# Stage 2 Hearing Sessions Matter 9 Site Allocations concerning Hersham.

Submission from: Mrs Susan Mealor, Resident of Hersham in Elmbridge.

Continuation of previous submission REP-39027297-001 under Matter 1
General Observations

I have serious concerns about the soundness of the process that has produced the details for several of the Hersham sites being included in the Local Plan. I am not in a position to know whether Hersham is a special case or typical. I also want to reiterate that when I refer to Hersham, I am referring to the Hersham Settlement, which is a geographic reality, and not the Hersham Village Ward, which is a numerical construct for electoral purposes only. Please note that LAA2021 is HOU03; LAA2022 is HOU2; LAA2023 is HOU17.

\* refers to Elmbridge Matter 9 Pre-hearing statement dated March 2024.

## 1. Question 8.14: Community Spaces

- 2. These are the listed Community Spaces: H1, H6, H13, and H15.
- 3. There can be no guarantee that any of the listed community sites would be available in the future, as it would all depend on the attitude of future building owners and the cost of renting these spaces.
- 4. Excluding scout and guide huts, this would only leave St Peter's Church Hall for major community gatherings in the centre of Hersham.
- 5. Taken together, the viability of community functions is decimated, not sustainable and not consistant with Elmbridge Development Management Plan or its Design Code, which is based on NPPF, which should support communities.

# 6. Questions 8.11,12 &13: Car Parking.

- 7. Whilst it is acknowledged that car use may have to be significantly curtailed in the future, at present car use is a vital and necessary part of the everyday life of many residents.
- 8. Encouragement not to use cars is noble, but compulsion is not currently acceptable.
- 9. The following areas have car parking, but many of these are only unofficially tolerated, which is no guarantee for future use: H3, H6, H7, H11, H13 & H15.
- 10. If all of these are built on, there are be **no** substitute parking sites in central Hersham for visitors, retail customers, EVcharging points, etc.
- 11. The roads in the Hersham Village are majority double-yellow-lined. There is already on-street parking stress.
- 12. H7: Elmbridge-owned New Berry Lane car park is considered to be an underused and unprofitable site. Current use is no indicator of future use. See para 30 below.
- 13. The parking policy for Hersham is therefore unsustainable, unjustified and unsound.

#### 14. **Question 8.5:** retail, community and infrastructure.

- 15. I note that in EBC response page 5 \*, H14, is said to be employment space. However, in HOU17, it is now designated as a housing site for 300 dwellings with no commercial use.
- 16. H6 is said to be <u>community use</u>. EBC \* page 5, However HOU17 (LAA23) states: *A mixed-use scheme <u>could</u> offer a renovated community centre as well as residential units*. This is a highly contentious site within the Hersham Community. The buildings were recently refurbished (c2019) at great expense, following community outrage at threatened closure. Instead of being returned to the community, the Village Hall has been rented out (10yr contract) to a company which so far is only using the hall for 3 evenings per week, with no community use. The Day Centre has recently had reduced hours imposed, which has infuriated the users of this popular venue.

### 17. **Question 8.7:** Density

- 18. I disagree with the EBC response. Densities are listed in all the LAA 2021, 2022 and 2023. Whilst it is true that 30dph (for sub-urban/ 40dph for urban sites), is not referenced there, it is a vital criterion for comparing sites. The new Design Code suggests the use of FAR (Floor Area Ratio) but this is impossible for any non-specialist to visualise, and is not a concept that can be used in outline planning applications, for example.
- 19. While it is true that density can be misleading, this is only true for micro sites and this is always obvious from the context.
- 20. Density is also important to distinguish between categories of settlement, such as urban/sub-urban and town centre/district centre and this helps in discussions with developers and communities to visualise impacts.

# 21. **Question 8.6:** Land Availability Assessments.

- 22. In my opinion, these are not always soundly produced.
- 23. A potential developer of a Hersham site has used the number in LAA as confirmation of capacity, when that number was initially suggested by themselves and surprisingly accepted by the council. That is not an assessment but a speculation. What would be unreasonable? Elmbridge states that LAA is a desk-based assessment, but that cannot be effective: what would a sewerage pumping station look like in a satellite picture? How can one see access points below trees?
- 24. Over the three annual LAAs, for H3, a sub-urban/district centre site, the "assessed" density has changed from 50 dph to 129dph to 64.5dph.
- 25. That such changes can be made shows that the process cannot be robust or effective. It needs to be involve the community.

