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70 Ember Farm Way
East Molesey
Surrey
KT8 0BL

Mr Jack Trendall
Planning and Development
Elmbridge Borough Council
Civic Centre
High Street
Esher
KT10 9SD

11th January 2023

Dear Mr Trendall,

OBJECTION TO APPLICATION 2022/3525 SUBMITTED BY LIFESTYLE RESIDENTS LIMITED AND SONS OF THE DIVINE PROVIDENCE FOR THE MOLESEY VENTURE SITE, ORCHARD LANE, EAST MOLESEY SURREY, KT8 0BN

We occupy number 70 Ember Farm Way, which is adjacent to the above application site. We write to object to the above application, which is for the following proposed development:

“Development comprising 3 detached buildings containing 74 residential units with underground and surface level car and cycle parking, mechanical plant, soft and hard landscaping and associated diversion of Thames Water pipe following demolition of existing buildings.”

Principle of Development

As it stands, the site is occupied by a mix of uses, including residential accommodation, a care home, and a horticultural centre which, prior to Covid, provided day care placements for people with learning disabilities. The Council’s Planning Policy Map shows that the site is constrained by the river Ember and the Green Belt to the west and north.

The proposed development is seeking to completely redevelop the site, resulting in the loss of the existing care home and horticultural centre. In its place, would be the provision of housing for the ‘later living’ sector together with 20 units that will be gifted to the Sons of Divine Providence as accommodation for use by the charity. No affordable housing is proposed on the grounds of viability.

The later living component will therefore take up the majority of the units and is intended for the over 65’s. To that end, the Applicant’s Planning Statement refers to Core Strategy Policy CS20 (Older People) which states that:

“The Council will support the development of specialist accommodation for older people in suitable locations, to help deliver the targets set out in the Strategic Review of Housing Provision for Older People in Elmbridge (2009) and any subsequent review”.

Whilst the proposed development would therefore appear to comply with this specific policy, no detailed needs assessment has been undertaken by the applicant to demonstrate that there is a specific requirement for this type of development, and in this location. Indeed, the emerging Elmbridge Local Plan policy HOU6, makes clear that:

“Development for specialist accommodation, including older person’s housing, will only be permitted where there is clear and robust evidence that demonstrates a local need for the new accommodation, the type and level of care it offers, and does not result in an over provision of that particular type of accommodation and care within the borough.”

Whilst this forms part of the emerging policy position, it is relevant to this case, because it shows the direction of travel in terms of this specific housing type, and, given the stage of the draft plan, it is a material planning consideration.

As it stands, the proposal has not fully justified the need for this type of development in this location. Indeed, the Council previously rejected a planning application for 222 units of senior living and care dwellings at New Zealand Road, Walton-on-Thames (2020/0832) on the basis that there was no short or medium term unmet need for C2 accommodation, this application was then allowed on appeal. Similarly, a planning application for 60 extra age restricted apartments in East Molesey was also rejected (The Royal Cambridge Home 82-84 Hurst Road - 2019/1813) before being allowed on appeal.

The approval of these applications would suggest that any existing need, which in itself was already questionable, has now been met within these existing developments.

Notwithstanding whether any need exists, this does not negate the requirement for development to accord with the other policies within the development plan. In this case, the proposal has not been well conceived and rather than focusing on a high quality scheme, the Applicant has sought to maximise the quantum of development with little regard to relationships with the surrounding area. It is also disappointing that the proposal has sought to escape the need to provide any affordable housing and will result in the loss of the horticultural centre, which provided a valued community facility.

Quality of Development

Core Strategy Policy CS17 (Local Character, Density and Design) makes clear that:

“New development will be required to deliver high quality and inclusive sustainable design, which maximises the efficient use of urban land whilst responding to the positive features of individual locations, integrating sensitively with the locally distinctive townscape, landscape, and heritage assets, and protecting the amenities of those within the area.”

The National Planning Policy Framework (NPPF) also identifies the creation of high quality, beautiful and sustainable buildings and places as being fundamental to what the planning and development process should achieve.

