

## **Comments Related to Latest Changes to Planning Application 2022/3796**

In addition to our individual objections to the original planning application 2022/3796, we now wish, jointly, to comment on:

1. The recent response by the LPA to the appeal against the non-determination of planning permission 4- 6 Oatlands Drive, Weybridge ref. 2022/2118. The LPA have confirmed that they would have REFUSED planning permission for this development. The developments proposed at 4 -6 and 16 – 18 Oatlands Drive (same developer) are almost identical in design, height, scale, bulk, mass and therefore the same reasons for refusal should apply to 2022/3796.
2. The latest revisions made by AA Environmental to the ecological report and biodiversity matrix as we continue to question the conclusions shown in those documents regarding biodiversity net gain (BNG).
3. Lift shaft extensions.

### **1. LPA rejection of PAs on Associated Sites 8- 14 Oatlands Drive and 4 – 6 Oatlands Drive**

The LPA refused planning permission for 8 – 14 and now has confirmed they would have refused permission on 4 – 6. The same reasons cited by the LPA should absolutely apply to the proposed development at 2022/3796.

- The proposed development would, by reason of its location, design, height, scale and bulk and inclusion of roof terraces, result in the creation of an incongruous form of development which would not quality or reflect and respond to the character and identity of local surroundings, which would cause harm to the character of the area and the street-scene.
- The proposed roof terraces would, by reason of their scale, location and proximity, cause noise pollution for the neighbours of Oatlands Drive, which is considered to be harmful to their amenities.
- The proposal, by reason of the lack of a completed legal agreement, fails to secure the necessary contribution towards affordable housing contrary to the requirements of Policy CS21 of the Elmbridge Core Strategy 2011 and the Development Contributions SPD 2021.

For these reasons, we request that EBC are consistent and reject PA 2022/3796

## 2. Comments Based on Latest Revisions by AA Environmental

### 2.1 Background

On 10/5/2023, Surrey Wildlife Trust wrote to the LPA noting anomalies with the biodiversity information provided by AA Environmental.

“Having compared the above referenced Biodiversity Metric 3.1 Calculation Tool with the Ecological Report, not all habitats, such as the ponds, appear to be included in the calculations. Furthermore, aerial photographs of the site appear to show hedgerows at the garden boundaries which do not appear to have been included in the calculations as linear features. We therefore advise the LPA that they request that the Biodiversity Net Gain Assessment and corresponding Biodiversity Metric 3.1 Calculation Tool, be amended to show all existing habitats on-site, and submitted to the LPA for approval.”

Two subsequent revisions were submitted by AA Environmental Consultants – on 19<sup>th</sup> May 2023 (Revision A) and on 14<sup>th</sup> June 2022 (Revision B).

Based on these revisions we have the following comments and concerns:

### 2.2 Hedgerows

In the latest report (14<sup>th</sup> June) it states under habitats:

“The majority of existing habitats within the site will be removed and replaced by the proposals, including the new block of flats with associated hardstanding, amenity garden, biodiverse green roofs and hedgerows”.

With specific reference to hedgerows, the Habitat Areas Table (Appendices 1) indicates a percentage increase in hedgerows of **54.42%**, despite the proposed removal of 3 existing, well established, dense hedgerows, namely:

H3 – 0.02 km length

H4 – 0.01

H5 – 0.01

Proposed new hedging is recorded as 0.112 km. From the drawings provided in the 14<sup>th</sup> June Report, there are approximately 12 small hedges, which look to be ornamental. If so and given their siting mostly around areas that will be heavily trafficked either by pedestrians or vehicles, they would support only limited wildlife and certainly none of the birds, small mammals or reptiles that use some of the existing hedgerow for food, shelter and nesting. We question how there is an increase of 54.42% (is this the overall volume of the hedgerows, or merely the length?). The Revision A report highlighted an increase of 137.89%, not including any existing hedgerows- a figure that does not appear remotely credible to us.

It should be highlighted that the amended plans, are completely at odds with the Landscape Plans provided by the developer. Where potential hedgerows are mooted, there are areas of planting (shrubs) which are not hedgerows (see Appendices 2).

We ask that and ask that the LPA/EBC and Surrey Wildlife Trust look very closely indeed at these recalculations and acknowledge the disparity between the initial submitted Landscape Plan and current proposals for additional hedgerows. The very fact that the developers' environmental consultants have now had to revise their report several times to correct errors and omissions does not inspire confidence that the latest results reflect the reality of what is truly being proposed.

## **Conditions**

Additionally, it is noted that in AA Environmental Report (Revision A), the hedgerow (H1) which currently separates 18 and 20 Oatlands Drive was originally not going to be retained. This substantial hedgerow is over 20 metres in length: in excess of 4 metres in height and 1 – 2 metres in depth. In AA Environmental Report (Revision B) it is shown in text and Habitat Areas Table 1, that it is now to be retained after all.

We would ask the LPA for assurances that this substantial hedgerow which homes many birds, reptiles and insects would be retained in its current height, mass and form and will not to be subsequently reduced or removed. Should planning permission be granted, or in case of a subsequent appeal, we ask that this is added as a specific condition.

## **2.3 Pond**

The amended application refers to **Amended plans to reflect retention of pond in the rear garden of No 18**. This is an error. The pond to be retained is actually in the rear garden of No. 16.

## **2.4 Green Roofs**

The Habitat Area Table 1 mentions that the Biodiverse green roof will provide 0.06 (ha) of habitat creation. Aside from the mention of green roofs and the fact that they are coloured green in the Revision B drawings, there is no information as to what type of green roofs are proposed. The site roof plans indicate a mix of PV panels and planting but there are no details of the type of planting, whether there will be a watering system, how the roofs will be maintained and how this would increase the biodiversity. The lack of detail provided makes accurate assessment of any claimed BNG impossible.

