70 Ember Farm Way
East Molesey
KT8 0BL
4th July 2023

Dear Jack,

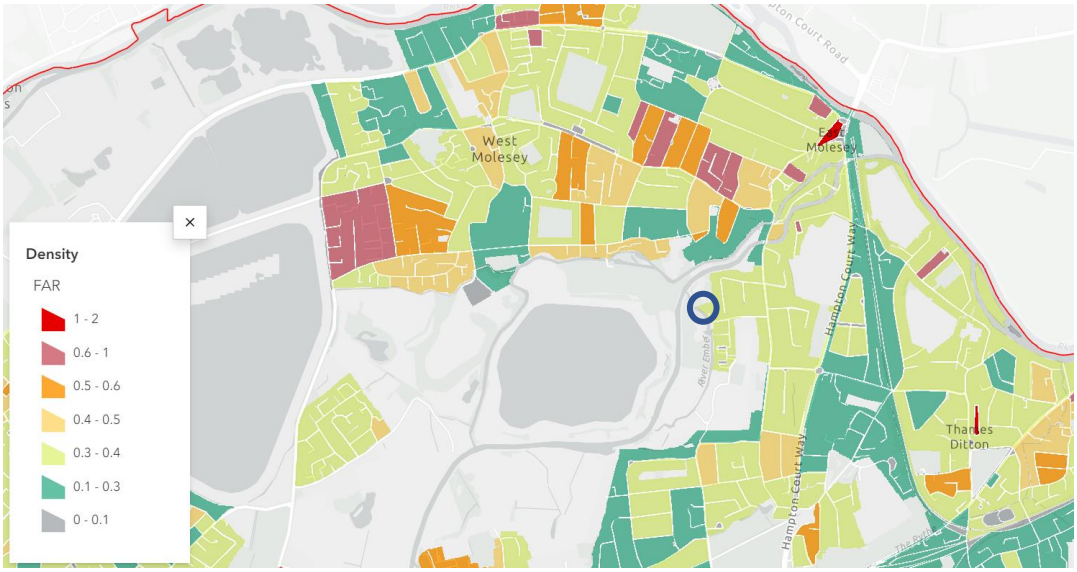
I would like to make a specific objection regarding the density proposed in this planning application. It is recognised that the LPA has to balance making the most efficient use of land while protecting the character of local areas of the borough. In order to deliver this there is a guide of having a minimum of 30 dph on new developments outside town centres while recognising that new developments need to integrate sensitively into the local area. It is also highlighted that higher density development should be in the most sustainable locations such as town centres. The density of this application, which is outside a town or district centre, is proposed at 99dph. This more than 3 x the 30 dph guide. The application has been put forward with the objective of maximising units on the site and has made no effort to adapt to its local surroundings. It is completely at odds with the local area and does integrate at all with the surrounding housing and density levels. The application goes against the conclusions and recommendations of Elmbridge LPA's commissioned density studies:-

- The Elmbridge Density Study 2019 shows that this proposal is massively out of line with planning precedent in area MOL10. Planning applications permitted since 2011 in MOL10 have been 35.67 dph (Source: Elmbridge Density study 2019 Table 10). The Imber Riverside development (2017/2083), accessed by the same road, has a density of 35dph. The current density of MOL10 is 11dph, one of the lowest in Molesey.
- The Elmbridge Capacity Study 2018 identifies the site within the Molesey District catchment area. It recommends a low and high density multiplier for district catchment areas of 30-70dph (Par 4.34 Table 3) and that applications should come forward with proposals at a mid point density of 50dph.

