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I strongly object to the proposed developments, my previous objections and concerns raised still stand considering the minimal updates made to the plans. This objection addresses further concerns I have in light of the amended/additional documents.

Waste management:

- Transporting 8 1100L waste bins twice weekly using the ramp leading to the underground car park is dangerous even when considering the use of a tug. According to <https://www.litterbins.co.uk/> 1100L waste bins weigh 60KGs when empty and have capacity to weigh approximately 440KG. Transporting 8 of these bins will be time consuming and laborious causing vehicular congestion on site. It's reasonable to assume that eventually staff will not be inclined to transport these bins due to the inconvenience and impracticality they bring will permanently be left in the presentation area that resides directly behind the gardens of the properties in Ember Farm Way, producing potent smells and therefore discouraging affected residents in Ember Farm Way from using and enjoying their gardens.
- There is no indication of where the "Ride-on-tug" will be stored if one is used for the purpose of transporting the waste bins. It's reasonable to assume that it will be permanently parked in a basement parking bay, reducing the allocated parking for the residence and further contributing to the insufficient amount of parking on site.
- The waste vehicle sweeping path is inconvenient to manoeuvre, so much so it states in the Waste Management Plan document that "Management will provide assistance to the waste collectors".
- The sweeping path of the waste vehicle is also inches from car parking bays when manoeuvring to the bin presentation area. Cars parking in parking bays often protrude, it's likely that a parked car will be hit by the waste vehicle or it will not reach its destination and a collection will be missed due to the waste workers having to manually transport the bins further than 15m.
- Trees along the route of the waste vehicle will be constantly damaged when coming into contact with the waste vehicle. If the waste vehicle cannot reach its destination because of these trees, they will be removed, further contributing to a loss in biodiversity.

- There is no contingency plan for when the waste vehicle cannot reach the site. The waste vehicle not reaching the site is a common occurrence in Orchard Lane in its current state of congestion. This occurrence will be inflated due to the vast amount of vehicles spilling over from the site due its lack of sufficient parking for residents, visitors, staff, tradesmen and delivery drivers. A single missed waste collection will result in 8 bins left in the presentation area for weeks, overflowing and attracting vermin. The location of the presentation area will have adverse effects on the neighbouring residents when this occurrence will also discourage them from using their garden's amenities due to the smells.
- There is no indication of where the two way signalling light will be placed for the basement.
- On waste removal days there will be a considerable amount of congestion, causing havoc on the site. When the waste vehicle has finished removing the waste it will need to awkwardly manoeuvre off the site, whilst allowing a queue of cars to pass which has accumulated during the waste removal procedure. The site's width of road is not wide enough for cars to pass the waste vehicle, this will mean a queue of cars dangerously reversing out of the site to allow the waste vehicle to exit before they can enter.
- The Waste Management Document states that "The management will also engage with specialists as a general provision to monitor and handle fox and vermin should such matter arise". Vermin will be attracted to these bins in the presentation area, also attracting them to neighbouring gardens considering its close proximity to them.

Ecological Report:

The landscape and ecological management plan states that buildings B1, B2, B4, B5, B6 have a high potential for roosting bats and is also a frequent foraging site. Structures as large and dense as the ones proposed will discourage all bats from commuting, foraging or roosting on the site. Continuous and prolonged exposure to artificial light, even at lower intensities, has been known to disturb bats by disrupting their feeding patterns and navigation. Bats will not relocate to a bat box when artificial light interrupts their habitat, it states in the Construction Ecological Management Plan provided by Middle March under the "impacts and effects from the Proposed Works" section include "Fragmentation of foraging and commuting habitat due to lighting".

According to the dusk emergence and dusk re-entry bat survey, it is legal opinion that roosts are protected whether or not bats are present due to them using the same roosts after periods of vacancy.

The ecological report clarifications document notes that a bat box will be replacing the roost for a minimum of 5 years and the bat box is not self cleaning. Who will undertake the maintenance/cleaning of the proposed bat box and why wouldn't a more permanent solution be proposed to mitigate disturbance to the roosting bats?

The soprano pipistrelle bat that is roosting in building B2, noted in the bat mitigation strategy provided by Middle March, soprano pipistrelles are a "Species of Principal Importance for Nature Conservation in England". The wildlife and Countryside Act 1981 provides protection for all bat species in the UK and makes it illegal to intentionally kill, injure or disturb bats, or to damage or destroy their roosts. The proposed development will not only damage and destroy the existing roost but also kill bats when disturbance will be made to their regular foraging site and commuting path.

