

From: Clare Adamson  
Sent: 24 May 2023 20:13  
To: Planning Idox  
Subject: FW: Elmbridge planning application no. 2022/3796 - site at 16-18 Oatlands Drive, Weybridge  
Attachments: Matrix feedback.pdf

Hi,

Please can you add the below email as a further letter of objection and the attachment as 'attachment for objection'.

Thanks,

Clare

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From: Rosemary Roach [redacted]  
Sent: 22 May 2023 09:47  
To: [redacted] [consultations@noturalengland.org.uk](mailto:consultations@noturalengland.org.uk)  
Cc: Clare Adamson [redacted]; 'Jane Murray [redacted]'; Sharon Finch [redacted]  
Subject: Elmbridge planning application no. 2022/3796 - site at 16-18 Oatlands Drive, Weybridge

For the attention of Karen Bartlett / SWT and Sally Tainton / Natural England

Good morning,

Please find attached a document detailing our concerns regarding the revised Biodiversity Matrix 3.1 submitted by AA Environmental on 19 May 2023 for the site at 16-18 Oatlands Drive, Weybridge, where the applicant seeks to build 33 flats. You will recall that we have previously written to both SWT and Natural England voicing our biodiversity concerns about this planning application, as well as application no. 2022/2118 which proposes 27 flats on the site at 4-6 Oatlands Drive. On the land between these two sites (nos. 8-14 Oatlands Drive) construction of 4 large blocks comprising 51 flats is currently well underway. Permission for these 51 flats was granted on appeal in 2021 following planning refusal by Elmbridge BC.

As you will see from our submission, we have severe reservations about the conclusion drawn by AA Environmental and have described our reasons for these reservations.

Once again we would like to record our deep concerns that the impact on the biodiversity of these 3 different, but adjoining, sites of – potentially - 8 very large blocks of flats replacing 8 modest detached houses (that all have/had large gardens) has been very much underestimated by the applicant. The cumulative impact of all 3 sites being considered together is, we believe, hugely important.

Given the unease we feel about the documents submitted by the applicant regarding the impact on biodiversity, we would again ask if your organisations could arrange a site visit to see the reality for yourselves. We understand this may be an irregular request but nevertheless believe the importance of this area's wildlife is paramount and worthy of every protection.

Thank you for taking the time to consider this information and request. We look forward to receiving your earliest possible response.

With kind regards,

Rosemary Roach (no.17 Oatlands Drive) Jane Murray (no.22) Sharon Finch (no.20)

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# Comments and Questions about the Revised Biodiversity Matrix for PA 2022/3796

These comments and questions relate to the Cover Letter from AA Environmental Consultant [REDACTED] submitted as an Amended Document, accompanying the Biodiversity Matrix 3.1, for the above planning application.

We have the following questions and comments:

## 1) Discrepancy with the latest Existing Habitats Plan.



Image 1 : The revised Existing Habitats Plan

The revised plan (Image 1) now shows the pond, **but still does not show:**

- the **FULL** 48m long, thick hedge between #18 and #20 Oatlands Drive, just a misleading thin green line. Also the hedges between #16 & #18 and #16 & #14 appear much shorter on the plan than in the photo (see Image 2 of satellite images.)
- the semi-circular border of Vegetated Garden in the front garden of #18 (see Image 2 below)
- the hedges currently in the front gardens of #16 and #18 Oatlands Drive (shown in Image 2.) These should also count towards Vegetated Garden and/or Hedgerow. We assume the developer plans to remove these if the application is granted as they do not appear in the Proposed Habitats Plan (Image 3)

Given the developer claims that they will increase the biodiversity, albeit by only 5.59% (well below the 2023 target of 10%), adding these changes could significantly reduce this figure, if it remains positive at all. The claimed net gain 137.89% hedges would be severely reduced or eradicated too.

Border between #18 & #20

Further 11m of trees and bamboo border

Privet hedge  
48m long  
5-6m high  
approx 2.5m wide

Other 2 hedges appear much longer than shown on Existing Habitats Plan.

Both hedges in the front gardens of #16 & #18 have been omitted from the latest Existing Habitats Plan.

#18

#16

The green semi-circular border in the front garden of #18 is still missing.