Furthermore, we cannot see any written mention of green roofs in the Design Access Statement, the Planning Statement or the Landscape Master Plan. Such lack of detail is not acceptable, given the importance of such a major element in the proposed construction,

especially given the reliance being placed on the green roofs by the developers to boost the BNG figure which will almost certainly be required to show a net gain of 10% from November 2023. Therefore, far more information and detailed assessment is needed to verify the developers' claims in this respect. The detail supplied thus far is insufficient and unacceptably vague.

**We would ask that EBC seek further information and clarity in order that an accurate audit on the re-assessment can be done.**

### **3. Lift overruns and smoke shafts**

On all the roof plan drawings there is an area on each block that is assumed to be a lift overrun/smoke shaft although there is no annotation to confirm this. As ever, these developers are being economical with the facts of what they are proposing. None of the "elevation" drawings show any such structures, apart from an almost-imperceptible line drawn slightly above the roof on the Oatlands Drive elevation of the front block. This is deceptive and does not show the reality of what is being proposed. Their size and appearance is not included in any of the diagrams showing heights of the buildings. If these are indeed projections that will rise above the roof level we ask that they be very firmly REFUSED.

Elmbridge planning has already turned down a non-material change application to build such constructions on the 4 blocks being built at nos. 8 – 14 because they would materially change the appearance of the building versus the proposed elevations depicted in the original planning application.

They would be intrusive, industrial looking, out of place in this setting and increase the overall height of the already very large buildings. No other blocks of flats in Oatlands Drive have such protrusions from their roofs.

Should planning permission be granted or in case of a subsequent appeal, we request that a condition excluding roof structures including lift overruns and smoke shafts be specifically added as a condition, to match the LPA ruling for 8 – 14 Oatlands Drive.

### **Summary**

In summary, we again ask that Elmbridge shows consistency with its previous decisions to refuse permission for the planning applications at the sites of 8-14 and 4-6 Oatlands Drive by refusing permission for 2022/3796. The two blocks proposed on this site at 16-18 would be even bigger and bulkier than those at the neighbouring site, they would be much closer to the road and would create an intimidating and overbearing development. The proposals are wholly unsuitable for the site and it would be no exaggeration to state that local public opinion is strongly opposed to any more blocks of flats in this area. This fact alone should carry a lot of weight in the LPA's decision.

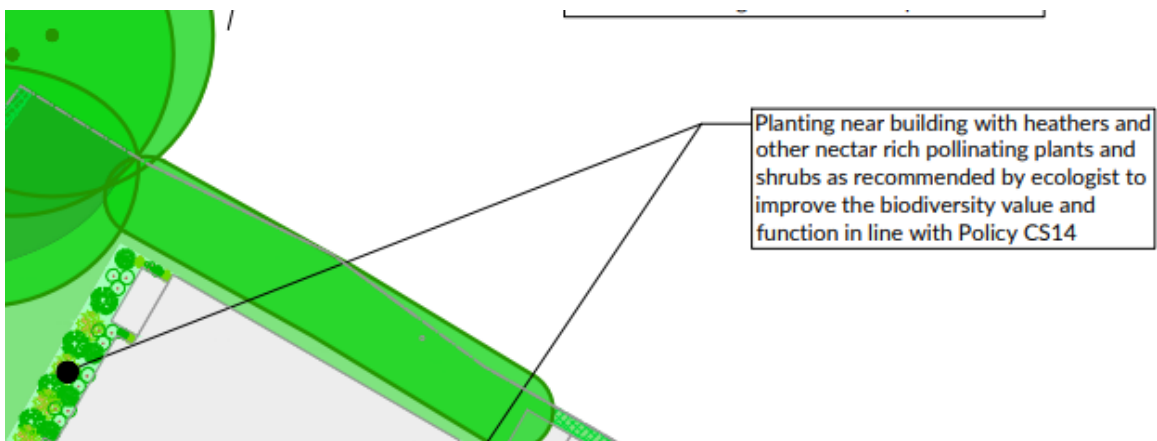
**We strongly urge that this application be refused.**

Existing Hedgerow Baseline			
Habitat	Length (km)	Comment	
H1 – Native Hedgerow	0.04	To be retained	
H2 – Line of Trees	0.03	To be retained	
H3 – Native Hedgerow	0.02		
H4 - Native Hedgerow	0.01		
H5 - Hedge Ornamental Non Native	0.01		
H6 - Line of trees	0.01	To be retained	
<b>Total Hedgerow Units</b>	<b>0.45</b>		
Proposed Habitat Creation			
Habitat	Area (ha)	Comment	
Developed land	0.15		
Vegetated garden	0.138		
Biodiverse green roof	0.06		
Urban tree*	0.118	2 medium, 11 small trees	
<b>Total</b>	<b>0.35</b>	Including retained areas	
<b>Total Biodiversity Units</b>	<b>1.31</b>		
Proposed Hedgerow Creation			
Habitat	Length (km)	Comment	
Native Hedgerow	0.112	Including all proposed hedging	
<b>Total Hedgerow Units</b>	<b>0.69</b>	Including retained hedgerow	
<b>Results:</b>	Unit Change	<b>Habitat</b>	0.07
		<b>Hedgerow</b>	0.24
	Percentage change	<b>Habitat</b>	5.90 %
		<b>Hedgerow</b>	54.42 %

\*Urban Tree areas are not included within the total area calculation of the Defra Metric 3.1.

Appendices 1

Table 1:Habitat Areas AA Environmental



Appendices 2

Landscape Plan