Cobham Conservation & Heritage Trust

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To the Planning Department, Elmbridge Borough Council

For the attention of Aneta Mantio

14th January 2019

Dear Ms. Mantio

Application no. 2018/3184 - 110 Fairmile Lane, Cobham, Surrey, KT11 2BX

The Trust writes to object to this application for 8 apartments in a detached two-storey building with rooms in the roof space and additional access from Fairbourne with associated parking and landscaping.

Features that would arise from the proposals would include the introduction of 13 hardstanding car park spaces onto what would otherwise be mostly garden land. Given the relatively remote situation of the site from facilities, it is arguable that even these may not be adequate for the occupants and visitors for the number of apartments proposed and it is part of the objection that this is likely to result in street parking. After taking what is presently garden land, what would be left for the "communal" open space/garden would then be inadequate for 8 apartments, something seemingly recognised by the council in pre-application advice. In any event the concept is overdevelopment not in keeping with the character of the area.

Applications must of course be considered strictly in accordance with the National Planning Policy Framework and guidance as it stands together with the Elmbridge Core Strategy 2011, the Elmbridge Development Management Plan 2015 and the applicable Supplementary Planning Documents (SPDs). In this letter the Trust seeks to highlight the local policy it considers should feature.

Elmbridge policy DM2(a) provides that all development proposals must be based on an understanding of local character including any specific local designations and take account of the natural, built and historic environment. Development proposals are expected to (at paragraph 2.3 the word "must" is used) take account of the relevant character assessment companion guide in the Design and Character SPD

The Trust took part in the process of creating the Design and Character SPD and the Planning Companion Guide document for the Cobham/Oxshott/Stoke D'Abernon/Downside area of Elmbridge. Much thought was put into defining the nature of various districts and this part of Fairmile Lane was placed in the COS08 (Fairmile district) and described as semi-rural. The intention was to have in this area

single detached houses with frontages to the road on which they stood and that has generally been adhered to.

Elmbridge policy DM2 (b) also requires an enhancement of the character of an area in terms of appearance……. and topography……. The planning system (in application no. 2016/1094) may already have given consent for the proportions of a property on the site as a single residence but if those are considered acceptable for that, they do not translate across to the applicants' proposals when there is a need for enhancement and the taking account of the character of the local area. The applicants' proposals do not respect that running throughout the policies to be considered is recurrent reference to the character of an area not being changed. When looking at the interconnected aspects of sustainability, what is advanced for imposing the applicants' proposals on the community is overwhelmingly outweighed by the damage that would be done to locality, the street scene and the general wellbeing of local residents.

The applicants struggle to provide any justification for a break with local policy. They cite as an example 30 & 32 Green Lane (2018/0976 for detached two-storey buildings, with rooms in the roof space containing 5 flats) but that is not comparable and overlooks that a previous proposal (2017/1836 for 11 residential units following demolition of [2] existing houses) was refused.

There does seem to be another aspect for the council to consider and that is the viability of providing affordable housing. It seems that in pre-application discussions the council indicated that it intends to continue the implementation of CS21 for minor residential developments. The Trust applauds the openness of publishing the applicants' viability report early. There are misconceptions in that, such as suggesting the site is close to Knowle Hill Park. As one objector in the profession indicates, the exercise does seem contrived and it is a little shocking to see in black and white that, for viability, developers look for 20% to 25% profit on a year's investment. On the analysis provided it seems that anyway more profit would come from a single dwelling on site and it is difficult in the circumstances to see how financially the developer can justify looking at apartments on the site.

The Trust notes that pre-application advice was given by the council. It is of concern that the applicants have this as that "overall, officers expressed support for the principle of developing the site for apartments to provide a greater contribution to the council's housing stock" and the council's own letter dated 2nd August 2018 states "whilst the surrounding area of the application site contains only detached dwellings, as the appearance of the building would be of such a building; and as the proposal would make a more efficient use of land by introducing a number of units within a flatted scheme, this approach would be supported by officers in principle". That seems to go entirely against local policy.

The Trust asks that the application be refused.

Yours sincerely

David Bellchamber,
Planning Team
Cobham Conservation & Heritage Trust