

Margarita Romanovich
Planning Department
Elmbridge Borough Council,
Civic Centre,
High Street,
Esher,
Surrey,
KT10 9SD

App Reference: 2025/2147
Date: 9 December 2025

Dear Ms Romanovich,

Planning Application Reference: 2025/2147 - Outline planning application for the development of up to 250 dwellings together with internal access roads and footways, car and cycle parking provision, suitable alternative natural greenspace (SANG) together with an associated car park served off Woodlands Lane, together with public open space, supported by a scheme of landscaping and planting, with principal means of access served off Leatherhead Road, following the demolition of all existing buildings and structures on the site. All matters, except for means of access from Leatherhead Road and Woodlands Lane, reserved for future determination.

‘Residents Against Clouds Hill Farm Development’ (‘RACHFD’) **strongly object** to the proposal which has been submitted to Elmbridge Borough Council (‘the Council’) for 250 homes at Clouds Hill Farm, Leatherhead Road, Oxshott, Leatherhead, KT22 0ET, planning application reference: 2025/2147, referred to as ‘The Site’ throughout this representation.

It is noted that the planning application has been subject to considerable public opposition. At the time of writing (2 Dec 2025) there are currently 808 objections listed on the planning portal, with the top concerns raised by residents being:

- Traffic and road safety
- Infrastructure capacity,
- Green belt loss,
- Character and design and
- Flooding and drainage.

Clearly, the scale of community opposition is substantial. Statutory consultees and major resident groups, most prominently Federation of Oxshott Residents Association (FEDORA) and the Cobham Conservation and Heritage Trust, together representing several thousand households across Oxshott, Cobham, and surrounding area have lodged detailed objections to the application. Their collective position underscores the seriousness of the scheme's shortcomings and the depth of public concern regarding traffic, safety, environmental quality, and the erosion of local character.

This planning application, particularly when seen cumulatively in conjunction with other planning applications including 2025/1097 (The Paddocks), 2020/0308 (Merrileas), and MO/2025/0462 (Two Ways), conflicts with Core Strategy Objectives 1 (high quality of life), 2 (unique character of the borough inc high quality built form), 4 (reduce reliance on driving), 6 (protect the Green Belt), and 8 (enhance the distinctiveness and diversity of landscapes within the Green Belt) which set the Council's vision for the future of the Borough. It also specifically conflicts with the following Local Plan policies, which will be discussed in more detail within this representation:

- Planning Policy Context
- Principle of Development (DM1, DM10, CS1, CS2, CS10 & DM17)

- Grey Belt Test
- Very Special Circumstances
- Heritage (DM12)
- Transport & Highways (CS25 & DM7)
- Strategic Views (DM20)
- Biodiversity Net Gain (CS15)
- Delivering a High Quality Development (CS17, Design Guide, DM2)
- Landscape Character (DM2, DM6, CS14)
- Air Quality
- Ecology (DM21 & CS15)

As a resident's group who wish to provide a detailed and technical representation for consideration by the Council, we have commissioned a number of independent reports and studies to support and justify our objections to the application, these include:

- A Grey Belt Assessment by ET Planning (Appendix A)
- Legal Advice from David Matthias KC (Appendix B)
- A Grey Belt report by Scarp Landscape Architecture (Appendix C)
- Heritage Impact Assessment by Archway Heritage (Appendix D)
- Transport Appraisal from John Russell Transport Planning (Appendix E)
- Traffic Survey Summary Note (Appendix F)

Preliminaries - Amendments to the Planning Application

Since the original application was submitted, it is noted that the applicant has been allowed to make amendments to the application. Changes include, but are not limited to:

- Acknowledging that part of the site is within Flood Zone 2 and confirming the development comprises of 50% affordable housing in the planning statement
 - The latter is fundamental to the grey belt test so it's difficult to see how this was missed in the original submission unless there are questions as to whether this will be delivered.
- Correcting a myriad of errors in the planning statement including the CIL rates,
- Changing the red line boundary to the east of the site.

These changes are difficult for residents to follow and are not fully explained in the covering letter.

Additionally, since public consultation began, criticisms have emerged from Statutory Consultees:

- Surrey Wildlife Trust identify 12 gaps in the Applicant's Ecology submittal that are important enough for them to recommend resolution prior to determination.
- National Highways criticise the Applicant's modelling, stating it does not reliably represent current conditions and may underestimate existing congestion.

Finally, our Transport consultant has determined that the Applicant's transport modelling is fundamentally flawed. For example, it misuses census data, omits car trips to the station, provides no HGV or delivery forecasts, and relies on comparator sites bearing no resemblance to the Site's isolated and car-dependent setting. Air Pollution traffic volumes and HGV numbers relied upon by the Applicant are also significantly below observed (ATC) traffic volumes. This in turn masks vehicle, pedestrian, and cyclist safety risks, as well as noise and air pollution.

Collectively, these points exemplify how this application has been put together in a speculative manner so as to take advantage of EBC's lack of a Local Plan.