The emerging local plan is also placing design quality as important for all new development.

In this case, the site is characterised by a collection of single storey low rise buildings on its eastern side raising up to two storeys along the river and back of the site. Whilst there is an opportunity to

improve on the design quality of these buildings, a notable existing feature is the transition in height from single storey to two storey as you move away from the neighbouring residential properties. This quality means that the site has a low visual profile in the local landscape despite the urban backdrop.

This existing arrangement also means that there is a suitable relationship with the properties along Ember Farm Way and along Orchard Lane. These roads comprise mainly two storey houses, with the gardens of Ember Farm Way backing on to the site. Indeed, the existing buildings have little visual impact and are generally in keeping with the low storey character of the area.

Under the proposal, three separate blocks are proposed. Two of these blocks will have elevations facing east towards the backs of the properties on Ember Farm Way and will be up to four storeys or approx. 13.25m in height. In addition to being some 6m taller than our own two storey house, the proposed buildings will also be closer to the boundary of 70 Ember Farm Way than the current buildings. The submission does not specify the exact distance to the closest point of our boundary, however our estimates are that this is approximately 6.9m behind our boundary. In contrast, the closest building to the boundary currently is the Horticultural building which is c. 5m tall and c. 10.5m from the boundary. The tallest building on the entire site looks to be Sundial House at approx. 8.3m.

This proposal will represent a significant change to the height of development on the site, and add substantial bulk that is out of keeping with the character of the area. The result will be an abrupt, overbearing transition that is unnecessary, dominating ours and other properties on Ember Farm Way. This is aptly demonstrated in the below image, which shows the existing situation on the left and a mock-up of the proposal, as seen from the back garden of our property.



Figure 1. Existing outlook



Figure 2. Outlook with proposed development (indicative)

As is visible in figure 1 there is currently significant screening provided by mature category B trees (up to c. 23m tall) which sit on the site at our boundary (circled by the red circle). The developer's proposal is that all of these existing trees on the site boundary will be removed to facilitate the development - thereby making the impact on our property even more stark.

The result of the proposal would therefore be an oppressive form of development that would eradicate the existing outlook, to the detriment of ours and our neighbours' enjoyment.

The proposed development will also be visible from the street of Ember Farm Way which currently enjoys views of the verdant landscape through gaps in the street scene. Those gaps will be eroded, if

not completely removed, by the proposed development and this harm will be exacerbated by the significant loss of trees that are currently visible across the landscape.

Such is the scale of the development, it will result in an over 400% increase in GEA compared to the existing development, which coupled with proposed densities (see section below) will mean a significant intensification of development on the site. This plays out in the visual harm the development will have and is also indicative of the Applicant seeking to place too much on the site.

The relationship with Orchard Lane fares little better and as shown from the below plan extract, the rear four storey block will dominate the site, appearing well above the roofline of the properties around it.

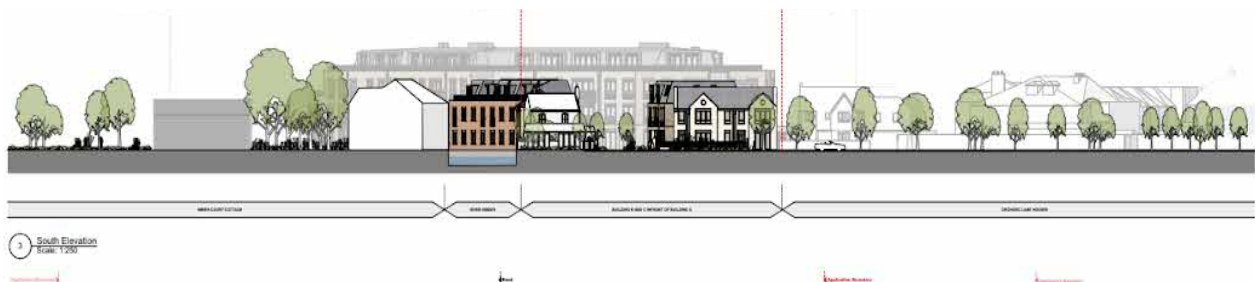


Figure 3. Orchard Lane street Scene Elevation - facing Orchard Lane

The relationship of the proposal to Orchard Way will be particularly detrimental to Number 18, which will see its outlook being significantly harmed and its occupants left with the sense of being dominated and enclosed by the scale of the proposal.

