Cobham Conservation & Heritage Trust

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By email to Members of the South Area Planning Sub-Committee

27th May 2020

Dear Councillors

Applications no. 2019/1032 and 2019/1202 - Land Northeast Of 49 To 51 High Street Cobham Surrey

The Trust writes in this application, due for consideration by the South Area Planning Sub-Committee this Thursday (28th May)

The Trust writes to oppose the applications which are for change of use of first floor from Retail (A1) to Residential (C3), part three/part two/part single-storey rear extension to existing building, link part two/part single-storey building to create 7 dwelling units with associated parking and amenity space following demolition of existing outbuildings in association with Listed Building Consent.

There are 2 applications which need to be considered together, 2019/1032 relating to the proposed development and 2019/1202 relating to the listed building. The Trust considers that the proposed development would have an adverse effect on the local community and conservation area and most importantly by creating on-street parking stress.

Background

There is already a long history of proposals for development at the site. The Trust has always considered that this site would make an immense contribution to the High Street (designated a primary shopping area) if it could, with the retention of the listed building, become a courtyard development for a mix of shop and mews type properties. Earlier applications worked along those lines but proposed overdevelopment. Such a mixed development might still have been viable until recently but it is now recognised that the future for High Street shopping is more difficult such that, with the retention of the listed building and retail unit, residential development may be the only viable solution. That may now be the efficient use of the land that accords with Paragraph 120 of the revised National Planning Policy Framework 2019. But in these proposals the loss of the barn to the rear, within the curtilage of the listed building, would be unfortunate.

Pre-application advice was sought prior to the submission of previous applications nos. 2018/0903 and 2018/1937, subsequently withdrawn. Since those applications, the current applications have been made, it seems without further advice from the Council. The current

applications have themselves undergone change, the extent of which might have been best served by a fresh application.

There are many plans submitted by the applicant but very little submitted in writing. Indeed. apart from the Application and Information Forms, there is only a (now revised) Planning Design Access and Heritage Statement with little narrative. Like the case officer, the Trust accepts that amended plans lodged during the course of this application were a considerable improvement on those originally submitted with a better preservation of the features of the listed building

The building is located within a Conservation Area and requires special attention to be paid to the desirability of preserving or enhancing the character or appearance. No. 51 High Street is a Grade II Listed Building. It is notable that there is no report from the Council Conservation Officer. The Trust have elsewhere expressed concern about the lack of availability of such reports with a case officer's report and in some recent applications there has been one available, but published only after the decision. Neither situation seems satisfactory.

The proposals

One conservation point identified is that the case officer considers it appropriate for the roof of the proposed new building to have slate tiles to contrast with the listed building. However the Cobham and Tilt Conservation Areas Advisory Committee have said that the provision of materials on the proposed roof should be amended to red clay tiles because those would pick up the vernacular theme of this part of Cobham and that harmony rather than contrast is most appropriate. A dark grey roof would overshadow the historic building.

In her report the case officer considers the view of the proposed development to be acceptable but refers to that from the High Street. It is, however, views from Church Street and Spencer Road that are the most important. On this, the applicants were keen to provide many views for their first design but have provided few for the redesign. The nearest depiction of a view from Church Street is now in the plan entitled "Proposed Section AA".

The case officer accepts that the proposal would result in some harm to the listed building but says that securing the use of a currently redundant Listed Building is considered be a substantial benefit. The Trust would point out that is not a consideration when an owner is anyway obliged to maintain a listed building.

Housing need

When the nature of the proposed units are considered (4 units of 1 bedroom and 3 units of 2 bedrooms), their size accords with the findings of the housing need identified by the 2016 Strategic Housing Market Assessment (SHMA) for Kingston and North Surrey. That is for predominantly 1 and 2 bedroom units, with some need for 3 bedroom units. But problems do arise from the number of units proposed for this site. To place density in context the Core Strategy seeks a minimum of 40 dwellings per hectare in the urban area (policy CS17) but the proposals would apparently result in a huge 110 d.p.h. As identified with previous applications the units are cramped and, it seems, have overlooking and other issues as identified in paragraphs 51 and 52 of the case officer's report

Access and Parking

Access to and from the rear of the site is via an entrance to the south of No. 53 High Street. The Surrey County Highways Authority have acknowledged that this does not meet current visibility requirements and, while they make no further point on that, it is a consideration. Perhaps most important is that there are only 2 parking spaces proposed on the site. That is clearly insufficient for a proposal for 7 apartments in this location. Policy DM7 requires new developments to provide parking levels that are "appropriate to the development and (do) not result in on-street parking stress that would be detrimental to the amenities of local residents". Appendix 1 of the Council's Development Management Plan requires one parking space per residential unit for new developments (1.5 spaces for 2 bedrooms) unless a robust justification in the form of a parking survey can be provided to support a significant variation from the figures. The point has to be made that the applicant has made no attempt to assess what may be the effect of parking stress on central Cobham from their proposals.

The reality is that with parking on the High Street, most of Church Street and other streets restricted and public car parks charging until 7 p.m. the occupants of apartments will look to park in residential roads, Spencer Road and Cedar Road in particular, which have no spare spaces and even if they may have restrictions, the County Council may not have the right to refuse residents parking permits. There is also a section of Church Street that is unrestricted and lengthy use of which during the day would detract from its use for business in Cobham. The proposals would cause considerable on-street parking stress.

The Trust has advocated underground car parking for local developments but the site under consideration would probably be too small for that, apart from it being in a sensitive Conservation Area and adjacent to a listed building.

Affordable Housing

The proposals do not represent a major development but the Council has made a decision to apply Policy CS21 for smaller developments. Nevertheless the case officer concludes that the applicant has shown that the delivery of affordable housing is not viable and should be waived for this proposed development. The Trust accept that 7 apartments would make a good contribution to the Council's housing delivery but considers that too many apartments are being looked for on this site. A lesser number might even be viable for delivering some contribution to affordable housing (and in turn would assist with that element of the New Homes Bonus Scheme) and overcome other problems arising. This is a material consideration.

The Trust considers that the harm that would be created by the proposals would not be outweighed by the benefits and asks that the applications be refused.

Yours sincerely

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Cobham Conservation & Heritage Trust