Planning Policy Context

The Statutory Development Plan for Elmbridge Borough Council comprises of the following documents:

- The Elmbridge Core Strategy (2011),
- The Elmbridge Development Management Plan (2015),
- Surrey Waste Local Plan 2020 (2020),
- Surrey Minerals Plan (2011),
- The Aggregates Recycling Joint Development Plan Document (2013) and
- The Minerals Site Restoration Supplementary Planning Document (2011).

Paragraph 15 of the National Planning Policy Framework (NPPF) sets out that planning should be plan-led, with the development plan guiding the planning process. The Planning Practice Guidance (PPG) also provides further detail.

The Council are currently in the process of developing an emerging Local Plan, which is due to be adopted in 2028. The Council has also commissioned evidence work in the preparation of the Local Plan which can be seen as having limited weight in the planning process due to the withdrawal of the emerging Local Plan.

This development proposal appears speculative and undermines the emerging Local Plan process for Elmbridge Borough Council. It raises concerns about the applicant's attempt to bypass the 'plan-led system' by leveraging the gap between

the adoption of the National Planning Policy Framework (NPPF) and the emerging Local Plan.

Overall, the RACHFD believe that any planning application on this Site is speculative and premature; the justification is weak; and there are significant limitations to the planning argument that is presented.

Principle of Development (DM1, DM10 CS1, CS2, CS10 & DM17)

The Site is located within the Green Belt, paragraph 153 of the NPPF notes that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The proposal therefore conflicts with Policies CS1 and CS10 of the Development Plan, which direct development towards previously developed land within existing built-up areas within the Borough. The latter policy focuses on the immediate locality.

Given that the Site lies within the Green Belt, a key consideration is whether the land can be legitimately considered “Grey Belt” according to the definition in the December 2024 NPPF and Green Belt PPG. If it cannot, the critical test becomes whether “very special circumstances” exist to justify the development.

Grey Belt Test

The RACHFD have commissioned a Grey Belt Assessment which has been undertaken by ET Planning, and informed by other consultants (Appendix A). This demonstrates that the Clouds Hill Farm site cannot be considered Grey Belt land and that the proposed development of up to 250 dwellings constitutes inappropriate development within the Green Belt.

The Grey Belt Assessment by ET Planning considers that the Site makes a strong contribution to Green Belt Purpose A, as development on the Site would represent

outward, uncontained sprawl from the combined settlement of Oxshott and Cobham, which function as a single large built-up area. The land is predominantly open countryside with a clear, defensible boundary, meaning development would significantly encroach into the Green Belt. This Assessment has been informed by a Grey Belt Review by Scarp Landscape Architects.

In relation to Purpose B, the Grey Belt Assessment finds that the Site plays a moderate role in maintaining the strategic gap between Oxshott/Cobham and Leatherhead. Although the Site forms only a small part of the wider separation, development would increase the risk of physical and visual coalescence, particularly due to topography, removal of mature trees, and proposed building heights.

There is no contribution to Purpose D, as no historic towns are affected. However, it is considered that Footnote 7 of the NPPF is directly engaged: the Heritage Impact Assessment undertaken by Archway Heritage confirms the development would cause “less than substantial harm” at the higher end of the scale to the setting of two listed buildings—Woodlands Park Hotel and Woodlands Farm. It is considered that this also disqualifies the land from being considered Grey Belt in light of the decision at ‘Land at Boscobel Lane, Staffordshire’ (APP/C3430/W/25/3363067).

In addition, assessment against paragraph 155 of the NPPF within the Grey Belt Assessment shows that the proposal fails to satisfy the required conditions for development not to be considered inappropriate. In particular, the development is not in a sustainable location, as confirmed by the Transport Appraisal undertaken by John Russell Transport Planning, which identifies the absence of safe walking and cycling routes and very limited bus services, and an unacceptable reliance on private car travel given there is only a pub and an independent preparatory school within 800m walking distance as measured from

the edge of the Site (per NPPF paragraph 115 (c) / National Design Guide) 5(c) (bearing in mind that, subject to density layout, people living in a dwelling at the Site would need to walk on average an additional 300m to reach the edge of the Site) and the nearest railway station (Oxshott) is approx. 1.2 miles away.

While the applicant argues compliance with the “Golden Rules”, this does not overcome the fundamental failures regarding sustainability and Green Belt policy.

Overall, the Site does not meet the definition of Grey Belt, as it performs strongly against key Green Belt purpose a), it triggers Footnote 7 protections, and fails the tests for being considered ‘not inappropriate’ as per paragraph 155 of the NPPF. The proposal is therefore not considered to be Grey Belt, is inappropriate development and conflicts with national policy.

Taken in combination, the proposed development would:

- Irreversibly erode the openness of the Green Belt;
- Introduce urbanising built form and associated lighting; and
- Undermine the integrity of the Green Belt boundary.
- This would be contrary to Policies CS1 and DM17, and NPPF paragraphs 147–151, which establish that development in the Green Belt is inappropriate unless justified by very special circumstances.