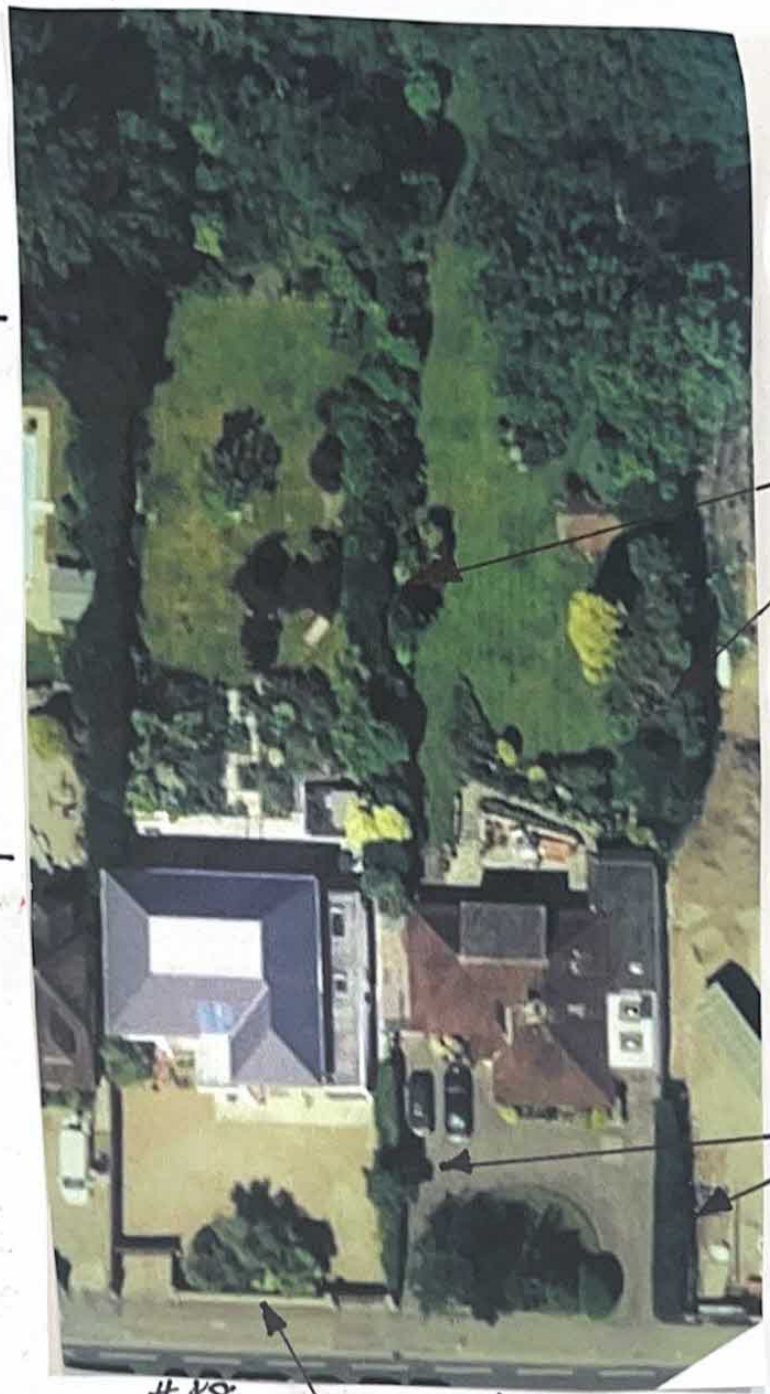


Image 2 - photo of 16 and 18 from satellite images.

