

70 Ember Farm Way  
East Molesey  
Surrey, KT8 0BL  
6<sup>th</sup> July 2023

Dear Jack,

We have reviewed the amended plans for application 2022/3525: The Molesey Venture Site, Orchard Lane, East Molesey, KT8 0BN. The amendments do not address our concerns as set out in our objection submitted on 11<sup>th</sup> January 2023. As a result we maintain those objections.

In addition to our 1<sup>st</sup> objection, we would like to highlight the following objections: -

**1) There will be a material loss of privacy and a significant adverse impact on our amenity:**

The proposal will result in an unacceptable level of harm to our privacy and amenity due to the cumulative impact the proposals will have on our property. It would lead to an unacceptable level of overlooking into our garden (our only private outdoor amenity space) and our rear habitable rooms, we will be enclosed by the buildings, and we will have a significant loss of outlook.

- Our property will be overlooked from 3 directions by Building A and Building C. We will be directly overlooked from the West and at angles from the North and South.
- The overlooking will be from living rooms, kitchens, and bedrooms of multiple flats.
- Many the windows which will overlook us on the east elevation of building A serve habitable rooms and are floor to ceiling in design.
- The secondary windows to habitable rooms that overlook our property have not been obscured.
- There is a 3<sup>rd</sup> floor roof terrace looking directly down onto our garden from a height of approx. 11m (approximately three times the equivalent height that our highest window would look out towards building A).
- The oriel windows on Building C now direct the outlook from those flats towards our property.
- The relationship between the height of Building A and our property are so materially different that it creates an overbearing and dominant effect. Flats in building A will look down at us from windows at approx. 5m, 8m and 11m. In contrast, the highest window in our property looks out towards building A from a height of approx. 3.5m.
- We have a mature Aurelia (tbc) tree (c. 12m in high) in our rear garden, next to the boundary. It contributes to screening of the Molesey Venture site from our property. Whilst we are pleased that the developer has now acknowledged this tree on their arboricultural survey, as of today they have the incorrect species for this tree on the plan. We also have not had confirmation that the distance from the boundary to the proposed sub-station meets the BS standard minimum root protection area required to ensure that the tree survives. We estimate this needs to be at least 2.1m from the boundary.
- The proposal plans to remove a group of mature trees (G08) on our rear boundary to facilitate the building of the sub-station. These trees provide us with a significant amount of screening of the site. The removal of the G08 tree group significantly exacerbates the harm from overlooking. It would leave our rear garden almost completely exposed to the windows of Building A - which will have an uninterrupted view into our garden and rear habitable rooms. The replacement landscaping is wholly ineffective. These 5 mature trees of over 12m tall are being replaced by two trees of c. 2.2m tall. The 1<sup>st</sup> floor finished floor level is at 3.3m so these trees will provide no screening at all.
- Building A is only 11m from our rear boundary. This might be sufficient in a situation of garden-to-garden 2 storey houses with bedrooms on the 1<sup>st</sup> floor, but it is not sufficient to maintain our privacy and minimise overlooking in this situation where Building A is 4 storeys and over 13m in height. Given the incongruity of the scale and height we would ask that this 11m distance should be significantly increased for any building above 2 storeys in height. In addition, Building A is out-dented closer to our boundary than it is to any other property on Ember Farm Way. Building A is 14m from the boundary of the other properties. This further exacerbates the detrimental impact on our amenity and privacy.
- We will suffer a material loss of outlook. Currently our outlook to the north is only trees and sky, to the west is 1 and 2 storey buildings with minimal windows, well set back, which are very well screened by trees - and to the south our outlook is low level roofs with no windows. The outlook will change for the worse in all directions and

our outlook will be almost entirely filled by Buildings A and C. Additionally, due to tree removal on site we would now see very few trees compared to our current outlook. See indicative outlook below.