While we acknowledge that “grey belt” is a relatively new concept, the applicant’s assessment fails to demonstrate that the site’s environmental and spatial characteristics justify such a designation. Given the Site’s landscape value (of which part is designated) the application conflicts with CS1, DM17, and NPPF paragraphs 110, 115, and 155.

Very Special Circumstances Fall Back

Under Policy DM17, new buildings in the Green Belt are inappropriate except in very special circumstances. However, the applicant has not demonstrated any such circumstances that would justify development on this site as opposed to others.

From the submitted documents, it appears that no Alternative Site Assessment has been undertaken to demonstrate that this is the only viable location for meeting housing, and any associated economic benefit can only be gained at this location. As a result, the applicant's reliance on housing supply pressures does not meet the policy test for "very special circumstances."

Determining a large, strategic site outside the plan-making process would be premature, contrary to NPPF paragraphs 33 and 47, and Core Strategy Policy CS1, which emphasises a plan-led approach.

Principle of Development Conclusion

The proposal conflicts with Policies CS1, CS10, and DM17 of the Core Strategy and fails to meet the relevant provisions of the NPPF. The Site is not sustainably located, i.e. it lies within the Metropolitan Green Belt, and is in close proximity to heritage assets that would be adversely affected by the proposed development.

The proposed development represents inappropriate development within the Green Belt and fails to meet the tests set out in the Development Plan and national policy. The Grey Belt Assessment undertaken by ET Planning demonstrates that the Site does not meet the definition of Grey Belt land, performs strongly against key Green Belt purpose A, and triggers heritage harm that, in itself, prevents such a designation. The proposal would result in significant and permanent harm to

openness, encroachment into the countryside, and erosion of a clear and defensible Green Belt boundary.

No Very Special Circumstances have been demonstrated, and no evidence has been provided to show that this Site is the only reasonable or necessary location for the development proposed. Proceeding with a major, unplanned strategic allocation ahead of the plan-making process would be premature and contrary to national and local policy.

For these reasons, and in light of clear conflict with Policies CS1, CS10, DM1, DM10 and DM17, as well as the NPPF, we respectfully request that the application be refused.

Heritage (DM12)

The proposal conflicts with policy DM12 because it would harm the setting of nearby designated heritage assets.

Clouds Hill Farm forms part of the historic rural setting of nearby heritage buildings, including Woodlands Farm (Grade II) and Woodlands Park Hotel (Grade II). Even the introduction of the SANG, with its car park and barrier, lighting and drainage features, would erode this agricultural landscape, contrary to DM12 which requires development near listed buildings to preserve or enhance their setting.

In relation to Woodlands Park Hotel, the applicant's Heritage Statement (Pegasus, 2025) asserts "no harm," relying largely on limited visibility. However, this conclusion is unsound. As set out in the Heritage Impact Assessment (HIA) prepared by Archway Heritage (Appendix D) and commissioned by RACHFD, setting is not merely about visibility but the experience of a heritage asset, as established in Historic England GPA3. The HIA demonstrates that the agricultural landscape surrounding both the Hotel and Woodlands Farm is a defining element

of their significance, contributing to their historic time-depth, rural character, and legibility i.e. how easily the historic significance and story of a place can be understood by visitors / guests. The report concludes that the development would introduce permanent, suburbanising change, disrupting long-established views and destroying the rural context fundamental to these assets.

The HIA by Archway Heritage finds that the scheme would result in “less than substantial harm” at the higher end of the spectrum to the setting of two Grade II listed buildings—Woodlands Park Hotel and its associated farm, Woodlands Farm.

The HIA by Archway Heritage directly contradicts the applicant’s baseline-only heritage review, which fails to assess effects on setting from upper floors of the Hotel or account for the Site’s elevated position. The HIA also highlights that Elmbridge’s own Article 4 Direction on the adjoining land demonstrates the high sensitivity and active development pressure on the Hotel’s setting, further emphasising the need for rigorous protection.

The proposed scheme therefore conflicts with:

- DM12 (Heritage) – by failing to preserve the setting of listed buildings and causing high-level less-than-substantial harm.
- CS17 (Local Character) – by introducing a dense suburban form that undermines the historic rural character.
- NPPF paragraph 208, 212–215 – which require great weight to be given to conservation, and clear and convincing justification for harm (none is provided).
- CS24 (Hotels & Tourism) – as the harm is relevant to the use of the hotel as a heritage asset.

Given the severity of heritage harm demonstrated in the independent HIA - harm to setting, rural character, commercial viability, and the Green Belt context - the proposal fails national and local policy tests. On this basis, the application should be refused.

Transport & Highways issues (CS25 & DM7)

There are significant transport and highways concerns associated with the proposal, which are already shared by many local residents given the existing pressure on the area's road network.

The resident's group have commissioned an independent Transport Appraisal (Appendix E) which has been undertaken by John Russell Transport Planning which confirms that Clouds Hill Farm is not a sustainable location and that the applicant has substantially understated transport impacts. Walking, cycling and public transport access are extremely poor: pedestrian routes along the A244 are unsafe, there is no cycle infrastructure, bus services are limited to weekday daytimes, and Oxshott Station is 2km away with no safe walking or cycling connection. As a result, most trips would inevitably be car-based, yet these additional car movements—are not properly assessed (see more below).

