards areas of lowest flood risk from all sources of flooding. However, there are specific types of development, for example for outdoor sports, that might be compatible with the areas at risk of flooding.
6.	There has to be conscious efforts to save mature trees. Very often, mature trees are felled by the owners/developers and the site cleared of trees prior to the planning application. It should be a mandatory question in all planning applications, whether any matured trees were felled 12-18 months prior to the planning application. The planning officer should take into consideration as if the trees are on site as part of the	The importance and benefits of trees, including existing and older/mature trees is recognised throughout section 5 of the design code. The need to retain existing trees is discussed in section 5.2. This is also a policy requirement set out in the Council's Draft New Local Plan, which was submitted for Examination in August 2023 (see draft policy ENV2).

	planning application. It should act as a small deterrent to fell the trees before the planning application.	
7.	It all feels a bit idealised. Tree planting is highly desirable everywhere, but most of the ideas outlined only apply to the spacious areas. For example, the proposed density of dwellings in Hersham Shopping centre is 129 dwellings per hectare. I doubt very much that even a pot plant would survive there! See also the new development in Station Road Walton. Suggestion: Is it possible to recommend a percentage of plot area to be green/natural/open.	Compliance with the urban greening factor and biodiversity net gain will effectively require a certain plot area to be green/natural. This is a more appropriate approach than requiring a flat percentage as it builds in some flexibility, allowing development proposals room to respond to their context.
8.	Some form of funding for the maintenance and management of the trees to be planted - or already on site - along the public highways. There is a huge cost associated with lining all new streets with trees. Buckinghamshire charged £300 for every tree planted on a highway: the architect therefore placed them in front gardens. The new residents objected to the loss of light and chopped them down. This issue should be recognised and addressed within the Code.	Paragraph 12.2.1 of the design code sets out requirements for management plans to be in place for development of over 50 dwellings or where they include publicly accessible assets such as open space, streets and community facilities. These must set out the management regime and structures in place to support the long-term high-quality management of the development.
9.	Yes. BNG should not be blanket applied to individual houses. The link on Page 50 is unhelpful and does not link directly to a Metric. From our experience sedum roofs are rather unattractive and create a false sense of 'greening'	BNG is applied in accordance with the requirements of the Environment Act 2021. The link provided takes the reader to the biodiversity metric information provided by Defra and Natural England. Comments regarding sedum roofs are noted. However, attractiveness is subjective, and sedum has several benefits -

		for example it is hardy, versatile and does not require a deep substrate.
10.	Yes - overall size at maturity needs to be considered when planting street trees. When natural hedge boundaries are planted there needs to be a clear maintenance and responsibility plan in place.	Paragraph 12.2.1 of the design code sets out requirements for management plans to be in place for development of over 50 dwellings or where they include publicly accessible assets such as open space, streets and community facilities. These must set out the management regime and structures in place to support the long-term high-quality management of the development.
11.	bins for dog waste. disgusting people leave poo bags around. Reed beds to filter water and spread the flow of rainwater, therefore reducing flood risk.	Refuse bins and collection would be included in a management plan and paragraph 12.2.1 of the design code sets out requirements for management plans to be in place for development of over 50 dwellings or where they include publicly accessible assets such as open space, streets and community facilities. These must set out the management regime and structures in place to support the long-term high-quality management of the development. However, the role of the design code is to guide and influence the design of new development coming forward in the Borough. It cannot influence the management of existing spaces, such as the provision of new bins. Urban greening includes sustainable drainage solutions, demonstrated by the images under section 5.2. **Codes and guidance on sustainable drainage solutions has now been expanded upon and we have created a separate section under 5.3.**

12.	Please do not allow developers to destroy mature trees, riverbank flora and fauna and bats habitats to build unsuitable developments which will blot the landscape. 2022/3525	The importance and benefits of trees, including existing and older/mature trees is recognised throughout section 5 of the design code. The need to retain existing trees is discussed in section 5.2. This is also a policy requirement set out in the Council's Draft New Local Plan, which was submitted for Examination in August 2023 (see draft policy ENV2). Section 5.1 also requires development to achieve a biodiversity net gain in accordance with the Environment Act. In principle, it would be contrary to this requirement for development to damage or destroy flora, fauna or wildlife habitats. In addition, section 5.4 sets out guidance seeking riverside development to contribute to the improvement of the river's edge and the retention of its natural character.
13.	YES - should any new development be allowed on river flood plans, given current climate trends?	It would not be appropriate to place a blanket ban on development on flood plains in the Borough. Development must follow the sequential approach to flood risk and the location of development set out in the NPPF and PPG on flood risk and coastal change. This requires development to be steered towards areas of lowest flood risk from all sources of flooding. However, there are specific types of development, for example for outdoor sports, that might be compatible with the areas at risk of flooding.

14.	Yes, protections for private green space to avoid the loss of trees that aren't covered by TPO	The importance and benefits of trees, including existing and older/mature trees is recognised throughout section 5 of the design code. The need to retain existing trees is discussed in section 5.2. This is also a policy requirement set out in the Council's Draft New Local Plan, which was submitted for Examination in August 2023 (see draft policy ENV2).
15.	There is no mention of nature corridors. Nature corridors link up green spaces and amplify the benefit. Nature corridors should be considered in spatial planning. I am aware that the Government has recently pushed back against biodiversity net gain (BNG). It is vital that Elmbridge does NOT follow suit: biodiversity (and its enhancement) is key to the nature of Elmbridge. Some of the wording is extremely weak ("Flat roofs could be used for roof gardens, brown or green roof surfaces using soft landscaping such as sedum". I suggest that it should be stronger, i.e., "Flat roofs SHOULD be used for roof gardens, brown or green roof surfaces". There is no mention of facilities for dog walkers. Poo bins should be provided and emptied regularly, to stop dog fouling, and poo bags littering green spaces.	Guidance in chapter 5 sets out that wildlife corridors are encouraged. It also encourages biodiversity and seeks that the applicants should refer to Natural England's Green Infrastructure Standards, which include the importance of corridors within the key standards and principles. The design code sets out the requirement for development to achieve a Biodiversity net gain in accordance with the Environment Act. Not everything within the design code is or can be a requirement, some is just guidance. This depends on the existing planning policy. Refuse bins and collection would be included in a management plan and paragraph 12.2.1 of the design code sets out requirements for management plans to be in place for development of over 50 dwellings or where they include publicly accessible assets such as open space, streets and community facilities. These must set out the management regime and structures in place to support the long-term high-quality management of the development.

16.	Many trees in new developments are poorly cared-for and die within a year or two of planting. Developers should retain responsibility for the health of new trees for 5-10 years post-completion.	Paragraph 12.2.1 of the design code sets out requirements for management plans to be in place for development of over 50 dwellings or where they include publicly accessible assets such as open space, streets and community facilities. These must set out the management regime and structures in place to support the long-term high-quality management of the development.
17.	Whilst evergreen planting gives year-round mitigation of hard landscaping use of appropriate native deciduous shrubs and trees improves biodiversity and creates seasonal interest for residents; flowers, berries, leaf colours all add to the beauty of a space, provided correct care is taken of the plants.	Evergreen planting is stated as an example. The design code provides scope for applicants to incorporate a range of planting and soft landscaping solutions. The aim is that the best species, most likely to thrive, should be selected.
18.	less high fences in gardens, less blocking every little hole so hedgehogs can't move freely. less cycling in woodland areas or have designated cycle routes and separate footpaths - cyclists seem to feel they have right of way even pavements out without chopping the trees down	The code and guidance set out in section 5 seeks to encourage biodiversity and wildlife and includes guidance stating that wildlife corridors are encouraged. Implementing the guidance should deliver outcomes enabling wildlife to move more freely. It is beyond the scope of a design code to place restrictions on where people are allowed to cycle. Provision of designated cycle and footpaths depends on the ability of the space to accommodate them. It would likely not be possible to provide such routes through a woodland area. The importance and benefits of trees, including existing and older/mature trees is recognised throughout section 5 of the design code.

		The need to retain existing trees is discussed in section 5.2. This is also a policy requirement set out in the Council's Draft New Local Plan, which was submitted for Examination in August 2023 (see draft policy ENV2).
19.	Keep the river parks clear and safe. overgrown and unlooked after areas don't encourage lots of wildlife. they become dumping grounds.	Section 5.4 sets out code requiring riverside development to contribute to the improvement of the river's edge and retain its natural character. In addition, paragraph 12.2.1 of the design code sets out requirements for management plans to be in place for development of over 50 dwellings or where they include publicly accessible assets such as open space, streets and community facilities. These must set out the management regime and structures in place to support the long-term high-quality management of the development. Maintenance programs for existing riverside parks are beyond the scope of the design code. It can only influence/guide the design of new development.
20.	Yes - new developments should not have completely paved front gardens. Fences between properties should allow passage for wildlife " hedgehog highways "	A new section 5.3 includes codes and guidance in terms of flood risk and the provision of Sustainable Drainage Systems. Guidance under section 5.1 sets out that wildlife corridors are encouraged.
21.	Yes. Regular maintenance of all footpaths and bridleways to ensure easy and convenient access.	Paragraph 12.2.1 of the design code sets out requirements for management plans to be in place for development of over 50 dwellings or where they include publicly accessible assets such as open space, streets and community facilities. These must set out the management regime and structures in place to support the long-term high-quality management of the development.

		Maintenance programs for existing footpaths are beyond the scope of the design code. It can only influence/guide the design of new development.
22.	Wherever it is possible, nature must be included, small spaces too; management should relate to principles of rewilding and should allow only native species with pollinators in mind. There is nothing nicer than to see long grasses on road verges, for example.	Section 5.1 sets out how nature should be incorporated in development. The aim is that all opportunities to incorporate urban greening are considered and taken up where appropriate. The code and guidance set out in section 5 of the design code enables applicants to provide a range of species. The aim is that the best species, most likely to thrive, should be selected.
23.	New parking and pavements should allow ground water to permeate to mitigate rainfall runoff	**Codes and guidance associated with the provision of Sustainable Drainage Systems is now included in a new section 5.3.**
24.	management of the riverside so it is returned to a 'tow-path style', removal of brambles and weeds overgrowing the paths around many local areas including along the river at the moment, for example the new Broadwater path is very overgrown and it's not possible to see the lake now for a lot of the walk	Section 5.4 sets out code requiring riverside development to contribute to the improvement of the river's edge and retain its natural character. Paragraph 12.2.1 of the design code sets out requirements for management plans to be in place for development of over 50 dwellings or where they include publicly accessible assets such as open space, streets and community facilities. These must set out the management regime and structures in place to support the long-term high-quality management of the development.

		Maintenance programs for existing footpaths and routes are beyond the scope of the design code. It can only influence/guide the design of new development can comes forward in the borough.
25.	There is evidence in my locality of developers buying land, putting horses on it to try to claim, "change of use", I'd like the use of the land to only be part of the consideration. It should also include the wildlife requirements. We have lost hundreds if not thousands of trees as part of the A3/M25 works, this land should be used to plant replacement trees	Proposed developments must be considered on their own merits in accordance with the requirements of national legislation, policy and guidance. The impact of development on wildlife is a consideration in this process.
26.	Yes - Rather than tarmac over curb-side grass areas, convert them to wildflower meadows or similar.	The principles of section 5 of the design code strongly encourage such an approach.
27.	Ensure vehicles do not park on greens and verges which ruins the grass. Improve accessibility to a route along the river Mole in Cobham. It would be lovely to be able to walk along the River in Cobham but at present this is impossible to do so.	Parking quantum requirements are set out in Appendix 1 to the Development Management Plan 2015. Section 4.5 of the design code sets out further guidance on implementing the parking standards. Section 5.4 sets out code requiring riverside development to contribute to the improvement of the river's edge and to retain its natural character.
28.	Yes. New developments should prevent vehicles from parking on grass/green space areas.	Parking quantum requirements are set out in Appendix 1 to the Development Management Plan 2015. Section 4.5 of the design code sets out further guidance on implementing the parking standards.
29.	Yes. There must be a biodiversity net gain as a result of all developments.	Section 5.1 sets this out as a requirement in accordance with the Environment Act.

30.	Protect Green Belt at all costs and existing green spaces.	National planning policy in principle protects existing green space and the green belt. Applications for development in these settings are considered in accordance with national policy requirements.
31.	In Section 5.1 You should exclude Lime trees and other tree species like Plane trees that inherently drop loads of sap off their leaves. In Section 5.2 You should specifically exclude Loral and Leylandii from being used in boundary treatments as they are fast growing, tend to grow very tall without regular pruning and when pruned often look unsightly. Plus, it must be stated that any hedge is planted a min 0.5m back from the highway to promote healthy and manageable growth. In Section 5.3 You need to add the Wey Navigation Channel in addition to the River Wey as this is a separate entity. Wherever there is new riverside development public pedestrian & cycle access must be provided for however short the river frontage is so, in time these can hopefully be joined up when future new development is proposed.	These species are not included in the code or guidance. Fig 5.2 mentions broad leaved lime as a typical tree species found across Elmbridge. The role of the Design Code is to promote good design in new developments and it should not restrict any type of development or specific planting. The requirement to place any hedge 0.5m back from the highway would be too prescriptive as this may not be possible depending on the context of the site. The Wey Navigation Channel is included within the River Wey. An image of the Wey Navigation is provided on section 5.4 to demonstrate this. Paragraph 5.4.2 of the design code states that pedestrian and cycle connections to the riverside should be made as part of new developments.
32.	More flora in town centres (Claygate has some lovely troughs of flowers, hanging baskets etc. Trees can be a menace in an urban situation. Tree roots have rendered some local pavements in Claygate unusable. I can walk	Tree planting is an important part of urban greening as they provide a range of benefits. Modern planting techniques can ensure the trees that are planted to not break up the pavement.

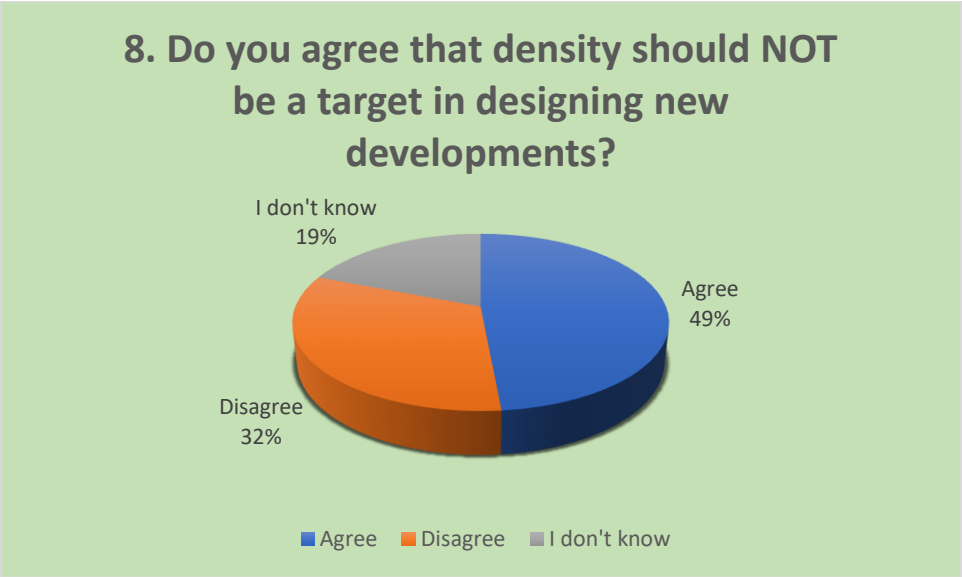
	around them but not if I was infirm or using a mobility aid. We do have good access to green spaces in Elmbridge and so I can't see this as being a concern.	
33.	Page 50: Chapter 5.2 (Urban Greening). Agree that Biodiversity Net Gain and Urban Greening should be incorporated into new development. However, some flexibility over the retention of trees “as a priority” should be allowed for, subject to their quality and the extent of re-provision proposed on site.	It is considered that retention of trees as a priority is appropriate given the current climate change context. That said it is a guidance, not a mandatory requirement.
34.	Yes: owners of gardens should be encouraged to provide natural spaces to encourage wildlife and provide some feeding facilities	It is not always appropriate to include native species. Guidance in section 5.2.1 explains that “the choice of planting should consider their climate change resilience, for example drought or extreme temperatures.”
35.	Response by Sport England: Sport England wishes to stress the importance of multi-functional greenspace and the benefits to sport; physical activity and movement that these can provide. We would support the emphasis of urban greening and considerations should be given to how these areas can provide opportunities for people to be active.	**This suggestion has now been added in section 5.1.**
36.	No direct mention is made of how flood must be mitigated and alleviated through design together with water impedance and displacement. This affects more than just development in flood plains. The requirements for sustainable drainage techniques, permeable paving, more greening and wet gardens described in Section 5 are important but not enough on their own.	**A new section 5.3 including codes and guidance on mitigating and alleviating flood risk through design and the use of the sustainable Drainage Systems has now been included.**

37.	Response from Surrey Wildlife Trust: In terms of the local character of each area, we note the future vision/ideas, for example in Claygate there is a loss of greenery in local streets and the document suggests 'incorporating greening and trees into streets of new development and enhance'. From a perspective of nature conservation and in the context of biodiversity net gain, it might be useful to explain what 'greening' means, perhaps by way of providing example (or referencing section 5.1 and 5.2 street and urban greening as a minimum). In addition, there appears to be no detail with regards to incorporating features to encourage different animal species. We further add here that it would be useful to cross-reference Biodiversity Opportunity Areas (BOAs) and urban BOAs in this section. For information, designation of Biodiversity Opportunity Areas (BOA)s represents a targeted landscape-scale approach to conserving and recovering biodiversity and are areas where the greatest opportunities for habitat creation and restoration lie, that will eventually become part of Surrey's Nature Recovery Network. In the draft code's 'nature' section, soft landscaping is referenced. We would advise with regards to soft landscaping, that planting schemes should climate resilient and should be appropriate in the context of any biodiversity net gain (BNG) metric calculation at a given site.	These matters were further discussed with an officer from the Surrey Wildlife Trust, and it was agreed that no changes to the Design Code in these terms were deemed necessary at this stage. **Guidance on climate change resilient planting has now been included in section 5.2.1.** The Urban Greening Factor (UGF) is only guidance whereas Biodiversity Net Gain is code. UGF is the minimum greening, while the BNG is the habitat uplift.

	This section also states development will be expected to meet ‘urban greening factor’ calculations. We would just seek clarification that UGF calculations should never be at crossed purposes with any BNG metric calculations and the BNG metric must take precedent as it is soon to be mandatory.	
	With regards to urban greening, there is discussion about residential development including evergreen hedges, rather than fences as part of their boundaries- the draft code lists some nice hedgerow species that could be planted. We would also add in this section that promoting diversity in planting is key, i.e., utilising a variety of hedge species to maximise biodiversity.	**A reference to a variety of species has now been added in section 5.1.**
	The document references tree planting, for example by Rivers, we would emphasise that with regard to tree planting, these should be ‘the right tree, the right place’. Tree planting by rivers can have a positive impact to water quality- we would also advise in these areas that consideration should also be given to whether these rivers are Sites of Nature Conservation Importance (SNCI) and ensuring that any new planting proposals do not have an adverse impact to the nature conservation importance of such rivers. The document talks about an ecological appraisal being undertaken for new development by rivers but doesn’t mention that this should be undertaken by someone suitably qualified, which is advisable.	**Reference to a suitably qualified consultant has been added to the guidance on requirements for ecological appraisals.**

	As a general point, the draft code references green open space, but no real definition is provided i.e., what habitats this might include, which we believe would be useful in considering nature conservation more widely.	A definition of green infrastructure is provided in the glossary of the design code.
38.	Response by Inspired Villages: The mandatory requirement for all new streets to be tree-lined at section 5.1 is too prescriptive and dependent upon many factors such as topography, existing services, available space for planting, micro-climatic conditions and the proximity of buildings etc. This should be made advisory as it is not always possible to deliver. There is also further clarity needed on which 'streets' this applies to.	Section 5.2 is clear that the requirement to provide street trees is on new streets only. It is for the applicant to demonstrate within their application the reasons why any requirements set out in the code cannot be met.
39.	5.2 Urban Greening - Sustainable Urban Drainage; remove word urban as no longer referenced like this and should be Sustainable Drainage System. As per the NPPF major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. Sustainable drainage should be considered for all new development regardless of size. Reference should be made to our Sustainable Drainage System Design guidance. Although photos of sustainable drainage are included there is no reference in the accompanying text.	**A new section 5.3 covering sustainable drainage systems featuring SCC's guidance and SuDS has now been added.**

8. Do you agree that density should NOT be a target in designing new developments?		
	Respondent's comment	*Council's response*
1.	Agree (49%)	Almost half of respondents agree that density should not be a target in designing new developments.
2.	Disagree (32%)	Almost one third disagree.
3.	I don't know (19%)	Noted.



9. If you disagree that density should NOT be a target, please tell us why.		
	Respondent's comment	*Council's response*
1.	density in Elmbridge town centres is too high and must be controlled. it leads to loss of privacy, light air, and amenity. it also creates traffic congestion. it is too easy to let schemes be built on the grounds that density is not an issue. it overloads the infrastructure especially drainage.	Specific density limits do not ensure that the high standard of residential amenities would be met in new developments. Design Code sets out these requirements through codes and guidance (light, privacy, outdoor space, height, plot ratio, urban greening etc.) to ensure high quality amenities are achieved in new development. **Specific Sustainable Drainage Systems requirements have now been included in a new chapter 5.3.** Traffic congestion is a result of the amount of infrastructure in the area. This is governed through the preparation of a Local Plan that is informed by the planned amount of new development and modelling of the needed infrastructure to accommodate this growth made by the infrastructure providers.
2.	Density increase will encourage Developers to push all the boundaries on planning and development applications. many of which could slip through the Consent process	It is proposed that the density is only the outcome, not the target. It is not determinative in terms of whether the proposed development is acceptable.
3.	It appears that there are proposed plans to greatly increase the density of housing in Hersham in an inappropriate way & extremely ill-conceived proposed developments in an area that is not appropriate	It is not the role of the Design Code to allocate sites for development. Its aim is to ensure that developments coming forward are of high design quality.
4.	In specific areas then more dense housing should be considered at an initial stage, for example in a centre, more dense building should be undertaken as land is at a	Efficient use of land is one of the key policies set out in our Local Plan and in the national policy (National Planning Policy Framework - NPPF).

	premium, this should be considered at the initial stage, as if you have a plan that has low density in a town centre this is in turn a bad use of space. Though it should not be the overarching consideration.	
5.	Density in new developments is pretty straightforward. What is more of an issue is the growth in density of the existing housing stock with the addition of rooms in the roof space or habitable space in the garden. This type of increase must be difficult to manage in terms of services and amenities as there does not seem to be a cumulative view e.g. a road of 2bed detached house being slowly demolished and replaced with 4bed houses.	Yes, this is a challenge in association with the existing/planned infrastructure including services. The provision of infrastructure is a strategic issue that is addressed through the Local Plan. The aim of the Design Code is to ensure high quality design of new development, which includes considerations of amenities.
6.	This is already well thought out by EBC	Support is noted.
7.	While I agree that Density is not a measure of good or poor design, it indirectly defines the local character of the area. New developments should take into account existing density to maintain the local characteristics. Secondly density correlates to higher residential count and the impact to infrastructure and public services should be taken into account if the density increase is disproportional to existing density.	The provision of infrastructure is a strategic issue that is addressed by the Local Plan. The aim of the Design Code is to ensure high quality design, which includes considerations of character of the area.
8.	Suggestion: That it is compulsory for developers and Elmbridge Planning office to use both density and FAR. They have to know both anyway, so it would not involve any extra work. We the public can then use both to make sense of a concept/sketch. reason: Density must be included at the outset. It is the only criterion that the public can use. It is obvious that for	The difference between FAR and DPH is that FAR can be calculated for development in any use, whether it is residential, commercial or other, as it is concerned with the floor space created by the development. DPH (dwellings per hectare) relates only to the developments in residential use.

	small sites the density can become meaningless, but in these cases, it is obvious that the number is an outlier. You say that FAR is better, but it is impossible to calculate when a developer shows a sketch of a building with no measurements. We can only calculate FAR after the building is completed, and that is of no use whatsoever. FAR 0.4 is meaningless to me. 30dph is meaningful. To the public, which is one of the target groups for using the code, it is semantics to suggest density is not a design feature. Of course, it is. It might not show good or bad design, but neither does FAR. You can still have a bad design with a good FAR number. But you can't have a good design for a suburban area with an excessively high density on a big site.	The draft Design Code is seeking a confirmation by the applicant that the density indicator is calculated and provided at the point of submission of an application. Whether it is FAR or DPH, this figure does not represent the quality of development design. The draft Design Code suggests this figure is only used to inform the planning policy matters, such as efficient use of land. In your example, if there is a proposed development in a suburban area that follows the codes within this Design Code, would offer adequate amenities to the existing and future occupiers and satisfy other policy criteria, the density would not be determinative. The current Local Plan policies do not require the developments to achieve specific density, but in the view of efficient use of land suggests minimum density to be achieved across the borough.
9.	Density is a known measurement for understanding the character of a particular area - as demonstrated by the three plans on page 58. It may be an 'output' but it's a useful tool in assessing appropriate design within a particular area. See the reasons given by the Councillors at the East Area Planning Committee's recent refusal of planning consent for 9 units at 40 New Road, Esher. I believe that Floor Area Ratio could also be misleading in that, to exaggerate the point, a large bungalow on a reasonable sized site may be far more appropriate for the character of an area than a three-storey block of flats with a similar floor area. I note the question on the control of height below.	None of the codes within the draft Design Code 'work' in isolation. In addition to the Plot Ratio, there are requirements set with regards to the development height, biodiversity net gain (BNG), urban greening, parking design, use of external materials, character of the area, etc. As such, all of these considered together will inform the appropriate form and scale of the development on a specific site in a particular location.

