

To: Programme Officer, Ms Charlotte Glancy, Banks Solutions uk

Topic: Elmbridge Local Plan  
Response to Stage 1 hearing Feb 2024

I am representor number 39027297

I wish to make comments regarding soundness and also in relation to question 1.6 regarding community involvement.

### Statement:

I am a member of the public, with no legal or council background. I think that this statement is relevant to Stage 1. I am supportive of a Local Plan, and fully acknowledge the thousands of hours of work that has gone into the preparation of the submitted documents. I also appreciate the work done over many years by officers and councillors on this complex document.

As a member of the public, I think that it is important to speak out if there appears to be consequences for my community if I do not do so.

The overall impression of the Local Plan, as far as I can understand, it looks competent. However, when one drills down into the fine detail, there are aspects of concern, primarily that the views of my local community do not appear to be heard, and this leads me to wonder if the concept of Soundness is fully addressed.

### Settlement vs Ward

There is a statement in HOU011: 3.4 *Even though the settlement areas have changed through the ward boundary review in 2016, these amendments have no impact on the character of the sub-areas.*

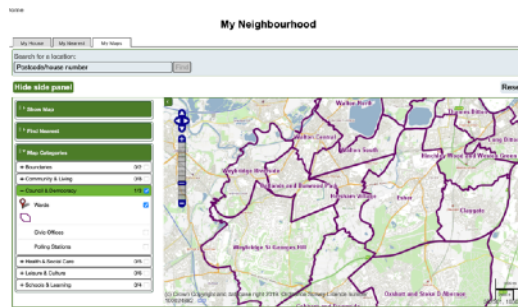
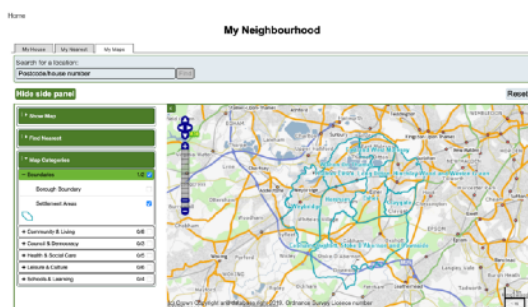
I contend that this is not true for Hersham.

The settlement of Hersham is clearly defined for most of its length, viz railway to north, river to east, major road to west. This is also the Hersham parish boundary of the Church of England and the Surrey County Division. It is thus geographic and independent of population.

The Hersham Village Ward on the other hand is purely an entity based on a headcount of electors at a date in the past (2016). It is therefore an electoral convenience to allow electoral equality, and is independent of community. Indeed, additional housing in the area would logically have to result in a reduced area within the boundary of Hersham Village Ward.

A very significant part of Hersham to the east, adjacent to the village centre, is no longer in the village ward. This is mostly Longmore Estate and amounts to 845 dwellings.

See below



For example, HOU011 refers to the old settlement area of Hersham, but OTH038 refers to the new village ward. Longmore estate is in Hersham Settlement area (HOU011) and Esher Ward (OTH038). The only mention of Longmore Estate in OTH038 is the Short Stay School, as being in Esher but which is actually in Hersham. It is not at all clear which of the two definitions of Hersham are used in the data and statistics of these two reports, and probably other reports as well. This does matter.

Therefore it is apparent that this is not sound.

I suggest that the Settlement boundary for Hersham should be the geographic one and not the EBC ward one. The impact of using the wrong boundary could have huge impact over the next 15 years.

### **Land Assessments**

For my community, it does not appear that the guidance had been followed.

There are several documents that mention housing density. Ignoring the anomolous results for very small sites, it is clear that there are different densities anticipated for urban and sub-urban areas, or town centres and district centres. This is: town centres to aim for 40 dph, and district centres to aim for 30dph. Hersham is a District Centre.

HOU011 para 1.19 states: *This policy seeks a minimum density in the Borough's suburban areas of 30dph and 40dph in the town centres which was in compliance with the previous Government's Planning Policy Statement 3 (PPS3): Housing. A year later the Government introduced the NPPF..... it was considered that this local policy was in line with National policy.*

Also in HOU011 para 1.27: *Question 11 is concerned with how the Council approaches density across Elmbridge generally and asks whether we should increase minimum densities at sustainable locations in the urban area, such as town centres and at train stations, above 40dph, where this would not impact on local character.*

And also in HOU011 para 3.10: *.....Ultimately the discussion seeks to determine whether the sub- area is achieving the current Core Strategy policy target of a minimum of 30dph for suburban areas and 40dph in the town centre.*

HOU002 states in para 3.4: *The methodology behind the LAA has not changed significantly since the 2016, 2018 and 2021 LAAs. The 2016 document is referenced here:*

2016 Land Availability Assessment Methodology para 3.4.8 (page 15) states: *The NPPF does not identify an indicative minimum net density threshold. The PPG suggests that where considered appropriate to do so, density should reflect local characteristics. Where information is available from sources such as, planning applications, pre-applications discussion, development briefs and masterplans, the known density information will be used. The Council will assume minimum densities based on the local character, neighbouring developments and Government Guidance. For example, it may be appropriate to assume a higher density in town centres and sites close to railway stations.*

Thus the distinction between 30 and 40 dph must mean something, otherwise what is the point of the exercise. It is clear that district centres can expect lower density applications than town centres and transport hubs.