In looking at the Applicant's justification, the Design and Access Statement refers to 'emerging developments' in the area, presumably to demonstrate some sort of precedent. However, and notwithstanding that individual applications must be determined on their own planning merits, the examples of 'Royal Cambridge Home and the Sheppard Trust' and 'Hampton Court Station' are not close enough to the site to act as any real influence. Furthermore, the Hampton Court Station scheme was refused planning permission by Elmbridge council, so cannot act as a positive precedent for this proposal. There may be some precedent in Orchard Farm Avenue, which is a more sympathetic development made up of predominantly two storey houses with a much lower density.

Further, the applicant's 'Orchard lane character & building height study' (section 2.9) refers to some of the houses having three storeys. However, only one of the examples given is a genuine three storey building, with the others including accommodation in the roof. The vast majority of the buildings in the area are two storeys only.

In addition, the progression of proposed new buildings towards the Green Belt combined with the additional height and loss of trees, means that the site will be more visible within the landscape. The National Planning Policy Framework and Development Management Plan Policy DM17 makes clear that inappropriate development will not be approved in the Green Belt.

In this case the proposal will sit immediately adjacent to the Green Belt and whilst it may not then be directly affected, due to the additional height and intensification of development on the site, there will be a visual impact caused to its visual openness. That impact will be made worse by the removal of important trees that otherwise screen the site. Given the important vista that the area to the

north and west of the site provides, the proposal will erode what is currently a transitional zone between the urban and green corridors that exist along the river, to the detriment of the local landscape.

Densities

As part of the consideration of high quality design, Policy CS17 also stipulates that:

“In order to promote the best use of urban land, and to protect the Borough's green spaces, the Council will promote well designed, high quality and sustainable developments which will contribute to the achievement of an overall housing density target of 40 dwellings per hectare.” [our emphasis]

In this case the proposed development would result in a density of 120.5 dph, which is significantly higher than the policy target of 40 dph.

We would also draw attention to two separate studies prepared by the Council on density, including:

- Elmbridge Urban Capacity Study 2018
- Elmbridge Density Study 2019

Within the 2018 study, it was 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).

The more recent 2019 study places the site within the MOL10 Ember Lane sub area (Figure 15 Policy Layers for East and West Molesey), which it identifies as having a current density of 10.86 dph - the lowest density sub area in East and West Molesey (Table 9 East and West Molesey Density Figures, para 4.57). The density for the proposed development is also over 3 times the average densities permitted since Jul 2011 in MOL10 of 35.67 dph (Table 10 Average Densities permitted since Jul 2011).

It is therefore clear that the development will result in a step change in local densities that is out of line with current levels. Indeed, The Council's Design and Character Supplementary Planning Document Companion Guide: East & West Molesey (2012) identifies increasing densities as a concern of the local community, and this is clearly not addressed by the proposal. Furthermore, other recent development in the area, including the housing development at Orchard Riverside (2017/2082), which is on the same street, was granted planning permission with a density of 35 dph. This has successfully integrated into the character of the area and is a useful measure of acceptability. The consistent approach would be to ensure that the development of this site achieves similar densities.

Further, the higher density does not provide any substantial public benefit, noting that the proposal offers no affordable housing on viability grounds. To that end, it is understood that the need to move the water main is adding significant cost to the proposal. It is therefore plausible that a smaller development that removed the need to redirect the water main could remove this cost and therefore allow for the provision of affordable housing. It is not, however, evident that this has been explored.