10.	High density should be restricted to city centres. Our borough has very few - if none - locations appropriate for this. It's already horrendous when one large building comes down and four or more go up in its place. This overloads the infrastructure and benefits the developer - who then walks away leaving residents to cope with the mess they've created.	To direct development in terms of its density is not the aim of the Local Plan. The aim is to make efficient use of land while delivering the appropriate form of new development considering its scale, height, space around the building(s), amenities, character of the surrounding area, etc.
11.	Density should reflect the local area surrounding the proposal - and reflect the biodiversity and if the development is on a flood plain, by green belt land and should fit in seamlessly with surrounding existing housing. 2022/3525 Molesey Venture - terrible proposal which does none of the above	Draft Design Code seeks to achieve just that. Once it is adopted it will be a material consideration in determination of planning applications.
12.	It is essential that there are controls on density of development, as developers inevitably try to maximise profits by maximising the density of development in terms of dwelling units.	The aim of the Local Plan, which will be supported by the Design Code, is to make efficient use of land while delivering the appropriate form of new development considering scale, height, space around the building, amenities, etc. As such, density is not determinative.
13.	What has been proposed is sufficient	Support is noted.
14.	Density should be a target, as it ensures that existing infrastructure is not over-whelmed by new development. e.g., schools, medical facilities, roads.	Provision of appropriate infrastructure is not within the remit of the Design Code, but of the Local Plan. Local Plan identifies potential development sites and plans for the provision of sufficient infrastructure based on the planned number of homes and scale of the commercial development for a period of time.
15.	High density areas do not encourage wildlife or relaxation. High density usually means flats/ apartments.	Regardless of density, new development will have to comply with the biodiversity net gain requirement and other greening-related codes.

	When you can hear your neighbours day and night knowing they can hear you, when there is no space to go outside and relax this causes anxiety and stress. People need private space.	A requirement for private amenity space in residential development is included in section 10.2.1 of the draft Design Code. The implementation of appropriate sound insultation in residential buildings is subject to Building Regulations and could be subject to noise-related conditions attached to planning permissions.
16.	Claygate is essentially a community of detached, semi-detached and terraced housing; it is essential that this character is maintained by ensuring no oversized blocks of living units of greater density than the present communities in the area.	Design Code contains numerous design requirements for new development to meet, including considerations of the character of the local area, height, plot ratio, urban greening etc.
17.	Density of a site defines its look/feel/appearance. New development should aim to be in keeping of the existing density as an input otherwise there is a risk of over developing existing green spaces and building on green belt.	New development would have to comply with the codes on height, plot ratio, BNG, urban greening, use of external materials, etc. As such, density in itself does not ensure appropriate built form to be delivered. Local Green Spaces as well as Green Belt land are subject to specific Local Plan and national policies that have to be satisfied before any such planning proposal is approved. It is outside of the Design Code remit to protect these areas.
18.	Density should be appropriate to location, use and existing build environment.	Density is not an indicator that guarantees new development would be of appropriate design in its surroundings. It is the other codes and guidance within the Design Code that ensure just that.
19.	Density usually equates to high residential count, which leads to inadequate public services	Requirement for a provision of appropriate infrastructure is not within the remit of the Design Code, but of the Local Plan. Local Plan identifies potential development sites and plans for the provision of sufficient infrastructure based on the planned number of homes and scale of the commercial development for a period of time.

20.	parking and transport need to support the population density of the proposed buildings. there needs to be an assumption that almost every adult in a residential building will have a car, therefore parking and transport provision needs to be considered for this	New developments must provide adequate parking provision in line with the standards set out in the Local Plan – please see Appendix 1 to the Development Management Plan 2015. Provision of public transport infrastructure falls within the remit of Surrey County Council as the County Highway Authority. Codes and guidance relating to the active travel, cycling and vehicle parking are set out in section 4 of the Design Code.
21.	There are issues with density as too high a density puts too much pressure on local services so, whilst not a target per se, it should certainly form part of the overall process and plan	Provision of appropriate infrastructure is not within the remit of the Design Code, but of the Local Plan. Local Plan identifies potential development sites and plans for the provision of sufficient infrastructure based on the planned number of homes and scale of the commercial development for a period of time.
22.	Because agreeing is giving permission to build more houses and more profit for developers. You cannot design new developments in rural areas without considering density	The current Local Plan policies do not require the developments to achieve specific density, but in the view of efficient use of land seeks minimum density to be achieved across the borough.
23.	Character of surroundings on density is very important to keep development in keeping	Every site has to be assessed on its own merits, as no two sites are the same. It would be also very difficult to ensure the same density was applied across different areas, for example the area on the border of a mixed-use town centre and the area of residential uses. New development would have to comply with the codes on height, plot ratio, BNG, urban greening, use of external materials, etc. As such, density in itself does not ensure appropriate built form to be delivered.

24.	No, obviously it should be targeted (and protected!) in order to enforce the consideration in design-work up front rather than getting to the end and then considering its impacts.	The proposal in the Design Code is that the development is designed in compliance with all codes, and this would result in the level of density appropriate for that site, i.e. you know what the potential impact is before you calculate its density.
25.	Do not build any new homes in the area, the roads cannot cope with it, it is too congested with traffic	As set out in the national policy, every borough or district in England is obliged to prepare a Local Plan that enables the delivery of development to meet the local need. This includes all uses, from residential to commercial. The infrastructure to enable the delivery of this level of development is also planned at that time.
26.	Density should be considered within the whole impact of the planning on the local area & amenities, rather than the density of the site in question	The current Local Plan policies do not require new developments to achieve specific density, but in the view of efficient use of land seeks minimum density to be achieved across the borough. If this is a concern that relates to the provision of infrastructure, Local Plan identifies potential development sites and plans for the provision of sufficient infrastructure based on the planned number of homes and scale of the commercial development for a given period of time.
27.	Density should be in accordance with that of the surrounding area.	The current Local Plan policies do not require new developments to achieve specific density, but in the view of efficient use of land seeks minimum density to be achieved across the borough. To achieve a development that compliments or enhances its surrounding area, other parameters, such as the building height, plot ratio, urban greening, the use of certain external materials, etc. would be relevant.
28.	targets and density should not override good design which will negatively impact on health and well being	This is the aim of the Design Code.

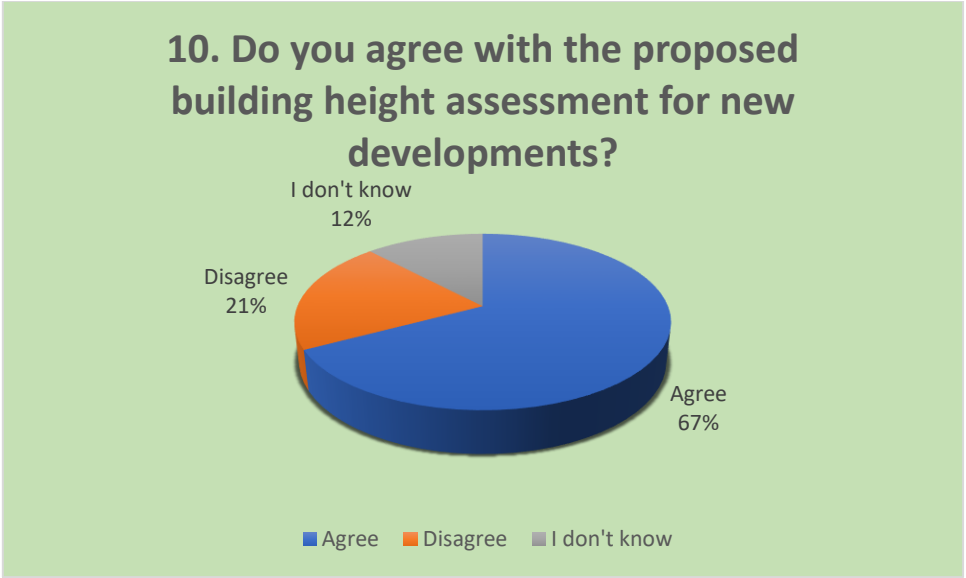
29.	Targets and density should not override good design for health and wellbeing nor lead to contrived design to fit too small plots.	This is the aim of the Design Code.
30.	Density is an input not an output. Developers will take this input and build to the limit of it. Without a limit it will be a concrete jungle. Accordingly, no development should be allowed that exceeds the average density of the immediate area of the development site without a very special reason.	Looking into the detail of this suggestion – how far from the development site does the immediate area reach? And what would qualify as a very special reason? These are very difficult matters to define at a borough-wide scale. The current Local Plan policies do not require the developments to achieve specific density, but in the view of efficient use of land it seeks minimum density to be achieved across the borough. The aim of the Design Code is that new development complies with the codes on height, plot ratio, BNG, urban greening, use of external materials, etc. resulting in the most appropriate built form/public realm/space for the development site. Density in itself does not ensure appropriate built form to be delivered.
31.	You have correctly given a Density range for the different residential area types which we generally agree with except that these need to be for the building verses the green space and not to include for car parking, driveways, roads and the like. To, for instance, prevent a tower block of flats to have paved access roads and car parking over much of the rest of the plot with little, if any, green space.	Plot ratio in section 6.1.1 represents the considerations on the proportion of a site that is occupied by a building's footprint. Car parking and associated hardstanding codes and guidance are set out in sections 4.3 – 4.6. Guidance for a provision of adequate amenity space is in section 10.2.1. Urban greening in chapter 5.1 includes guidance on quality and quantity of natural features proposed as part of a development, such as planting, waterbodies and green roofs.
32.	In developing land, commercial considerations are fundamental, and the designer cannot avoid addressing density when arranging the plan and height of developments. As with other parts of this document, it is	Design represents not only how the building/development looks, but also, how it relates to its surroundings, how it feels, how it functions and what it offers to its users.

	written for the architecturally literate community not for the lay majority. The establishment of appropriate density is covered by the guide, but where this sits in the design process which Elmbridge is mandating is not clear enough. This is leading to confusion which will degrade the value of the guide in the eyes of the wider community - a tragedy! For the layman, in this context, what is meant by "design" - style/form/decoration etc only? Density is one of the earliest matters for the designer. I suggest that the design sequence which should be followed is explained early on in the document and how the earliest stages deliver acceptable solutions for density and height. The next issue in this context is "design quality because density can be increased by exceptionally good design. But how are the planners to assess this subjective matter - this also needs to be clearer in relation to a hot topic for Elmbridge residents	Whilst density might be important from the developer perspective, only following the design principles set out in the Design Code the designer should arrive at the most appropriate built form and density for the site. The sequence of the relevant steps to be followed by the applicant in developing their scheme is included in section 1.6 – The design process. The Design Code does not propose that density would be assessed as part of the application process unless there are concerns relating to the lack of efficient use of land.
33.	Design is a response to a client brief which will have a commercial aspect leading to "how many units can we get on this plot, the mor the better". This leads to maximising density which may also affect height. You appear to be using a narrow aspect of "design". Make it a lot clearer as to the whole design sequence and Elmbridge's insistence on the absolute priority of density formulae.	Density is not an absolute priority, but the efficient use of land while enabling high quality design. The commercial aspect of the development is appreciated. However, this should not be at the expense of good design. New development is expected to incorporate a high-quality design, with the codes and guidance, to inform this, being included in the Design Code.
34.	Surely if we have to fit more people into the same space then it will mean higher density is required. So, in some	Yes, it is the efficient use of land while enabling high quality design.

	cases it has to be. But for the most part those impacted by this don't want more density. Otherwise, you would acquire every detached house, knock them down and build flats. So, density can't be the driving force.	
35.	I agree that targets and therefore density should not override good design or create harmful living conditions for future occupiers i.e., prison cell like conditions with windows over 1.7m to overcome overlooking, nor result in enclosing neighbours resulting in an overbearing impact	This is the aim of our Design Code and of the Local Plan, ensuring efficient use of land while enabling high quality design.
36.	Agree that density should be an output of the design process rather than an input, however, the need to make the most efficient and effective reuse of brownfield land should be a guiding principle of the design process, as stated in the NPPF. Esher in particular requires increased urbanisation to protect and enhance footfall, vitality and viability.	This is the aim of our Design Code and of the Local Plan, ensuring efficient use of land while enabling high quality design. We have passed on your comment to the Council's Regeneration Officer, who is working on the Esher Vision project.
37.	Response by Inspired Villages: Density is a key element in designing new developments to ensure the viability and deliverability of housing for older people. The density requirements which are set out as part of Figure 6.5 are too stringent and do not allow for the most attractive and viable proposals to be brought forward. We believe that Density Per Hectare is a relevant density measure and should also be included within Figure 6.5 not just Floor Area Ratio, this is due to most	The commercial aspect of the development is appreciated. However, this should not be at the expense of good design. New development is expected to incorporate high-quality design, with the principles to inform this being included in the Design Code. Design Code proposes that density is only an indicator to be used for example in the assessment of efficient use of land. FAR is a universal density parameter that is not associated with a specific use opposed to DPH that is relevant only to

	architects using Density Per Hectare as the primary measure of density.	residential development. For the developer's commercial needs they are welcome to use any indicator necessary, however the Council does not consider that density is appropriate to indicate whether the design of the scheme is acceptable or not and this is set out in the draft Elmbridge Design Code. As stated in paragraph 1.1.4, where there is a deviation through exception, a robust justification will need to be made in the application submission, i.e., in the Design & Access Statement accompanying the planning application.

10. Do you agree with the proposed building height assessment for new developments?		
	Respondent's comment	*Council's response*
1.	Agree (67%)	Two thirds of respondents agree with the proposed building height assessment for new developments.
2.	Disagree (21%)	About a fifth of respondents disagree with the proposed building height assessment for new developments.
3.	I don't know (12%)	Noted.



11. If you disagree with the proposed building height assessment, please tell us why and offer an alternative solution.		
	Respondent's comment	*Council's response*
1.	building higher leads to overdevelopment and poor living conditions. too many rooftop schemes have created poor housing. Elmbridge is not a high-rise area.	The code and guidance set out in section 6.3 of the design code on building heights and taller buildings does not set out that taller buildings are acceptable or appropriate in principle. It provides guidance to inform how development for such buildings should be approached to ensure they are of the highest quality and appropriate in the Elmbridge context. The building heights guidance provided at paragraph 6.3.1 is clear that the height of new developments must relate to the height of surrounding existing buildings and not detract from the local character.
2.	Completely inappropriate in the area of Hersham & schemes of this type would be better suited to Walton on Thames where there are a number of similar developments of size & height	The code and guidance set out in section 6.3 of the design code on building heights and taller buildings does not set out that taller buildings are acceptable or appropriate in principle. It provides guidance to inform how development for such buildings should be approached to ensure they are of the highest quality and appropriate in the Elmbridge context. The building heights guidance provided at paragraph 6.3.1 is clear that the height of new developments must relate to the height of surrounding existing buildings and not detract from the local character.
3.	I am in agreement	Support is noted.
4.	The suggested height reference based on 50m radius is a good design code.	Support is noted.
5.	Query: Fig 6.7: Is the guide intentionally off centre?	**Thank you, this has now been adjusted.**

6.	I totally agree with the intention, but how will the Code counter the Government's Permitted Development Rights to build upwards?	Permitted development rights are set in legislation. Local policy and design code cannot alter these.
7.	Reason - Buildings heights for new dwellings are dependent on internal floor to ceiling heights, current construction techniques including beam and block and concrete floor construction with a suspended MF ceiling and building regulations requirements for increased roof insulation. Previous standard floor to ceiling heights of 2.4m are now being superseded by, for example, the London Plan, which requires a minimum of 2.5m. Principal rooms in larger houses can be quite large and require a proportionate ceiling height. This can mean that ridge levels for houses built in the 1920's dictate ridge levels 100 years later built to completely different construction criteria. A further problem with the proposed uniform ridge level is that can induce a drab suburban uniformity and lack of design variety. See for example figs 6.30 and 6.38 in the draft Code to see how a varied ridge line can be beneficial The problem then is to define the limits of what is acceptable. I am happy to explore this further - please contact me	These potential implications of the proposed building heights assessment are understood. Design Code has a built-in flexibility, as set out in paragraph 1.1.4. This explains that were there is a deviation from compliance with code/s through exception, a robust justification will need to be made in the submission. This will then be assessed on a case-by-case basis during the course of the application.

8.	building heights should reflect the area in which they are being constructed. Plonking a 6 or more-storey building in the middle of a 2-storey environment creates an eyesore for the future. I would only consider a hospital as being possibly a suitable exception to this rule.	The code and guidance set out in section 6.3 of the design code on building heights and taller buildings does not set out that taller buildings are acceptable or appropriate in principle. It provides guidance to inform how development for such buildings should be approached to ensure they are of the highest quality and appropriate in the Elmbridge context. The building heights guidance provided at paragraph 6.3.1 is clear that the height of new developments must relate to the height of surrounding existing buildings and not detract from the local character.
9.	The problem is one of enforced uniformity. In the past on many streets there are often huge variations which can contribute greatly to the character of an area (for example a very high bank building at the end of the high street which looks great but would be dismissed if tested against a code which only allowed for small variations. Scale can add drama and interest.	The aim of the Design Code is to ensure that the approach is a creative process, orientated and tailored to the context as opposed to being a standard solution imposed regardless of context or a pastiche replication of existing buildings (paragraph 1.2.4). Planning applications for development are expected to comply and demonstrate compliance with its requirements and where there is a deviation through exception, a robust justification will need to be made (paragraph 1.1.4). Furthermore, there is a separate section 6.3.2 concerned with 'taller buildings' which enables further flexibility in the height assessment subject to compliance with the set of specific codes.
10.	Planning creep eventually enables the character of an area to be changed as comparisons with newer builds, not the older buildings, obscure the original heights/ widths. This is very clear where new builds with rooms in the roof and high ceilings slowly take over an area that	The code and guidance set out under section 6.3.1 requires development to proposals to: A. Assess and evidence the height of existing buildings along their street where the site is located (minimum 25m in both

	used to have two floor homes with mid-20th century height ceilings, thus ridge heights can be up to 2m taller.	directions) as well as the height of the local context (prevailing height). Prevailing height is defined as height of buildings within a 50m radius measured from the centre of the site, or the heights of all buildings on plots which share a boundary with the site, whichever is greater. The resulting prevailing height is calculated as the average of those heights. This seeks the individual higher building not to skew what is considered an appropriate height. And B. Where the height of existing buildings along the street is consistent or of minimal variation, not to exceed the existing building height level of the adjacent plots along the street. This will ensure creep of building heights will not occur where heights are consistent.
11.	The height of a development should be in character with the local area. In Walton an 8-storey high block of flats if a good design would not be out of character, stuck in the middle of Whiteley village would be an eyesore. Don't go by height go by what suits the area and looks nice. Some of the flats recently built on the Birdseye development are characterless blocks.	The building heights guidance provided at paragraph 6.3.1 is clear that the height of new developments must relate to the height of surrounding existing buildings and not detract from the local character.

	Privacy of other houses/ property already in the area should be paramount	
12.	Building heights should fit the context; where tall buildings are prevalent, the council should ensure these areas do not spread into lower landscapes.	The building heights guidance provided at paragraph 6.3.1 is clear that the height of new developments must relate to the height of surrounding existing buildings and not detract from the local character.
13.	Exceptions really should be exceptions, not regularly granted	Noted.
14.	I wouldn't want to see a lot of high-rise building in the area as I feel they detract from the sense of community and am not sure if the plan is sufficiently stringent in this area. The words are fine but, as ever, interpretation is everything.	The code and guidance set out in section 6.3 of the design code on building heights and taller buildings does not set out that taller buildings are acceptable or appropriate in principle. It provides guidance to inform how development for such buildings should be approached to ensure they are of the highest quality and appropriate in the Elmbridge context. The building heights guidance provided at paragraph 6.3.1 is clear that the height of new developments must relate to the height of surrounding existing buildings and not detract from the local character.
15.	topography should also be taken into account to give good flow to the street scene and should be taken in line, as a cross section and 360º within the surrounding area.	This is a policy requirement (DM2). When the neighbouring buildings' heights are taken into account, topography is automatically accounted for.
16.	Topography should be included in the consideration and street scenes should be in line and across the street or 360º if on a corner or cul-de-sac	This is a policy requirement (DM2). When the neighbouring buildings' heights are taken into account, topography is automatically accounted for. Local validation requirements include a Street Scene plan to be provided for all applications involving new or replacement buildings.

17.	The height of new developments must not exceed to the height of surrounding existing buildings and not detract from the local character. The PDR allowing extensions upward will routinely be removed from planning approvals.	It is not the place of the design code to be restrictive on developments to place a blanket requirement for new building heights to be exactly the same as those of existing buildings. The building heights guidance provided at paragraph 6.3.1 is clear that the height of new developments must relate to the height of surrounding existing buildings and not detract from the local character. In addition, the code and guidance set out under section 6.3.1 requires development to proposals to: A. Assess and evidence the height of existing buildings along their street where the site is located (minimum 25m in both directions) as well as the height of the local context (prevailing height). Prevailing height is defined as height of buildings within a 50m radius measured from the centre of the site, or the heights of all buildings on plots which share a boundary with the site, whichever is greater. The resulting prevailing height is calculated as the average of those heights. This seeks the individual higher building not to skew what is considered an appropriate height. And B. Where the height of existing buildings along the street is consistent or of minimal variation, not exceed the existing building height level of the adjacent plots along the street.

		This will ensure creep of building heights will not occur where heights are consistent. Permitted development rights are set in legislation. Local policy and design code cannot alter these.
18.	In general, we applaud this maximum height assessment except that in 6.3.1. A you only make reference to the height of existing buildings along a street and appear to make no reference to Back Land development where for instance a developer may wish to erect a tower block. There is no clarity on where the centre of a Site is, for instance the proposed blocks of flats on the Hersham shopping centre car park. The centre of car park is well over 50m from the houses in the adjoining road behind but as currently proposed the tower block will be as close as 11m to the back wall of the nearest house. This clause needs to be changed to both make it a statutory requirement and to increase the distance to the nearest property by a min of the height of the proposed tower block/building. Thus at least then not infringing on any Rights of Light, privacy etc.	6.3.1 A. sets out that development proposals must assess and evidence the height of the local context (prevailing height). Prevailing height is defined as height of buildings within a 50m radius measured from the centre of the site, or the heights of all buildings on plots which share a boundary with the site, whichever is greater. The resulting prevailing height is calculated as the average of those heights.
19.	In developing land, commercial considerations are fundamental, and the designer cannot avoid addressing density when arranging the plan and height of developments. I suggest that the design sequence which should be followed is explained early on in the document and how the earliest stages deliver acceptable solutions for density	Noted. However, high quality design is always subjective and often depends on the context in which it is located. The design code sets out principles of what high quality design should consider. It is not prescriptive about what this should look like which enables flexibility for applicants/developers to respond to the local context and requirements of the development.

	and height. Height can be increased by exemplary and distinctive design. But how are the planners to assess these subjective matters? - "distinctive" could be modern, ugly, traditional or beautiful in the eyes of ....who? This also needs to be much much clearer in relation to a hot topic for Elmbridge residents	
20.	Can't see the problem in building up as long as it is in keeping with the surroundings. Comes back to the fact expanding up does not need to expand the footprint. There is plenty of space upwards - just not much of it on the ground.	Noted.
21.	Agree in principle but the topography of the street scene both in line and cross section should also be taken into account.	Consideration of topography is a policy requirement (DM2). When the neighbouring buildings' heights are taken into account, topography is automatically accounted for. Local validation requirements include a Street Scene plan to be provided for all applications involving new or replacement buildings.
22.	A more flexible approach should be taken to development in areas where existing development heights are more sporadic, notwithstanding any proposals of greater height than the prevailing or adjacent existing development height will need to be tested through a Townscape/Landscape Visual Impact Assessment. Esher in particular requires increased urbanisation to protect and enhance footfall, vitality and viability.	The code and guidance set out in section 6.3.1 of the design code requires applicants to assess and evidence the height of existing buildings along their street where the site is located (minimum 25m in both directions) as well as the height of the local context (prevailing height). Prevailing height is defined as height of buildings within a 50m radius measured from the centre of the site, or the heights of all buildings on plots which share a boundary with the site, whichever is greater. The resulting prevailing height is calculated as the average of those heights.