For all of the above reasons, I do not understand why for the most important site in my Settlement area, Hersham Village Centre (US379), the apparent density was 30dph in 2018; 50 dph in 2021 and 129dph in 2022.

2018 land Availability assessment for US379

App No / Site Ref	Site Address	Settlement	Ward	Source	Timescale	Capacity		Suitable	Available	Achievable	Comment
						Net	Gross				
US379	All Saints Catholic Church Hall, Quorra Road, Hershams KT12 8JZ	Hershams	Hershams Village	Urban Capacity Study	11 to 15	8	8	✓	TBC	✓	Physical constraints and availability confirmation required
US379	Waitrose Car Park, New Berry Lane, Hershams	Hershams	Hershams Village	Internal Workshops Urban Capacity Study	11 to 15	17	17	✓	TBC	✓	Availability confirmation required

HOU003 2021 Land Availability Assessment for US379

HOU002 2022 Land Availability Assessment for US379

US379: Waitrose Car Park, New Berry Lane, Hershams

Ward: Hershams Village Site reference: US379 Site area: 0.58 ha

Site address: Waitrose Car Park, New Berry Lane, Hershams

Map:



Satellite image:



Site description: The site consists of a large car park for Waitrose customers and is located to the south east of the Waitrose building. Residential properties neighbour the site to the north and Burtill primary school is located on the opposite side to the south.

172

Ward: Hershams Village

Site reference: US379

Site area: 1.56ha

Site address: Hershams Shopping Centre, Molesey Road, Hershams

Map:



Satellite image:



Site description: The site consists of the Hershams shopping centre with Waitrose and other shops. It includes a large car park for Waitrose customers and is located to the south east of the Waitrose building. Residential properties neighbour the site to the north and Burtill primary school is located on the opposite side to the south.

187

Existing land use: Car Park (Sui Generis) Source of site: Urban capacity study.

Is the Site Previously Developed Land: Yes

Relevant planning history / Status: No relevant planning history.

Landowners: Essex County Council

Policy designations/ constraints

- Thames Basin Heath Special Protection Area 5-7km
- Adjoins Hershams Village Conservation Area
- Strategic View 5 - The Valley of the River Mole from The Ledges at Esher.

Potential use of site

Residential development: Yes Proposed yield: Net: 30 Gross: 30 Proposed density (dph): 50/dph

Commercial uses: No Proposed floorspace (sqm): N/A

Existing land use: Retail (Use class E) Car Park (Sui Generis) Source of site: Pre-application.

Is the Site Previously Developed Land: Yes

Relevant planning history / Status: No relevant planning history.

Landowners: Private

Policy designations/ constraints

- Thames Basin Heath Special Protection Area 5-7km
- Adjoins Hershams Village Conservation Area
- Strategic View 5 - The Valley of the River Mole from The Ledges at Esher.

Potential use of site

Residential development: Yes Proposed yield: Net: 200 (C2/C3) Gross: 200 (C2/C3) Proposed density (dph): 128/dph

Commercial uses: No Proposed floorspace (sqm): N/A

It is often repeated that the LAA is a desk-based exercise, whereby any land developer has to prove that the number in Local Plan can be accommodated. This is not the view of developers, as proven by submissions to Reg19 of this Plan: *CD033 page 1557: Submission 41258625 from property developer: H3 US379 Hershams Shopping Centre, Molesey Road, Hershams 200 residential units. Our Clients support the intention to allocate the Site for residential development which evidently shows that it is suitable for a high density development of 200 units.....we suggest that the site allocation should be broadened to reflect the aspiration to deliver mixed-use development ..... As such, the wording of Site Allocation H3 is suggested to include; '200 residential units (C2/ C3) in addition to town centre uses as part of a mixed-use development.'* To which the Elmbridge Council response is: *CD034a page 1292 of 1413: Additional text suggested for site allocation H3 is considered appropriate and will be changed to reflect the mixed-use development proposed. \**

Thus the site has progressed from 17 dwellings on a fully utilised car park, to 30 on a fully utilised car park, to 200 dwellings with no shops involving the total demolition of a popular shopping centre, to an agreement to increase to 200 dwellings plus shops. Or, put another

way: initially assessed for 30dph, then 50 dph, then 129dph and finally agreement to allow 189dph on original car park area (latest proposal in late 2023 from developer).