Ultimately, it appears that the proposal has been approached with the objective to maximise the number of units on the site, rather than having true regard to the character of the area, including the prevailing local densities. This is not compatible with the aims of Policy CS17.

Neighbouring Amenity

The proposal has paid little regard to the relationship of the development with neighbouring properties. As well as being harmful to outlook, the scale of development and relationship with neighbouring properties will inevitably result in an unacceptable degree of overlooking and perception of overlooking. In relation to our own property there will be significant cumulative impacts on our amenity as detailed below. These impacts will be felt both from inside our home where our rear open plan living area is, and where, with our young children, we spend most of our time, whilst also removing the enjoyment of reasonable privacy within our only outside amenity space - our back garden.

- 1) The proposal will result in directly overlooking our property from the habitable rooms (living rooms and bedrooms) of multiple flats at 2nd and 3rd floor level. A number of these directly face towards our house (some from single aspect rooms), whilst others overlook us from an angle.
- 2) This significant harm will be further exacerbated by the proposed inclusion of a roof terrace that circulates the fourth floor and looks directly into our garden and open plan living space from a height approximately 5 metres above the very top of our roof. There are a further 4 balconies which will overlook us from an angle.
- 3) The distance from our rear open plan living room to the proposed building A is, by our calculation, circa 25.8m. Whilst Elmbridge recommends separation distances of 22m, this is between 2 storey buildings only. Given building A is 4 storeys, it makes sense that greater separation distances should be applied, noting that we are aware that other councils have higher minimum separation distances for more storeys e.g. minimum of 28m for 3 storeys. Of course, the effect on the enjoyment of privacy in our garden is therefore more pronounced due to the closeness to the boundary.
- 4) All the current screening from the mature category B trees (c. 23m tall) which sit on the site at our boundary are proposed to be removed so we no longer have any screening to mitigate the impact of this proposal.
- 5) The current buildings on site have a significantly smaller impact on our property. Currently our property is barely overlooked. The nearest building to our boundary is the single storey Horticultural Society building which is at a distance of 10.5m. Sundial House which is two storey is c. 24.5m from our boundary and only the roof faces our private amenity space. The Molesey Venture building, also 2 storeys, does have windows facing towards our property but is situated some c. 37m from our boundary.

Notwithstanding that permission for this scheme should not be granted, in the event that the developer considered an alternative scheme as a minimum we would like to see the following changes, noting that these still will not resolve most of our concerns:

- Building height at the boundary to Ember Farm Way reduced to a maximum of 2 storeys.
- Building a minimum of 11m from our rear boundary.

- No roof terraces or balconies on the South and East Elevations of the buildings which overlook our garden.
- The windows facing us in the flats on all floors to be obscured.
- Trees that currently provide screening on the boundary to be preserved.

The proposal will also have other impacts that will be detrimental to neighbouring amenity. As an example, the general arrangement plan shows that there will be a plant room and substation located on the shared boundary with residential gardens on Ember Farm Way. There will also be additional noise from cars passing along the proposed basement access and from the movement of bins from within the basement storage area to enable collection.

Whilst a noise assessment has been undertaken, this does not come across as sufficiently detailed, with declarations such as:

“Details have not yet been finalised and detailed data is not yet available.”

Accordingly, it seems that the assessment has not been completed and it is not sufficiently detailed to conclude that there will be no impacts from noise. Indeed, even as written, the submission stipulates that internal ambient noise would exceed existing ambient noise levels by 2 dB with windows partially open. The assessment does not however make clear what the likelihood of noise impact on neighbouring properties, including private gardens will be. Accordingly, it is difficult to have confidence in the outcomes of this assessment.

The proposal will also create additional lighting impacts over and above the existing development that will spill over into neighbouring properties. This will also have a detrimental impact on neighbouring amenity and is further evidence that the proposal will result in harm.

Despite a number of rounds of pre-application discussions with the Council, it is particularly disappointing that such poor consideration of neighbours has been given. Without significant alteration to the proposal, it is highly unlikely these issues can be addressed.