		By using an average for prevailing height, the approach accommodates more sporadic development heights.
23.	Response by Inspired Villages: The storey heights stated at paragraph 2.4.10 as being generally 2 storeys is very prescriptive – allowance for buildings which are levelled with topography such as stepping down a hill should be made. Within the Elmbridge Urban Area there are a number of existing 3 and 4 storey buildings therefore we believe that it should state 2-3 storeys are acceptable. Furthermore, within the urban areas of Elmbridge there are many occurrences of Floor Area Ratio (FAR) being bigger than 0.4, we believe this should be amended, to be more in line with what is already delivered in Elmbridge.	Paragraph 2.4.10 does not prescribe what heights can be proposed. It sets out what is typically seen in Elmbridge in the context of residential led areas.

12. Would you like to add or change any of the proposed requirements in terms of taller buildings?		
	Respondent's comment	*Council's response*
1.	Woking and Tolworth demonstrate the awful impact of taller buildings. Walton in particular is suffering from becoming overshadowed by tall buildings. it is not tall building town and is losing its Edwardian character.	Noted. The design code does not state that tall buildings are acceptable in principle and every application for a tall building must be assessed on its individual merits in accordance with planning legislation, national policy and guidance. The design code is clear that where tall buildings are proposed they must be of exemplary design or to offer significant public benefit, as well as meeting a range of other requirements to ensure proposals are of the highest quality.
2.	Yes - the text blocks A and B on page 58 end with "or": that appears to be a typo, and they should end with "and". Surely "exemplary design quality" and "significant public benefits" are required in addition to the other requirements, rather than instead of.	The aim of these codes is that the requirements of codes A, B or C must be met, together with D, E, F and G for a proposed tall building to be acceptable in design terms.
3.	Single houses on large plots should be carefully reviewed before allowing of a second or third house on the plot, that simply adds value only and profit to the redevelopment	All applications must be assessed on their individual merits in accordance with planning legislation, national policy and guidance.
4.	I think as long as the buildings are in line with buildings in the same area. in residential estates/estates outside of town centres it is key to keep building heights minimised.	The building heights guidance provided at paragraph 6.3.1 is clear that the height of new developments must relate to the height of surrounding existing buildings and not detract from the local character.
5.	Not in favour of high rise living	Noted. The design code does not state that tall buildings are acceptable in principle and every application for a tall building must be assessed on its individual merits in accordance with planning legislation, national policy and guidance.

		The design code is clear that where tall buildings are proposed they must be of exemplary design or to offer significant public benefit, as well as meeting a range of other requirements to ensure proposals are of the highest quality.
6.	Just a query: How will you assess "exemplary" design quality (p.58, box A). Will you have the power to refuse developments that are not "exemplary" for example? And who will be making the determination? I agree that design should be exemplary.	All applications must be assessed on their individual merits in accordance with planning legislation, national policy and guidance. The Council when determining a given application will need to weigh up all relevant planning material considerations including whether it is of exemplary design in case of a taller building.
7.	No, looks good	Support is noted.
8.	As in most master planning, the Code should identify where taller buildings might be permitted - i.e., in town centres and other key, high density areas. Your illustrations of 4 storey blocks of flats in Camden and Westminster are understandable and probably acceptable for those parts of London but would not be appropriate outside the commercial town centres within Elmbridge. I suggest that section D on page 58 might be reinforced to make this point - if accepted.	The building heights guidance provided at paragraph 6.3.1 is clear that the height of new developments must relate to the height of surrounding existing buildings and not detract from the local character. Section 6.3.2 is only for proposals that exceed prevailing heights. Code D will be relevant in all cases, where taller buildings are proposed.
9.	Yes. 'Exemplary design quality' is highly subjective, and, with respect, the officers determining whether a building complies with this criterion may not have sufficient knowledge or experience to make this judgment. This is exemplified by the fact that, although there are examples of this principle in Elmbridge, the illustrations are all from outside the Borough.	Noted. Council benefits from the internal urban design expertise to enable the assessment of proposals' design quality. The aim of these codes (chapter 6.3.2) is that the requirements of codes A, B or C must be met, together with D, E, F and G for a proposed tall building to be acceptable. These seek to ensure that where a tall building is proposed,

	Para B suggests that a tall building is acceptable if there is a public benefit. This is not a sufficient justification to create something that would be out of scale with the neighbouring buildings. Para C suggests that if a building has exceptional sustainability benefits this will outweigh the impact on neighbours. Again, this is not sufficient justification per se Para D suggests that a clear townscape rationale could justify taller buildings. The same happened in Woking...need I say more Para F - justifying a tall building by contributing to the public realm is opening the door to buying a consent for something that would otherwise be unacceptable See comments above	public benefits and positive impacts can be secured as part of that proposal. Whether a tall building is acceptable in its context is determined on proposal's individual merits. Determination of all major schemes is usually based on considerations of complex planning balance of all benefits and harms arising from that development, and design consideration will be only one of them.
10.	fire regulations are paramount for tall buildings. After this what do they overlook and how does this affect everyone connected to those buildings.	Fire regulations are requirement in building regulations. These are a legal requirement that sit separately to the planning process. The impact of a proposed tall building, including overlooking, will be considered by the case officer and will inform decision making.
11.	I tend to think there ought to be a borough wide limit of say max 5 domestic storeys. Otherwise, the tendency towards taller buildings (as seen for example in Kingston) will harm the particular character of the borough.	The Council cannot place a blanket maximum limit on building heights across the Borough, as this would be contrary to national policy and guidance. Each application must be assessed on its individual merits in accordance with planning legislation, policy and guidance.

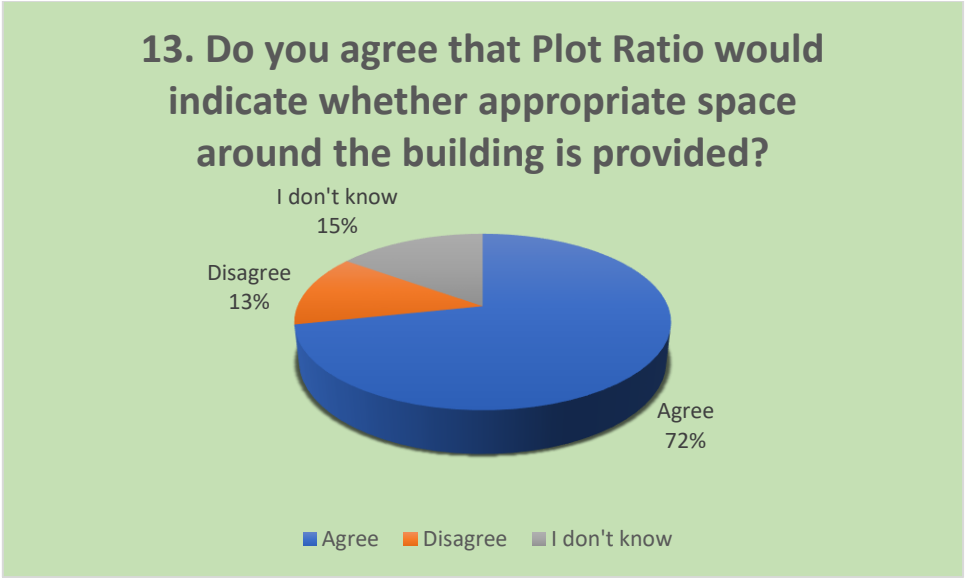
		The building heights guidance provided at paragraph 6.3.1 is clear that the height of new developments must relate to the height of surrounding existing buildings and not detract from the local character. Specific design requirements associated with proposals for taller buildings are set out in 6.3.2.
12.	consideration should be given to the height of legacy building rather than those that have been built in the last 5 years - these new taller buildings may have set an unwelcome precedent	The building heights guidance provided at paragraph 6.3.1 is clear that the height of new developments must relate to the height of surrounding existing buildings and not detract from the local character. This includes older buildings.
13.	yes, think of ALL neighbours who will be overlooked - not only those right next door	The impact of a proposed tall building, including overlooking, will be considered as part of decision-making process.
14.	Yes. All flats should be sound proofed, have large balconies (not small or doors that open onto a metal fence balconies) and at least 2 parking spaces and a locked storage space like in Australia	Sound proofing between flats falls within the remit of Building Regulations, outside of planning. Guidance for provision of outdoor amenity space is set out in chapter 10.2. Parking provision standards for cars and cycles are set out in our Local Plan, in Appendix 1 to the Development Management Plan 2015.
15.	Use of high-quality solid materials with styling finishes which both relate to existing urban environment and engage public at ground level (shop / commercial frontage, dining establishments etc). Use of setbacks to be encouraged to avoid potential canyon style development.	These considerations come under exemplary design quality, which is a requirement as set out in code A under 6.3.2. Requirements in terms of local vernacular, active frontages and animating streets are included in chapters 7 and 9.
16.	Residential should be no higher than 3 stories	The Council cannot place a blanket maximum limit on building heights across the Borough. This would be contrary to national policy and guidance. Each application must be

		assessed on its individual merits in accordance with planning legislation, policy and guidance. There are also permitted development rights that enable additional storeys above the existing buildings, including residential.
17.	they should be in keeping with the local architecture, and not just follow the design of the most recent modern building (e.g. Morrisons in Weybridge- have attempted to create a village street look) while the development opposite Waitrose has just copied a previous boring square building, not in keeping with the local area at all	Design Code states (at 7.1.1 A) that proposals for new build developments must consider the character of a site and its surroundings to inform the architectural approach and when specifying materials and construction details. Section 1.6.4 discusses various design approaches. At 1.2.4 is confirms that the aim of Design Code is to ensure that the approach is a creative process orientated and tailored to the context as opposed to being a standard solution imposed regardless of context or a pastiche replication of existing buildings.
18.	Some sort of mandatory level of interpretation.....	Requirements A to G in section 6.3.2 are all mandatory and offer examples of how a particular code might be considered in a planning proposal for such building(s).
19.	They need to keep within the existing local standards	Building height variation might be appropriate in some instances and as such we set out design requirements that must be met for such proposals for them to be acceptable to gain planning permission.
20.	Yes. Ne taller buildings must enhance the overall aspect of their surroundings.	Code A under section 6.3.2 includes this consideration.
21.	Exceptions to the high-rise limits implied by the local area must be subject to a very special circumstances test and formal public review.	Consideration of Very Special Circumstances (VSCs) relates to inappropriate development in the Green Belt. Taller buildings do not need to be necessarily high-rise; they are just those that are taller than their surroundings. In such cases, a set of codes in chapter 6.3.2 will be relevant to their consideration.

22.	YES building height must be determined by heights of buildings adjacent to the site i.e. either side of the proposed development NOT by buildings behind the site.	The building heights guidance provided at paragraph 6.3.1 is clear that the height of new developments must relate to the height of surrounding existing buildings and not detract from the local character. Some new developments will include more buildings, would be a backland development or on a larger site and in those instances buildings behind might be relevant to the overall height considerations.
23.	Yes, rather than 50 homes, this needs to be reduced to 20 homes to make it more relevant and in keeping with Elmbridge as a whole.	Guidance in chapter 6.3.2 states: “For larger developments of 50 homes and more, height variation using a gradient across the site might be considered appropriate. “ It is unlikely that a site that could accommodate 20 dwellings would be large enough to create a satisfactory higher “centre piece” building. However, where such a situation arises, paragraph 1.1.4 of the Design Code should be pursued, and a different design approach justified in the submission by the applicant.
24.	The building height should be appropriate to its surrounding neighbours. Targets and density/massing should not dictate the ht. of the built form to squeeze in extra living space if not consistent with the average of the character of the area, particularly residential areas. To minimise effect of taller buildings in areas i.e. low level high streets, the storeys should be set back with terraces for greenery but the rear and sides should not be overly massive which would make the building monolithic.	Design Code does not use density as a target as it is an output of good design. As such, density should not dictate the height, massing or design of a proposal. Considerations such as minimising effect of taller buildings, terraces with greenery etc. come under exemplary design quality, which is a requirement as set out in Code A under 6.3.2. Requirements and guidance for urban greening and biodiversity net gain are set out in chapter 5.

25.	Add an additional requirement for taller buildings, where, subject to the other requirements, a proposed building requires a degree of prominence due to the nature of the business/enterprise, and where this can be justified in landscape terms. Quality of architecture can enable taller, beautiful buildings which help to preserve the countryside.	This example seems quite unique. Design Code cannot cover every design eventuality. As such, where such a situation arises, paragraph 1.1.4 of the Design Code should be pursued, and a different design approach justified in the submission by the applicant.
26.	Yes, show consideration of the privacy of adjoining buildings by ensuring there is a limit to views from the new building	The impact of a proposed tall building, including overlooking, will be considered by the case officer and will inform decision making.
27.	Response by Inspired Villages: Within Figure 6.7 the use of only 50m local context radius from the centre of a site is not adequate on larger sites and a reference area should be established on a site-by-site basis. We are supportive of the use of height variation using a gradient across the site. We believe that taller buildings should be categorised as over 4 storey, as having reviewed the heights in Elmbridge 2-3 storeys is frequent occurrence.	The Council agrees that a 50m radius might not be appropriate in every situation, especially where a development on a larger site is proposed. This is why it is proposed that in these situations buildings on all neighbouring plots are considered to ascertain the appropriate height. This is secured through the text in 6.3.1: “Prevailing height is defined as height of buildings within a 50m radius measured from the centre of the site, or the heights of all buildings on plots which share a boundary with the site, <u>whichever is greater</u>.” [our emphasis] Tall buildings cannot be defined as a specific number of storeys, as each application site would have a distinctive surrounding area.

13. Do you agree that Plot Ratio would indicate whether appropriate space around the building is provided?		
	Respondent's comment	*Council's response*
1.	Agree (72%)	Almost three quarters of respondents agree that Plot Ratio would indicate that appropriate space around the building is provided.
2.	Disagree (13%)	Only 13% of respondents disagreed.
3.	I don't know (15%)	Noted.



14. If you disagree that Plot Ratio would be appropriate, please tell us why and offer an alternative solution.		
	Respondent's comment	*Council's response*
1.	plot ratio is being ignored on residential extensions. rear gardens need to be at least 15 metres. to give sensible separation between houses to prevent overlooking and create decent housing conditions. two storey rear extensions must be resisted to preserve privacy and amenity.	Plot Ratio is currently not used in Elmbridge. The use of the garden depth (i.e., 15m) has caused practical issues, especially where gardens are of irregular shapes. The proposed use of Plot Ratio would apply to the proposals for home extensions. To ensure sufficient privacy between properties, Design Code includes guidance in chapter 10.2.3. Council is unable to introduce a ban on certain type of development. Each proposal for home extensions will be determined on its own merits, also considering any overlooking and potential loss of privacy. Guidance on home extensions is included in section 6 and chapter 10.2.3.
2.	The plot ration needs to be proportionate to the immediate area. A block of flats in a road of detached houses with large gardens is not appropriate, nor is a mansion in a crowded urban space.	Indicative appropriate Plot ratio ranges as set out in Fig 6.1. These have been tested in terms of different area types. The aim of the Local Plan is to make efficient use of land, which relates to the assessment of most appropriate built form and use of each site.
3.	Plot Ratio is a lazy architect solution of getting around inconvenient areas	Noted.
4.	I agree in principle, but the max range seems disproportionate, for example gated and riverside seems to show that only 20% of the land can be used for the dwelling, but some plots can be quite small. I would suggest raising this max ratio, maybe look at suburban as well.	It would be difficult to provide guidance and codes for every situation within the Design Code. There might be instances where the compliance with the suggested ranges might be challenging, even impossible. This could be for example due to the existing proportion of the built form to be higher prior to any new development. In these cases, paragraph 1.1.4 of the

		Design Code should be pursued, and a different design approach justified in the submission by the applicant.
5.	Suggestion: It depends on how the area of the site is determined. This should be the area of the site within the close vicinity of the habitable buildings. Reason: Example: in the Hersham Shopping centre proposals (I do not have good knowledge of many other Elmbridge sites), the dwellings are exclusively proposed to be on the area of the existing car park. However, the site includes a shopping centre and an adjacent council car park. It would clearly be nonsense to include the area of the shops, staff parking, delivery zone, shop access road, or even the council car park, etc, within the area allocated to the housing for this ratio calculation.	The site area would be determined by the red outline of the application site as shown on the Location Plan submitted with a planning application. This will apply on a denser urban site as well as in a gated area.
6.	An excellent measure of appropriate size for a plot - and the different types have been identified.	Support is noted.
7.	Figure 6.2 is too prescriptive, and the ratios need more investigation. The existing density policy already highlights how a blanket policy can be unworkable. The footprint needs to take account of various factors including front and rear building lines, 45º sight lines etc, and the aspect ratio of the site. At the urban end of the scale, we have projects above 0.6, and on the gated developments we have perfectly acceptable projects at 0.25. Many of the sites we work on have deep back gardens, which can distort the plot ratio - please contact me for an analysis of our projects	Figure 6.1 is an example. Indicative range of appropriate plot ratios is included in Figure 6.2. It would be difficult to provide guidance and codes for every situation within the Design Code. There might be instances where the compliance with the suggested ranges might be challenging. This could be for example due to the existing proportion of the built form to be higher prior to any new development. In these cases, paragraph 1.1.4 of the Design Code should be pursued, and a different design approach justified in the submission by the applicant.

8.	on paper it looks reasonable, but visualising this is very difficult for anyone who's not a trained architect or surveyor.	Plot Ratio is simply a proportion of a plot being covered by buildings. For example, if a site of 100sqm is covered by a building with a 50sqm footprint, Plot Ratio is 0.5, which means that 50% (half) of the site is covered by built form.
9.	I think plot ratio is a good alternative BUT separation between buildings must not be reduced below the average in a local area as this most affects street scene.	Separation between buildings is set out in chapters 6.8.1 (street rhythm), 6.8.2 (urban grain) and 10.2.3 (rear curtilage).
10.	Clearly plot ratio is the measure of how much of a plot is covered by buildings. So, in that I agree. But if someone would find more amenity to an indoor space rather than garden then can you really say they are wrong to think that. As long as any extension does not disadvantage neighbours unduly. But current planning rules do a good job of checking for that.	Yes, there are other design parameters set out in the Design Code that complement Plot Ratio, including street rhythm, urban grain, rear curtilage, private amenity, urban greening, biodiversity net gain and others that will ensure that the proposed development respects the character of the local area and amenities of neighbours.
11.	In general, the plot ratio is a good assessment, however the 11m rule for the upper storey to rear boundary line prevented little or no space being left in the design, for boundary planting which would provide privacy to neighbours and continuation of wildlife corridors. Less rear space means that that future occupiers will be able to look into other neighbours' gardens affecting their previous privacy and enjoyment of their outdoor amenity.	Yes, there are other design parameters set out in the Design Code that complement Plot Ratio, including street rhythm, urban grain, rear curtilage, private amenity, urban greening, biodiversity net gain and others that will ensure that the proposed development respects the character of the local area and amenities of neighbours.
12.	Response by Inspired Villages: The plot ratio does not deal with apartments and, and a "plot" is not the appropriate terminology for specialist housing, due to our sites having communal gardens, spaces and facilities this should be amended to take this into account.	Plot Ratio applies to all residential development. Additionally, there are other parameters that compliment this, such as urban grain, street rhythm, private amenity, urban greening, etc.

	The plot ratio for Gated areas in Figure 6.2 of 0.1-0.2 is below low-density standards. This should be amended. There needs to be a specific reference to specialist housing and allowance for differentiation from the code on this point. A one size fits all approach is not appropriate when it comes to specialist housing, as set out in relation to the communal facilities above.	It would be difficult to provide guidance and codes for every situation within the Design Code. The indicative ranges set out in Figure 6.2 were calculated using GIS within those area types in Elmbridge as shown. Where there are discrepancies on the application sites going forward, paragraph 1.1.4 of the Design Code should be pursued, and a different design approach justified in the submission by the applicant.

15. Considering THE BUILT-UP AREAS located adjacent to the Green Belt boundary - are you able to identify their distinctive features the Design Code should highlight?		
	Respondent's comment	*Council's response*
1.	Not disrupting the natural setting & encouraging biodiversity; Preserving & enhancing the natural setting; Access to open Green space.	Parameters set out across the Design Code seek to do just that. Edge of settlement does not appear to be any different than identified urban area types.
2.	Yes, the Green Belt should be treasured as a great benefit to Elmbridge & not encroached upon at all	Any new development requiring planning permission coming forward in land designated as Green Belt would be subject to local and national policies considerations. It is not within the remit of the Design Code to ascertain no encroachment upon Green Belt.
3.	There should be more strict maximum height for development in these areas, also lower plot ratios should be considered here, allowing more greenspace to ensure it does not appear development is built on top of each other.	All new development is subject to a requirement for making efficient use of land. It is the aim of the Local Plan to enable development to meet the identified need.
4.	The design should blend with the natural environment	Code A in chapter 7.1.1 sets out that proposals for new build developments must consider the character of a site and its surroundings to inform the architectural approach and when specifying materials and construction details.
5.	Yes, as low density as possible. And no new dwellings should be built in the green belt.	All new development is subject to a requirement for making efficient use of land. It is the aim of the Local Plan to enable development to meet the identified need. Any new development requiring planning permission coming forward in land designated as Green Belt would be subject to local and national policies considerations. It is not within the remit of the Design Code to restrict any new dwellings being built in Green Belt.

6.	No building over two storeys. Grass verges between road and footpath. Relatively deep front gardens where possible.	It is not within the remit of the Design Code to restrict the height of buildings to a certain number of storeys. The assessment of appropriate height of new development is set out in chapter 6.3. Code A in chapter 7.1.1 sets out that proposals for new build developments must consider the character of a site and its surroundings. Further codes and guidance in terms of built form are set out in section 6, including considerations of building lines (6.7), street rhythm and urban grain (6.8).
7.	building height is of great importance in connection with this. they should not dominate the skyline. Concrete would be an inappropriate material in this location.	The assessment of appropriate height of new development is set out in chapter 6.3. Code A in chapter 7.1.1 sets out that proposals for new build developments must consider the character of a site and its surroundings to inform the architectural approach and when specifying materials and construction details.
8.	Yes, suburban characteristics should be filtered out. For example, lower levels of lighting and unmade up paths. Care should be taken to ensure only native trees and plants are used.	**We have now added a guidance point about the low-level lighting in chapter 6.9.1.** Guidance about accessibility, biodiversity and natural setting are already included in chapter 6.9.
9.	Blundel Lane, Stoke D'Abernon, is narrow and winding. It gives the many who drive along it, or walk or cycle or scoot or ride horses, gorgeous landscape views of Green Belt Sub-Area 11. The stunning, unspoilt, highly biodiverse landscape, including the ancient section Public Footpath 51 and the thick, biodiverse ancient hedgerows, is readily visible from the houses, many of which now have solar panels - despite the oak trees opposite. The	These features have been captured in the guidance points in chapter 6.9.1.

	extra light from the open countryside makes it energy efficient to install solar panels.	
10.	Lower density, no taller (+2 storeys) buildings	All new development is subject to a requirement for making efficient use of land. It is the aim of the Local Plan to enable development to meet the identified need. It is not within the remit of the Design Code to restrict the height of buildings to a certain number of storeys. The assessment of appropriate height of new development is set out in chapter 6.3.
11.	Housing density is much lower adjacent to Green Belt. Farmhouses, small areas of woodland in between small groups of cottages etc.	Chapter 6.9.1 (Edge of settlements) already contains the following guidance: 'New developments in residential areas should not disrupt the low prevailing scale of the edge of settlement character.' This seeks to ensure the new development maintains the character of edge of settlement. Furthermore, Code A in chapter 7.1.1 sets out that proposals for new build developments must consider the character of a site and its surroundings. Codes and guidance in terms of built form are set out in section 6, including considerations of building lines (6.7), street rhythm and urban grain (6.8). These are relevant across the whole borough.
12.	Blending with natural environment and should not be detrimental to green spaces	First guidance point in chapter 6.9.1 sets out that proposals should enhance the natural setting and encourage biodiversity.
13.	The edge of the Green Belt and Green Space areas must be tapered so that e.g., tall buildings are not right on the edge of these areas. Developments near these edges must provide a smooth transition not a hiatus!	The assessment of appropriate height of new development is set out in chapter 6.3 and this applies across the borough.