A further Traffic Survey Summary Note produced by John Russell Transport Planning dated November 2025 (Appendix F) further reinforces these concerns. A four-week ANPR survey of the adjacent Knott Park estate recorded 8.78–9.56 daily vehicle movements per dwelling, which applied to the proposed 250 homes equates to 2,195–2,390 vehicle movements per day. By contrast, the applicant forecasts only 980 daily movements, understating actual traffic generation by around 1,400 trips every day. The applicant's Air Quality Assessment also underestimates traffic at 1133 daily movements, and implausibly assumes no HGV activity, despite home deliveries, refuse vehicles and service traffic being unavoidable for a development of this scale.

Automatic Traffic Count (ATC) surveys along the A244 similarly show significantly higher existing traffic volumes and speeds than those relied upon by the applicant for air quality purposes. Observed flows range between 17,114 and 22,570 daily vehicles, compared with the 12,377–12,519 used in the applicant's modelling i.e some 5,000 to 10,000 fewer daily movements. HGV proportions are routinely around 3%, not the <2% claimed. Speeding is endemic, with almost all drivers exceeding the 20mph limit in central Oxshott and around 10,000 vehicles per day exceeding 30mph near the proposed access point. These baseline discrepancies are then extrapolated into future-year modelling, resulting in 2030 forecasts that are between 4,000 and 9,000 vehicles per day lower than observed current conditions, this then renders the Transport Assessment and Air Quality Assessment fundamentally unreliable.

The implications for active travel are severe. The A244 carries typically 20,000 + vehicles per day, with 85th percentile speeds at or above 30mph even in 20mph zones. There is no continuous footway, several sections are narrow, and pedestrians must cross the A244 without formal crossing points, conditions which the applicant's own Transport Assessment acknowledges are unsafe. For cycling, Government guidance (LTN 1/20) requires fully segregated facilities where traffic exceeds 6,000 PCUs/day; yet surveys show flows of 17,000–22,000 vehicles/day with no protection in place or proposed. As such, the development cannot credibly support walking or cycling and fails to provide any genuine modal choice.

The applicant's transport modelling is fundamentally flawed. It misuses census data, omits car trips to the station, provides no HGV or delivery forecasts, and relies on comparator sites bearing no resemblance to the Site's isolated and car-dependent setting. Cumulative impacts from nearby major developments are ignored, contrary to the NPPF. The proposed Site access has not been shown to safely accommodate daily delivery vehicles, and junction modelling is unvalidated and unreliable. Overall, the Transport Assessment fails to

demonstrate that the scheme would avoid severe impacts on congestion, safety, air quality, or noise, conflicting with NPPF paragraphs 110, 115 and 116.

The Site is clearly car-dependent, contrary to Policy DM7 and Core Strategy CS25, which require minimising vehicle impacts in sensitive residential areas. Oxshott already has high car ownership, and the A244 carries over 20,000 daily vehicle movements with no continuous pavements, safe crossings, or dedicated cycle lanes. The nearest bus stop is more than 800m away along unsafe walking routes, reinforcing the car-dominated nature of the site. This contradicts Policies DM1, DM7, CS25 and NPPF paragraphs 110–113. Despite acknowledging the lack of safe walking and cycling routes, the applicant proposes no meaningful mitigation.

The absence of a Road Safety Audit is a further oversight. Surrey County Council's collision data already shows a record of injury accidents along Leatherhead Road, and adding substantial traffic without physical safety improvements would heighten risks for pedestrians, schoolchildren, and road users.

National Highways has also criticised the applicant's modelling, stating it does not reliably represent current conditions and may underestimate existing congestion. Their response makes clear that the applicant's conclusions on network capacity are uncertain and cannot demonstrate compliance with NPPF paragraph 111, which requires residual cumulative impacts not to be severe.

National Highways also emphasises the need to support sustainable, low-carbon travel (NPPF 77, 110; PAS 2080:2023). This development does the opposite: it entrenches car dependency, offers no genuine modal choice, and fails to provide any safe walking, cycling or public transport connections. This directly conflicts

with a vision-led, sustainable transport approach required by national policy and with local policies DM7 and CS25.

In summary, the development would significantly worsen congestion, undermine safety, increase pollution, and provide no credible sustainable transport alternatives. It fails local and national policy, including policies DM7, CS25, DM1 and should therefore be refused.

Strategic Views (DM20)

The proposed development is not considered to respect visual amenity by protecting important views out of the existing settlement. The map below shows the key views that that runs through the site, which will be affected by this proposal.