- We will suffer a sense of enclosure from this development. In the proposal only c. 10m of the c. 90m length of the eastern boundary of the site is free from buildings. The eastern side of the site will be filled with a near continuous run of 3 and 4 storey buildings creating a terracing effect. This will also be visible on Ember Farm Way between and above the houses.
- On the current site the build form and roof heights progress from lowest (single story building) to highest as the site progresses westwards towards the river and away from Ember Farm Way. The proposal has given no such thought to the progression from Ember Farm Way houses. Instead this proposal has building A abruptly starting at 3 storeys on the east boundary.

**Photo showing current outlook from rear of  
Ember Farm Way**



**Indicative mock up image showing outlook  
after proposed development**



## 2) **Unsustainable over-development of the site:**

The proposals appear to have been developed with the objective of maximising the number of units on site. Little consideration has been given to the character of the area. The result is a proposal which is excessive in terms of the number of dwellings resulting in massive over development of the site. It would have an adverse impact on the character of the area and is unsustainable in terms of access and infrastructure. The evidence of overdevelopment includes: -

- ***Huge and inappropriate increase in density:*** the proposal has a density of 99dph. Elmbridge LPA historic decisions show how inappropriate this is for this area. Planning applications permitted since 2011 in MOL10 have been 35.67 dph (Source: Elmbridge Density study 2019 Table 10). The Imber Riverside development (2017/2083), accessed by the same road, has a density of 35dph. Based on an in keeping density of 35dph the site should sustain 26 dwellings rather than 74. The proposed density is nearly 3 x higher than the planning precedent of MOL10. The Elmbridge Capacity Study 2018 identifies the site within the Molesey District catchment area. The low and high density multipliers recommended for district catchment areas is 30-70dph (Par 4.34 Table 3). The mid point density is 50dph. This proposal is for double this. On the FAR (Floor Area Ratio) measure of density it is all excessive with a FAR of 1.5 in an area characterised by FAR of 0.3-0.4.
- ***Unnecessary diversion of the Thames Water Main and resulting removal of 8 mature trees:*** As demonstrated in the earlier pre-planning submissions, the site could reasonably be developed without the need to move the Thames Water main. The main could remain in situ if the development was within the current built footprint of the site. The application extends into the green, undeveloped area to the north of the current permanent structures. If the development was kept within the current built area the trees proposed to be felled, only to relocate the water main, could be retained. It is also worth noting that other trees are being removed on the eastern boundary. Again, if the site was of a smaller, more appropriate scale these trees could also be retained. All of these trees have a public amenity value - being visible above and between the houses of Ember Farm Way and contributing to the existing backdrop of the street scene.

- **The proposed development is within 20m of a Thames Water Sewage Pumping Station:** this is against the best practice of the Thames Water Codes for Adoption and will have impact on future residents' amenity.
- **Massive increase in the over built area, GIA and heights vs. the current development:** The development proposes a huge increase in built area: +1000sq m. (+74%) and a reduction in landscaping of over -500 sq.m (-15%). (Source FRA May 2023 Table 7). The GIA is 9,992 sq m. vs the current development of 1,892 sq m. +428%. (Source: Design and Access Addendum June 2023). This level of GIA is only deliverable by a scheme that significantly increases heights vs. the current buildings and the surrounding area. Building A is 13.3m. The highest building on site currently is Sundial House at 8.3m. This is a 5m (+60%) increase in height of the site. Surrounding houses are around 8m or lower and number 66 Ember Farm Way is a bungalow. The over development is further shown by the fact the buildings are 3 and 4 storeys in an area which is predominately 2 storeys.
- **Parking Provision:** The proposal only provides 1 space per dwelling (74 spaces) and no visitor or staff parking. According to Elmbridge's own parking guidelines there should be 109 spaces (excluding visitor and staff spaces). Even then, this inadequate level of parking provision can only be delivered by building a basement carpark as there is not enough space to provide surface parking. This will inevitably push parking off site and increase on street parking stress on what is narrow road often parked on both sides.
- **Housing Type:** The development is 95% flats in an area which is predominately made up of houses. It is interesting that the applicant submitted a pre application end 2019 (Appendix 2: 2<sup>nd</sup> pre app response on the portal) which detailed a development for 38 dwellings. The majority of this proposal was 2 storeys. The higher 3 storey building was located away from Ember Farm Way and Orchard Lane. The applicant received favourable feedback on this proposal subject to it making a positive contribution to the appearance of the area and not impacting neighbouring amenity.