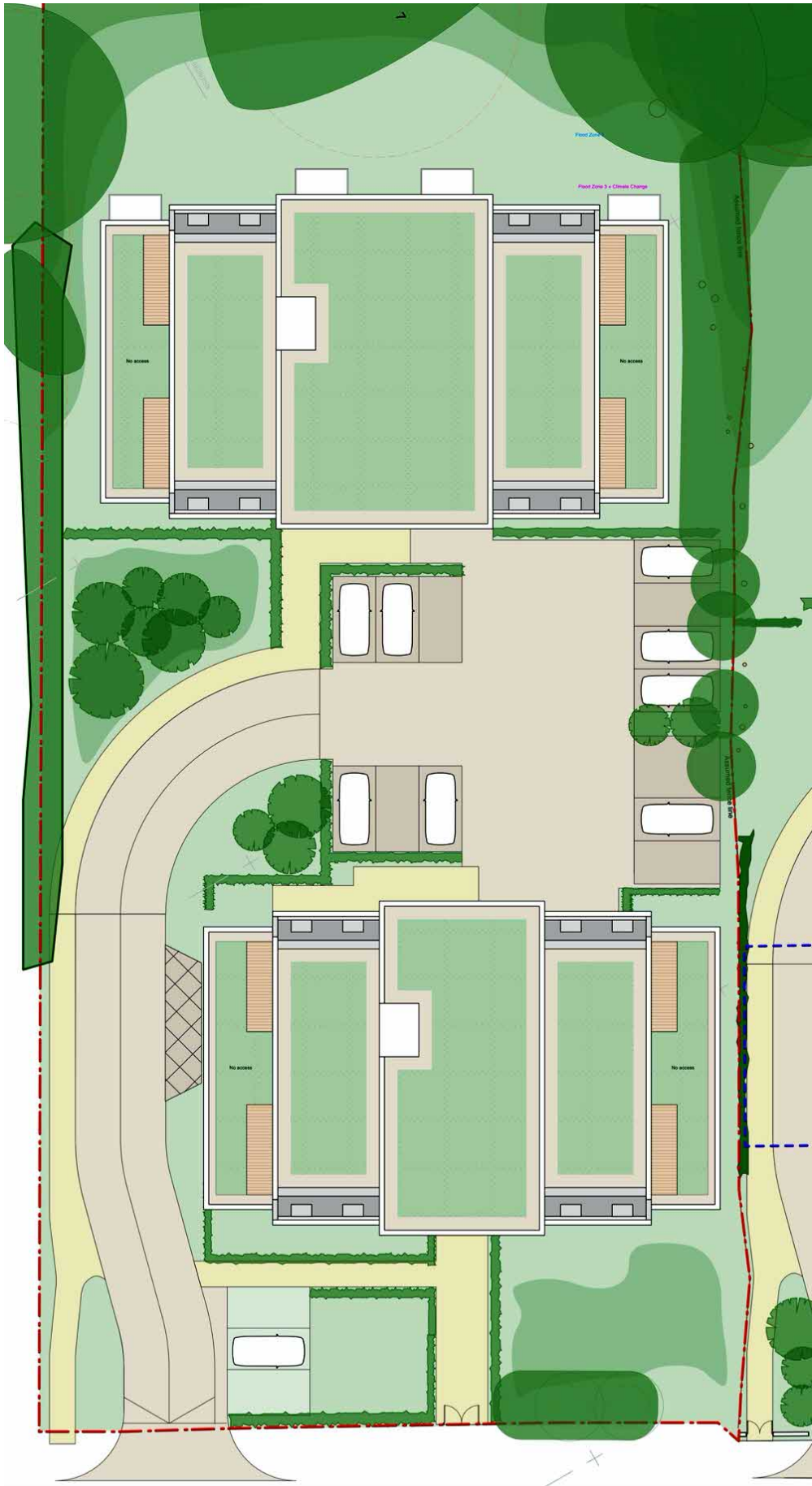


Image 3: The Proposed Habitats Plan, showing removal of front hedgerows.

## 2) Hedgerows

AA Environmental Consultants claim the plan would result in a net gain of 137.89 % in hedgerows

Firstly, as demonstrated in the 3 images above, they have not counted the 2 existing approx 14m long and 2 to 3m high hedges currently in the front gardens of #16 & #18 that can be seen in image 2. They have also shown the hedges between #16 & #18 and #14 & #16 as considerably shorter than they actually appear to be in the satellite images.

Secondly they are including several metres of low height, thin, short sections of hedging that they propose will line pathways and separate car park spaces.

The definition of hedgerow is:

### *"Habitat Description*

*A hedgerow is defined as any boundary line of trees or shrubs over 20m long and less than 5m wide, and where any gaps between the trees or shrub species are less than 20m wide (Bickmore, 2002). Any bank, wall, ditch or tree within 2m of the centre of the hedgerow is considered to be part of the hedgerow habitat, as is the herbaceous vegetation within 2m of the centre of the hedgerow. "*

So we question whether these small partitions really count as hedges towards the biodiversity matrix, versus the established, much larger hedges already in place. And if they count, then the two large hedges in the existing front gardens would also be included in the matrix.

Finally, they say they will remove and replace the hedgerow between #18 and #20. It makes no sense to remove an existing quality, healthy hedge that has been there for many years with resulting residing populations of insects, small mammals and birds. It is 48m long, over 5m high and up to 2.5m wide, shown in Image 4. The only reason for the developer to remove this hedge would be to replace it with something smaller and thinner, which would therefore be an inferior habitat.