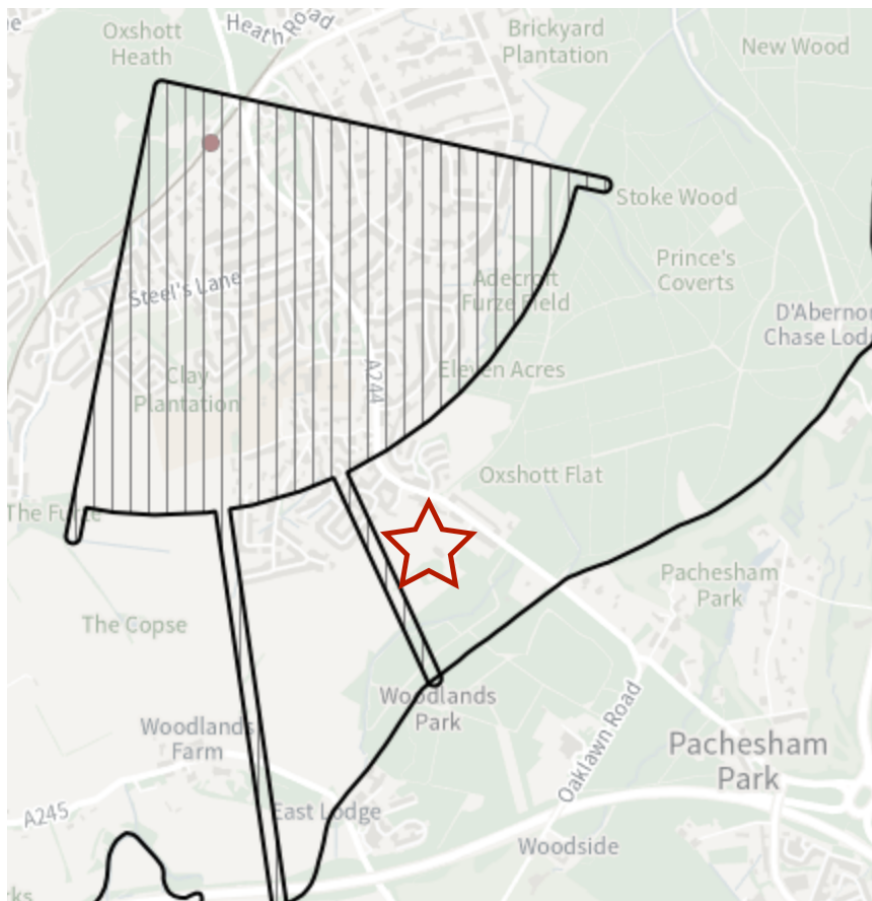


Figure 1: Extract of the Policies Map (From Elmbridge Borough Council website) showing the key views across the site (shown in black hatching, as per

Policy CS14 and DM20, black line is borough boundary). Approx site location shown in red star (but site extends further than red star)

Policy DM20 (Open Space and Views) states that development within Strategic Views or affecting Key Landmarks (as identified in the Policies Map and detailed in Appendix 3) will be permitted provided that it has been well designed to take account of the setting, character and amenity value of the view or landmark. Proposals should not obscure or adversely affect these views and landmarks and those that create new views or reinstate obscured views will be supported. It is not clear from the masterplan how this development responds to this strategic view and therefore complies with Policy DM20. The submitted masterplan does not appear to illustrate any meaningful design interventions, such as view corridors, adjusted building heights, or landscaped buffers—to mitigate harm.

Without clear evidence that the scheme has been shaped around the Strategic View, the development is considered to conflict with DM20 and would result in an unacceptable impact on an important visual asset of the settlement.

Biodiversity Net Gain (CS15)

The Council's Sustainability Appraisal (which appears to have been removed from the LPA's website but is a material consideration in planning terms) states that the 'condition of local biodiversity and the borough's SSSIs is below target.'

In line with Policy ENV6, we believe that the development proposal must seek to protect, enhance and conserve wildlife habitats by creating new habitats rather than damaging existing ones. This is best done on Site. This development will have a significant impact on landscape, trees and woodland (Policy ENV2) as shown in figure 2.