14.	Yes, as shown in your photos on page 57 these are single, or two storey buildings/houses and it needs to be mandated that no new development in these areas exceeds two stories in height plus a pitched roof.	It is not within the remit of the Design Code to restrict the height of buildings to a certain number of storeys. The assessment of appropriate height of new development is set out in chapter 6.3.
15.	It probably makes sense to have a buffer zone where different rules apply. Otherwise, you will get a hard transition from built up to green space. So, for example plot development (e.g., extensions) adjoining green belt should be different to that where a plot is surrounded by houses.	We have considered buffer zones also in connection with other design parameters, but it is challenging to define these in a simple way across the borough. Despite this, we acknowledge that in majority of cases on the edge of settlements there are two storey dwellings with or without rooms in the roofspace. Many of these have been in situ for longer than the Green Belt designation itself and create an acceptable 'edge' of urban areas adjacent to the Green Belt land. As such, the borough-wide codes within the Design Code, such as Code A in chapter 7.1.1 that sets out that proposals for new build developments must consider the character of a site and its surroundings, or codes in section 6 (built form) are considered to meet this suggestion.
16.	lower density, low built form to plot ratio, low ancillary-built form to plot ratio, wider spacing around built form, higher boundary planting ratios built height to tree height ratio - sadly this has been eroded in the last 20 years.	Code A in chapter 7.1.1 sets out that proposals for new build developments must consider the character of a site and its surroundings. Codes and guidance in terms of built form are set out in section 6, including considerations of plot ratio (6.1.1), building lines (6.7), street rhythm and urban grain (6.8). These are relevant to all new development across the whole borough.
17.	The Design Code should highlight Esher as being diverse and varying in architectural design typologies. Given the ad-hoc mix of design typologies in the town and edge of Centre, flexibility should be offered as part of the Design Code in respect to new development proposals. To the	A level of design flexibility is built in within the Design Code. Guidance in chapter 7.1 says that 'in sensitive historic settings such as Conservation Areas, the use of traditional materials and detailing is advised. In areas that are less constrained by heritage, modern materials and methods of

	north of Esher, adjoining the Green Belt, the uses are mixed, with commercial type uses prevalent. Much of the design and architecture has been dictated by operational purpose.	construction might be acceptable.' It also refers to section 1.6.4 on design approach. However, should the applicant propose a different approach based on valid reasons, this should be justified in the application submission as set out in paragraph 1.1.4 of the document.
18.	Yes. As a resident of Claygate I would like to see its mix of styles retained	Code A in chapter 7.1.1 sets out that proposals for new build developments must consider the character of a site and its surroundings to inform the architectural approach and when specifying materials and construction details. This requirement is valid for all new development across the borough.
19.	Yes. Ensure that the new buildings do not have large windows or decking to ensure that they do not dominate the view from the open space/green belt	It is not within the remit of the Design Code to restrict the size of openings within the buildings or the implementation of decking. Most forms of these type of development fall within the permitted development. Furthermore, there is no right of view over private land in planning.
20.	Response by Inspired Villages: The distinctive features of the built- up areas of the Green Belt boundary are: • Characterful Village quality • Arts and Crafts architectural style (this is noted in Design Code) • High quality robust materials (including brick, render, slate, clay tiles) • Richness and variety of materials used across facades and roofs • Varied and articulated roofscapes	Thank you for this quite an extensive list. Considering each feature, these could apply across various areas of the borough, not only in the areas on the edge of settlements. Design Code document seeks to increase the design quality of new development and these features, such as building heights, use of external materials, variety of architecture, articulation of roofs, etc. are all covered in their separate sections, together achieving a pleasing and inviting environment for people to enjoy, live in and work in.

	• Variety of building heights • Combination of historic terraces, modern designs and grand domestic scaled buildings • Landscape relationship to the wider green belt	

16. Would you like to propose any additional guidance or specific mandatory design requirements to apply to the new development located on the edge of settlement?		
	Respondent's comment	*Council's response*
1.	Retaining the natural setting, e.g., by planting trees. No intrusive features that would disrupt the natural setting (e.g., bright lights, noise, extra traffic, extra parking). No development should impact on existing biodiversity. Harmonious design.	Chapter 6.9.1 (Edge of settlements) already includes provisions for enhancement of its natural setting, encouragement of biodiversity, maintaining the prevailing scale and its character, and connectivity to green spaces.
2.	any encroachment onto green belt however small must be resisted.	It is not within the remit of the Design Code to restrict any land from new development. Any such proposal would be determined on its own merits in line with the local and national planning policies.
3.	Lower density and more green areas near edge of settlements should ensure that there is a gradual transition to greenbelt.	We have considered buffer zones also in connection with other design parameters, but it is challenging to define these in a simple way across the borough. Despite this, we acknowledge that in majority of cases on the edge of settlements there are two storey dwellings with or without rooms in the roofspace. Many of these have been in situ for longer than the Green Belt designation itself and create an acceptable 'edge' of urban areas adjacent to the Green Belt land. In accordance with the Local Plan, all new development is directed to the urban areas, i.e., the areas that are not designated as Green Belt, and must ensure efficient use of land.
4.	low plot density on the edges	Built up areas adjacent to Green Belt fall within urban land. In accordance with the Local Plan and the national policy (National Planning Policy Framework), the Council must ensure efficient use of land to meet the identified development needs.

5.	If a deep / large development site fronting onto an existing highway, the creation of multiple connections - vehicular and pedestrian/cycleways - from the site to the public open space.	Connectivity and provision for active travel is one of the main aims of the Movement chapter (chapter 4) within the document.
6.	The Environment Agency has designated the detached houses in the semi-rural Blundel Lane settlement opposite Oxshott Green Belt Sub-Area 11 as high risk of surface water flooding. Of course, a River Mole underground estuary runs along the western part of the agricultural fields opposite - where the hay meadows and many trees, including ancient oaks on the boundary of the fields next to 2 Waverley Road, help to manage rainfall. But the fields' western edge nonetheless floods during the wettest months of the year. The verge opposite this semi-rural settlement is officially classified and maintained by Surrey County Council as genuinely rural.	Thank you for your observation.
7.	Special plot ratio - more green space	Built up areas adjacent to Green Belt fall within urban land. In accordance with the Local Plan and the national policy (National Planning Policy Framework), the Council must ensure efficient use of land to meet the identified development needs. While considering the efficient use of land, new development needs to observe the characteristics of the site and its surroundings to ensure high quality design of the new development. Codes and guidance to achieve this are set out across the document.
8.	needs its own infrastructure	Is there any specific infrastructure needed at the edge of settlements?

		It is outside of the Design Code remit to require specific infrastructure to be provided as part of new development. It is the role of Local Plan to do so.
9.	Keep development low and tidy. it should be inobtrusive	Codes and guidance associated with the height of new development are set out in chapter 6.3. It is outside of Design Code remit to restrict development's height to a certain level. Additionally, code in section 7.1.1 requires that new build developments must consider the character of the site and its surroundings.
10.	The above should be preserved by a sliding scale of building density as you move from built up areas to green belt. This will preserve the existing street scene in these transitory areas. Very large housing developments should not be built directly next to or on existing green belt land.	It is not within the remit of the Design Code to restrict any land from new development. Any such proposal would be determined on its own merits in line with the local and national planning policies. Once Design Code is adopted, it will be a material consideration in the determination process.
11.	Space adjacent to green belt should be designed so that it doesn't encourage littering or build up if rubbish	The aim of the Design Code is to improve design quality of new developments. Once these are implemented it is the behaviour of its users causing littering, which cannot be controlled through planning.
12.	Keep all green belt land and do not build on any nature	It is not within the remit of the Design Code to restrict any land from new development. Any such proposal would be determined on its own merits in line with the local and national planning policies.
13.	Yes, these must be constructed using traditional materials that are low key in tone and pallet.	This requirement is set out in Code A in chapter 7.1.1 and is valid across the whole borough.
14.	Yes, we propose that it should be mandated that there should be no new development within a min 50m of the Green Belt boundary. By having any new development	We have considered buffer zones also in connection with other design parameters, but it is challenging to define these in a simple way (such as a specific distance) across the borough. Despite this, we acknowledge that in majority of cases on the

	set back from the boundary it will be less intrusive on the Green Belt itself.	edge of settlements there are two storey dwellings with or without rooms in the roofspace. Many of these have been in situ for longer than the Green Belt designation itself and create an acceptable 'edge' of urban areas adjacent to the Green Belt land. In accordance with the Local Plan, all new development must ensure efficient use of land.
15.	Height is a consideration, but today's rules seem to make it difficult enough to raise the height of a building	We included codes and guidance in terms of taller buildings (taller than the prevailing height) in chapter 6.3.2.
16.	Urban ratios should not be applied and traditional ratios to maintain character should be applied	We have considered buffer (transitional) zones, but it is challenging to define these in a simple way (such as a specific distance) across the borough. Despite this, we acknowledge that in majority of cases on the edge of settlements there are two storey dwellings with or without rooms in the roofspace. Many of these have been in situ for longer than the Green Belt designation itself and create an acceptable 'edge' of urban areas adjacent to the Green Belt land. In terms of the character of the area, Code A in chapter 7.1.1 will apply and this is valid across the whole borough.
17.	The Design Code should highlight Esher as being diverse and varying in architectural design typologies. Given the ad-hoc mix of design typologies in the town and edge of Centre, flexibility should be offered as part of the Design Code in respect to new development proposals. To the north of Esher, adjoining the Green Belt, the uses are mixed, with commercial type uses prevalent. Much of the design and architecture has been dictated by operational purpose.	A level of design flexibility is built in within the Design Code. Guidance in chapter 7.1 says that 'in sensitive historic settings such as Conservation Areas, the use of traditional materials and detailing is advised. In areas that are less constrained by heritage, modern materials and methods of construction might be acceptable.' It also refers to section 1.6.4 on design approach. However, should the applicant propose a different approach based on valid reasons, this should be justified in the application submission as set out in paragraph 1.1.4 of the document.

18.	Response by Inspired Villages: The borough's urban areas that lie outside of the Green Belt designation have been categorised into Area Types based on their common design characteristics. There is no categorisation of the differing Green Belt areas. On areas where a site sits within two different 'types' which have specific design elements, there will be no clear guidance upon which design standards are to be adhered to. This should be clarified. The entire designated Green Belt is simply characterised as Green Belt. However, there is built development within parts of the Green Belt, and Green Belt areas on the edge of built-up areas may have characteristics that are influenced by development. 2.3.2 states that the Code does offer overarching design principles that should be met by new development, whether in the urban area or in the Green Belt.	For the reasons set out in chapter 2.3 no area types have been identified within the Green Belt. Design code index (Fig 1.3) however sets out which codes are applicable not only in accordance with the area type the application site is located in, but also in accordance with the type of development proposed. As such, for example, if a homeowner wishes to build an extension in Cobham Downside (in the Green Belt), this index identifies which codes must be considered in terms of design, despite the site not being identified within a specific area type. Across the Design Code, codes and guidance are explained and set out in such a way that it should be clear what is required. If there are any specific cases or advice is needed, Council offers pre-application service, where any such questions can be answered by officers.

17. Would you like to add any other design requirements to the BUILT FORM section of the document (pages 53 - 67)?		
	Respondent's comment	*Council's response*
1.	Building on an existing residential plot. There needs to be rules to govern the number and size of buildings that can replace an existing house or that can be built in the garden of a house. Also, rules to prevent the construction of Airbnb dwellings.	Rules in terms of built form include plot ratio, urban grain, street rhythm, building heights and lines, all of which will determine how many new homes could be built on a plot, even as a backland development. It is not the aim of Design Code to restrict the number of buildings to be built in an area, but if a proposal comes forward, how this should be designed. Recent legislation (Regulation 228, Part 12 of the Levelling Up and Regeneration Act 2023) introduced provisions for forthcoming secondary legislation in connection to short-term rental properties (Airbnb). It is outside of the Design Code remit to regulate or restrict the use of dwellings as Airbnb.
2.	Not design but I feel relevant to your survey i.e., the state of the present pavements which are a hazard to everybody, especially the elderly and others with walking aids, i.e., push chairs walking frames, walking sticks etc. In addition, road and pavement drainage which has no apparent attention for at least 10 years!	It is outside of the Design Code remit to rectify this issue. We suggest that when such situations are observed, unless in private roads, these are reported to Surrey County Council as the County Highway Authority on their website.
3.	Yes, insufficient detail has been given to preserve and complement the Edwardian character of Walton.	Code A in chapter 7.1.1 requires that new developments consider the character of a site and its surroundings to inform the architectural approach and when specifying materials and construction details. It also refers to section 1.6.4 on design approach.

	Designing out crime must be given higher priority. Greater use of 106 agreements must be implemented to enforce permissions granted. Stricter site working times must be conditioned. It is not enough to rely on Environmental controls. Overlooking in residential areas must be resisted.	**We have now included references to Secured By Design across the document. These are however also covered in Building Regulations.** Imposition of S106 legal agreements is governed by the National Planning Policy Framework (paragraphs 55 - 58). Their use is subject to meeting specific tests and could be used only where it is not possible to address unacceptable impacts through a planning condition. As the construction working hours are governed by a different regime, unless there are site specific concerns, no restrictive working hours conditions could be imposed through the planning decision process. It is outside of the Design Code remit to restrict the construction working hours. Protection of privacy is set out in chapters 6.6 and 10.2.3.
4.	No, but I do have some observations on the density options selected for Hersham: Chapter 6.2 Density Fig 6.6 examples of different density across the borough. Second row is of Hersham. I find your selection of colours somewhat strange and random. If this is how FAR works, then it is a strange concept. Have all these houses had FAR assessment done on them? I can easily work out dph. A pale purple area (midway down photo, right of centre) is Havers Avenue, odd numbers. These look to be as the same density as Havers Avenue, even numbers, and all	Geographic Information System (GIS) software was used by our external consultants to group buildings within the same block (area of buildings surrounded by roads to all sides that was used as a unit) into different density brackets. These were indicated as examples in Fig 6.6 within the draft Design Code document. FAR (Floor Area Ratio) represents a density indicator that does not differentiate between the uses of these buildings, for example whether they are offices or housing. Instead, it is looking at the floor area of a building (if a building has multiple storeys, the floor area of each storey is added)

	were built to same design and at same time. Therefore, all should be moderate density (light brown) The Hersham Shopping Centre is included as mid-brown i.e., moderate density when it has no housing at all, and maybe never will. Air Products Office complex on Molesey Road is coloured dark maroon. It has no housing and there is no housing planning application. In the local Plan it is reserved employment zone. Therefore, it is not high-density housing. As an office block, it has a large unbuilt plot around it, so unlikely to count as high density by any metric.	and then divided by the size of the plot. This gives a good indication about how densely the site is built up. The area of the Hersham Shopping Centre represents a density between 0.4 and 1 (FAR) and therefore was indicated in this colour. Similarly, Air Products site's higher FAR is reflected in the red colour. [FAR is a density indicator that does not depend on the use of the site/building.]
5.	Reference to the Building Better: Building Beautiful recommendations. Also, as a guide for new developments in the Borough I believe section 6.4 is probably the first and most important guidance and it should directly make reference to the character of an area: "New development should contribute positively to the local townscape by improving legibility and wayfinding and recognizing the character of the area." The other sections then follow on as to how to do that. Section 7.1's statement on Local Vernacular may cover it but perhaps the two can reinforce each other. As set out in the Design SPD, Elmbridge has many enclaves of particular character, and these should be enhanced and not lost.	Living with beauty: report of the Building Better, Building Beautiful Commission published in January 2020 is an independent report on how to promote and increase the use of high-quality design for new build homes and neighbourhoods. This is essentially the aim of the Design Code as a whole. Thank you for this observation. It is the aim of the document not to repeat specific guidance or codes in different sections of the document to streamline the content to ensure its concise format.

6.	Yes. Building design will need to embrace renewable technologies going forward. This may mean that buildings are going to look different.	Design Code as a Supplementary Planning Document (SPD) will be reviewed fairly frequently based on any changes to the national or local policies. It is expected that new technologies will introduce new designs, which will be then reflected in the future guidance and codes.
7.	insulation, solar power and other 'green' factors are paramount with new build.	Guidance in the last two chapters – Resources and Lifespan touch on these issues. Elmbridge's Local Development Scheme (LDS) sets out that a new Climate Change and Renewables Supplementary Planning Document (SPD) [scheduled for adoption in 2025] will set out detailed guidance on how new development can contribute to climate change mitigation and adaptation and support the implementation of new policies in relation to sustainability and climate change matters.
8.	YES - the guidance on extensions (6.6) should be mandatory.	This chapter contains specific guidance associated with extensions to existing buildings. As these do not appear in the planning policy, they cannot be set as mandatory requirements.
9.	Yes, it is important that dwellings are dual aspect to facilitate cross ventilation to help mitigate overheating	This guidance is included in chapter 11.1.1.
10.	YES 1. There should be a maximum floor space per dwelling, to prevent over-sized homes being built. Homes with a large floor space are less efficient to heat. 2. Consideration of aspect of housing should be given to take into account solar gain.	There are minimum, but no maximum, dwelling floor space standards set out in the local or the national policy. As such, it is beyond the remit of the Design Code to introduce any such standards. Several points in chapter 11.1.1 offer guidance with regard to passive solar gain, overheating risks, cooling and ventilation.

	3. There should be default allowance of heat pumps, even if they are closer than 1 meter to the neighbouring plot. Direction	Elmbridge's Local Development Scheme (LDS) sets out that a new Climate Change and Renewables Supplementary Planning Document (SPD) [scheduled for adoption in 2025] will set out detailed guidance on how new development can contribute to climate change mitigation and adaptation and support the implementation of new policies in relation to sustainability and climate change matters.
11.	Whilst designs should reflect existing built environment, Georgian, Victorian, Edwardian and art noveau and art deco are sought after styles for a reason. Prevailing design styles should emulate elements of those styles and maintain some continuity to existing build landscape.	Code A in section 7.1.1 requires new developments to consider the character of the site and its surroundings. However, the aim of the Design Code is to ensure that the design approach is a creative process, orientated and tailored to the context as opposed to being a standard solution imposed regardless of context or a pastiche replication of existing buildings (paragraph 1.2.4).
12.	Yes - there needs to be designed-in provision set in place as a go/no-go point to include amenities such as schooling places (primary and secondary), GPs surgeries, Areas for youth activities, NHS dentists, etc. These are already too thinly spread.	The provision of infrastructure is the task of the Local Plan and outside of the Design Code remit. The Local Plan sets out the number of residential dwellings that are to be delivered and at the same time plans for appropriate level of infrastructure to support the level of development in consultation with the infrastructure providers.
13.	The Surrey vernacular design style should be observed save when there are very special circumstances suggesting otherwise.	Section 7.1 discusses local vernacular. Code A in section 7.1.1 requires new developments to consider the character of the site and its surroundings to inform the architectural approach and when specifying materials and construction details and refers to section 1.6.4 for appropriate design approach.
14.	Yes: Section 6.6.2 - Single storey extensions adjoining a side boundary must not remove the only open pedestrian access to the rear of a property because, this access is	It is beyond the Design Code remit to restrict any specific type of development.

	needed by the Fire Brigade and other emergency services to gain access to the rear of the property to, for instance, undertake a first floor rescue when there is a fire. Section 6.6.4 - This needs more clarification by adding to "match those of the existing building" in design, colour and texture. to prevent any ambiguities. Section 6.7. A - This should not preclude a Set-Back of the proposed development from the existing adjoining buildings. Especially, given any new development is very likely to be of a different design and so a Set-Back will help it blend in.	Thank you for the suggestion. **This has now been added to the paragraph.** Code A in this section states that where there is a well-established front building line, this will have to be maintained. However, in exceptional circumstances where the applicant considers this is not appropriate, a robust justification will need to be made in the application submission in accordance with paragraph 1.1.4 of the document.
15.	As the construction industry is a big contributor to CO2 release at all stages of construction (please google co2 emissions in construction) it is better to convert buildings already in situ rather than tear down. First priority should be conversion. e.g. The six- bed/6bath buildings built in the last 20 years could be converted into terraces or flats where front curtilage allows for adequate parking and leave houses with gardens for families.	Guidance in section 12.1.1 states: 'Provide justification for the demolition of existing buildings. First consider retrofit of existing buildings or reuse of substructures / superstructures.'
16.	Fig 6.2 While layouts are a useful indication, they are not a definition and therefore leave open the possibility of development creep which it is so essential to prevent.	In addition to the Plot Ratio new development will need to comply with numerous other codes and guidance. There is no specific policy in our Local Plan or in the national policy that would suggest any specific space around buildings to be maintained, and as such this cannot be introduced through the Design Code.

	Density using a FAR ratio is a good measure together with the method for assessing of building heights, but again with the measure for taller buildings there is no pass or fail level. We fear this could provide an escape route for developers being able to justify ever taller buildings which inevitably change the dynamic and character of historic towns. In Weybridge we feel an absolute maximum must be set of 4 stories with possibly rooms in the roof space to prevent tower blocks and limit yet more flats. Fig 6.13 – I assume the middle building is the good example while the one to the right is an example of what is not.	It is outside of the Design Code remit to impose any height restriction in terms of number of storeys in any specific area or across the whole borough. All applications will be determined on their own merits, in line with the codes and guidance in the Design Code, and local and national policies. Yes, it is the building in the centre. **Explanatory comment has now been included in the accompanying text.**
17.	Response by Inspired Villages: We believe that the 50m radius reference area described in 6.3.1 should be extended to encompass the existing grain around a site. The wording of the policy at current is not something we can support.	The Council agrees that a 50m radius might not be appropriate in every situation, especially where a development on a larger site is proposed. This is why we propose that in these situations buildings on all neighbouring plots are considered to ascertain the appropriate height. This is secured through the text in 6.3.1: “Prevailing height is defined as height of buildings within a 50m radius measured from the centre of the site, or the heights of all buildings on plots which share a boundary with the site, <u>whichever is greater</u>.” [our emphasis]

18. Are you satisfied with the design parameters set out on page 69?		
	Respondent's comment	*Council's response*
1.	no. Walton needs much more emphasis on preserving and complimenting its Edwardian Town centre character.	Where a special built form is present, there are other means of their preservation or enhancement in terms of their heritage status – listed buildings or conservation areas. Code A in section 7.1.1 states that 'Proposals for new build developments must consider the character of a site and its surroundings to inform the architectural approach and when specifying materials and construction details' and refers to the section 1.6.4 on design approach.
2.	No. I disagree with "Proposals for new build developments must consider the character of a site and its surroundings to inform the architectural approach and when specifying materials and construction details". Outside sensitive historic settings more freedom in designing houses is needed. Design should be judged independently and not constrained by existing houses.	Code A in section 7.1.1 requires new developments to consider the character of the site and its surroundings. [our emphasis] However, the aim of the Design Code is to ensure that the design approach is a creative process, orientated and tailored to the context as opposed to being a standard solution imposed regardless of context or a pastiche replication of existing buildings (paragraph 1.2.4).
3.	No. Emphasis is given to Conservation Areas and, as mentioned earlier, Elmbridge has many areas which have different and diverse characters which are not within the Conservation Areas and those 'local characters' should be respected and enhanced where appropriate although that requirement should not constrain new, innovative design if the overall character of the particular area is not destroyed.	Code A in section 7.1.1 requires new developments to consider the character of the site and its surroundings. [our emphasis] However, the aim of the Design Code is to ensure that the design approach is a creative process, orientated and tailored to the context as opposed to being a standard solution imposed regardless of context or a pastiche replication of existing buildings (paragraph 1.2.4).
4.	This implies that the adjacent character and materials should dictate what happens on a site. As there are so few contemporary houses in Elmbridge this policy will perpetuate what already exists... the Code should allow for contemporary interpretation	Code A in section 7.1.1 requires new developments to consider the character of the site and its surroundings to inform the architectural approach. [our emphasis] It also refers to the section 1.6.4 on design approach. The aim of the Design Code is to ensure that the design approach is a creative process, orientated and tailored to the context as

		opposed to being a standard solution imposed regardless of context or a pastiche replication of existing buildings (paragraph 1.2.4).
5.	Please reflect local building heights and bulks – don't let new builds be too bulky and too high. Especially near open ground (The Wilderness, Cow Common), Rivers mole, ember and Thames. 2022/3525.	All new developments need to be determined on their own merits, i.e., taking into account the character of the site, of the surrounding area, size of the site, scale of the development, etc. Guidance and codes relating to the building heights are set out in section 6.3.
6.	NO - the principle is right, but the wording could be tightened up.	Noted, but no suggestion about how to tighten up the wording was made.
7.	Claygate is now beyond being a 'village' and needs to be treated accordingly	Codes and guidance in chapter 7 are applicable across the borough, including Claygate.
8.	No, Design parameters should also include safety in the construction e.g., Flammability and durability of materials in the construction.	Safety of the building materials used in construction of developments falls outside of planning, within Building Regulations.
9.	In areas less constrained by heritage, planning should still require development to be in keeping with the existing street scene e.g., bricks and tiles should match existing houses as much as possible.	Code A in section 7.1.1 requires new developments to consider the character of the site and its surroundings to inform the architectural approach and it also refers to the section 1.6.4 on design approach. Section 6.6 (extensions to existing buildings) and more specifically in 6.6.4, guidance in terms of materials and detailing of extensions matching those of the existing building is included.
10.	No - got to include car-parking for commercial premises. e.g., when Premier shop in Steels Lane was doubled in size, no parking provided, nor street crossings provided - now a dangerous area!	The number of parking spaces to be provided for development is set out in our Local Plan and this is outside of the Design Code remit.
11.	Given other comments herein...	N/A
12.	Mainly yes, but with the above points.	Noted.