The proposal does not therefore represent high quality design. Indeed, the design of the proposed development is poorly conceived, and pays little regard to local character and the relationship with neighbouring homes. It therefore fails to comply with the aims of the Core Strategy and the NPPF in delivering high quality development.

Flooding and Drainage

Flooding and drainage are also areas of concern, noting that Core Strategy Policy CS26 stipulates that:

“Development must be located, designed and laid out to ensure that it is safe; the risk from flooding is minimised whilst not increasing the risk of flooding elsewhere; and that residual risks are safely managed.”

In this case, it is noted that the site is largely protected from river flooding due to existing flood defences that have been put in place. However, the FRA provided with the application states that part of the site may be inundated with floodwater. Given the inclusion of a basement, albeit for car parking, the wisdom of this seems to be questionable. Indeed, if an extreme flood event were to

occur, then the basement could then be affected, preventing residents from being able to access their cars for safe egress from the site.

Furthermore, we note that no sequential test has been undertaken, despite this being a requirement for all development that falls within flood zones 2 and 3.

Whilst we are aware that the site benefits from local flood defences, that does not completely remove the risk of flooding and, therefore, alternative sites that are less vulnerable to flooding should be considered for such a style of development.

In respect of surface water drainage, a 'Foul & Surface Water Drainage Strategy Report' has been provided with the application. As with the above, this is a highly technical area, however, it has already received an objection from Surrey County Council, in their role as Lead Local Flood Authority (LLFA) on the basis that:

"The proposed surface water drainage scheme does not meet the requirements set out in the NPPF, its accompanying PPG and the Non Statutory Technical Standards for sustainable drainage systems."

In particular, they note that all 'major' planning applications being determined must include full details about surface water drainage and sustainable drainage systems. However, they are clearly not satisfied that this requirement has been met. Accordingly, there is a legitimate concern that the proposal could not be delivered without causing harm in respect of surface water drainage.

Given the close proximity of the proposed buildings to ours and other properties the potential for future flooding into our gardens and properties must be properly assessed as part of this application because it would not be satisfactory for such matters to be agreed by condition.

In addition to the above, the proposals include the redirection of the Thames Water main that runs across the site and is clearly an impediment to the proposal. Whilst we have no objection to redirection of the main, this will have clear detrimental consequences. Indeed, to facilitate the new main, several mature trees will need to be removed from the site, which we discuss below. However, given the extent of the existing buildings on the site, the progression into the northern part of the site, to the extent that it requires the redirection of the water main, would itself suggest over development. We can see no legitimate reason why any future development of the site cannot be kept within the existing building envelope.

Trees

In relation to trees, Development Management Plan Policy DM6 stipulates that:

"Development proposals should be designed to include an integral scheme of landscape, tree retention, protection and/or planting..."

In this case, the Arboricultural Report by Arbtech states that 13 individual trees and 6 groups/hedges will be removed as part of the proposed development. Only 2 of these are classified as U rated, with the remainder classified as class B and C, so include trees that are reasonable quality and that should be retained. There is no justification for their removal other than to facilitate the development.

The removal of these trees, which include a significant number to enable the diversion of the water main, should be avoided as they provide an important backdrop to the site and are of local amenity value. The necessity to extend the development beyond the existing building envelope, to the extent

that the water main has to be diverted, is not justified other than to facilitate overdevelopment of the site.

Furthermore, not all the trees that could be affected by the proposed development have been shown on the survey. For example, we have trees at the end of our garden that are not shown. This suggests that not all the potential for loss of trees has been properly evaluated.

Even so, it is clear that the closeness of the proposed development to the shared boundary with ours and neighbouring gardens on Ember Farm Way, will result in a significant visual obstruction. Whilst it would in no way overcome the severe harm that the proposed buildings will cause, retaining and extending a landscape buffer along the eastern boundary of the site could provide some reprieve from the impact of the development.