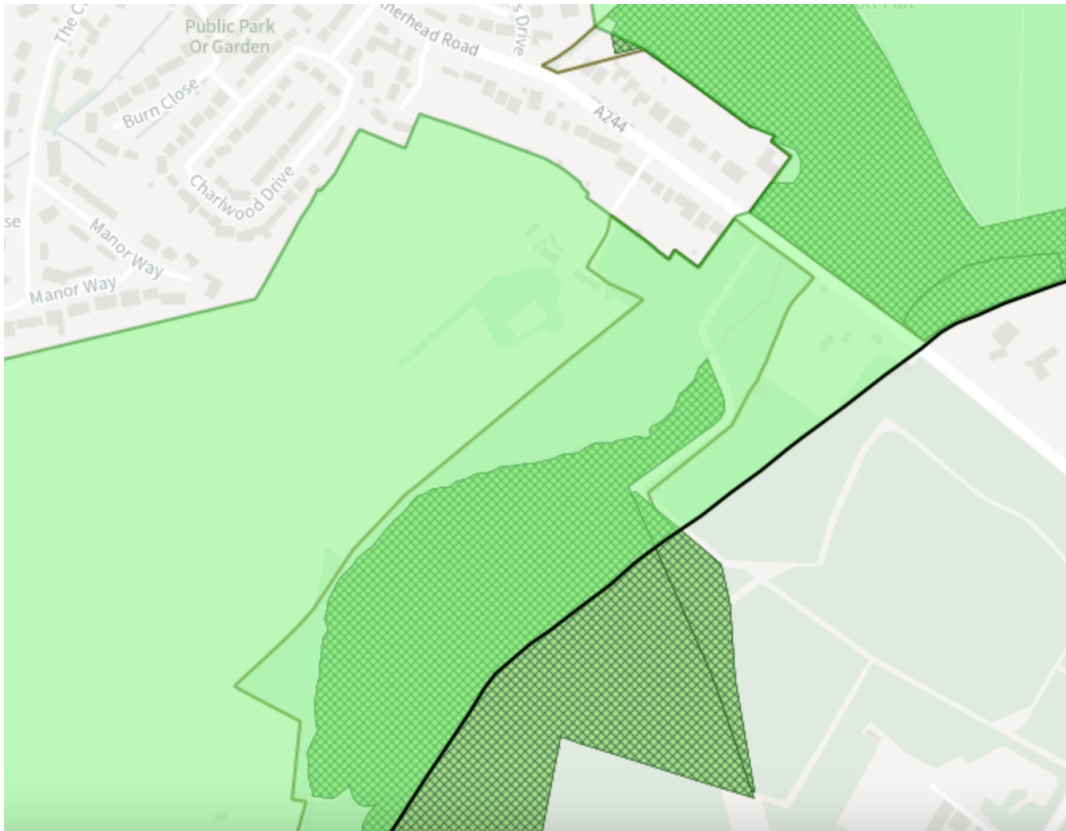


Figure 2: Extract of the Policies Map showing the environmental designations that affect the site. These are Green Belt (light green), Ancient Woodland (Green hatching), Site of Importance for Nature Conservation (Brown boundary)

Policy CS15 (Biodiversity) states that all new development will be expected to preserve, manage, and where possible enhance existing habitats, protected species, and biodiversity features. Despite incorporating a large SANG this development fails to deliver a net gain. This reflects the intensive nature of the proposals, which aren't acceptable in their current form. While it is acknowledged that the applicant will seek off site mitigation, as noted in paragraph 7.94 of the applicant's Planning Statement which notes *'In terms of BNG the proposal will deliver a net gain of 32.09% in hedgerow units but will result in a net loss of 5.3% in area habitat units. In order to meet the 10% BNG requirement the applicant will need to purchase sufficient woodland other neutral grassland units off-site in order to off-set the trading rules, which has been*

agreed through Wild Capital based in Cobham’ this needs to be carefully controlled. We believe that the incorporation of an additional landscape buffer on the parameter plan between the existing properties and the new proposals could be one mechanism to improve biodiversity net gain. Also, the incorporation of additional biodiversity features in the parameter plan and reductions in housing could be used to improve the score, albeit in this instance the principle of development still isn’t acceptable.

Overall, the proposal does not demonstrate compliance with Policy CS15 or the wider policy framework relating to biodiversity protection and enhancement. Although a substantial SANG is included, the scheme still fails to deliver a measurable biodiversity net gain, reflecting the intensity of the development and the extent of habitat loss proposed. In its current form, the development would result in significant adverse effects on landscape features, trees, and woodland, contrary to Policies ENV2, ENV6 and CS15.

Delivering a High Quality Development (CS17, Design Guide, DM2, DM6)

Although this is an outline application, there is undoubtedly conflict with the Residential Design Guide which sets out guidance for new developments on the edge of settlements. The guide states that fringes of settlements, particularly in the southern part of the Borough, have a semi-rural character with a high degree of diversity in terms of architecture and built form.

The parameter plan shows a development which is incongruous to the prevailing character of the area, and the large number of three storey buildings proposed is an urbanising feature which is counter to the occasional three-bedroom property adjacent to the site. This development does disrupt the prevailing scale of the edge of settlement character.

Given that this proposal is in outline form, a full assessment of the proposal, which considers lighting, layout etc can only be considered at Reserved Matters stage. However, notwithstanding this there is undoubtedly an inbuilt flaw in the proposals as presented, and as a result it is considered to conflict with the residential design guide.

The proposed development would urbanise an open rural landscape, introducing built form that defies the rural edge of Oxshott. The Site, classified as being located in Strategic area C according to the green belt boundary review 2017, maintains its character through its gently sloping lowland containing medium to large fields of pasture with some arable farming, ancient woodland, and historic parks. This conflicts with DMP Policy DM2, which requires proposals to respond positively to local character, and DM6, which seeks to protect landscape features and trees.

The submitted Landscape and Visual Impact Assessment (LVIA) seeks to demonstrate that the site is “well contained” by existing woodland and that any effects on landscape character would be “limited to negligible.” It accepts that the scheme will result in the demolition of existing rural buildings and the introduction of urban-scale housing of up to three storeys (13m) across previously open agricultural land. Despite this, it concludes that landscape effects would be “moderate-minor” and limited to the site itself.