13.	Yes & No, where it says, "In sensitive historic settings ... the use of traditional materials and detailing is advised". We say remove the word "advised" and replace it with the word "required" to remove any ambiguity.	As such requirement is not set out in the local or national policy, Design Code is unable to introduce it as a mandatory requirement. It can be only a guidance. However, all proposals affecting heritage assets are reviewed by the Council's conservation officer and the use of appropriate materials and detailing is considered as part of the planning processing of applications.
14.	No - Simplified detailing when attempting to reflect the detailing of local existing buildings, leaves them looking mean/cheap/prison-like in the case of many new flat developments. Please find a way of avoiding these risks in the document.	Code A in section 7.1.1 makes it mandatory to consider the character of a site and its surroundings to inform the architectural approach and when specifying materials and construction details. Additional guidance is also included - the detailing and facing materials of any extension should take account of those on the existing property.
15.	Response by Inspired Villages: We are supportive of the mandatory requirement for a contextual design approach.	 Support is noted.

19. Would you like to see any other shop front related design requirements included?		
	Respondent's comment	*Council's response*
1.	Requirements should also cover Noise (e.g., music or announcements from shops).	Shopfronts do not usually include any noise related equipment. If such a proposal is however submitted for consideration, this would be reviewed by the Council's environmental health officer who would be able to advise on appropriate noise levels in each individual case.
2.	there is a need to preserve the original character of the parades whilst modernising for current occupiers.	Guidance in section 7.2.1 seeks to retain or restore original, historic features of high street frontages where possible.
3.	Yes, a common standard of quality and good design should apply to shop fronts to give a simple clean unity along shops. Brand Signage size and colour needs care and consideration and encourage retailers to consider the building frontages as a whole.	Design Code offers general guidance in terms of the traditional and contemporary shop fronts. Specific detailing, such as signage size and colours, will be considered on a case-by-case basis, as there are many variables, all of which cannot be outlined in the Design Code.
4.	All shop frontages incl. contemporary ones should have internal security grills. External grey metal shutter external grills make high streets look uninviting and unsafe.	**Guidance relating to the shop front shutters and their colour is included in section 7.2.1 in association with traditional shop fronts. We have now replicated it in section 7.2.2 that is concerned with the contemporary shop fronts.**
5.	Happy with existing requirements	Support is noted.
6.	Fit in with the existing shop facades in the high street. Can bring in some level of modernity, but is should not stand out.	Guidance regarding traditional and contemporary shop fronts is included in sections 7.2.1 and 7.2.2 respectively. This sets out numerous design principles, including such proposals respecting the appearance of the host building.
7.	Yes. Where contemporary or utilitarian shop fronts have been inserted into older buildings in the past, there should be a requirement for traditional replacements in the future. The presence of an existing inappropriate shop	Design Code offers general guidance in terms of the traditional and contemporary shop fronts. Once the Design Code is adopted, the new proposals will need to follow this advice.

	front should not at as a key to introduce a similar one if replacement is proposed.	
8.	Should special consideration be given to the design of shop fronts where the redevelopment of corner shops and/or shops in small parades is being proposed within the Borough?	Guidance regarding traditional and contemporary shop fronts is included in sections 7.2.1 and 7.2.2 respectively should be followed.
9.	Better control of fascia signage	Design Code offers general guidance in terms of the traditional and contemporary shop fronts. Specific detailing, such as fascia signage size and colours, will be considered on a case-by-case basis, as there are many variables, all of which cannot be outlined in the Design Code.
10.	no - shops should be able to be more free with their designs to create an individual appearance.	Guidance regarding traditional and contemporary shop fronts is included in sections 7.2.1 and 7.2.2 respectively should be followed. However, in exceptional circumstances where the applicant considers this is not appropriate, a robust justification will need to be made in the application submission in accordance with paragraph 1.1.4 of the document.
11.	Fit in with local area and not stand out.	Guidance regarding traditional and contemporary shop fronts is included in sections 7.2.1 and 7.2.2 respectively. This sets out numerous design principles, including such proposals respecting the appearance of the host building. Additionally, Code A in section 7.1.1 makes it mandatory to consider the character of a site and its surroundings to inform the architectural approach and when specifying materials and construction details.
12.	Yes, no neon or plastic or over large signage	It is not the aim of the Design Code to restrict any specific type of signage or development proposal. However, guidance

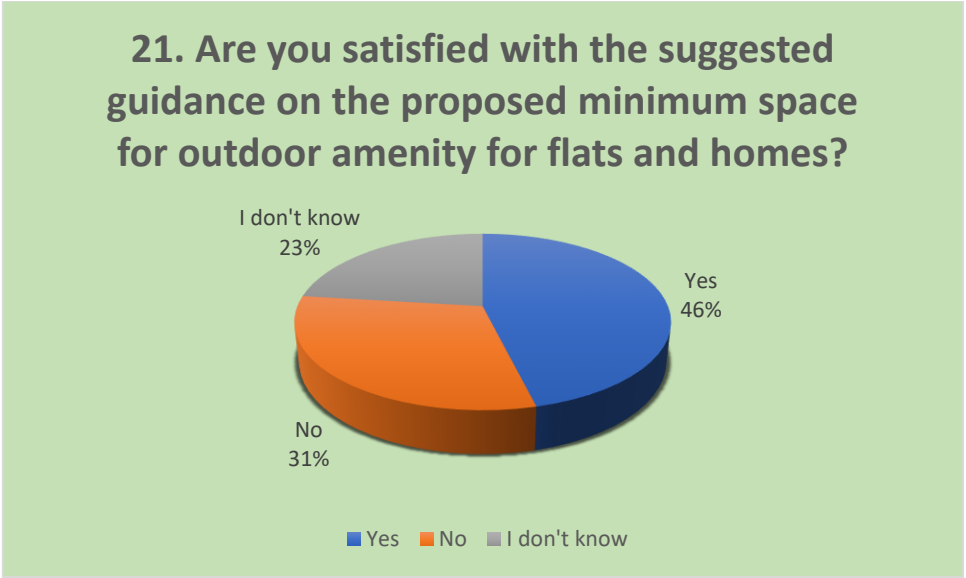
		regarding traditional and contemporary shop fronts is included in sections 7.2.1 and 7.2.2 respectively should be followed.
13.	Illuminated signs should not be allowed. It is an unnecessary use of energy.	It is not the aim of the Design Code to restrict any specific type of signage or development proposal. Illuminated signs might be appropriate in certain locations and such proposals will be considered on a case-by-case basis.
14.	Automatic watering systems installed for hanging baskets	This requirement falls outside of the Design Code remit as the hanging baskets (and their provision) falls outside of the definition of development.
15.	Yes - where one or more existing units are combined, the shop front should be remodelled sympathetically. Just closing off one of the legacy doors results in an unpleasant facade. e.g., Boots in Weybridge	Guidance in section 7.2.1 sets out that shop fronts should respect the bays of the host building with fascia correlating to the natural rhythm.
16.	retain old shop fronts or replicate	Guidance in section 7.2.1 sets out that original, historic features should be retained or restored where possible.
17.	Limit sign boards that block pavements.	Sign boards on pavements, unless permanently installed as such, likely do not require the advertisement consent as they technically might not fall within the definition of development.
18.	shops may be superseded - so many are closing, and new uses will have to be found.	N/A
19.	A requirement to maintain them in a good state of repair and cleanliness!	This is a matter of human behaviour and falls outside of the Design Code remit.
20.	The Intrinsically dark Green Belt and Riverside Residential Area Type 100/10sqm lighting should be encouraged everywhere! We don't need neon signs everywhere	The luminance levels set out in Fig 7.8 are the recommended maximum. It might not be appropriate to use the same luminance in intrinsically dark areas of the borough as in the town centres. Although lower levels would be likely acceptable, there is no local or national policy stating the appropriate levels. As such Design Code might be able just to

		offer guidance and all proposals will be determined on their own merits with the assistance of this guidance.
21.	Unsure	N/A
22.	Suggest you need to worry more about keeping shops in business (e.g., rates). An empty shop is terrible no matter what the frontage looks like.	It is beyond the remit of the Design Code to ensure continuous commercial occupancy of the existing shops.
23.	Should not jar with local vernacular see below	Guidance regarding traditional and contemporary shop fronts is included in sections 7.2.1 and 7.2.2 respectively. This sets out numerous design principles, including such proposals respecting the appearance of the host building. Additionally, Code A in section 7.1.1 makes it mandatory to consider the character of a site and its surroundings to inform the architectural approach and when specifying materials and construction details.
24.	No comments.	N/A

20. Would you like to add any other design requirements to the Identity section of the document (pages 68 - 72)?		
	Respondent's comment	*Council's response*
1.	Requirements should cover pavement space - i.e., how much a shop can encroach onto a pavement & how the needs of pavement users can be met.	In majority of cases the pavement in front of shops is the highway land. As part of every application for the use of the pavement in connection with the adjacent commercial premises, Surrey County Council as the County Highway Authority is consulted to ascertain whether such proposal would be appropriate in its location from the highway safety and capacity perspective.
2.	yes - size of identity boards mounted perpendicular to the shop front.	It would be very challenging to set out restrictions on the size of projecting signs across the borough. Different premises in different locations would require specific assessment. These are therefore best determined individually on a case-by-case basis.
3.	assume the shop front requirements apply every time they are changed in an existing building where they planning approval is needed to enable high streets to be enhanced.	Yes, design of new shopfronts is reviewed as part of each new shop front application.
4.	to keep area looks as vintage as possible	Guidance in section 7.2.1 sets out that in historically sensitive locations signage should respect fascia lines and not disrupt the existing character.
5.	No, but applicants should be encouraged to take note of Elmbridge's Local List of heritage features when designing new developments, as this will be a pointer towards good, locally relevant design.	Section 7.1.1 includes guidance - In sensitive historic settings such as Conservation Areas, the use of traditional materials and detailing is advised. In areas that are less constrained by heritage, modern materials and methods of construction might be acceptable.
6.	Offices. There should be some guidance on the design parameters that would be acceptable both where new offices are proposed, or old offices are being converted to another use.	A set of codes and guidance across the Design Code seeks to guide all types of new development, including mixed and commercial. Compliance with specific codes in association with specific type of development is set out in Fig 1.3.

7.	Ensure there is no light pollution during the hours of darkness.	The recommended luminance levels in Fig 7.8 are set out as maximum and should not be exceeded at any time during the night.
8.	Yes, I was disappointed to see the development of the Torrington Rd car park was blocked largely because a vocal minority argued it would damage the identity of the village of Claygate. Fair enough if the view was that it would lead to a decline in other shops, but I did not see any evidence to that end. But to use some vague concept of identity is just going to get used to block any change that someone does not like.	This issue falls beyond the remit of the Design Code.
9.	In other countries roofing over pavements to protect customers from the elements is common. I have found this gives a better shopping experience. The UK used to use a lot of awnings. It could be more solid and of clear material. This would give some of the benefit of malls to the high street.	We have a number of shops that have awnings. There is no specific guidance with regards to these and they are considered on a case-by-case basis as part of the shop front applications.
10.	7.2.2 - Suggest that all shop frontages including contemporary ones should have internal security grills. External grey metal shutter type external grills make high streets look uninviting and unsafe.	**Guidance relating to the shop front shutters and their colour is included in section 7.2.1 in association with traditional shop fronts. We have now replicated it in section 7.2.2 that is concerned with the contemporary shop fronts.**
11.	No comments.	N/A

21. Are you satisfied with the suggested guidance on the proposed minimum space for outdoor amenity for flats and homes?		
	Respondent's comment	*Council's response*
1.	Yes (46%)	Almost half of respondents is satisfied with the suggested guidance on the proposed minimum space for outdoor amenity for flats and homes.
2.	No (31%)	Almost a third of respondents is dissatisfied.
3.	I don't know (23%)	Noted.



22. If you are dissatisfied with the proposed guidance on outdoor space, please tell us why and suggest an alternative.		
	Respondent's comment	*Council's response*
1.	rear gardens must be 15 metres deep to allow for extensions, sheds, summer houses and offices. off street parking provides additional amenity space and should be encouraged along with electric cars.	Garden shape is not always regular and as such a 15m deep garden does not ensure that adequate outdoor space is provided for a specifically sized dwelling. As such, we are proposing to implement a Plot Ratio consideration set out in section 6.1.1 that enables adequate outdoor space to be provided regardless of the garden shape. The requirement for parking provision including the facilities for EV charging is set out in our Local Plan. Design of parking and charging facilities is set out in chapter 4 of the Design Code.
2.	Need to see the details and or proposals on a wide range of options	Calculations on various size dwellings and their associated outdoor space on several recent or current major development sites within the borough were made during the preparation of the draft Design Code. The table Fig 10.5 broadly reflects these.
3.	I think all flats should have some private amenity space even if there is communal space if at all possible. a small balcony is better than none. if that's not possible, a Juliet balcony is better than nothing	Guidance on a minimum outdoor space is set out in section 10.2.1 - An appropriate size outdoor amenity space should be provided for each home in accordance with Figure 10.5 as a minimum. This includes both apartments and homes.
4.	Too little due to far too much housing being built with no regard to traffic, leisure facilities. More consideration should be given to brownfield sites to develop.	Development on brownfield land is a planning policy preference – both local and national. The number of homes to be built is set out in the local plan that also ensures that appropriate level of infrastructure support the delivery of this level of residential development. This is tested through the examination of the local plan.
5.	What you are proposing looks good	Support is noted.

6.	The guidance parameters are good for the initial design and implementation. However, it is not clear how this will be maintained and protected over time - for example it could be lost by people paving over their gardens.	The guidance sets out the size of the outdoor amenity space. This space could take different forms, including for example green garden, patio, pond, etc. Some forms of development fall under the permitted development and therefore could be built without the need for planning permission. However, Plot Ratio (section 6.1.1) will guard to certain extent the amount of built form within the curtilage of a house.
7.	Depends if it imposes on previously unbuilt land or by a riverbank when biodiversity will be destroyed. 2022/3525	This guidance applies to all new homes and provides for an outdoor amenity space. This could take different forms, including for example green garden, patio, pond, etc.
8.	Movement and safe and ease of use of space should guide size. There should be space for visitors, tables and chairs and planting for wildlife corridors and wellbeing.	There are several other codes and guidance that support the size of the plot/site in terms of the expanse of the built form (plot ratio) and provision for urban greening and biodiversity. These are set out in the other sections of the Design Code.
9.	The outdoor amenity space for flats should be large enough for tables, chairs etc for visitors as well as occupiers and provide space for planting to extend wildlife corridors. Gardens should have space for play equipment, trees of varying types and heights. Movement and use should give guidance to size rather than bedroom numbers.	The guidance in section 10.2.1 advises that apartments should be provided with private amenity space in the form of a balcony or terrace, where other amenity space, such as a communal garden, is not available. There are several other codes and guidance that support the size of the plot/site in terms of the expanse of the built form (plot ratio) and provision for urban greening and biodiversity. These are set out in the other sections of the Design Code.
10.	The proposed Minimum Requirements are reasonable for properties in Urban Areas. They are not reasonable for properties in Suburban areas where we consider to adequately differentiate between the two types of area these minimum requirements need to be doubled and doubled again for Gated Areas and doubled again for	The outdoor amenity spaces are set out in section 10.2.1 as a guidance and a minimum. There are other design parameters, such as urban grain or plot ratio, that will guide the appropriate plot sizes within specific locations.

	Riverside Areas and other areas where residential development is proposed.	
11.	For new builds then fine. But my worry is that a house owner then can't decide what balance is right for them between indoor/outdoor space. Does that mean any conservatory would come under planning consent? A neighbour of mine has a small garden. They have added a conservatory taking space away from the garden (in what is already small). But they decided it was in keeping with their needs as the space could be used year-round. Is that not their decision?	Guidance in section 10.2.1 applies to new homes only. Plot ratio that is set out in section 6.1.1 is the guidance that will be relevant to the scenario pictured in this example.
12.	The sizes of balconies for apartments should allow space for visitors, tables and chairs and planting space for wildlife corridors, oxygen production and co2 absorption. Rather than allocate size related to bedrooms the size should be related to use and give best possible amenity space for benefits to good health. Similarly, the space for family homes should include space for play equipment, ball games etc.	Guidance in section 10.2.1 applies to new homes and apartments. It would be up to the buyer of the home/flat to determine whether the outdoor amenity space is sufficient for their needs.
13.	Re: Street furniture (especially signposts/speed signs etc) .... no reference to keeping these to a minimum.	Detailed guidance in terms of street furniture is provided in the document that is referenced in code A in section 8.2.3. Any signs and street furniture that is subject to planning permission/advertisement consent is considered also in terms of the street clutter and its impact on the character of the locality on a case-by-case basis.
14.	Private amenity space - We are pleased to see the minimums suggested but are not sure that these are consistent with the plot area and ratios specified in section 6.	The scale of the outdoor amenity space would depend on the size of the plot/site and of the building containing flats/dwelling. The two parameters will work together. In unlikely situation, where a conflict between the two arises, the

		character of the area/urban grain will be also considered. Justification in line with paragraph 1.1.4 of the Design Code should be made in the application submission.
15.	Response by Inspired Villages: The 22m distance for rear curtilage is onerous. We would like there to be acknowledgement that different approaches to private amenity is necessary for specialist housing. This is due to the communal gardens and facilities which are included within Integrated Retirement Communities; therefore, the amount of private amenity space is reduced due to a large part of the offer being communal amenity space, which is a major factor in residents choosing to move into an Integrated Retirement Communities. Back-to-back distances should not apply to developments with communal gardens and facilities.	The distance of 22m is to ensure sufficient privacy and outlook for the future occupiers of the new development as well as the existing neighbouring residents. Section 10.2.3 also offers an example of an alternative solution in Fig 10.13 for a constrained site. Should there be a deviation from this guidance, justification in line with paragraph 1.1.4 of the Design Code should be made in the application submission.

23. Would you like to add any other design requirements to the Homes & Buildings section of the document (pages 84 - 89)?		
	Respondent's comment	*Council's response*
1.	Parking requirements (cars, cycles, buggies etc).	New developments must provide adequate parking provision in line with the standards set out in the Local Plan – please see Appendix 1 to the Development Management Plan 2015. It is outside of the Design Code remit to set these standards.
2.	designing out crime must be given a higher profile brick and tile elevations should be encouraged to compliment the architecture of Surrey. Painted render should be resisted. it is ugly and expensive to maintain.	**We have now included numerous guidance points that link to the Secured By Design throughout the document.** Code A in section 7.1.1 makes it mandatory to consider the character of a site and its surroundings to inform the architectural approach and when specifying materials and construction details. It is not the aim or the role of the Design Code to restrict any specific external materials to be used on new buildings.
3.	There should be no exceptions for minimum distance (22m) between block of flats facing each other.	There are situations where 22m cannot be achieved due to the site's topography or other constraints. Design Code offers alternative design solutions that could achieve the ultimate goal of preserving privacy and offering sufficient outlook in section 10.2.3.
4.	Communal bins: 30m from front entrance is a long way from the front door of a sixth floor later-living apartment. Refuse storage should be adjacent to blocks of flats and readily accessible for both residents and waste collection.	Where later-living apartments are provided, the management company should ensure appropriate accessibility of the communal bins for its residents or to include this service as part of the management fees.
5.	Please do not allow the feel of an area to be destroyed. Mass and bulky blocks of flats should not be built on flood	There is a general presumption against residential development being implemented on the flood plains. Any such proposal is subject to strict sequential testing.

	plains in areas of low-rise housing where biodiversity and flooding may occur.	Considerations pertinent to the loss or gain in biodiversity is also subject to compliance with Environment Act 2021, national and local planning policies.
6.	All properties should have an outside space for recycling. Adequate parking for 2 vehicles with an electric charging point and adequate lockable storage space.	This requirement is set out in codes in section 10.2.4. New developments must provide adequate parking provision in line with the standards set out in the Local Plan – please see Appendix 1 to the Development Management Plan 2015. It is outside of the Design Code remit to set these standards. However, how these should be designed on new developments is set out in codes and guidance in chapter 4 Movement. The Nationally Described Space Standards set out the minimum limits for storage across differently sized dwellings.
7.	Refer back to use of solid materials with traditional style aesthetics in keeping with the prevailing build environment	Code A in section 7.1.1 makes it mandatory to consider the character of a site and its surroundings to inform the architectural approach and when specifying materials and construction details. It is not the aim or the role of the Design Code to restrict any specific external materials to be used on new buildings.
8.	More space for bus stops.	Bus stop technical specifications are set out in chapter 12.7 of the Healthy Streets for Surrey Design Code published by Surrey County Council as the County Highway Authority (CHA). Any new bus stops would be subject to consultation with the CHA and would have to comply with these provisions.
9.	Roads need to be sufficiently wide to accommodate passing cars and green verges	Carriageway design requirements, including their width, are set out in chapter 5 of the Healthy Streets for Surrey Design Code published by Surrey County Council as the County

		Highway Authority (CHA). Any new roads would be subject to consultation with the CHA and would have to comply with these provisions.
10.	No contrived windows which affect privacy, outlook, health and well- being inside and out of built form	Policy DM2 of the Development Management Plan 2015 (part of our Local Plan) seeks new developments to offer an appropriate outlook and provide adequate daylight, sunlight and privacy. Design and location of the proposed windows is therefore assessed against this policy requirement.
11.	Habitable rooms should have proper windows for good outlook not contrived designs. They should not sit above 1.7m as this would lead to poor light levels and ventilation, increasing dependence on lighting and air conditioners and have a negative impact on physical and mental health.	Policy DM2 of the Development Management Plan 2015 (part of our Local Plan) seeks new developments to offer an appropriate outlook and provide adequate daylight, sunlight and privacy. In accordance with this policy, windows and doors in all new developments are assessed on whether they are appropriate for its future occupiers. Where there are secondary windows to habitable rooms, these could have a higher sill height and might be even obscurely glazed, however, these would be the secondary source of light to a room, in addition to the primary source of light usually in the form of a larger window or doors (sliding/bifold/etc.).
12.	Yes, Section 10.1.1 - Where it says "A minimum of 5% of new homes should meet..." We believe this should be increased to 10%. Plus where it goes on to say "on sites of 20 or more new homes" This needs to be reduced down to 10 to reasonably reflect the average scale of development in Elmbridge as a whole. Section 10.2.3.D - This must be made a requirement and increased from two wheelie bins to a minimum of three to take into account that Elmbridge has a high tree coverage	This relates to the provision of M4 (3) 'wheelchair user dwellings' and the wording has been taken from the draft new Local Plan Policy HOU5 (Housing technical standards) and is currently a guidance. 10.2.4 D is a code and therefore a mandatory requirement. A garden waste collection service is not mandatory and therefore it has not been included in the code.

