

## **Ref: 16 – 18 Oatlands Drive – 2022/3796**

### **Further Comments Regarding Sequential Test Report and Rebuttal**

In the updated Planning Officer's Committee Report, which was issued BEFORE the comment's deadline Of 7/11/23, mention is made of the sequential test results provided by the developer:

- The document has considered other similar sized sites that have been reviewed as part of the Land Availability Assessment for the Local Plan, and therefore subject to Strategic Flood Risk Assessment. The conclusion is that the sequential test is passed. The report considers that as the development itself is located only in Flood Zone 1 that an exception test is not required, however one is carried out to ensure robustness. (Para 108)

We make no further comment on the details of the sequential test, although we do not agree with its findings. However, we do believe that the data therein demonstrates unequivocally that the proposals should be refused as the site is too small, based on EBC's own evaluations.

### **Other similar sized sites**

We have looked at the Brownfield Site Register and identified sites of a similar size to the site at 16 – 18 Oatlands Drive. As can be seen below, the EBC estimated potential development at the sites of similar size reflects a significantly smaller number of dwellings and dph. This reinforces our view that 33 flats on 0.35 with an alarming density of 96 dph, way beyond the density recommended by EBC, is totally inappropriate at this leafy, tree-lined suburban location.

#### **Brownfield Register Sites of Similar Size to 16-18 Oatlands Drive**

<b>Sites with similar Area</b>	<b>Area</b>	<b>Dwellings</b>
<b><u>Sites not included in Savills' Sequential Test</u></b>		
243 Brooklands Road	0.35	17
8 Holtwood Road Oxshott	0.34	8
Bevendean Cottage, Oxshott	0.39	14
Copsem Manor, 50 Copsem Lane	0.36	6
Hersham Day Centre, 7 Queen's Road, Hersham	0.39	15
Warling Dean, 33 New Road Esher	0.39	19
<b><u>Sites included in Savills' Sequential Test</u></b>		
East Molesey Car Park	0.40	23
Walton Car Park	0.34	17
Hall Place Drive	0.32	25
Cricket Way	0.35	7

Portsmouth Road	0.36	25
Torrington Car Park	0.34	8
Hanover Cottage	0.31	13
Millbourne Lane	0.36	25
AVERAGE	0.36	16

The only 2 locations of this size that were considered by EBC to be able to have capacity for over 33 flats were Manor Road South and Brook House. The first is a location directly on a major, busy junction, opposite a huge petrol station and diagonally opposite a large block of flats. The second is a location replacing a car dealership and surrounded immediately on all sides by flats already. These are not in any way comparable locations to 16-18 Oatlands Drive so have been discounted.

#### Sites with similar number of dwellings

The table below shows the area of sites in the BFS Register that EBC has identified as being able to accommodate similar numbers of proposed dwellings as the application for 16 – 18 Oatlands Drive. As can be seen, in EBC's own view, to accommodate the number of dwellings the areas required are much higher.

Sites with similar no of dwellings	Area	Dwellings
241 Brooklands Road	0.404	32
Brook House and Thames Honda, Portsmouth Road	0.3921	30
Abbey House, Wellington Way, Weybridge	0.4553	28
Building B, St George's Business Park, Brooklands	0.4053	30
Molesey FC, 412 Walton Road West Molesey	0.7865	38
Sherwood House WOT	0.5234	30
Weybridge Hospital 22 Church Street	0.8399	30
Thamesview House, Felix Road, Walton	0.5906	33
Average	0.55	32

## Findings

Many of the reasons given by the developer for discounting the alternative sites were based largely on the capacity of the sites being too small or the larger sites identified with suitable capacity by EBC being too expensive.

The reason for this is clear and makes a mockery of the sequential test. There is a lack of similar sites because the proposed 33 flats are being squeezed into 0.35 hectares. We believe that the sequential test cannot pass in these circumstances and the above factors have not been fully acknowledged by the Planning Officer. The site is simply too small for the proposed development, as backed up by EBCs own Brownfield Site Register.

## Flood Risk

We understand that due to concerns raised by residents regarding the sequential test not being carried out to the necessary standard, this information is currently being reviewed by the Council's external Flood Risk Consultant and the outcome of the consultation will be updated at Committee. We hope that this misleading comment from the PO in paragraph 108 of the Committee Reports is corrected before then.

- The report considers that as the development itself is located only in Flood Zone 1 that an exception test is not required, however one is carried out to ensure robustness. (Para 108)

The development whilst predominantly in Flood Zone 1, also extends into Flood Zone 3B, as did 4 -6 Oatlands Drive, which was dismissed at appeal because of it. We ask that the results of the exception test be made public ahead of the Planning Committee Meeting.

## Conclusion

The proposed development already has many factors indicating it is too big for the size of the site:

- There is insufficient parking and the developer is acknowledging this by identifying Ashley Close as an area for overspill
- There is lack of meaningful landscaping and amenity space, as commented on by the inspector on 4-6 Oatlands Drive (most of the green space is inaccessible roof space)
- The buildings are less than 22m apart
- The front building cannot fit within the established built line and is too close to the kerb
- The rear building extends to the very edge of the flood zone predictions, which is not an exact science, meaning there is a risk of flooding for future residents
- The rear building would be too close to and too visible from the greenbelt at the rear, will be shaded and thereby threaten the future of trees, and will spoil the enjoyment of this rural amenity space by its overbearing and urban appearance

And now, based on EBC's own Brownfield Site Register and comparison to sites identified there, it is demonstrated that sites of this size, in this type of location, cannot fit this many flats. If the developer cannot build these flats on a bigger size plot because it is too expensive, then their plans are inappropriate and should change, that is not a reason for them to be allowed to cram them into a site which is too small.

**The proposals are too big for the site. They would lead to unacceptable impact on the street scene and Cowey Sale to the rear, cramped living conditions for future residents, development in an area of flood risk and parking stress, and they should be refused.**