We make the following additional comments on the applicants LVIA:

- The masterplan (ECE Architecture, 2025) shows an intensely developed layout extending across much of the existing open fields, overwhelming the existing landscape structure and resulting in a loss of openness, which is directly contrary to DMP DM2 (Design and Character) and DM6.

- Photographic evidence in the LVIA (Appendix 6.1, Photographs A–M) demonstrates that the site currently contributes strongly to the verdant, tranquil setting of Oxshott, defined by views across open pastures and enclosed woodland edges. The proposed development would substitute this with built form, access roads, and lighting, eroding the area’s rural calm and replacing it with a suburban character that is alien to its setting.
- The LVIA acknowledges that there are open and partial views from Charlwood Drive, Manor Way, and Leatherhead Road, yet it does not include representative photomontages from these locations. This omission prevents proper assessment of the scheme’s visual intrusion on residential receptors and the settlement edge.

In summary, the proposal fails to demonstrate that it can deliver a high-quality development in accordance with Policy CS17, the Residential Design Guide, and Policy DM2. While the application is in outline, the parameter plan already establishes a form and scale of development that is inconsistent with the semi-rural, edge-of-settlement character described in the Design Guide. As such, the development, as presented, is not considered capable of achieving the high-quality design required by the policy framework.

Air Quality

The Residents Against Clouds Hill Farm Development are concerned with the impact of extra traffic on the Leatherhead Road and the resultant implications for air quality, this is explored in more detail in the John Russell Traffic Summary Note (appendix F).

They believe that the A244 is currently operating in excessive capacity with an average number of vehicle movements per day (during the five working days per week) of approximately 20,611 vehicles per day as recorded by Surrey County

Council on the 16th of May 2022 during the reduced number of vehicle movements at or around the CV19 shut down. The same ATM recorded c. 12,000 vehicles per day at the weekends. As noted, the John Russell Traffic Summary Note (appendix F) as mentioned in the highways section indicates that the applicant has substantially understated traffic volumes.

The proposal is for up to 250 open market and affordable homes and as a result there will be significant implications to the local highways network. Due to the proximity of the Site to the settlement, and the M25, the residents that use this development are likely to be highly dependent on cars¹. This was also highlighted in the John Russell Transport Planning Appraisal (appendix E).

The Council's Sustainability Appraisal acknowledges that 'planned growth, from the emerging Local Plan alongside neighbouring Local Planning Authorities plans, could put pressure on the local road network which could continue the past trend of air pollution and congestion.' This is particularly significant as the site wasn't included within the Regulation 19 Local Plan. In this instance the development will not have been considered by the Local Authority at all during the Local Plan Process. This means that the environmental impact cannot be considered alongside other potential developments which have gone through the site selection process prior to allocation.

While it is accepted that Paragraph 115 of the NPPF states that 'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, we believe that the local authority needs to carefully consider the implications of the development on air quality and the

¹ The Residents Association highlight that the nearby Royal Kent Primary School, along with other surrounding schools, are operating at capacity (according to Ofsted). As a result, this development will likely require children to be taken further afield by car for schooling.

applicant's air quality assessment so that measures can be put in place to mitigate this at application stage. Furthermore, the Grey Belt Assessment considers that the Site could not meet paragraph 115 from a sustainability perspective.

In conclusion, the proposed development raises significant concerns regarding its potential impact on local air quality, particularly given the already high traffic volumes along the A244 and the car-dependent nature of future residents. The scheme introduces a substantial number of additional vehicle movements into a network that is already operating above capacity, thereby heightening the risk of worsening congestion and pollutant emissions. Unlike allocated sites considered through the Local Plan process, this proposal has not been assessed cumulatively alongside other planned growth, resulting in a clear gap in understanding the wider environmental implications.

While national policy sets a high bar for refusal on highways grounds, it nevertheless requires decision-makers to ensure that development does not give rise to unacceptable environmental effects. In this case, the Local Planning Authority must scrutinise the applicant's air quality assessment with particular care and ensure that any impacts are fully quantified, transparently presented, and appropriately mitigated. Given the sensitivity of the local road network and the concerns raised by the community, robust evidence and mitigation measures are essential before any progression of the scheme can be considered acceptable.

Ecology

Paragraph 7.11 of the Planning Statement says the Application Site itself is not subject to loss of important landscapes or irreplaceable habitats however the proposed Site exists as a Site of Significant Ecological Sensitivity, being an:

- Biodiversity Opportunity Area
- Site of Nature Conservation Importance (SNCI)

- Having parcels of Ancient Woodland to the north and east of the site
- In close proximity to the Thames Basin Heaths SPA (Zone C)

Developments are required to conserve and enhance biodiversity and to avoid significant harm to designated sites according to policies. The site's cumulative impacts on the SSSIs mentioned contravene paragraph 180 of the NPPF and DM21 from the DMP.