	and nearly all new properties will need a garden waste bin. Section 10.2.3 - Where it says "Be conveniently located for residents and should be no further than 30m from the entrance door". The word "should" needs to be replaced with "must" to remove any ambiguity. The "30m from the entrance door" needs to both be reduced to 20, to take account of the return distance for the older generation and it needs to be clarified that the entrance door is the entrance door to the house/flat and not just the entrance door to a block of flats. Plus, the 20m needs to account for stairs at say the rate of 0.5m per step as these are far more difficult for people to carry bags of rubbish and lifts should be discounted as they are often 'out of order'.	This relates to the storage for communal bins serving apartment buildings, not individual dwellings. The word 'should' mean that there is no current planning policy stating such a requirement and therefore it cannot be mandatory. The distance of 30m was taken from the current guidance provided by the refuse collection service team. Where later-living apartments are provided, the management company should ensure appropriate accessibility of the communal bins for its residents or to include this service as part of the management fees. **We have now included a clarification stating that the distance of 30m as measured from 'the main entrance door to the building.'**
13.	Rear Curtilage – Fig 10.12 is concerning as where I have seen this being used, it directs outlook to neighbouring gardens affecting their enjoyment of amenity space, especially if a window where one would sit at e.g., study desk or stand at i.e., kitchen sink/worktop. Fig 10.13 There should be enough rear space in both properties for planting at rear for privacy without possible future pressure on heavy pruning or removal and should have protections in place.	Fig 10.12 applies in a mixed-use area type, which is exclusively situated in the town centres. Provision of gardens in these areas is fairly limited due to the historic and existing urban grain where plots are usually packed close together and their majority is covered by built form. However, each proposal would be considered on its own merits, i.e., on a case-by-case basis. Fig 10.12 does not state that this will be acceptable in every instance, but it might be explored as an option. Example shown in Fig 10.13 indicates a building being situated closer to the boundary in order to make efficient use of a constrained site and specifically with the overlooking issues in mind. At the same time, this development would

		have to satisfy other codes and guidance set out in the Design Code, including the biodiversity net gain and urban greening requirements in chapter 5.
14.	Yes. Plans and elevations for new buildings should show their relationship with adjoining buildings	This is a matter of Validation Requirements at the point when the application is submitted. Where new or replacement buildings are proposed, the applicant is required to provide street scene plan.
15.	Response by McCarthy Stone: As well as requesting a minimum number of homes to be built to M4(3) and M4 (2) standards which is consistent with the Draft Elmbridge Local Plan – Delivering homes for all ('Submission Local Plan') that is currently at Examination in Public, the design code asks at para 10.1.1 bullet 4 and 5 for 'new homes to be designed to Lifetime and Wheelchair Home standards, to ensure they are more accessible and adaptable, allowing people to live independently for as long as possible, and providing greater choice for disabled people who cannot achieve independence due to lack of suitable housing' and that 'New developments should follow the recommendations of the Housing our Ageing Population Panel for Innovation (HAPPI) report to enable people to live healthy, active lives and maximise the opportunities for community diversity, inclusion and cohesion'. Paragraph: 008 Reference ID: 61-008-20190315 of PPG on Plan Making states 'Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local	Thank you for your observation. Bullet points within the document represent advisory guidance, not a code. This is an optional undertaking by the developer and would be considered beneficial if this was incorporated within the new development. Please see chapter 1.3.6 for further detail.

	plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan… They should not add unnecessarily to the financial burdens on development'. The requirements for Lifetime and Wheelchair homes and HAPPI standards are not included within the Submission Local Plan would add an addition financial burden to development. By introducing a more onerous requirement beyond the Submission Local Plan, this introduces new planning policy and could add unnecessarily financial burden to development. It is therefore contrary to PPG Paragraph: 008 Reference ID: 61-008-20190315 and the requirements of para 10.1.1 bullet 4 and 5 should therefore be removed. Additionally, paragraph 1 of the PPG "Housing: Optional Technical Standards" (March 2015) states: The government has created a new approach for the setting of technical standards for new housing. This rationalises the many differing existing standards into a simpler, streamlined system which will reduce burdens and help bring forward much needed new homes. The government set out its policy on the application of these standards in decision taking and plan making in a written ministerial statement, This effectively means that Application of Lifetime and Wheelchair Home Standards has been superseded by the Optional M4 standards and the M4(2) standard is broadly equivalent to lifetime Homes (see Governments Consultation on Raising Accessibility standards July 2022) Lifetime Homes should no longer be used and guidance	

	such as Happi, if referred to should be seen as an aspiration and not a requirement. Recommendation: Delete para 10.1.1 bullet 4 and 5 as these requirements could add unnecessary financial burden that have not been examined at Examination in Public and is contrary to PPG.	
16.	Response from the Designing Out Crime Officer, Surrey Police: In connection with defensible space and active frontages, Secured by Design award gives the assurance of suitable certified physical security measures, providing sustainability for the home and surrounding environment.	**We have now added further guidance point in chapter 10.1.1 to ensure long term security and safety of new housing developments.**
17.	Response by Inspired Villages: We would like there to be acknowledgement that different approaches to private amenity is necessary for specialist housing.	Council does not accept this proposition. The distance of 22m is to ensure sufficient privacy and outlook for the future occupiers of the new development as well as the existing neighbouring residents. Should there be a deviation from this guidance, justification in line with paragraph 1.1.4 of the Design Code should be made in the application submission.
18.	Response by Surrey County Council – Environment, Transport & Infrastructure Directorate: SCC does not suggest any additional design requirements to the Homes & Buildings of the document (pages 84-89), but supports details provided in section 10.2.3 paragraph B ‘Refuse Storage’ outlining that storage space for waste and	Support is noted.

	recycling in residential development should be well considered and integrated into the design of a development, accommodating Local Authority Collected Waste and Commercial and Industrial Waste. We also support details provided in section F of page 88 for the careful consideration of commercial waste bins in non-residential schemes. This is supported by Policy 4 of the Surrey Waste Local Plan 2019-2033, that states planning permission for any development will be granted where it has been demonstrated that on-site facilities to manage the waste arising during the operation of the development of an appropriate type and scale have been considered as part of the development; and integrated storage to facilitate reuse and recycling of waste is incorporated in the development.	

24. Would you like to include any other design requirements to the Public Spaces section of the document (pages 73 - 78)?		
	Respondent's comment	*Council's response*
1.	if relevant use solar panels to generate power for lighting. if relevant add 'green' roof to cycle parking covers.	Where new lighting is provided in the public realm, this could be powered by solar panels. However, this might not be appropriate in all areas, especially in more sensitive locations, for example in conservation areas. Specification for lighting provided on highway land is included in chapter 9 of the Healthy Streets for Surrey Design Code.
2.	Yes- please implement this strategy document so developers build some housing that does not destroy trees, biodiversity and increase the risk of flooding to surrounding housing (by proposing a massive underground car park on a flood plain next to a river). 2022/3525	These matters are already subject to the Local Plan Policies – DM6 (Landscape and trees), CS14 (Green Infrastructure), CS15 (Biodiversity), DM21 (Nature conservation and biodiversity), CS26 (Flooding), and to a Flood Risk Supplementary Planning Document (SPD); in addition to the national policies set out in the National Planning Policy Framework (NPPF).
3.	Cycle stands should be of the Sheffield Stand design and spaced appropriately. No stands that only offer support to single wheel. These damage cycle wheels and are often of insufficient scope to lock a bicycle properly.	This is already included in chapter 4.4.1.
4.	Where there are local recreation grounds, they should be greatly enhanced so the current homes can enjoy the same benefits as are being suggested for new spaces. It is an opportunity to create areas for the neighbourhood to congregate and use for leisure for all ages with outdoor gyms, scooter ways, netball/ basketball shoot areas and a decent football area, picnic tables and of course interesting areas for small and older children to explore and enjoy.	Design Code is concerned only with the new development as it cannot require improvements to the existing built form or infrastructure. However, it might be possible to improve the existing recreation grounds through the CIL funding. For more information please see the Council's website.

	Oxshott has a huge, under-utilised rec yet there are 400 homes with tiny gardens within 200 m of it.	
5.	STOP the seating outside taverna and the other restaurant in Claygate - makes it very difficult for disabled/pram pushers to pass as they have no regard for passing traffic. also clamp down on those who park on the double yellow lines outside.	These two points are outside of the Design Code remit, as they fall under the County Highway Authority.
6.	When building high density buildings local parks should not be included as part of the green space the building offers. All new buildings should have their own adequate green spaces built into the design. A recent building development near us was showing the 2 local parks as green space in their design to try to make it look attractive rather misleading	As part of the development management process in planning, some developments may rely on the existing green space provision depending on the scale and type of development and its proximity to the green space. These are considered on individual basis. Such a requirement falls within the Local Plan Policy, outside of the Design Code remit.
7.	more attention to rewilding with lower management schedules	**We have now added a guidance point in section 5.2.**
8.	Yes - as stated above, design has to cover all needs.	Noted.
9.	Common areas need to be kept litter free and grass cut regularly and maintained by the council or allow volunteers to take responsibility for local green spaces in collaboration with the council to ensure pride in our green parks	Requirement for long-term management plans is set out in chapter 12.2.1. The management of the existing spaces should be discussed with the landowner, as this falls outside of the Design Code remit.
10.	Lighting	Requirement for long-term management plans is set out in chapter 12.2.1. The management of the existing spaces including lighting should be discussed with the landowner, as this falls outside of the Design Code remit.
11.	Pavement parking should be banned on all new roads.	This matter sits outside of the Design Code remit.
12.	Provide good sight lines for public safety and include in police patrols.	Sight lines associated with the egress from new development is considered by the County Highway Authority

		as part of the planning application process. A requirement for police patrols is outside of the Design Code remit.
13.	Yes, you keep using the word "should" whereas you must use the word "must" for any particular requirement to actually be a requirement rather than 'it would be nice of you could do this' Section 8.2.1 - Where you refer to "Neighbourhood Equipped Area Play" "being within a maximum walking time to facility 5 or 15 minutes" we believe you should add "without the need to cross through roads" that being roads of any designation that have in general a constant flow of traffic as, these are especially dangerous to 5-year-olds and almost as dangerous to 10-year-olds.	Design Code can require a mandatory compliance ('must') only on matters that are set out in the planning policy (Local Plan and planning legislation/Government statement(s)). All the other requirements that are currently not a planning policy can be only advisory ('should' or 'could') and if implemented in the development, these would add to the benefits arising from that development. Children crossing the roads might need to be accompanied by an adult. Safety of the highway network, including of the frequency and safety of the pedestrian crossings, are within the remit of the County Highway Authority.
14.	I am beginning to tire of this. Unless you are retired with time on your hands you are not going to read a 100-page document. If one of these sections appears of interest, then you will reference the few pages concerned. So, I wonder whether consulting on a 100-page document is effective. Why not consult more often on less content/scope.	Draft Design Code has been streamlined as much as possible to include the most important design requirements and guidance. The Code itself is set out on pages 37 – 95. Some of the residents and other interested parties might be interested only in specific issues, such as parking or height of new development. Others, such as the landowners and planning agents might want to read the whole document and want even more. You are welcome to respond to only some questions, or all. We understand that it might be a long document for some. Thank you.
15.	Childrens play areas mixed materials. Children benefit from natural areas and materials to encourage connection with	**We have included additional guidance to this effect in chapter 8.2.1.**

	natural world and imagination. Areas for forest schools etc. The national trust is increasingly using natural materials, similar would give a different dimension for those who are surrounded by concrete and glass.	
16.	New open spaces should include emphasis on encouraging physical activity and movement as well as play which will help meet the principle of "physical activity for all".	This point is already included in chapter 8.2.1.
17.	Front and side front boundaries, whether fences, walls or hedges should not exceed the height of neighbouring boundaries and conform to the general height adopted within the street scene. It is not explained how proposed enhancement of the public realm across towns will be controlled to meet the Design Code in terms of green spaces, public spaces and greening especially within high streets so that there is conformity and coordination.	It is not the role of the Design Code to restrict new development. In some cases, the differences in front boundary treatments create a distinctive character. There is no height restriction on the boundary planting, albeit in some cases high hedges might cause some nuisance, which could be dealt with through a specific complaint process. The management of the existing spaces should be discussed with the landowner, as this falls outside of the Design Code remit. Design Code is concerned only with the new development. Requirement for long-term management plans as part of new major development schemes is set out in chapter 12.2.1.
18.	Response from the Designing Out Crime Officer, Surrey Police: 8.1 Enhancing the public realm – landscaping should enhance natural surveillance from surrounding dwellings, active frontages. Blank end gable walls are to be avoided. Gable end walls with windows overlooking the road/footpaths should be sought.	Natural surveillance by avoidance of blank walls and a requirement for active frontages is set out in chapters 9.1.1 & 6.4.1.

	8.1.2 New open spaces - Improving the public realm around new developments - lighting columns as opposed to bollard lighting that should only be used for wayfaring purposes. Possibly incorporate Green Flag spaces (new initiative) applied to parks and community spaces.	**We have now added a guidance point to this extent in chapter 8.1.1.**
19.	Response by Inspired Villages: Within 8.1.1 A the use of trees must be carefully considered against the site constraints and available growing space, topography and existing conditions. The optimal dimensions for a new street in Figure 8.3 are very prescriptive and may be difficult to achieve when taking into consideration other factors impacting a site. How do the dimensions set out align with the parking dimensions at 4.6.2, we believe further discussion is needed around this point. Within Figure 8.4 the opportunity for rain gardens and SUDS should be included. We support the use of community gardens, but the locations need to be carefully considered to allow access to all, including those with accessibility needs. Within Section 8.2 the emphasis also needs to be made on the specific users of open spaces and how the space can be more function orientated for active and passive	 Suitable trees and their spacing is paramount to the success of their long-term health and benefit to the community. Figure 8.3 sets out 'optimal dimensions' and it is not a code. It is expected that the creation of new streets in Elmbridge would be applicable only on the major development sites. Where it is considered by the applicant that the suggested dimensions cannot be achieved, justification should be provided as part of the planning application submission in accordance with paragraph 1.1.4 of the Design Code. **This has now been added within Fig 8.4.** Chapter 8.2.1 is specifically concerned with amenity and play spaces for children. Reference to varying physical and sensory abilities had been included.

	recreation along with the suitability of the space within the context of different site types. In relation to site furniture, further wording should be added to ensure that the equipment provided is suitable and caters to all ages and user groups to allow those with accessibility needs to be included.	Code A in chapter 8.2.3 requires that all new street furniture meets the standards and requirements set out in the DfT Inclusive Mobility document. This considers all ages and ability groups.
20.	Figure 8.1 shows integrated SuDS but there is no accompanying text. We would recommend adding a bullet point which says how SuDS can not only contribute to a reduction in surface water discharged from an area, but provide amenity, biodiversity and water quality improvements and contribute to mitigating climate change by considering both drought and flood conditions. The photos on page 74 show a raingarden but figure 8.4 does not have any raingardens labelled, these could easily be included by labelling one of the planted green areas.	**We have now included a whole new chapter on Flood Risk and SuDS (see chapter 5.3). In this we refer to Figure 8.1 and vice-versa.**
21.	10.2.2 A – replace 'should' with 'must'. *Developments must not increase the rate of surface water run-off to the existing formal drainage system. Instead, they must incorporate sustainable drainage techniques.* This point is not only relevant to front curtilage it is relevant for all types of development.	**We have now included a whole new chapter on Flood Risk and SuDS (see chapter 5.3). Also, we replaced the word 'should' with 'must' in code A in chapter 10.2.2.**

25. Would you like to see any other design requirements in the Uses section of the document (pages 79 - 83)?		
	Respondent's comment	*Council's response*
1.	Yes, these relate to the public realm but not how they will be used to set a design code for improving existing green spaces, raised beds and greening in public spaces, high streets and along main thoroughfares where new developments are not involved. This is much needed so that improvements meet a common standard that is monitored by EBC. Currently volunteers making 'enhancements' are not working to any town plan, vision or Code. A joined-up design code is needed to cover this.	The management of the existing spaces should be discussed with the landowner, as this falls outside of the Design Code remit. Design Code is concerned only with the new development. Requirement for long-term management plans as part of new major development schemes is set out in chapter 12.2.1.
2.	No good shops are important and there are some excellent offers from larger retailers coming forward.	From this comment it is not clear what design requirement to include in the chapter.
3.	Should there be some guidance on the development of commercial/light industrial accommodation re: density of development and overall height? Might you provide guidance on entrances and perimeter fencing design for spots facilities and other areas of open space used by the public?	Codes and guidance associated with density of development expressed as FAR (Floor Area Ratio) and building heights are set out for all types of development in chapters 6.2 and 6.3 respectively. Guidance on designing natural boundary treatments is included in chapter 5.2; and front boundary treatment in chapter 10.2.2. Furthermore, code A in chapter 7.1.1 requires that proposals for new build developments consider the character of a site and its surroundings to inform the architectural approach and when specifying materials and construction details. This relates not only to the buildings but also any other man-made structures, such as boundary fences.

4.	build in rainwater harvesting to supply to publicly planted areas.	**We have now included a whole new chapter on Flood Risk and SuDS (see chapter 5.3). One of the guidance points includes this suggestion.**
5.	Reflect local area and keep biodiversity/ trees intact.	Code A in chapter 7.1.1 requires that proposals for new build developments consider the character of a site and its surroundings to inform the architectural approach and when specifying materials and construction details. Urban greening and biodiversity net gain requirements and guidance is included in chapter 5. Furthermore, these matters are already subject to the Local Plan Policies – DM6 (Landscape and trees), CS14 (Green Infrastructure), CS15 (Biodiversity) and DM21 (Nature conservation and biodiversity); in addition to the national policies set out in the National Planning Policy Framework (NPPF).
6.	Remove traffic to allow broader spaces for animated	The intention of the Design Code is to improve design quality in new development. Traffic relates matters fall within the remit of the County Highway Authority.
7.	Roof gardens, especially on top of shop developments or developments without a large outside space.	Guidance on roof gardens is included in chapter 5.2.
8.	Yes - as stated above, design has to cover all needs.	Noted.
9.	Be consistent with building heights and also consistent use of materials. Learn by mistakes of 60's and 70's with their fair faced concrete finishes.	Code A in chapter 7.1.1 requires that proposals for new build developments consider the character of a site and its surroundings to inform the architectural approach and when specifying materials and construction details. Approach to the building heights in new development is covered in chapter 6.3.
10.	Not at this time.	Noted.
11.	Space for inclusion of more trees. When there are two streets next to each other and one is lined with trees and	Street and urban greening codes and guidance are included in chapters 5.1 and 5.2.

	treetops are viewed behind the roof line there is a completely different feel. This decreases the urban effect and will add to health benefits for residents and wildlife alike.	
12.	Page 80: Chapter 9.1. This section should promote the animation of frontages to visitor attractions through development, providing a focal point and front door to important destinations, such as Sandown racecourse. Given the acknowledged importance of Sandown racecourse, it is important to protect and enhance its ongoing commercial viability and vitality, and promoting its visible street frontage onto A307, Portsmouth Road.	This comment relates to specific premises. Design Code provides design requirements and guidance in more generic terms that are applicable across the borough or in designated area types. Should a redevelopment come forward on large sites, such as Sandown Racecourse, design matters should be subject to a site-specific masterplan.
13.	No comments.	Noted.

26. Would you like to see any other design requirements added to the Resources section of the document (pages 90 - 92)?		
	Respondent's comment	*Council's response*
1.	Discouraging paving over front gardens.	Guidance in chapter 10.2.2 sets out that a hard landscaped pedestrian path within the defensible space zone should be provided for wheelchair and bin access. **We have now amended a guidance point in chapter 5.1 – 'naturally planted areas in front, rear and communal gardens should be maximised.'**
2.	Yes, needs to apply to buildings where Change of Use is requested to ensure this is a sustainable and adaptable option. Other design code elements should also be applied.	Resources section of the Design Code contains guidance that is relevant to all types of development that requires planning permission, including the change of use proposals.
3.	There need to be more strict guidance than "Incorporate renewable energy technologies to meet any operational needs and do so in a sensitive manner that maximises energy output and minimises visual impact" Each new development should have a minimum EPC rating and also should utilise solar and heat pumps where possible.	Design Code can require a mandatory compliance ('must') only on matters that are set out in the planning policy (Local Plan and planning legislation/Government statement(s)). All the other requirements that are currently not a planning policy can be only advisory ('should' or 'could') and if implemented in the development, these would add to the benefits arising from that development.
4.	Renewable energy should be encouraged	This is already included in chapter 11.1.1.
5.	Orientation, shading etc is dependent on the site so it may be difficult to satisfy some of these criteria	Each proposal needs to take into account its unique constraints. Compliance with guidance in chapter 11.1.1 is optional.
6.	YES - for new builds, adherence to energy efficiency standards should be mandatory.	Design Code can require a mandatory compliance ('must') only on matters that are set out in the planning policy (Local Plan and planning legislation/Government statement(s)). All the other requirements that are currently not a planning policy can be only advisory ('should' or 'could'). As the set-

		out guidance associated with energy efficiency is not currently a policy, it cannot be mandatory in this iteration of the Design Code.
7.	Unsure	Noted.
8.	On the Thames - a guide for islands in Elmbridge to favour greening mid-stream. Much of this aspect of our Thames landscape has already been lost!	This is already included in the guidance in chapter 5.4.
9.	Yes - as stated above, design has to cover all needs.	Noted.
10.	See point about amenities	Noted.
11.	Transport as above, unless provided and with ever increasing parking costs. Local businesses will suffer, and council tax take will reduce.	Matter related to the provision of more public transport is a matter of Surrey County Council as the County Highway Authority and more broadly of the Local Plan in seeking to secure infrastructure provision. Design Code is concerned with the design of new development and therefore cannot require additional infrastructure, but if any such infrastructure was proposed, it includes guidance on how this should be designed in chapter 4.
12.	No, because the Building Regulations already covers this.	Noted.
13.	Yes. Make it clear that Elmbridge standards may exceed national building regulation requirements. Refer specifically to embodied carbon in relation to demolition of existing buildings. Consider future adaptability for alternative uses in terms of lifetime and carbon calculations. Longer life = lower carbon impact over time. High thermal mass does not necessarily save energy or	Elmbridge Design Code will be adopted as a Supplementary Planning Document and therefore it cannot introduce new or higher standards. This is the matter for a Local Plan or the national legislation, such as regulations. This is already included in chapter 12.1.1. **This reference in chapter 11.1.1 has now been removed.**

	avoid overheating and it can increase embodied carbon - remove this reference and add; Refer to correct use of window orientation aspect ratio shading and height together with and wall ventilation openings for moderating overheating and avoiding air conditioning. Avoid artificial cooling (air conditioning in all dwellings. Avoid "innovative" solutions which have not already been proven to deliver ultra-low carbon consumption in real life rather than relying on a theoretical result. (NB many heat networks are far less efficient than a combi boiler!)	 These matters are already included in chapter 11.1.1. As a matter of principle, the Elmbridge Design Code encourages innovation. This might not be necessarily associated with energy demands of new development, but with other aspects, for example movement or nature.
14.	Yes, make it clear that Elmbridge's standards on climate change mitigation and sustainability exceed Building Regulations requirements. Avoid air conditioning with summer cooling for domestic buildings. Ensure that energy losses of heat networks does not exceed 10% of the total energy transmitted though the network. Avoid excessive noise with heat pumps. Full allowance for embodied carbon, making demolition of existing buildings not favoured. The best practice highlights need a re-think as they don't cover anywhere near enough. The Leti suite of documents could be a resource for you to do that!	Elmbridge Design Code will be adopted as a Supplementary Planning Document and therefore it cannot introduce new or higher standards. This is the matter for a Local Plan or the national legislation, such as regulations. We had included the links to the LETI guides in chapter 11.1.1.
15.	Response from the Designing Out Crime Officer, Surrey Police:	

	Savings offered by crime prevention may be more than just financial. A study into the carbon cost of crime conducted by Pease (2009) demonstrated that crime could have a substantial impact on the environment in terms of a large carbon footprint and introduced the idea that 'it would be difficult to envisage a high crime society being a low carbon society'.	Thank you for your observation, however Design Code is not best placed to include research findings within.
16.	No comments.	Noted.

27. Would you like to include any other design requirements to the Lifespan section of the document (pages 93 - 95)?		
	Respondent's comment	*Council's response*
1.	Yes, great weight should be given to retrofit	Guidance in chapter 12.1.1 seeks applicants to provide justification for the demolition of existing buildings; and first consider retrofit of existing buildings or reuse of substructures / superstructures.
2.	Management plans should also consider the lease and charges to the tenants, so they are not unfairly charged in the future. Restrictive covenants should be set in place to stop the scandal of exorbitant leases and ground/service charge increases that make properties unsellable in the future.	This matter falls beyond the scope of the planning system.
3.	no, but a presumption that is not in favour of demolition of good buildings.	Guidance in chapter 12.1.1 seeks applicants to provide justification for the demolition of existing buildings; and first consider retrofit of existing buildings or reuse of substructures / superstructures.
4.	Yes - as stated above, design has to cover all needs.	Noted.
5.	Do not push for all elderly to live together. Not everyone wishes to live in communal spaces. Retired residents in Elmbridge often still do some form of work and still have grandparenting & caring for own parents' responsibilities. 3 bed houses with gardens have more flexibility of use.	It is not the aim of the planning policies to make elderly to live together. The more recent later living models have been developed by the private sector to provide for larger communities, but this does not stop anyone to live independently.
6.	More bungalows and three-bedroom houses with gardens are required for flexibility of housing provision. They should not be permitted to be developed so that different levels of provision are maintained. Not everyone wishes to live in flats or in age related communal living sites.	The provision of different size homes is the aim of the Local Plan, outside of the Design Code remit.
7.	consistency of approach.	Noted.