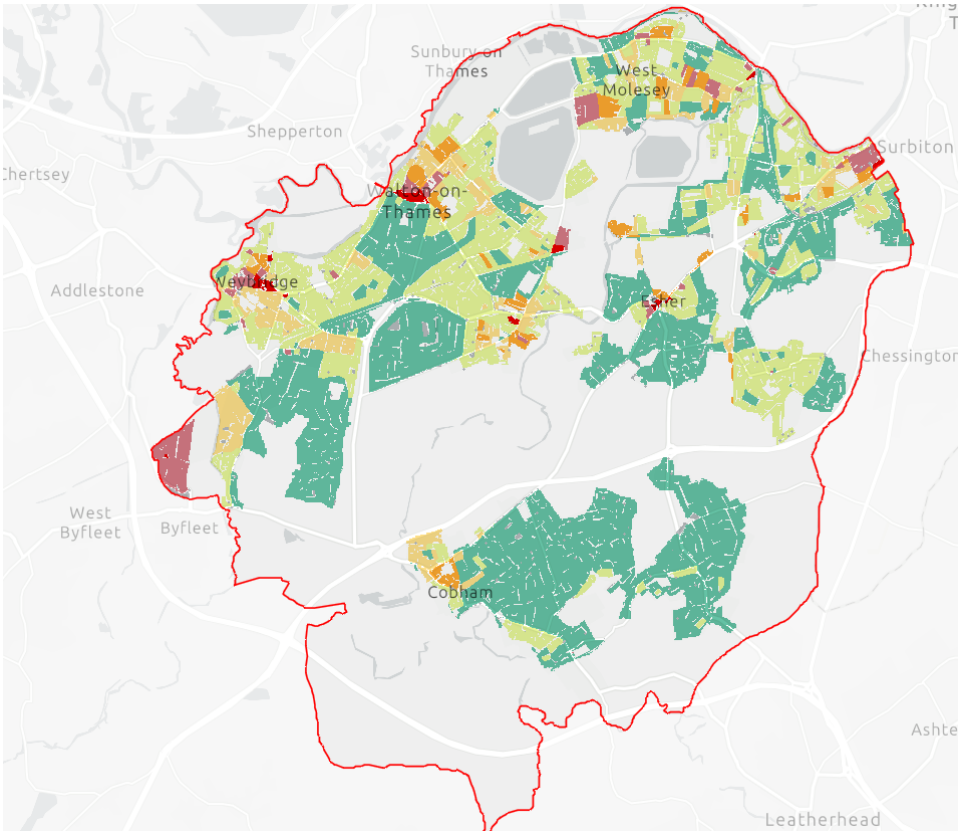
This proposal is for nearly 3 x the density precedent in the area and double the mid point of the recommended density multipliers.

Looking at the application density based on FAR (Floor Area Ratio) shows a similar picture. The total GEA of the proposed building is c. 11,032 sq m. The site is 0.75 hectares (7,500 sq m).
Based on the FAR calculation (total area of the buildings divided by Site Area) the FAR would be 1.5.

This FAR would fall into the 1-2 bracket. This is the highest level in the borough only seen in town or district centres and around stations. It is completely out of keeping with the surrounding housing which has a FAR of 0.3-0.4. The site location is shown by the blue circle below on the FAR map below (taken from the Elmbridge Emerging Plan Design Code Story Map.) In the site vicinity there are only two tiny areas of red: around Hampton Court Station and in Thames Ditton centre. The contrast between the current density of the area and proposed will be incongruous and damaging to the area. A sensitive increase in density would be moving to the 0.4-0.5 FAR band.



Looking at the whole borough it can clearly be seen that there is limited housing in the highest FAR bracket and it is mostly located in the most sustainable areas of Weybridge, Walton on Thames and Esher.



The inappropriate density is further shown by the fact it is only deliverable by building at a significantly higher level than the surrounding housing. The proposal is for 2 blocks of 3 and 4 storey flats (95% of the dwellings are flats). At their tallest the buildings are over 13m. Again this is completely incongruous in the area which is predominately 2 storey houses of heights of 7-8m.

This planning application has highlighted a number constraints which reduce the developable area of the site. This will reduce the density that can be sustainably delivered. Examples include:-

1) The EA requirement for a minimum 8m river buffer zone for the River Mole
2) Thames Water Main 11m easement across the site.
3) The site is within 20m of a Thames Water Sewage Pumping station. Thames Water have highlighted this could reduce future residents' amenity.
4) Access to the site: the entrance located off a small turning circle on Orchard Lane, which is narrow and has on significant on street parking.
5) Site is in Flood Zone 2 and 3.
6) Retention of the riverside façade of Newstead flats

I submitted a response during the Regulation 19 Consultation on the Draft Local Plan in Jun/Jul 2022 regarding the density allocated for this site (D6/US462). I put forward that the density of 120 dph, as identified in the Land Availability Assessments 2022 and 2021, was not consistent with the policies used to inform the Draft Local Plan and as a result is unsound. I put forward that the density should be amended to a more appropriate level within the draft local plan. Please find below the response I submitted in the appendix below.

