

**Our reference:** COM574569095

**Application number:** 2023/2889

**Application address:** Land Off Anyards Road and Copse Road Cobham Surrey KT11 2LH

**Name:** Mrs Scianna

**Address:** 130 Portsmouth Road, Cobham, Surrey, KT11 1HX

**Comment type:** You object to the planning application

**Date of comment:** 04 Jan 2024

**Comment:** The previous application made to this site. 25 dwellings, submitted in December 2021, planning reference: 2021/3243.

Surrey Wildlife trust were consulted and this time around they have not been consulted. This planning application is near identical to the previous, Surrey Wildlife Trust must be consulted. Many excellent points have been made by Surrey Wildlife previously for the near identical application.

1. The LPA (local planning authority) has a duty to conserve Biodiversity in line with planning and legislative context.

2. The Biodiversity net gain assessment presented by Shanly Homes is bias. The assessment was based on the baseline condition of the site decided to be in March. It states: "The baseline condition of habitats on site is considered to be low, given the dominance of low value vegetated garden and hardstanding." Yet, the report uses google maps satellite images of the site showing numerous high clusters of trees and vegetation that have been stripped from the site by the developer and previous developer over the preceding 2 years. The report points out: "It must be noted that the garden habitats had been cleared of shrubs prior to the site survey, at some stage in 2023.", it goes on to state "The habitats prior to clearance have been estimated." And yet this is impossible, the previous developer and current have been reducing the habitat consistently for 2 years! This makes it a false and bias report, akin to being allowed to take a breathalyser the day after driving (allowing time for the alcohol to leave the system before taking the test!)

Surrey Wildlife pointed this out already in 2021 as follows, "The report indicates that trees have been removed prior to the determination of the planning application. The Applicant should be aware that the baseline biodiversity net gain assessment must consider the baseline biodiversity value of the site as being before the trees were cut down. The guide describes a projects ecological baseline conditions "existing in the absence of proposed activities". The LPA should be aware that trees have already been cut down, it is unknown whether these trees were assessed for bat roosting suitability and bird nest."

This valuation still applies. Developers continue to willfully degrade the site biodiversity and present application with new baseline dates to more easily portray a net biodiversity gain. This is fixing the test. The biodiversity net gain must be based on the site prior to the felling of trees and vegetation in 2021 and conducted by an independent qualified body! Clearly seeing immense tree clusters and sizes from google maps images shows there will be a huge biodiversity net loss from the site baseline pre tree felling in 2021!

3. Many strong points are raised by the surrey wildlife trust and should all be considered

On the previous application in 2021 which is near identical (planning reference: 2021/3243).

Environment Health noise and pollution were consulted. They must be consulted for this application. They commented on noise, pollution, plan suitability and mitigation which is still valid as the application is almost identical to the previous.

On the previous application in 2021 which is near identical.

I object against Design, Material, Layout and Density.

The proposed development would be out of character with this area of Cobham. These buildings would be of a different style and higher than the buildings around them. Building in the garden area separating all these existing houses would also be "out of character" and as such would be a loss of faith with all the neighbours that have lived with the assumption of this forever being open space all these years. The density of the dwellings involved is an extreme departure from the existing built form density. This contradicts preservation of local character.

The 2 bedroom houses on Portsmouth road are built on plots that are 165 metre squared per dwelling (on average). The 2-3 bedroom houses on Copse road (to the east are built on plots that are 160-190+ metre squared. The smaller houses on Copse road (South of the development) average 135+ metre squared per dwelling whilst the 2 bedroom houses on Anyards average 160 metre square plots per dwelling. Contrast this with the planning application; the high value 3 bedroom houses are built on plots of 120 metre squared per dwelling and the 2 bedroom houses are built on plots smaller than 120 metre squared. This is clearly a VERY different density to the surrounding housing stock and completely out of character. The gardens on the plots are tiny and surrounded by tall buildings, they would receive barely a few hours of direct light a day (even in summer), this is hardly in keeping with the area, promoting biodiversity or creating quality housing!