8.	Yes, Section 12.2.1 - The 50 dwellings mentioned needs to be much lower, perhaps as low as 5 as there are very few sites in Elmbridge where over 50 dwellings are likely to be built. Plus, all new developments of say 5 or more dwellings must have it written into each dwelling's title deeds that there is a Sinking Fund that they must pay their proportion towards for the management and upkeep of the external and communal areas and this amount will increase annually by the rate of inflation. Or words to that effect so that dwelling owners are compelled to pay towards the ongoing upkeep. So often these external areas are left to rack a ruin as no one wants to take responsibility for them.	The requirement for management plans is applicable on developments of over 50 dwellings, or where they include publicly accessible assets such as open space, streets and community facilities. Imposition of S106 legal agreements is governed by the National Planning Policy Framework (paragraphs 55 - 58). Their use is subject to meeting specific tests and could be used only where it is not possible to address unacceptable impacts through a planning condition. This has to be determined on a case-by-case basis and sits outside of the Design Code remit.
9.	Not everyone wishes to downsize into a flat or community living and there is an increasing search for bungalows or smaller 3 bed houses with gardens. More of these types of properties should be built and size retained without extending, which would give an extra layer of available accommodation in the settlement areas for the way humans change their living accommodation throughout life according to circumstance and need.	It is not the aim of the planning policies to make elderly to live together. The more recent later living models have been developed by the private sector to provide for larger communities, but this does not stop anyone to live independently. The provision of different size homes is the aim of the Local Plan, outside of the Design Code remit. Once smaller homes are built, they could be extended without the need for planning permission, under the permitted development rights. A removal of permitted development rights could be imposed by a condition on the original permission, however this is not used frequently, as such a condition rarely meets the tests set out in the national policy.

10.	A well-designed development that takes into consideration crime prevention and the fear of crime should reduce the repeated call on police to attend the location leading to a feeling of being safe and caring for that environment.	The 'Lifespan' chapter is more concerned with the carbon life cycle. We have however included this point in chapter 8.1.1.
11.	No comments.	Noted.
12.	Response from the Designing Out Crime Officer, Surrey Police: A well-designed development that takes into consideration crime prevention and the fear of crime should reduce the repeated call on police to attend the location leading to a feeling of being safe and caring for that environment.	This chapter is more concerned about the carbon life cycle. **The raised point better fits in section 8.1.1 where we have added a guidance point relating to this matter.**

28. Do you have any observations on the first section of the document – INTRODUCTION?		
	Respondent's comment	*Council's response*
1.	Yes - it should reference Change of Use requests as they change the dynamic of an area, and the building should then confirm to many of the design code requirements. - should also make clear that while fundamentally setting a design code for new developments is also setting a complimentary code to be applied in enhancing existing public areas of towns.	**Change of use type of development has now been included in Figure 1.3.** Figure 1.3 lists all codes relevant to a specific scale/type of development and the area type. These are mandatory. Once the Design Code is adopted, the Council will provide a compliance sheet for the applicants to demonstrate their compliance. It will also include a list of guidance, so it is clear when the proposal includes these as benefits.
2.	Progress should be accepted, and not old-fashioned design keep being used	Design Code does not require to follow the 'old-fashioned' design, but it encourages to choose the appropriate design approach. It identifies positives and negatives of traditional, transitional, contemporary and innovative approaches in chapter 1.6.4.
3.	I like the aim of the design code to achieve the objectives on Climate, Character and Community	Support is noted.
4.	Paragraph 1.3.1 appears to have some detail missing or an erroneous first line?	**Thank you, this has now been amended.**
5.	At the discussion on 9th October, I think it was said that this Design Code would sit alongside of the Local Plan and carry equal weight. Is it a legally required document that is also free-standing? On page 4 is says that the Design Code is a Supplementary Planning Document and therefore it sits within the Local Plan. Therefore, what will be the Design Code status if it is accepted by Elmbridge Council before the Local Plan is accepted by the Planning	In late October 2023 the Levelling Up and Regeneration Bill received the Royal Ascent and became an Act of Parliament. This makes a provision for Design Codes to become Supplementary Plans of equal weight as the Local Plans. However, further detail is needed in the form of secondary legislation (Regulations) that will set out the mechanism for their preparation, consultation, potentially examination and ultimately their adoption. Until these

	Inspectorate? Will it be useable and enforceable in Planning Applications as soon as it is accepted? (I really hope so).	Regulations are made, Design Code once adopted as a Supplementary Planning Document will be a material planning consideration in determination of applications.
6.	in 1.2.2 stress that the Borough has many 'local characters' - per 2.1.1.	Chapter 1.2 confirms that objectives of the Elmbridge design Code and paragraph 1.2.2 states: 'The goal is to ensure that new development enhances the local character across the borough, creates a 'sense of place' which is memorable for its architecture and townscape, provides high quality public realm and is well connected to its immediate and wider setting.'
7.	Generally, it is quite difficult to complete the questionnaire without printing off all 105 pages. I have been doing this with the questionnaire on one screen and the Code on another screen and it is still quite difficult, and how many people have two screens? The Code is difficult to read with the double page spread open (i.e., it's too small), so it's easy to miss things. Its interesting/unfortunate/illustrative that so many of the example illustrations are from outside the Borough. There are not many if any examples of recent new build houses in the Borough - there are good examples of bespoke architect-designed houses including: contemporary, contemporary interpretation of older styles, modernist, modern arts and crafts and well considered modern neo classical	Draft Design Code has been streamlined as much as possible to include the most important design requirements and guidance. The Code itself is set out on pages 37 – 95. Some of the residents and other interested parties might be interested only in specific issues, such as parking or height of new development. Others, such as the landowners and planning agents might want to read the whole document and even more. We understand that it might be a long document for some. Throughout the process of the Design Code preparation the team of officers and consultants visited the Borough in search for good design examples and several are included within the document. Through the earlier consultations that formed part of the Design Code preparation, we asked those who responded to the questionnaires to provide examples or upload photos of such developments, but we haven't received any. As such, we had to reach out of the Borough to provide some illustrative examples within the document.

8.	Good - please implement as soon as possible.	Support is noted.
9.	Where are questions on Sections 10, 11 and 12 of the consultation document? These are extremely important sections. This seems to be a grave error and might mean that this entire consultation is not lawful. I would be grateful to receive an explanation for this omission.	Questions relating to sections 10 (Homes and buildings), 11 (Resources) and 12 (Lifespan) were included in the questionnaire as questions 21, 22 and 23; 26; and 27 respectively.
10.	it all reads well, just a question how well it can be adhered to.....	Design Code once adopted as a Supplementary Planning Document will be a material planning consideration in determination of applications.
11.	Nothing in the objectives talks about preserving green belt, open space, nor does it factor in the need to consider road traffic density, transport links, schools, health centres etc.	None of these matters fall within the remit of the Design Code as a Supplementary Planning Document (SPD), but of the Local Plan.
12.	Need more on public transport, as indicated above. And more on strategic car parking.	There is an extensive chapter 4 discussing various design matters associated with parking. Matter related to the provision of public transport sits with Surrey County Council as the County Highway Authority and more broadly with the Local Plan in seeking to secure infrastructure provision. Design Code is concerned with the design of new development and therefore cannot require additional infrastructure, but if any such infrastructure was proposed in new development, it includes guidance on how this should be designed.
13.	No all seems very carefully thought out in response to local residents	Support is noted.
14.	YES In my view, the views of the local Weybridge community are not observed. Too many unwanted flatted developments are permitted which do not enhance local character nor do they provide the small 'affordable' homes required by families.	It is not the role of the Design Code to restrict any specific type of development, nor to ascertain the provision of affordable or small homes. The latter falls within the remit of the Local Plan.

15.	Yes, Section 1.2.2 - Given what we have just said in relation to section 12.2.1, it is imperative that for your stated "provides high quality public realm", that sinking funds are established and perhaps managed by the Council to save on administration costs to ensure that all new "development enhances the local character across the borough" rather than detracting from it in say 10-20 years' time though a lack of maintenance. Section 1.7.9 - Where it says "In future this will likely include whole life carbon..." This should be changed to "In 2025 this will include whole life carbon..." to take out any ambiguity and that this D.A.S. is likely to become in effect in 2025.	Code A in section 12.2.1 sets out a requirement for larger schemes, those of over 50 dwellings, or where they include publicly accessible assets such as open space, streets and community facilities will need to outline and commit to day-to-day/regular management. This would include but is not limited to refuse collection, private deliveries and landscape maintenance. This sentence explains that this might be a requirement once the future Local Plan is in place. The new Local Plan is currently at the stage of Examination in Public (EiP), and it is not clear whether this requirement will be adopted or when.
16.	Yes 1. Change title to: Design Code + Design Standards for Development Elmbridge welcomes good development. This Code gives a clearer vision of development expectations. It provides applicants with as much certainty as possible about what is likely to be acceptable to the Council and the community it serves. 2. Welcome the lay reader by adding - Superimposed onto the map add say 5 or 6 coloured images depicting existing and possible good practice contexts/examples Include conservation area examples and good modern stuff. Page 1 - The document has excellent content and I respect this. However, it uses a lot of what might be termed elitist	The meaning of Design Code is effectively Design standards for Development. Shorter title of the documents is preferred by the Council. Coloured images are included throughout the document. We attempted to use plain language as far as possible throughout the document and where we sought to use

	architectural language which is off-putting and most likely not properly understood by the lay reader who may dismiss it as arrogant. Expressions such as Typology, Legibility, Morphology, Modal shift etc. can be expressed more simply and some of the stuff on density for example is like angels dancing on the head of a semantic pin. An appendix for these expressions could be used, but then the thing becomes more like an academic paper than an easily usable clear to all document. Better to adapt the language in the first part of the section or use the technical term but add an explanatory sentence or two at the point of each use.	planning or architectural jargon, we have included these in the Glossary in Appendix A. Terms typology, legible and morphology had all been included. Modal shift means changing the way people travel – moving away from the use of car to for example cycling or walking.
	Innovative is a much-abused expression and novelty has been shown not to deliver sustainability (Probe studies etc) or quality, so please don't use it. Robust/Well-proven solutions are more appropriate for our future.	Term 'innovative' is a commonly used word in the planning system. It is also included in the Glossary and means a departure from both the traditional and modern approaches. Innovation could be technological or design related.
	I think it needs a much harder-hitting introduction on page one/two explaining better how helpful the Code can be, for all interested parties when used in real life planning situations. It puts both the Council and therefore, the community in control of standards. Developers will find that if complied-with, it significantly reduces planning risk and so, can speed the process overall.	**We have now included this in paragraph 1.1.3.**
	The mandatory texts should be bolder. It should be clearer where you wish to retain existing style, how to respect/compliment the context and the sort of new styles/typologies which would be welcomed.	**We have now changed the text font style of all codes to bold.**

	Full height boundary fences in wood and walls of stone are accepted but bricks, which are manmade are not defined better/examples?	The aim of the Design Code is to improve the design quality of new development, it is not its role to restrict any specific building materials. Section 7.1.1 seeks proposals to consider the character of the site and of its surroundings to inform the architectural approach and when specifying materials.
	Explain what it doesn't do in simpler terms in a few examples?	
	1.2 Will this development be a good place to live and not detract from the pleasure existing residents get form their locality?	**This point has now been added in paragraph 1.2.1.**
	1.3.1Grammar!	**Thank you, this has now been amended.**
	1.3.2 Residents can use the code to understand etc	**This has now been amended.**
	1.3.5 Vary as to whether they are mandatory or just advisory Area Types expect to design in line with the existing styles and decoration High variation from this needs to be justified by â€¦â€¦â€¦.	**The wording in this paragraph has now been updated.**
	1.6 Morphology Visioning (does this mean Options and concepts?)	Point 2 in section 1.6 talks about the historic processes and factors that have influenced the existing form of development. This includes settlement morphology. This is separate from point 7 that says that the site analysis provides a strong base for visioning and detailed design of new development.
17.	Not sure where this comment fits, but please take due notice of past examples when trying to build more cycle	Thank you for your observation. The provision of new cycle lanes falls within the remit of Surrey County Council and the

	lanes. Our roads rarely have room to support them and so to add them inconveniences other road users. Now that decision should be based on how well they are used. I go along the Portsmouth road into Kingston. The cycle lane there is wide and so impacts the use of the road for others (e.g., cars, commercial vehicles etc). But it seems rarely used. It has been there long enough to hopefully have seen an increase in cycle usage, but I can't see that it has - largely because of the impracticality of cycling to a major shopping centre.	County Highway Authority. Your comment has been passed on to the CHA for their consideration.
18.	Yes: the role of the Design Code in the design process will only be effective if there are sufficient staffing resources for applicants' assessments to be considered critically. i.e., it must not be a tick box exercise prepared by a consultant and accepted without proper assessment by planning officers.	This process will be carried out by planning officers at the application stage.
19.	Yes: Greater emphasis on the character of the area to ensure new development reflects that character	This is already covered by Code A in section 7.1.1.
20.	Reference in 1.7.9 is made to identifying existing relevant evidence and guidance that is set out in policies and guidance in appendices, but this is not included.	**This has now been clarified within the paragraph.**
21.	How the Design code will be applied to planning applications for 'change of use' to ensure that buildings can and will be adapted to comply with the Design Code.	**'Change of Use' has now been added in section 1.4 (Design Code Index) under the 'Scale / Type of development'.**
22.	Response from the Designing Out Crime Officer, Surrey Police: Design and Access Statements for outline and detailed applications should demonstrate how crime prevention	**This point has now been added to the chapter on Design and Access Statement (1.7).**

	measures have been considered in the design of the proposal and how the design reflects the attributes of safe, sustainable places underpinning NPPF and Elmbridge Local Planning Policy.	
23.	No comments.	Noted.
24.	Response from Surrey County Council: Overall, we welcome the introduction of an SPD supporting the implementation of the Local Plan policies and setting out clear expectations for design quality and sustainability across the borough. We note that only one reference is made to Healthy Streets for Surrey (surreycc.gov.uk) in paragraph 4.1.1. We would expect the Elmbridge Design Code to make reference and provide a link to Healthy Streets in the introduction and to make additional specific cross references within appropriate sections of the code where it overlaps or covers Healthy Streets and for Elmbridge Borough Council to ensure that the design code aligns with Healthy Streets. This is throughout chapter 4: movement and chapter 5: nature, chapter 6: built form and chapter 8: public spaces. We would also expect the Elmbridge Design Code to make reference to our guidance Sustainable Drainage System Design Guidance - Surrey County Council (surreycc.gov.uk) in chapter 5 (5.2 urban greening), chapter 6 (built form) and chapter 8 (public spaces).	**Overall support is noted. Specific cross references within appropriate sections of the code to 'Healthy Streets for Surrey' have now been included.** **A new sub-section '5.3 Flood Risk and Sustainable Drainage Systems' has now been added and it contains a reference to this guidance.**

	We are pleased to see reference to nature and green spaces being woven into the fabric of our built environment in chapter 5. SCC has published a Green and Blue Infrastructure Best Practice guide. The aim of the document is to highlight to individuals and organisations involved in the development process the benefits that can be achieved when green and blue infrastructure is delivered within an urban development setting and the important contribution it makes to delivering 'good growth' in Surrey. We would suggest that this guide is referred to in the SPD. The design code should refer to climate adaptation measures and the importance of adapting: e.g., tree shading, water use. Our climate change specialists would be happy to provide further support/guidance if required. **New section on sustainable drainage/flood risk** There is little reference to the risk of flooding from all sources in the document and we would recommend that the document includes a separate chapter on sustainable drainage/flood risk (from all sources). Development should be located sequentially to areas at lowest risk of flooding. This would be relevant to all development types (as listed in figure 1.3) and links should be made to Healthy Streets for Surrey and our Sustainable Drainage System Design guidance.	In accordance with the Local Development Scheme 2023-2026 a bespoke Climate Change and Renewables Supplementary Planning Document is scheduled for adoption in Spring 2025. It is envisaged this SPD would provide further support and guidance in the matters relating to climate change. **A new sub-section '5.3 Flood Risk and Sustainable Drainage Systems' has now been added. A link to this guidance has also been included.**

	The design code does not include information on ordinary watercourses. Where ordinary watercourses (also relevant to main rivers) are impacted by proposed developments they should be included within the context of the development as open blue/green corridors which allow maintenance to occur and so that there is no increase in flood risk on or off site. This could be included in a sustainable drainage/flood risk section. See our guidance on Living next to a watercourse - your rights and responsibilities - Surrey County Council (surreycc.gov.uk) and Ordinary watercourse consents - Surrey County Council (surreycc.gov.uk). The River Thames Scheme will have impacts in Elmbridge which should be referenced in the design code. This could also be included in a section on sustainable drainage/flood risk.	The Council considers that this information is irrelevant to the Design Code.

29. Do you have any comment on the second section of the document - BOROUGH-WIDE CONTEXT?		
	Respondent's comment	*Council's response*
1.	We are part of one borough and should accept that not try to isolate certain areas	This is reflected in chapter 2.1.
2.	There is a lot of emphasis on character which is good. In terms of where there are existing designated and undesignated Heritage Assets, there should be mention of significance also, so as not to detract from that aspect.	This section of the document does not include any design requirements. Heritage assets, whether designated or non-designated, and their significance have to be considered as a matter of Planning Policy.
3.	The description of borough-wide characteristics feels elitist. There are several post WW2 housing estates of modest sized housing which are almost garden suburbs as housing specifications were high. The main downside is that not much parking was provided. But they are well designed estates with public open spaces, and a large number of residents live there, and are desirable in the housing market. Late 20th and early 21st century estates are less spacious with little space for greening. A few more pictures of these would be good and of the smaller terraces of early 20C. Including these would possibly account for most of the population. Also I would like definition of urban/suburban clarified. 2.2 area types. I disagree with the colouring/classification of housing in Hersham.	Thank you. As part of the earlier consultation on Design Code, we asked residents to provide photos of areas that they felt represented the character of their locality. Unfortunately, none were received. We have included a variety of photos from across the borough. Design Code does not provide specific definitions; however, it elaborates on the characteristics of each area type in chapters 2.4 and 2.5.

	1. Whilst there are terraces of shops along the main roads, only the housing on the north side of the village green is flatted, 5-storey, so the line of mixed uses is a narrow strip.	The area type designation has not been grained based on individual buildings. The unit was defined as a block of buildings surrounded by roads. Prevailing typology (type of built form) as well as the use were taken into account to define a broad area type.
	2. You have classified all of the central area as this (coloured maroon), whereas it is actually suburban (light brown).	The central part of Hersham has been shown as 'mixed-uses' area type due to the prevailing typology of built form and the existing uses based on the above principle.
	3. You have classified housing north of Back Green (Church Green) as urban (dark brown) when it is cul-de-sac (suburban 2.4.8) and light brown.	Terraces are a typical building typology of the urban area type (please see paragraph 2.4.2 of the document) and therefore the terraces in the surrounding area of Church Green were designated as 'urban' area type.
	4.You have included the Waitrose car Park/Hersham Shopping Centre as urban. It is not. It has no housing on it currently. At present, there is not even a planning application for this. In Regulation 19 consultations, it was disputed as a site, and was only for 30dph which is a suburban density. The Local Plan is not yet valid; therefore, you should not include it, nor presume that it will have high density housing on it. Therefore, it should be suburban (light brown)	The area type seeks to identify the existing built form typology considering various indicators, such as type of buildings, their density (FAR), the existing uses (within the block unit) and does not dictate the density of any future potential redevelopment proposal. Furthermore, the Design Code does not allocate any site for any specific type of development but seeks to improve the design quality of new developments. Please note that to define an area type, density (FAR) is also considered. And although The Hersham Shopping Centre itself does not contain any residential use, this site falls within a block (unit) that includes both commercial and

		residential uses, and therefore the designation as 'mixed-uses' area type is considered appropriate.
4.	The identification of the Settlement Areas in Fig. 2.10 is far too wide - as it could be used to attribute specific character /identities to the area enclosed within the thinner red line. Would it be better to identify them as Parish areas or some other label? I think it would help to show what area is Metropolitan Green Belt on that plan, not just green open spaces	This map will be provided so it could be zoomed in and out. The settlement areas are set out in our Local Plan and all consultations in connection with the Design code were carried out accordingly. As such, the Council considers this to be appropriate. There is only one parish in the Borough – Claygate. The metropolitan Green Belt is identified on the map in the lighter green colour.
5.	In section 2.2 the Bevendean Estate is clearly shown marked in a shade of brown that denotes it as Suburban not Gated. I consider that this designation is incorrect and should be grateful if it could be corrected, please. Just because the estate is no longer one with private roads it does not reduce its status. The EBC Local Plan 2000 contained policy HSG17 that referred to area of Special low density within the borough. This included the Bevendean Estate which together with the Birds Hill Estate comprised what is referred to as the Crown Estate. In 2012, this policy was superseded by the Supplementary Planning Documents. In the Companion Guide for Cobham, Oxshott. Stoke D'Abernon & Downside, Section COS 10 is entitled The Crown Estate (Birds Hill Estate) & Bevendean. It states that "Both of these areas are part of the Crown Estate which is recognised in CS17 of the Elmbridge Core Strategy as being an area of special low-density development." It continues that "These areas are essentially defined by their very low density" and that	**Following this submission, further information was requested by the Council from the residents of Bevendean Estate to justify their assumptions. This has been reviewed and due to the existing low FAR, it is considered appropriate to identify this specific locality as falling within the 'gated' area type. The map in Fig 2.10 has now been amended accordingly.**

	"Development should seek to retain the established landscape character." Indeed, in CS17 of the Core Strategy where there is reference to Development Density, it is stated that "Other than in the St George's Hill Estate, Burwood Park and the Crown Estate, Oxshott, a minimum density of 30dph will be required." So, the principle of classifying the Bevendean Estate as an area of special low-density development has been completely clear until now. We understand why EBC wish to remove the category of special low-density development. And, in principle, we support the move from a density measured in dwellings per hectare to one of a Floor Area Ratio (FAR). We can see no justification though for treating the Bevendean Estate any differently to the Birds Hill Estate. The latter has been denoted as gated which puts into a category of Low density. In contrast, the Bevendean Estate has been denoted as suburban which puts it into a category of Moderate density. At present, houses on the Bevendean Estate (particularly Goldrings Road and Holtwood Road) are detached houses in plots of typically 0.3ha. The FAR's will typically be in a range of about 0.1 to 0.3. This is firmly within the Low-density range shown in the DC. Classifying the Bevendean Estate as moderate density with an indicative range of 0.4 to 1.0 has the potential to increase present densities by a factor of 4 or 5 and would have a permanent, adverse	

	effect on the character of the estate. In the DC consultation held last year, the Bevendean Residents Association participated very fully. The views expressed by local residents were very clear. A copy of their submission is attached for your reference. Opening up the area to a four- or five-fold increase in densities is decidedly at variance with those local views and seemingly represents an area where the views of the consultation have not been taken into account.	
6.	each area needs a different approach	It is not clear what the term 'area' means. Is it the area type, neighbourhood or settlement? And what difference in the approach is envisaged?
7.	Thames islands - the river runs along the Elmbridge boundary, and it is an important landscape, amenity, wildlife corridor	These points are covered in 'Enhancing the riverside' section of the document.
8.	Need more on public transport, as indicated above. And more on strategic car parking.	Matter related to the provision of more public transport is a matter of Surrey County Council as the County Highway Authority and more broadly of the Local Plan in seeking to secure infrastructure provision. Design Code is concerned with the design of new development and therefore cannot require additional infrastructure, but if any such infrastructure was proposed, it includes guidance on how this should be designed in chapter 4. This chapter also includes design principles to be utilised in new development in terms of car parking.
9.	No all very good assessment	Support is noted.
10.	Promote a stronger community culture.	It would have been helpful if some specific design features to promote a stronger community culture were offered.