The impact on trees has not been justified and therefore the proposal fails to meet the aims of policy DM6. In addition, the opportunity to provide additional planting that could mitigate some harm has not been proposed at our property.

Ecology

Core Strategy Policy CS15 states that the Council will seek to avoid loss and will contribute to a net gain in biodiversity across the region, and will support the objectives of the Surrey Biodiversity Action Plan (BAP). Policy DM21 of the Development Management Plan also goes on to state that:

“In accordance with Core Strategy policy CS15 – Biodiversity, all new development will be expected to preserve, manage and where possible enhance existing habitats, protected species and biodiversity features. The Council will work in partnership to explore new opportunities for habitat creation and restoration.”

The Ecological Appraisal provided with the application identifies that there are a number of statutory and non-statutory sites nearby and that the site is located within SSSI Impact Risk Zone for Bushy Park and Home Park SSSI.

Regardless of the above, there is an opportunity to provide significant biodiversity enhancements as part of the proposal. However, the Biodiversity Net Gain Assessment shows that the proposal will actually deliver a net loss of -0.14 habitat units, which is a -3.28% decrease relative to baseline habitat value. The proposal will not therefore provide any biodiversity benefit overall, which is a missed opportunity and also weighs against the proposal.

Highways

Core Strategy CS25 (Travel and Accessibility) and Development Management Plan Policy DM7 require development proposals to have regard to highway impacts and to promote sustainable travel choices.

In regard to the submitted Transport Assessment, it reports that the proposed development will result in 124 two way vehicle trips per day and that it will generate an increase in peak hour trips. Whilst it goes on to play down the significance of this increase, it is important to note the specific circumstances here whereby the development is located and accessed via the bottom end of Orchard Lane - which includes a heavily used pedestrian access onto Cow Common. Orchard Lane has unrestricted parking and is regularly lined with parked cars on both sides. This already causes

problems in terms of navigating the road, particularly for large delivery and refuse vehicles, and even during quieter times of day. Although the Transport Assessment refers to a parking stress survey that indicates that the parking stress is only at 25%, this is not a true reflection of the impact of even a small number of additional cars in this specific location. It also does not reflect our own observations of both parking problems, and conflict with these parked cars, when seeking to navigate Orchard Lane. This risks therefore being problematic for emergency services - specifically noting that the proposal is aimed at over 65's, where there is likely to be greater need for emergency medical care.

In terms of internal circulation, the proposal includes a single entrance point with an internal road that leads to some above ground parking, with the majority of the parking to be provided within the proposed basement. This is served via a roadway in the gap between building A and the rear gardens of ours and neighbouring properties on Ember Farm Way.

That fact that basement parking is necessary on the site, despite being in a suburban area, is a further indicator that too much development is being sought. That aside, this arrangement has little regard to our amenity. The basement access proposed is extremely close to the boundary and will require a tight right hand turn when leaving the basement, controlled via a traffic light system. This will result in noise, exhaust smells, and loss of amenity from headlights pointing directly towards the neighbouring residential properties. This is yet another impact on neighbouring amenity.

In addition, the site is not well placed in terms of access to public transport. Whilst there are opportunities for alternative modes of transport in the wider area, these are not necessarily convenient to the site. For instance, there are no bus stops on Orchard Lane and therefore the residents would need to walk up to Esher Road or Embercourt Road, which may not be possible for those with mobility issues.

Concerns are also raised by Surrey County Council, in their capacity as Highway Authority, who are seeking additional information on the access arrangements from Orchard Lane whilst also questioning the safety of the stated refuse collection arrangements for building A. They have also asked for clarification on fire safety in relation to the provision of EV charging, notably in the basement. Their response also reinforces our view that the occupants of the development may have mobility problems, so there is a need for close access to public transport.

The acceptability of the proposal on highway grounds has not therefore been established.