We believe this development will impact the following:

- Impact on designated sites – Residents are concerned about the impact of the development on the surrounding woodlands including the Prince's Coverts Woodland on the opposite site of Leatherhead Road.
- Population of Wild Birds – The council's sustainability appraisal confirms that, the population of wild birds and local biodiversity has seen a change to its status since 2016 and is now below target. Whilst the Breeding Bird Survey submission is welcome, we believe the mitigation measures proposed aren't sufficient.
- Bats - Given the confirmed presence of bat roosts on-site and the acknowledged suitability of the wider landscape for a diverse assemblage of bat species, the absence of seasonal bat activity surveys represents a fundamental gap in the ecological evidence base. Without these surveys, the applicant cannot reliably determine the level of bat usage across the grassland, woodland, hedgerow corridors and scattered tree network, nor quantify the impact of removing up to 114 trees and extensive areas of high-quality foraging habitat. Surrey Wildlife Trust clearly states that there is “no

knowledge of where the most important bat foraging and commuting corridors are located on-site” and that they “have not found conclusive evidence and justification for why bat activity surveys have been scoped out”. This lack of baseline data means the Council cannot confidently assess whether the development would maintain the favourable conservation status of bat species—one of the legal tests that must be satisfied under the Conservation of Habitats and Species Regulations. Proceeding without this evidence would therefore present a substantial and unacceptable risk of breaching statutory protections for European Protected Species.

- Development in the Green Belt - Paragraph 2.23 of the Sustainability Appraisal confirms that development on Green Belt land presents sustainability issues such as soil erosion, biodiversity losses, and flooding. As this development is unplanned, it would be difficult to mitigate against within the local plan process.

Overall, the application fails to demonstrate that the proposed development can avoid significant ecological harm or comply with the requirements of national and local policy. The Site is subject to multiple, overlapping ecological sensitivities—including its location within a Biodiversity Opportunity Area, its SNCI status, proximity to ancient woodland, and its position within Zone C of the Thames Basin Heaths SPA. These designations indicate an environment of high ecological value where development must be approached with exceptional caution.

. The development’s potential impact on wild bird populations—already identified as being below target—and its location within the Green Belt compound the risks of biodiversity loss, habitat degradation, and wider environmental pressures.

In its current form, the scheme does not provide convincing evidence that it can conserve, enhance, or even protect existing ecological assets, contrary to NPPF paragraph 180, DMP Policy DM21, and the principles set out within the Sustainability Appraisal. Given the scale of the ecological sensitivities and the acknowledged deficits in local biodiversity, the development is considered unacceptable in ecological terms.

Conclusion

For all the reasons outlined in this objection letter, Residents Against Clouds Hill Farm Development consider the proposed scheme to be fundamentally unacceptable in planning terms. The application fails to comply with the adopted Development Plan, emerging policy evidence, and multiple core principles of the NPPF. It represents inappropriate, unsustainable, and unjustified development in the Metropolitan Green Belt; causes demonstrable harm to landscape character, biodiversity, ecology, heritage assets, and the rural setting of Oxshott; and would significantly worsen traffic, air quality, and highway safety conditions along the already-congested A244 corridor.

Residents consider that the proposal is speculative and premature, attempting to bypass the plan-led Local Plan process and relying on flawed assessments across transport, ecology, design, and heritage. A Grey Belt Assessment by ET Planning clearly demonstrates that the Site does *not* meet the definition of “grey belt,” as it performs strongly against Green Belt purpose a), fails footnote 7 and would not meet the ‘inappropriate development’ test. In addition, the Site is incapable of accommodating major development without extensive environmental harm.

Of particular significance is the failure to meet NPPF Footnote 7, which sets out a number of key constraints that automatically prevent land from qualifying as grey belt or being considered suitable for development in policy terms. The Heritage Impact Assessment (Archway Heritage, Appendix D) identifies high-

end “less than substantial harm” to the setting of two Grade II listed buildings—Woodlands Park Hotel and its associated farm Woodlands Farm.

Accordingly, the scheme conflicts with a wide range of statutory and national planning policies, including:

- CS1 (Location of Development)
- CS2 (Housing Provision)
- CS10 (Green Belt)
- CS14 (Green Infrastructure)
- CS15 (Biodiversity)
- CS17 (Local Character & Design Quality)
- CS24 (Hotels & Tourism)
- CS25 (Travel & Accessibility)
- CS26 (Flooding)
- DM1 (Design & Amenity)
- DM2 (Design & Character)
- DM6 (Landscape & Trees)
- DM7 (Access & Highway Safety)
- DM10 (Green Belt Development)
- DM12 (Heritage)
- DM17 (Green Belt – Infill/Redevelopment)
- DM20 (Open Space & Views)
- DM21 (Nature Conservation)
- ENV2 (Trees & Woodland)
- ENV6 (Biodiversity Protection)
- NPPF Paragraphs 15, 33, 47, 77, 110–116, 147–151, 155, 174, 180, 186, 208–215
- NPPF Footnote 7 (Heritage constraint – disqualifying the site from grey belt designation)

For these reasons, we respectfully request that Elmbridge Borough Council refuse planning application 2025/2147.

Yours sincerely,

Residents Against Clouds Hill Farm Development