The image below provided in the appendix of the FRA May 2023 aptly demonstrates the over development to the site. The purple shows the current build footprint vs. the proposal which completely fills the site.



### 3) The mass, scale and the footprint of the proposal vs. the character of the area

The mass, scale and footprint of this development is in no way comparable to the surrounding area.

- The scale, footprint and heights (as detailed in section 2 above) are significantly larger and higher than the neighbouring housing.
- The architectural design is more urban in style. Mansard roofs are not evident in MOL10. It has not adopted the architectural design of neighbouring properties in any way.
- The buildings interrupt the prevailing pattern of development. The result is the visual impact of the buildings is dominant in the landscape, green belt and compared to surrounding housing. We note the building was amended to be 2 storeys to help transition from the green belt however no such transition was done to improve the transition from Ember Farm Way and Orchard Lane. It is completely incongruous to the area.

- The proposal will have a very detrimental impact on the street scene. Visualisations show Building A and C projecting above the roof line of Orchard Lane. The applicant has not provided a street scene visualisation from Ember Farm Way but given that heights of the houses on that road and the bungalow at number 66 it will also be visible. It will dominate the street scene above and between the houses. This will be further exacerbated by removal of trees.

**Street Image (south Elevation) from Proposed site wide elevation / Street scene document**



South Elevation  
Scale: 1:250

- The images below clearly show how this dominating scale of the development and how it is not sympathetic to the local character of the area.

**Impact from Proposed site location**



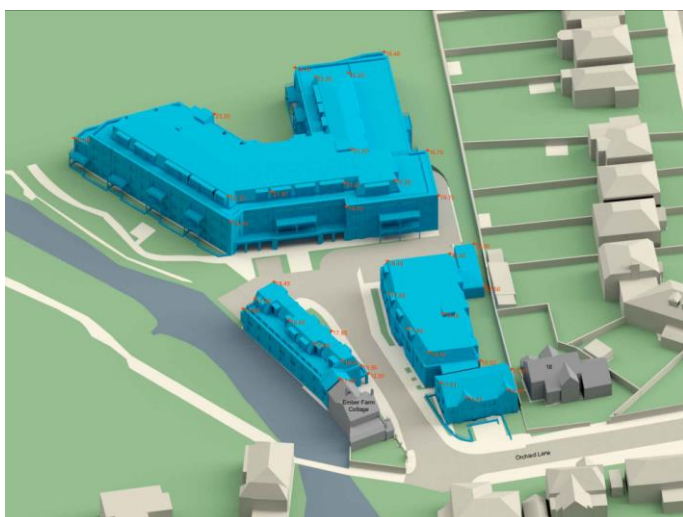
**Model shown at public consultation.**

**Shown in Design and Access**

**Statement: part 2 (18/11/22 pg. 47)**



**Architect drawings produced for the Daylight and Sunlight Assessment Nov 2022 (Appendix)**



**Image from Design and Access statement**

**(07/06/23 pg. 10)**





The application is clearly contrary to CS1 spatial strategy, CS17 Local character, Density and Design, CS15 Housing Type and size, DM7 Access and Parking, DM6 Landscape and Trees, DM7 Access and Parking.

I hope you will protect the local character of MOL10, Ember Farm Way, Orchard Lane, Cow Common, the River Mole and the adjacent green belt by robustly refusing this planning application.

Kind Regards,

Katherine Le Clerc and Jeff Wemyss