Loss of community facility

Core Strategy Policy CS16 states that the Council will resist the loss of existing social and community facilities or sites, unless it can be demonstrated that:

- the facility is no longer needed for its original purpose or viable for any other social or community use;
- an alternative facility will be provided in a location with an equal level of accessibility for the population it is intended to serve,
- there is no requirement from any other public service provider for an alternative community or social facility that could be met through a change of use or redevelopment.

In this case, the proposed development will result in the loss of the existing care home and also the horticultural centre. No substantive evidence has been put forward by the Applicant in respect to either of these facilities.

It is noted that the horticultural centre closed during the pandemic, however, that does not mean to say that it should be lost forever and that there was no demand for it, or indeed for an alternative community facility. As it stands, the proposal does not fully meet with the requirements of this policy, noting that the NPPF also states that planning policies and decisions should guard against the unnecessary loss of valued facilities and services.

Conclusion

Whilst we do not object in principle to the redevelopment of the site, the proposed development should be the right one for the site and should not result in unacceptable harm. In this case the proposal falls short in several areas and has not been well conceived by the Applicant. In summary:

- The local need for over 65's accommodation has not been fully demonstrated through a detailed needs assessment. As such it cannot be determined that there is a requirement for this type of accommodation.
- The proposal would not result in a development of high quality design, which is a primary aim of the development plan and the NPPF. Indeed, the proposal would result in over-development of the site with significant harm caused to neighbouring properties owing to the poorly conceived relationship with the surrounding area, due to its height and bulk. Indeed, this proposal would result in a repressive form of development for many of the neighbouring residential properties.
- The density of the proposed development would significantly exceed the prevailing local density levels, as determined through successive density studies. This also points to over-development of the site. Despite the high number of units, no affordable housing is proposed on viability grounds. The proposal does however include the unnecessary diversion of the water main at significant cost.
- The proposal will result in a greater than 400% increase in GEA compared to the existing development, which coupled with proposed densities, will mean a significant intensification of development on the site.
- Neighbouring amenity, including our own, would be seriously harmed by the proposal from a number of aspects which have individual and cumulative impact. This includes significant overlooking of neighbouring gardens and properties, whose outlook will also be substantially harmed due to the oppressive nature of the proposal.
- Impacts relating to noise and the movement of cars (along with the undesirable effects of exhaust fumes) has not been well considered and will also impact neighbouring amenity, particularly from movements in and out of the proposed basement area. Indeed, the noise assessment states that "details have not yet been finalised" so has not fully assessed potential noise impacts in its submitted state.
- The Flood Risk Assessment identifies that the part of the site could still be inundated with water in a flood event, despite existing flood defences. It is therefore of concern that the proposal includes a basement level that will be particularly vulnerable to flooding. Also, no sequential test has been undertaken. There is a further concern in respect of surface water flooding, with an objection received from the LLFA in this regard.
- The proposal will result in the unnecessary loss of trees, primarily due to the proposed redirecting of the water main, which is not necessary to be able to redevelop the site. Also,

the tree survey has not picked up on a number of trees, particularly those falling within neighbouring gardens, which could be harmed. Any proposal should ideally retain and extend the current landscape buffer to soften its impact to neighbouring properties.

- The proposal has made little of the opportunity to provide biodiversity net gains and actually results in a net biodiversity loss.
- The development will result in increased highway movements, which are likely to conflict with parked cars using Orchard Lane, which is already difficult to navigate (particularly for larger vehicles). The proposed car access to and from the basement will impact on the amenity of neighbouring properties due to its proximity to ours and other people's gardens. Also, the site is not particularly well located for access to public transport.
- No justification has been given for the loss of the horticultural centre or the existing care home spaces, despite these being community facilities. This assessment should include the consideration of alternative community facilities, as required by Policy CS16.

As it stands the proposed development fails to deliver a form of development that delivers on the aims of the Development Plan or the NPPF. Consequently, it should be refused planning permission.

We would be delighted to welcome you to visit our property as part of your assessment of this submission should you wish to see the impact of the proposed development on our amenity for yourself.

Yours sincerely

Katherine Le Clerc and Jeff Wemyss