#### 26. Questions in relation to individual sites

- 27. **H15: Library,** referenced in 8.5 and 8.14. Only half of the site is occupied by the library, the other half is open green space. 500 objections were sent in during the Regulation 19 consultation, objecting to its inclusion. Hersham needs a library with parking for less-able and disabled. I do not believe that Surrey County Council will sell this land for redevelopment and then rent a unit with no parking at a commercial rent. With flats on site, there will be no space for parking for library users or other community users.
- 28. It is fortunate for us and our future residents, that our predessors had the foresight to put a covenant on it, on what was Common Land, limiting the use to a library. Long-sightedness is highly to be valued in times of extreme short-sightedness.
- 29. **H11:** This is small green area adjacent to site H14, but is fronted by a listed Public House, which is well used. It is inconceivable that it would be allowed to be demolished or converted. Behind it is a sewerage pumping station, and a day nursery.
- 30. Referenced in 8.11. **H7: New Berry Lane car park.** The EBC page 18\* states: "H7 is retained as a site allocation: this site <u>could be incorporated</u> into the neighbouring shopping centre and residential development at site H3."
  - 1. It is used as a drop off point for the local primary school, for which there will be no alternative drop-off point, and which was specifically mentioned as important in the expansion of that school in 2012.
  - 2. If the adjacent car park in H3 is built on, as its present owners have applied to do, then H7 will be the only car park where parking is not restricted.
  - 3. There is no other option available in Hersham. Most of the surrounding roads have double yellow parking restrictions. Those that don't are limited to 2 or 3 hours with no return for 3 hours. It is already an area of high on-street parking stress.

- 4. Loss of this car park will be catastrophic to the viability of retail and social life in Hersham.
- 5. As an indication of local concern, to date, 3100 have signed a petition to keep the car park separate and in public ownership.
- 31. **H3 Hersham Shopping Centre.** I covered this in my previous submission, but am now updating it.
  - 1. This site (US379) has changed in capacity over 6 years, but the sustainability chart in the LAA remains unchanged.
  - 2. The site capacity and area has changed, as detailed in my earlier submission. It has now changed again in HOU17. How are such major changes of any use in planning or commercial guidance, and how are residents meant to combat this?
  - 3. The planning application 2024/0498 refers to the Local Plan as allowing 200 on the site. Even though it is intended to only be guidance, the developers use it as a fact. This shows that the LAAs can be misused, and therefore need a better methodology. The current process is not justified or sound.
  - 4. These changes have resulted in housing density proposals on the car park section of the site from 30dph (2018), to 50dph (2021), to 129 (2022), to the latest proposal of 188dph in the current Planning Application (109 dwellings on 0.58ha)
  - 5. This shows the importance of using density as well as capacity and FAR.
  - 6. The fact that all this has happened recently shows emphatically that the process of site evaluation is not sound.
  - 7. Incidentally, the planning application, which is currently live, has already received 1700 objections (as at 5/5/2025). These are mainly concering capacity, loss of successful retail, loss of parking and danger to school children.
- 32. The problems that have been seen in Hersham may be a special one-off case, but that still illustrates that the site allocation process and the precursor land availability assessments are not sound or effective in supporting this community. If all of these included sites were developed, there would be no off-road parking, extreme on-street parking stress, no library. So, nowhere for visitors to park leading to no evening social life, minimal community meeting places, reduced retail offering, problematic access to the primary school. With sparse public transport, isolation for many would increase, car ownership would increase for those able to park on their own gardens and nowhere to park or charge electric vehicles for those not so lucky. I do not think that a Local Plan should be responsible for this state of misery. A Local Plan must show that real public consultation has occured, with notice taken of opinions expressed at them.
- 33. This also shows that previous community consultations have been meaningless.
- 34. I propose that Local Plan procedures have to include a compulsion for meaningful community engagement and proof that concerns have been properly addressed.