Image 4: current quality hedge between #18 & #20 ( L 48m x H 5+ m x W 2.5m)

### 3) New Trees

The table in their document suggests that the existing gardens have only 0.977 ha of trees and the proposals would deliver 1.118. The image 2 of the current gardens vs image 3 of the proposed habitats would make this surprising.

The Proposed Habitat Plan in image 3 shows many trees of varying sizes being planted on the left hand side near the car park / entrance driveway.

The table says there would be 2 new medium and 11 medium small trees. But the 2 spaces that these trees are drawn in on the plans measure approximately 10m by 4m, and one quarter of a circle of radius 6m. So there is no way that they could support more than 2 or 3 trees in total.

Even if they could find space for all the trees they are claiming, these new, mostly small, trees would in no way provide the same value as habitat as the current towering trees in these gardens.

### 4) Underground Streams

In her letter to Clare Adamson at EBC Planning Dept dated 9/5/23, Sally Tainton of Natural England (in reference to this planning application and the connected 2022/2118) stated:

*“They have also highlighted that Cowey Sale is a Biodiversity Opportunity Area and have concerns that the ecological surveys have not fully addressed the impacts to the species inhabiting this area e.g. in relation to light pollution, disturbance.*

*The area adjacent to both planning applications (known locally as Cowey Sale) is also recorded as deciduous woodland priority habitat on the priority habitat inventory. You should therefore consider any impacts on veteran trees in line with paragraph 180 of the NPPF. You should also consider the impacts of the proposed development on any local wildlife sites, in line with paragraphs 175 and 179 of the NPPF and any relevant development plan policy.”*

Many of the houses on the north side of Oatlands Drive have underground streams flowing under and through their back gardens. These lead down and contribute to the wetland area and Engine River behind the gardens, which are an important area for biodiversity.

The fact that #16 has a pond in the garden suggests this may be the case for at least one of these houses too. Basements and underground parking in large blocks of flats could affect the flow of water down to these important habitats and affect flora and fauna there.

5) Questions on plans for green roofs.

Much of the “increase” in biodiversity is based on the green roofs in the plan.

Image 3 is repeated below, showing the roof plan according to AA Environmental Consultants used for the Biodiversity Matrix, next to image 5 which is the roof plan as it appears in the actual planning application, for comparison purposes:

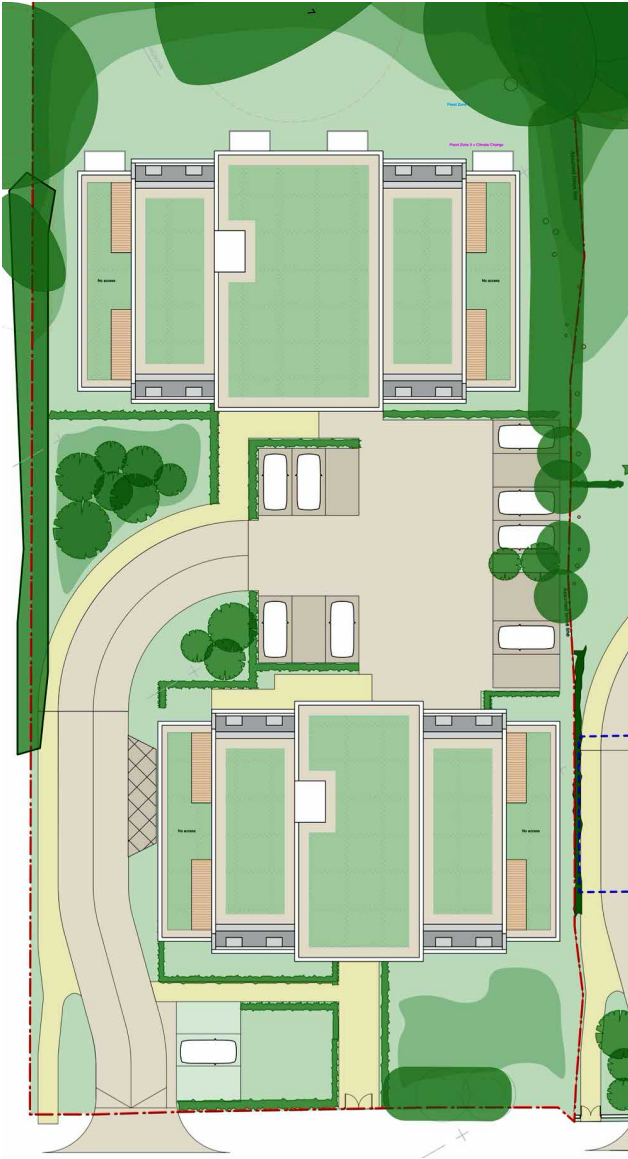


Image 3 (repeated)  
Roof plan used in biodiversity matrix

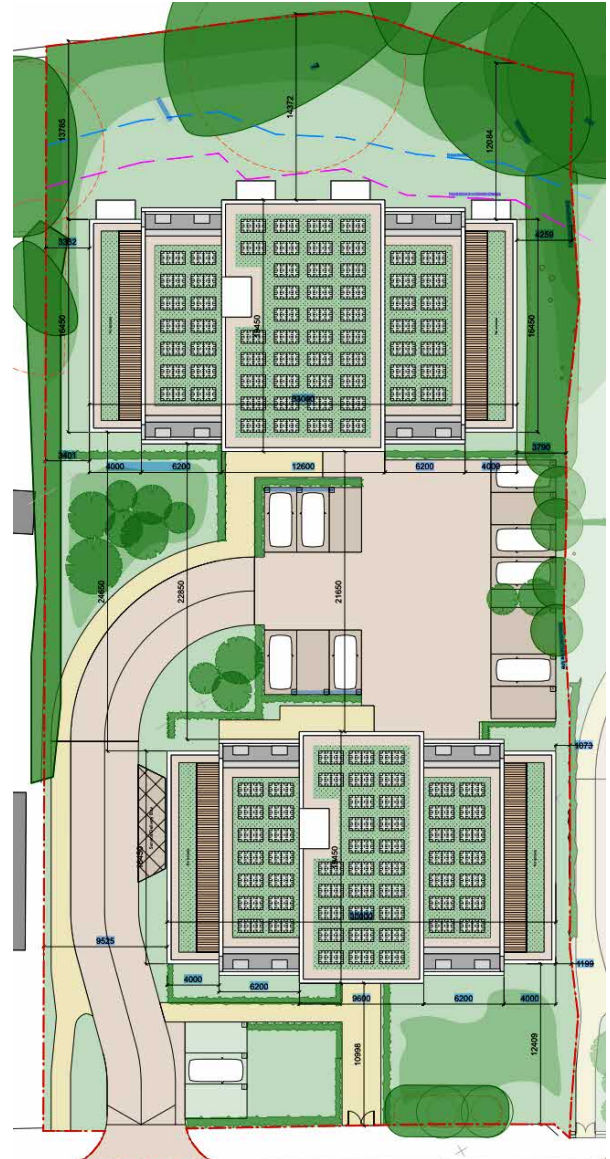


Image 5  
Roof plan in planning application 2022/3796

In the planning application (Image 5), the majority of the side sections of roofs are used for roof terraces and amenity space for the proposed flats. They also show solar panels covering significant amounts of the remaining roof space. So, Image 3 (Biodiversity Matrix) and Image 5 (Roof Plan in Actual Planning Application) show very different roof plans. The use of this space is vague and contradictory as either green, or resident amenity, or solar panelling.

Apart from these pictures, there is no detail about green roofs in the Design and Access Statement. There is nothing in writing to commit to these roof spaces or explain exactly what they are and how they would be maintained.

So we are concerned that it is these green roof spaces that currently tip the matrix into a positive, given the lack of clarity on what they are and how much space they will take up.



## SUMMARY

In summary, the biodiversity matrix is still inaccurate as it:

- is missing a garden section from the front garden on #18
- Is missing 2 large hedges in the front gardens of #16 and #18 (both in the hedges and vegetated garden figures)
- appears to understate existing hedgerow in the back gardens, especially between #16 & #18 and #14 & #16
- is not showing the same roof plan as the planning application
- has a lack of clarity and commitment about what these green roofs would be and how much space they take up
- is including small knee-high dividing plantings in its proposed hedgerow calculations
- is overstating the number/quality of trees to be planted as there is not enough space allocated

Questions:

- Exactly which trees will be removed and where will new ones be planted?
- What exactly is the "green" roof plan, and are the roofs actually going to be used as roof terraces or for solar panels?
- Are there underground streams and has the effect of blocking water flow by basements and underground car parks been considered on the biodiversity areas behind these houses?
- Can the matrix be redone with the correct figures and plans reflecting the current status of these gardens.