# Cobham Conservation & Heritage Trust

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To the Planning Department, Elmbridge Borough Council 30th January 2018

For the attention of Tom Scriven

Dear Sirs

**Application no. 2017/3188 - Land West of 26 to 38a, High Street, Cobham,**

The Trust writes to object to a number of aspects of this application. Following the proposals that were objected to and refused or dismissed on appeal previously, it may seem churlish to be making points on this more modest proposal for this site but there are significant concerns and this letter should accordingly be regarded as an objection to the proposals.

**The proposed development**

The application is by Elmbridge Borough Council Asset Management and Property Services (Elmbridge) for the demolition of existing garages and outbuildings and erection of 5 dwellings comprising a single storey building containing 3 one bedroom dwellings and a two storey building containing 2 two bedroom apartments with some associated parking. Each unit would be served by its own private garden area and allocated parking space. The total area of the site is 0.09 ha.

In the previous application the Inspector was of the opinion that the fully two storey nature of the proposal would erode the spacious setting of the site and be harmful to the Conservation Area and the wider area surrounding the appeal site. The Inspector commented that buildings of the nature proposed would be “shoehorned” into the site.

Unfortunately there is no appropriate street scene provided. That supplied is from the east that would not be seen. There should at least be one from Church Street

There has been talk of the site being allocated for social (as opposed to just “affordable”) housing. The Trust has looked at the documents lodged for a clear commitment to that by the Council. There seems to be mention of the provision of “affordable” housing in the pre-application advice but in the application form it is said that the proposal is for market housing even though there is also the option of describing it as for social rented, intermediate or key worker housing. Elmbridge should make it very clear that all housing provided on this site will be social housing.

**Pre-application advice**

It is appreciated and refreshing that the pre-application advice (provided by Graham Speller, Assistant Development Manager, in October 2016) has been disclosed. It is frustrating to those considering planning applications that all too often such advice given is not available or is then spun by applicants in their favour. It would be good if disclosure of such advice could be the norm for the planning process.

**Comprehensive development of the area**

It is said that the pre-application advice outlines all relevant planning policy that would be used to assess the application. There is however one aspect missing from that and is also missing from the material submitted in support of the application. That is evidence of whether Elmbridge have sufficiently catered for and explored the possibility of planning not only for this site but for the adjacent premises owned by Elmbridge (Nos. 26-38a Cobham High Street - properties comprising shops and other businesses at ground floor level, flats above and activity at the rear), the land to the south over which Elmbridge clearly have at least the right of access and the land on which the telephone exchange stands.

Elmbridge policy DM4 looks for comprehensive development that achieves a co-ordinated approach. The policy places an obligation on applicants that is quite positive, cast as “to avoid piecemeal development, proposals for a site adjacent to another site with development potential should demonstrate that all reasonable attempts to develop the sites comprehensively have been exhausted. Development proposals that fetter the potential for developing an adjoining site will not be supported” Paragraph 2.12 here says that “this policy also aims to prevent proposals that unduly prejudice the development of an adjoining site in future, for example by limiting amenity and outlook”

It appears that the opportunity is being lost to deal with the area behind shops owned by Elmbridge in looking at the operation of waste, deliveries and parking. There is a case for any consideration for development of the site to be deferred until the telephone exchange site becomes available for development.

**Conservation area**

The Cobham Conservation Area has existed since 1973 and contains many listed buildings. The development is partly in and otherwise adjoins the Conservation Area with all the implications of that. The Trust understands that the Conservation Area is due for appraisal during the course of 2018 and it is arguable that any proposals should have awaited the outcome of that.

Church Street, from which the site is visible, is an important part of the area. Even though Elmbridge say the site’s current appearance detracts from the character and appearance, the Inspector formed the view that then proposed dwellings would ‘sit much less comfortably within the site than the existing garages which although utilitarian in their appearance and somewhat unkempt, sit unassumingly within this part of the Conservation Area and provide a degree of spaciousness’

At this time we have yet to see the response of the Conservation Officer but in the pre-application advice it is said from that source that while there is “no objection to the development in principle due to the scale of the development and its design, the appropriate choice of external materials (The D & A statement actually has reference

to an appropriate “palette” of materials) used and landscaping details would be important”. Policy DM2 in referring to design and amenity, expects all proposals to be based on an understanding of local character and to be appropriate in terms of its scale, appearance, mass, height and distances to plot boundaries. DM12 in considering heritage assets also prescribes that proposed development in such locations must preserve or enhance the character and appearance of the area.

**Materials**

Elmbridge describe the materials as being of a high quality, utilising brick weatherboarding and traditional tiles/slates. The Trust considers that materials should relate to the vernacular. In that respect timber clad buildings are out of keeping with surrounding buildings. Nearby Longboyds and what may be developed on the adjacent telephone exchange site should be considered when looking at finish, with brickwork preferred. This is important because the Trust considers the site can be seen from Church Street.

**Access**

Vehicular ingress and egress for the site has not been sufficiently considered. Both the High Street and Church Street entrances pose problems. The service road off Church Street positioned between Nos. 2 and 4 is not part of the application site. The rights there and how that area is capable of development are not defined. Parked cars in Church Street will create problems for heavy vehicles. The service road available directly from the High Street between Nos. 24 and 26 High Street is an alleyway 3m wide and its fitness is questionable (too small for trucks) without which a one way through system would be considered to be the workable option. It remains an option for small vehicles.

This was looked at in the past Appeal with Elmbridge now saying for these proposals that “Although the Inspector acknowledged that the development would be served by substandard access, it would not worsen the risk to highway safety and no conflict with the Council’s policies in this regard would be caused. It is reasonable to conclude that the Inspector was of the opinion that the access into the site and its servicing was acceptable”. Elmbridge should be looking for a higher standard.

**Loss of parking and storage**

It is noted from the application form that the suggestion is of 16 existing parking spaces with 6 provided and therefore a net loss of 10 but the reality is shown more by the description of the loss of 17 garages and other outbuildings along with hardstanding used for parking. The site is presently used for parking for various categories of users including shops, businesses and residences. It has been estimated that twenty existing cars will have to be relocated. With Hollyhedge Rpad car park often full, there is nowhere for them to go without disrupting others. This cannot be an acceptable position for the council to adopt. This loss of car parking space is of particular concern given the loss of parking behind Holly Parade, the potential loss of parking from adjacent to the Methodist Church in Cedar Road and pressures on Hollyhedge car park meaning that it is now often full. There is every reason for new development such as in the proposals to be placed on hold until there is a comprehensive plan to cater for parking in the village. The garages may have been used for storage in many instances but the true loss of parking is still considerable.

The space behind the shops and garages is critical to the operation of some shops and businesses such as "At Home" and they do not just provide employment but they are fundamental to the vibrancy of the High Street. The loss of "At Home" to Cobham at this critical time would seriously undermine the High Street.

**In summary**

Despite the limiting of the building closer to Church Street to one storey and the smaller 2 storey building there are many factors, as outlined above, that the Trust considers mean that the application be refused until the matters raised relating to the site have been addressed. Elmbridge as owner of this site has an obligation to the community far greater than that of a third party developer and must think wider in this case and should withdraw this application in view of the serious matters raised.

Yours sincerely

David Bellchamber
Planning Team
Cobham Conservation & Heritage Trust