Design

The design of the site does not incorporate values set in place by Elmbridge's Design Code. Albeit the design code is yet to be adopted but this development, if approved, will shape the architectural design of Elmbridge when other developers reference this development's design to justify their own. The design code depicts the area surrounding the site as "Garden Suburb", any proposed development for the site should follow suit, this development is far too out of character to the neighbouring properties and must be taken into consideration.

Bike storage

Increasing the bike storage space from 32 to 54 is not a sufficient way to combat vehicle congestion. The roads around the site are not safe or suitable for elderly people to ride bicycles, elderly people in this area depend on cars as transportation. To reiterate the concerns: 1 parking space per unit is not enough when there are 3 bedroom units. Major congestion in Orchard Lane and neighbouring roads will be a permanent occurrence when the cars owned by residents on this development will spill outside of the development when considering the insufficient lack of parking.

Flood Risk Assessment Addendum

The document states that “The proposed development proposes minimal new structures compared to the existing situation and will therefore allow floodwater to pass through the site with minimal effect on the conveyance routes. Therefore, mitigation measures are not required.” In reality, the combined area of the existing buildings currently stands at 22,938 square feet, whereas the proposed development boasts a substantial area of 118,026 square feet. This represents an increase of more than 500%. The mitigations raised in the Environment Agency’s consultation response should still be required and their objection should stand.

The document also states that “A minimum of an 8m buffer zone adjacent to the top of the River Ember will be retained. Along the majority of the river reach a buffer zone of greater than 8m is achieved with the majority of structures being over 10m away from the river and all new buildings being over 9.30m from the river. The existing building/s to be demolished are located within 7m of the top of bank of the River Ember. The proposed development will provide betterment compared to the existing situation by increasing the size of the buffer zone.” While it is accurate that one of the existing buildings is situated 7 meters away from the buffer zone, this distance constitutes only a small fraction of that building. Therefore, claiming that the proposed development will “provide betterment” is somewhat exaggerated, especially when considering the proposed development’s height and density that will run along the majority of the site’s buffer zone. I would contend that the proposed development would be a declension in this regard.



The photos below illustrate what is a common occurrence in my garden during the slightest amount of rain, and during heavy downpours the entirety of the garden can become submerged.



As stated in the EBC Level 1 strategic flood risk assessment document, the potential for groundwater flooding in East Molesey is great and any new developments should take appropriate action when preventing potential flooding. The amount of earth excavated from a floodplain, for the basement car park will make neighbouring properties even more susceptible to groundwater flooding.

As the requirements state in the Elmbridge Flood Risk SPD guidelines; all plans must demonstrate that the development:

- Is safe from flooding for the lifetime of the development
- Does not increase flood risk elsewhere
- Where possible will reduce overall flood risk

As per stated in the Environment Agency's latest consultation response, the proposed plans do not sufficiently demonstrate what is required. The images in this document that illustrate the extent of flooding events depict the area around the car park entrance being flooded. On this occurrence, the 50+ vehicles parked in the basement will be displaced in neighbouring streets as residents scramble to relocate their vehicle, consequently causing an extreme amount of congestion.

The Elmbridge Borough Council Flood Risk SPD confirms that Elmbridge Borough Council's policy (see page 43 of the SPD) is that a safe access/egress route "...should allow occupants to safely exit and enter the buildings via a 'dry' route above 1 in 100 year event to reach land outside the flooded area (e.g. Flood Zone 1) using public rights of way without the intervention of the emergency services or others." The majority of the site, including Block A's main entrance, is situated in a Flood Zone 2 area which does not provide an adequate 'dry' route for access or escape.

The Flood Assessment document, dated 26/06/2023, states under 5.4 First Floor Accommodation that "The levels of the first floor will be well above any floodwater levels. This provides a 'safe haven' above any floodwater levels." It's important to note, however, that there are no communal areas situated on the first floor of any of the buildings on site, thereby lacking a designated 'safe haven' in the event of flooding.

Given that the applicant has submitted supporting documents as recent as 26/09/2023, it is prudent to extend the comment by deadline to ensure that the community receives proper notification and has ample time for a thorough review. Allowing just 3 days for awareness and review is insufficient.

The many impracticalities of this development as stated in this objection provide further indication that it is too large for the site. The developer seems to have little manoeuvrability to update their plans and make adjustments that really address the concerns raised by the community. The lack of real change to the plans raises the concern as to whether this project is financially viable considering the rising costs and rate of inflation. This development should not go ahead for an abundance of reasons.