Furthermore, the source of the information on the site in the Land Availability Assessment 2022 is stated as pre application. I question whether a pre application submission by a prospective applicant is a sound and impartial basis by which to identify the potential site density. The 120dph density level seems to have been based on pre applications submitted by Lifestyle Residences/Sons of the Divine Providence. Lifestyle Residences/Sons of Divine Providence have then gone on to use the density in the Land Availability Assessment as a justification for the density of this proposal. (Refer to section 2.1 height, scale, massing and density on pg. 10 of the amended Design and Access statement.)

This application should be refused on grounds of excessive density. On the quantitative measures of density it is excessive and out of keeping with the character of the area. The design and proposal characteristics also point to excessive density. It is contrary to the policies of both the current local plan and the emerging local plan.

It is contrary to the following policies of the current local plan:

1) CS1 Spatial Strategy it states higher density is more appropriate in the most sustainable locations of Weybridge and Walton.
2) CS2 Housing Provision, Location and Distribution which again talks about delivering high density housing in the most sustainable locations
3) CS17 Local Character Density and Design which looks to achieve a minimum of 30 dph which integrate sensitively into the local townscape. This proposal does not in any way sensitively integrate into surrounding housing and as a result will cause harm to the local area.

Kind Regards,

Katherine Le Clerc

Appendix

Regulation 19 consultation Submission

Through this regulation 19 consultation I would like to question the soundness of the density per hectare allocation for site D6 US462 Sundial House, The Molesey Venture, Orchard Lane, East Molesey, KT8 0BN.

The recommended density identified for this site in the Land Availability Assessment 2021 is 120 dph. This is not consistent with the policies in the Draft Local Plan and the findings of evidence based studies that were used to inform the plan.

The Land Availability Assessment 2021 para 3.21 states that the council has provided an estimate for each site, based on a range of factors including:-

- Nature of the area
- A consideration of historic development yields achieved on comparable schemes within the locality.

The density proposed for site D6 US462 of 120 dph does not reflect the nature of the area or development yields in the locality and as a result is contrary to the Draft Local plan guidelines. Below is the evidence showing where the site density allocation is not consistent with the proposed draft plan and evidence based studies:-

1) The Elmbridge Urban Capacity Study 2018 has site US462 situated within the East Molesey District Centre catchment area. The proposed density for this site of 120 dph is double the top range of densities achieved on recent schemes in this catchment area. The Elmbridge Urban Capacity Study identified that densities achieved on recent schemes range from 21-60 dph. (Para 4.22, 4.23). The proposed density for the site is also significantly higher than the low and high density multipliers identified for town and district centre catchments of 30pdh – 70dph. (Para 4.34 Table 3).

2) In the Elmbridge Density Study 2019 the site falls within MOL10 Ember Lane Environs sub area. (Figure 15 Policy Layers for East and West Molesey). This sub area has a current density of 10.86 dph and is the lowest density sub area in East and West Molesey (Table 9 East and West Molesey Density Figures, para 4.57). The proposed density for the site is over 3 times the average densities permitted since Jul 2011 in MOL10 of 35.67 dph. (Table 10 Average Densities permitted since Jul 2011)

3) The Elmbridge Density Study 2019 identified the most sustainable locations in the area as MOL04 and MOL09 (para 4.62) and that the key gateway to the settlement around Hampton Court station could accommodate higher density development (para 4.66). The site US462 does not fall within either of these areas.

4) As site US462 is not identified in the above evidence bases studies as being most sustainable for higher density development the proposed density of 120 dph is not in line with strategic policy SS2 (Sustainable Place Making) point 1. The council will apply the presumption in favour of sustainable development, balancing the economic, social and environmental objectives and point 2(a)iii Enhancing the character and qualities of places and contribute positively to local distinctiveness, identity and history.

5) It is also not in line with policy HOU2 Optimisation of sites: this policy aims to develop higher density housing within or on the edge of town, district and local centres and sites adjacent to train stations. (HOU2 2.a) NPPF defines edge of town as 300m of a town centre boundary or 500m of a station. Based on the Retail Centres Boundary Review 2021 site US462 is an estimated 1000m from both the Bridge Road District Centre and East Molesey District Centre. It is and estimated 1100m from Thames Ditton Station and 1400m from Hampton Court Station and so would sit outside the areas suitable to higher density development.

In summary based on the evidence based reports and draft local plan policies the allocation of a density of 120 dph to site D6 US462 Sundial House, The Molesey Venture, Orchard Lane, East Molesey, KT8 0BN is unsound and should be amended to a more appropriate level before the draft local plan becomes adopted.