So what is the point of a density guideline for a district centre of minimum of 30 dwellings per hectare? What is the purpose of the whole exercise?

\* Incidentally, that response is in spite of nearly 2000 individual responses being received by EBC concerning Hershams sites within the period from the start of the Reg 19 consultation and the final document being agreed, of which approximately 1500 individual pro-formas concerned the centre site.

It is apparent to me that this process has not been fit for purpose, therefore cannot be sound. Also regarding question 1.6, it is obvious that there has not been any community involvement here.

I will be adding further information concerning this site in Stage 2, site allocations, with the request that a density target of 30 dph is reinstated. But for Stage 1, I am suggesting that the process was neither sound, nor involved community engagement.

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App no./ Site Ref	Site Address	Settlement	Ward	Source	Timescale	Capacity		Suitable	Available	Achievable	Comment
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## US379: Waitrose Car Park, New Berry Lane, Hersham

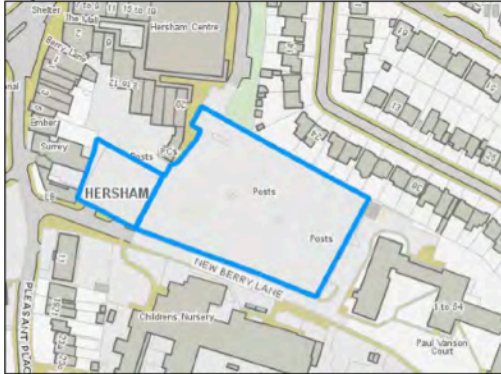
Ward: Hersham Village

Site reference: US379

Site area: 0.58 ha

Site address: Waitrose Car Park, New Berry Lane, Hersham

Map:



Satellite image:



**Site description:** The site consists of a large car park for Waitrose customers and is located to the south east of the Waitrose building. Residential properties neighbour the site to the north and Burhill primary school is located on the opposite side to the south.

172

**Existing land use:** Car Park (Sui Generis)

**Source of site:** Urban capacity study.

**Is the Site Previously Developed Land:** Yes

**Relevant planning history / Status:** No relevant planning history.

**Landowners:** Essex County Council

### Policy designations/ constraints

- Thames Basin Heath Special Protection Area 5–7km
- Adjoins Hersham Village Conservation Area
- Strategic View 5 - The Valley of the River Mole from The Ledges at Esher.

### Potential use of site

**Residential development:** Yes

**Proposed yield: Net:** 30 **Gross:** 30

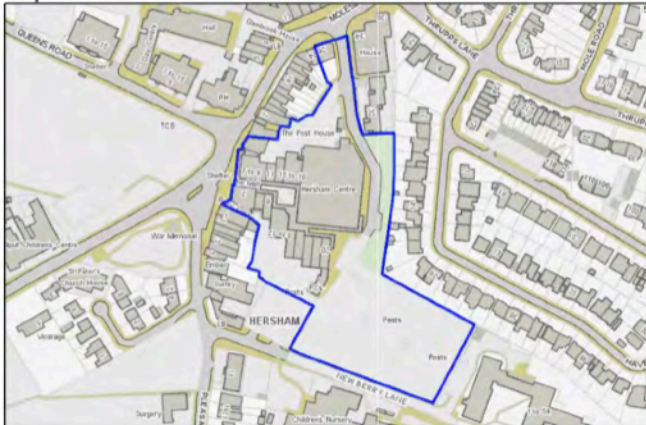
**Proposed density (dph):** 50dph

**Commercial uses:** No

**Proposed floorspace (sqm):** N/A

Site address: Hersham Shopping Centre, Molesey Road, Hersham

Map:



Satellite image:



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**Existing land use:** Retail (Use class E) Car Park (Sui Generis)

**Source of site:** Pre-application.

**Is the Site Previously Developed Land:** Yes

**Relevant planning history / Status:** No relevant planning history.

**Landowners:** Private

**Policy designations/ constraints**

- Thames Basin Heath Special Protection Area 5–7km
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- Strategic View 5 - The Valley of the River Mole from The Ledges at Esher.

**Potential use of site**

**Residential development:** Yes

**Proposed yield: Net:** 200 (C2/C3) **Gross:** 200 (C2/C3)

**Proposed density (dph):** 129dph

**Commercial uses:** No

**Proposed floorspace (sqm):** N/A