		Design Code is concerned with the design principles of built and natural environment.
11.	Yes, Section 2.1.4 - You do not mention Hersham whereas Hersham also had large areas Vernacular to the west of the village centre and has many Arts & Crafts inspired dwellings. Please add Hersham to this list. Section 2.4.15 - Again the Wey Navigation Canal should be included and elsewhere in this document you name four rivers and not just the three mentioned in this clause. Please change it.	**This has now been added.** The Wey Navigation Canal is mentioned in the Design Code. The Council does not consider it to be a river (created naturally) as such. It is a man-made structure to enable the boats to pass inland. Paragraph 2.4.15 is concerned with homes with both their fronts and backs to the borough's rivers, i.e., islands. There are no islands, or homes of this characteristic in the Wey Navigation Canal.
12.	Page 19: Chapter 2.3 (Green Belt). Whilst recognising the importance of the Green Belt in preserving openness and serving the five purposes as identified in the National Planning Policy Framework (NPPF), it should be acknowledged that in certain instances and locations development in the Green Belt can be of benefit to people and place. There are edge of settlement locations, such as at Sandown Racecourse, where washed-over Green Belt includes brownfield car parking that could accommodate built development that helps to sustain the vitality and viability of Esher Town Centre.	Design Code includes codes that are relevant across the Borough. Area types have been identified only in urban areas and exclude land designated as Green Belt. Any proposal for new development within the Green Belt will have to comply with the local and national Green Belt policies, and once the Design Code is adopted, it will be required to satisfy criteria set out within this SPD.
13.	The boundary for Weybridge as recognised by residents and raised in the previous workshop, does not include Burwood Park or Whitely Village which Hersham residents consider part of their town. The Seven Hills Road and	New settlement boundaries were approved a few years ago and are not subject to change as part of the Design Code.

	Queens Road up to Sir Richards Bridge form the boundary between Weybridge and Hersham. The Borough maps shown in Area Types need to identify all the river courses as well as residential riversides to assist in the recognition of flood plains and the influence of flood water on areas of development.	Once the Design Code is adopted as an SPD, the map of Area Types (Fig. 2.10) will be in a digital format as a layer in the Council's GIS (Geographic Information System). It will be available on the Council's website in 'My Neighbourhood' maps as an additional layer.
14.	Response by Inspired Villages: In Section 1.5 the borough's urban areas that lie outside of the Green Belt designation have been categorised into Area Types based on their common design characteristics. There is no categorisation of the differing Green Belt areas. In section 2.5 due to the nature of an Integrated Retirement Community, they typically comprise of a village centre which generally has a restaurant, shop, bar, and wellness facilities and is classified as C2.	Noted.

30. Do you have any observations on the third section of the document - “LOCAL CHARACTERISTICS?		
	Respondent’s comment	*Council’s response*
1.	Walton needs a much higher profile. It has been overlooked and is being ruined by overdevelopment, poor architecture, too many flats and too much social housing.	Thank you, but unfortunately no suggestion about how a ‘higher profile’ should be achieved through the Design Code.
2.	Yes, page 26 re Claygate. The blanket statement of "put pedestrians first" is too sweeping and does not reflect the more varied needs of most people for whom the car is an essential and efficient means of transport (in addition to other means of transport that they may use). Instead, we need to "balance the needs of pedestrians and traffic". As a result, main roads in Claygate (such as Hare Lane, Oaken Lane, St Leonards Road, Red Lane) should not have "traffic slowing mechanisms", and the existing 30mph speed limit is appropriate. A lower speed limit may be appropriate on residential roads off the main roads that have much less traffic. The same comment applies on page 32 re Esher, where "lower speed limits on roads" is too sweeping and should not apply to main roads.	**Both pages have now been amended to take this comment into account.**
3.	See comment on Weybridge in section 29 above.	Noted.
4.	Yes, through traffic is increasing causing in Esher and Hinchley Wood. Due to commercial traffic from Chessington.	Noted.
5.	No - I am pleased to see the individual settlements given bespoke assessment in this way.	Support is noted.
6.	This: "Single dwellings are being replaced with blocks of flats" is not a challenge. Sprawling is caused by tradition of raw houses dwellings i.e., low density of settlements. By taking less space and providing higher density, blocks of	This point was raised through the earlier public consultation on the Design Code and was raised by several residents.

	flats allow to preserve more surrounding space for other uses. This of course requires change of character of the whole area not only replacing single dwellings.	
7.	Hersham. Please confirm that Hersham is suburban. Urban: 2.4.1; 2.4.2; 2.4.3 do not apply Suburban: 2.4.5; 2.4.6; 2.4.8; 2.4.9 all do apply. therefore Hersham is Suburban	Parts of Hersham represent the 'suburban' area type, however there are areas that fall within the 'urban' area type too, based on the methodology used for the identification of specific area types. The methodology works on the unit of a block, which encompasses all built form surrounded by roads. The prevailing typology (type of buildings) within the block then together with other indicators, such as the existing uses and density (FAR), indicate the most appropriate area type for the given block.
8.	Following on from the comment above I believe that it is important to make it clear that each 'Parish' (or whatever) area has many characteristics, and it is wrong to start each with the words "The key characteristics.....". They are just some of the characteristics! This is confirmed in your definition of 'Character Area' in Appendix A!	'Key characteristics' were put forward by the residents of individual settlement throughout the earlier consultations on the Design Code. There have been numerous area types identified in individual settlements. Furthermore, Design Code puts emphasis on the character of the area. As such, character of each area or neighbourhood will have to be taken into account when new development is designed.
9.	There are ways of interpreting local characteristics in a contemporary way. The photo examples given are not really very representative - the one-page format for each locality is too limiting. Previous design guides were much more informative and captured the character areas more precisely.	The aim of the Design Code is to provide design requirements and guidance to ensure higher quality urban and natural environment. It is not its role to provide elaborate descriptions of the areas' character.
10.	Maintain as much individuality as possible between locations. None of us want to look like any of the other places and in maintaining this, the whole borough becomes unique.	Section 7.1 seeks to achieve this.

11.	Para 3.6 Stoke D'Abernon says, There are large patches of Green Belt that lie between Stoke D'Abernon and Oxshott that people feel are undervalued. This is not a matter of feeling - but of knowledge of inaccuracies in Sub-Area 11 evidence base in ARUP's & Savills documents. Hence 2455 have signed the petition demanding the evidence base for Sub-Area 11 inaccuracies be corrected: https://www.change.org.uk/p/our-green-belt-is-under-threat. The petition is readily available to read as the pinned tweet on the @BluWavOxshott Twitter account that the EBC Leader Cllr, the EBC Planning Portfolio holder and many other Cllrs, including Working Group Cllr Burley, follow. However, there are more inaccuracies and disproportionate assessments that the petition does not mention. It is a petition- not a book. It is absolutely essential to keep the Design Code statement in para 3.35 that Green Belt surrounds the settlement. The retention of the semi-rural character of Blundel Lane south of Waverley Road & north of the Bridleway is essential. Residents, walkers and horse riders need this statement.	Considerations associated with the SA-11 are relevant to the evidence base documents that were created during the preparation of the new Local Plan and outside of the Design Code remit. This section of the Design Code document represents a summary of comments received by the borough residents during the earlier consultations.
13.	Yes, thanks. But: The para 3.6 sentence There are large patches of Green Belt that lie between Stoke D'Abernon and Oxshott that people feel are undervalued needs to be expanded in order to be accurate. People feel that the Green Belt Sub-Area 11 site is undervalued because the evidence base for this site in several documents contains	Considerations associated with the SA-11 are relevant to the evidence base documents that were created during the preparation of the new Local Plan and outside of the Design Code remit. This section of the Design Code document represents a summary of comments received by the borough residents during the earlier consultations.

	inaccuracies. They are therefore unsound (using the NPPF system) as well as disproportionate. In addition: the veteran and ancient oak trees that mark the boundary of SA-11 which are near 2 Waverley Road, need to be recognised, both for their biodiversity and flood risk management. In addition, the ancient hedgerows along both sides of the north-south part of Public Footpath 51 (the part of the Footpath with views of the Surrey Hills and accessible from the Bridleway - and leading to the oldest church in Surrey) need to be duly recognised. The flood risk management they provide is vital, given the surface water flood risk the houses in Blundel Lane on the west boundary of the site have been designated with by the Environment Agency. The western fields of SA-11 are flooded in the wet part of the year, as there is a River Mole estuary that is subterranean there. Thanks for recognising the fact that the village of Oxshott settlement is surrounded by Green Belt. This is a key fact relevant to SA-11, which provides 100% unspoilt countryside/farmland readily visible from narrow Blundel Lane with a stunning, highly biodiverse landscape that is tremendously treasured by the many walking or cycling or scooting to schools of the railway station. People have proved that they are well aware of key inaccurate and disproportionate evidence concerning Green Belt SA-11 because this is the nature and propose of the petition about SA-11 with 2455 signatures, at https://www.change.org.uk/p/our/green-belt-is under-threat. This petition is readily available, as it has been posted as the pinned tweet on the popular @BluWavOxshott Twitter	

	account that all key Councillors, including the Council Leader, the Planning portfolio Cabinet member, and the Working Group Cllr Burley all follow.	
14.	Section 11.1 Limiting energy demand The UK's latest sustainability guidance, targets and best practice is not good enough, and falls behind what is advised by sustainability building research experts. Elmbridge should be a leader and exceed current guidance.	The Council is unable to introduce new policy or targets through a Supplementary Planning Document, the Design Code will become. Instead, it can expand on the requirements of the current policy in the introduction of codes; and if the requirement is not currently set out in policy, it could be only a guidance.
15.	Regarding Oxshott. Gates are partly used for privacy but also as a deterrent to prevent burglaries, which an affluent area will always suffer from. The A244 problems MUST be confronted, not CONSIDERED for reviewing as the code states. It is killing the village. Parking is a very big problem, for shop assistants let alone residents trying to access the village centre. The roads around the village are so busy cycling is dangerous and there are only so much shopping pedestrians can carry. Parking signage is appalling - tiny signs and NO ROAD markings, so disabled and unloading bays are permanently used by other vehicles. Insufficient official monitoring means incorrect parking happens with impunity.	These matters fall beyond the scope of the Design Code. The highway related matters are within the remit of Surrey County Council as the County Highway Authority. This comment has been passed onto them for consideration.
16.	Yes - A typical example of non-compliance is the new block of flats on Weybridge high street next to the old Thai restaurant. These are out of keeping ugly and could have been better designed as the ones on the old bowls green behind. So, whatever is recommended is often ignored anyway.	That specific development was approved in the past, when Elmbridge did not have the benefit of the Design Code. This document, once adopted, will guide the new development going forward to achieve higher design quality.

17.	M&S or large chain in Claygate totally inconsistent with hike you describe character. It made no sense.	This matter falls outside of the Design Code remit.
18.	Yes. Ensure that the essential character, in terms of design of dwelling and density of occupation should be commensurate with the present situation in Claygate. We are proud of the character of our small high street in Claygate with its range of successful independent retailers providing quality community services and would oppose any attempt to parachute a major supermarket retailer that would endanger their continued existence.	Providing new development in keeping with the character of the area is set out in section 7.1.1. The matter of a specific proposal, such as a supermarket, falls outside of the Design Code remit.
19.	Need more on public transport, as indicated above. And more on strategic car parking.	Matter related to the provision of more public transport is a matter of Surrey County Council as the County Highway Authority and more broadly of the Local Plan in seeking to secure infrastructure provision. Design Code is concerned with the design of new development and therefore cannot require additional infrastructure, but if any such infrastructure was proposed, it includes guidance on how this should be designed in chapter 4. This chapter also includes design principles to be utilised in new development in terms of car parking.
20.	See point about Claygate traffic speeds	Noted.
21.	Yes. Cobham is blighted by traffic. The High Street should deter through traffic and promote walking.	These matters fall beyond the scope of the Design Code. Promotion of walking and cycling are within the remit of Surrey County Council as the County Highway Authority. This comment has been passed onto them for consideration.
22.	Yes Section 3.3 - Whilst you show a picture of Surrey Vernacular design in Hersham you have otherwise completed omitted to mention it in your description on Hersham where there is a considerable quantity of	**This has now been added in the list of key characteristics as identified by the residents.**

	Vernacular and Arts & Crafts dwellings especially to the north-western area of Hersham. Please correct this.	
	Section 3.15 - You state "There is an ageing population" We don't disagree with this but it is only mentioned for Hersham whereas we suggest that this statement is relevant to most if not all areas of Elmbridge and therefore Hersham should not be isolated by this description.	This point was raised by Hersham residents as a challenge in the previous consultations relating to the Design Code.
	You state " All new Developments must consider accessibility for all" Whereas the rest of this DAS document suggests very limited accessibility for the whole of Elmbridge as we have previously commented on.	Accessibility is one of the aims of high-quality design in new developments and this principle has been applied throughout the document in various chapters. Without specific pointers on any deficiencies the Council is unable to rectify any potential mistakes.
	So, taking the last two points into consideration should not Hersham have a special requirement that all new dwellings be fully accessible?	Design Code is allowed to request a mandatory compliance only on the issues that are already covered in planning policy. As a fully accessible developments are not currently required by policy, this requirement cannot be introduced as mandatory through a Supplementary Planning Document.
	You state, "In partnership with the infrastructure providers agree the level of necessary additional services to bring new development forward". Please elaborate on how you intend to do this given the infrastructure providers are required in law to connect new developments with what we understand to only be the cost of the connection rather than increasing the capacity of their systems overall? For instance, water, sewerage, electricity, highways etc.	This work is carried out through the preparation of a new Local Plan. During this time all infrastructure providers are consulted on the future infrastructure needs to support the level of development planned in the new Local Plan. At this stage, rigorous modelling is carried out by the providers and their results are incorporated in justification of the level of new development. Prior to its adoption, Local Plan must go through an Examination in Public, where all the evidence supporting the new Local Plan is tested.

	You state "Support green streets ... to accommodate off road parking" We suggest you need to add the words car, van, pickup and truck before the words "off road parking" so it is not confused with just say bicycles.	It should be noted that this wording is not a policy. It represents future vision and ideas. Issues associated with the design of parking are set out in chapter 4 of the document.
23.	Reading the section on Claygate, where I live, I was concerned about the reference to 'putting pedestrians first'. I do walk around Claygate. I have no concern that I am being somehow not catered for. Plus, I am pretty sure that putting pedestrians first also means putting car drivers last. Like it or not, cars are a necessary part of life today in Elmbridge. Yes, please improve public transport. But don't start to take up half the roads with some sort of joined up walkway or cycle lanes (or at least not until such time as you have largely eliminated car usage and the roads need to be repurposed). As a pedestrian I find the pavements serve my needs very well. I rarely find I am competing with cars for them. My concern is that if this means attempts to slow down cars via speed bumps. These are a nuisance for marginal benefit. If they save lives, then please provide evidence to the fact before they are implemented. How many pedestrians have been injured or killed in Claygate in the past 10 years due to collision with other road users? But I personally know several people that have been injured while cycling on the roads. I know which one I think is safer.	**This has now been amended.** **We have now removed the reference to the 'traffic slowing mechanisms'.**

24.	Maintenance arrangements for developments of less than 50 dwellings?? Given the greater emphasis on landscaping of parking areas etc, who will be responsible for these areas in smaller developments?	Long-term management plans are required in chapter 12.2.1 on development of over 50 dwellings or where they include publicly accessible assets such as open space, streets and community facilities. All other developments should be maintained by their respective landowners.
25.	Page 32: Chapter 3.7 (Esher 2023). It is agreed that Esher High Street needs support to maintain vibrancy, vitality and viability. In addition, new initiatives are required to reduce the dominance of the car, whilst promoting sustainable and active travel, particularly by providing more effective links/connectivity to Esher Train Station. In addition, given Sandown racecourse's agreed status as an important destination at the edge of the Centre, more needs to be done to support this important local employer, destination, and attraction.	Esher town centre is subject to the 'Esher Vision' project that is looking at all these issues. Your comment was passed onto the officer who is working on the project.
26.	Yes. - on section 3.1. The village's key characteristics are accurately described as are the current challenges. As regards the future vision for the central area there needs to be a degree of caution in terms of how the Parade might be developed as described so that existing businesses are not adversely impacted, and a good variety of retail and service offers results. Also, while accepting the need to fully accommodate pedestrians and cyclists car drivers should not be forgotten Not everyone is able to get to the Parade on foot or by cycling or is able to get their purchases home on foot or by cycling.	It should be noted that this wording is not policy. It is more of a future vision and ideas that could assist in tackling current challenges identified by Claygate residents through earlier Design Code consultations. **This section has now been amended to read 'balance the needs of pedestrians and traffic…'.**

	No comments of the future vision for the residential area.	Noted.
27.	Yes. As you have said, it is very important to reflect that character.	Support is noted.
28.	Response on behalf of the Cobham Conservation and Heritage Trust: I would also like to comment on the single page description of Cobham and request some changes as follows: **Cobham-specific characteristics as identified by the residents are:** Cobham centre is distinctly different in its retail offering to Oxshott; Cobham having more chain retail as part of its mix. Why compare us to Oxshott at all? There is little or no "chain retail" in Cobham so that's wrong anyway. I would delete this bullet, please. Cobham's position and aspect - set alongside the River Mole and its floodplain, looking out over the wider Green Belt - is attractive and valued by local residents. There is a semi-rural character at the settlement edge. Please change this second sentence to read "Cobham is a village surrounded by rural and Green Belt areas". **Central section (the captions under pictures):**	 **This bullet point has now been removed.** **This has now been amended.**

	Residential streets are characterful and some are lined with repeated housing styles Please amend to read “Residential streets are characterful with streets with distinctive housing styles rather than with repeated designs.	**This has now been adjusted.**
	More modern designs have started to be mixed in to the existing vernacular Please add “that are to be resisted wherever possible”.	It is not the role of Design Code to restrict any specific type of development.
	Strong green character at settlement edges please add “as well as within the settlement.	This photo (Fig 3.24) shows the green character at settlement edges. As such, it is not considered appropriate to include the suggested wording. However, **we have now included an additional characteristic to this extent.**
	Continuing with the challenges and “future vision” part (right side):	
	Central Area - Congestion can be an issue and active travel could be improved: Identify streets where walking and cycling routes could be introduced successfully, safely, and accessibility. Please add “wherever this does not restrict traffic flow or parking space”.	**We have now adjusted the sentence to include ‘while balancing the needs of pedestrians/cyclists and traffic/parking’.**
	Residential area - ADD “lack of” before “Parking is spoiling the character of the area: Ensure that new development, especially flats have integrated car parking which is ideally out of sight”.	**This has now been added in.**

	(change the first part to) New developments all look the same while difference should be encouraged: Identify key characteristics from area and look for ways that these can be integrated into new development in a modern guise.	The proposed change to the wording is a suggestion for an improvement. However, this sentence (as in the draft) sets out 'current challenge as identified by the residents', and therefore was not amended.
29.	Characteristics - While we agree with the key characteristics of Weybridge the 5 conservation areas need to be mentioned as they highlight the historic origins that must be respected. **Challenges – to be added - Challenges central area** - The high street has a lack of any community focal point and visible link to the recreation ground. The vision is to provide a visible connection with a new piazza/square providing this link via the main car park and delivering a purpose-built community hub. - In areas of high parking stress there must be adequate parking provision within developments. - The poor integration and use of Brooklands is recognised but the vision with 'innovative intensification' needs qualification. Suggest 'innovative low rise residential intensification'. Urban sprawl from the Brooklands retail and commercial areas would not be acceptable. Current Challenge Residential – The already excess of flats throughout the town and proposals for more in ever higher blocks needs to be stopped and the limited sites available used to meet the demand for 2/3 bed houses.	**We have now added a note of the six existing conservation areas in the settlement of Weybridge.** Please note that Whiteley Village Conservation Area falls within the settlement boundary of Weybridge. This is a requirement of Policy DM7 of the Development Management Plan 2015. It is not the role of Design Code to restrict any specific type of development, including its height. Its aim is to improve the design quality in new development. It is not the role of Design Code to restrict any specific type of development. The need for delivery of smaller market homes is identified in the Local Housing Needs Assessment 2020 and the imposition of the delivery of specific type of

	The future vision is to restrict over densification in the form of flats and meet the housing demand by delivering imaginative estates of small/terrace/semi-detached houses with well landscaped amenity space.	housing is the role of planning policy set out in the Local Plan. This is beyond the scope of Design Code.
30.	Response by Inspired Villages: In Figure 3.1 there are a lack of smaller homes available for downsizing, this is a key issue. A way to address this would be to introduce and support other forms of rightsizing such as retirement housing this should be added to the ideas section. Within the Integrated Retirement Communities sector this is referred to as rightsizing as people move from larger family homes into housing in which they can comfortably spend their retirement years. Integrated Retirement Village operator's primary objectives are to meet resident's care needs and allowing residents to age respectfully and appropriately in a place they can call home. This means so long as it is safe and practical to do so, once a resident makes an IRC their home, a change in their personal circumstances should not force them to find alternative accommodation within the village. This is achieved by designing each extra care unit to enable maturing care needs to be met. The overall design of the village - from the layout of individual apartments, to creating spaces that foster interactions and the provision of on-site, communal facilities, is fundamental to providing appropriate care and improving holistic well-being.	Noted. Fig 3.1 shows a photo from Claygate with the text: 'Attractive detached homes which are inconsistent in age and built character'. Inspired Villages comment relates to the overall housing needs and supply of smaller homes, which is a matter of planning policy set out in the Local Plan, beyond the scope of Design Code.

	In Figure 3.8 larger properties and plots are being subdivided and developed which can compromise the style and scale of area. A way to address this is to introduce and support other forms of downsizing such as retirement housing this should be added to the ideas section.	Noted. Fig 3.8 shows a photo from Claygate with the text: 'Village feel and sense of community'. Inspired Villages comment relates to the introduction of purpose-built smaller retirement homes. Should this comment relate to the last point on page 26 (section 3.1), which says: 'Identify opportunity sites for smaller three bed terraced homes or maisonettes with private amenity space, close to the centre.', this would suit retirement homes too.
	In Figure 3.15 there is an ageing population which is a key challenge that should be included within the figure. A way to address this is to introduce and support other forms of rightsizing as such as retirement housing this should be added to the ideas section.	Figure 3.15 shows a photo from Hersham with the text: 'Modern architecture has been introduced to the central areas.' Inspired Villages comment possibly relates to the challenge identified in section 3.3: 'There is an ageing population'. **We have added a suggestion for specialist retirement housing here.**
	Within Section 3.7 we are supportive of Esher High Street needing diversification and support in order to continue to thrive and improve. We are supportive of the need for new housing and affordable housing, but this also needs to include the need for specialist housing for older people in addition. We further believe that the improvement in the quality of accessible open space is of the highest importance and high quality accessible green space will be of the most value to the residents of Esher.	Esher town centre is subject to the 'Esher Vision' project. Your comment was passed onto the officer who is working on the project.
	In Figure 3.43 there is a key challenge in the need for affordable housing and the ageing population. Currently there are 12.4 million people in Great Britain aged over 65 (18% of the population). By 2041, this is projected to rise to	Noted.

	20.4 million (26% of the population). But many older people live in homes that do not support them to live a safe, healthy and independent later life. We want to address that, ensuring that all older people have access to appropriate and attractive housing solutions - now and in the future. The Integrated Retirement Communities sector seeks to address this.	

31. Do you have any suggestions for the final section of the document - APPENDICES?		
	Respondent's comment	*Council's response*
1.	Are there different urban greening factors set for different land uses so that increases are made in urban, sub urban, semi-rural, edge of settlement etc?	No. There is only one set for all urban areas.
2.	No, we did not read them as they seemed to be description definitions and how to calculate urban greening areas.	Noted.
3.	Yes - Expressions such as Typology, Legibility, Morphology, Modal shift etc. are special architectural terms. These can be explained at the point of use, rather than in the appendix, good as it is. It isn't fair on the lay reader for them to have to refer to the end of the document just to understand what is being written.	Thank you for your observation. This could be accommodated in the future iteration of the Design Code, once this is in a digital format.
4.	Appendix B urban greening Are there different urban greening factors for development in urban, suburban, rural areas. What are the acceptable greening factors for those areas.	No, there is only one set for all urban areas.
5.	Glossary: No reference or description of Locally listed buildings??	**The definition has now been added to the Glossary.**
6.	May have missed it ... but although Listed Buildings are mentioned there doesn't seem to be any reference or description about Locally Listed Buildings.	**The definition has now been added to the Glossary.**
7.	No comments.	Noted.
8.	Include sustainable drainage SuDS are an approach to managing surface water runoff which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible. SuDS offer significant advantages over	**The definition has now been added to the Glossary.** Whilst we appreciate the suggested wording, we used the definition that is set out in the draft New Local Plan for consistency reasons.

	conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water runoff from a site, promoting groundwater recharge and biodiversity benefits, as well as improving water quality and amenity value.	