

Dear Councillors,

**REF: PA 2022/3796 - Proposal to demolish 2 detached houses to construct 2 blocks comprising 33 flats at 16 – 18 Oatlands Drive, Weybridge**

This document contains our final responses to the late amendments by the developer and the Planning Officer's latest response to these and associated residents' comments.

Before making your final decision on this planning application, we would ask you to please read this communication, together with the detailed representations submitted to the council during the extended consultation period. These were submitted by residents specifically in response to the following 5 application amendments received by Elmbridge Council from the applicant on 24 October 2023:

1. Parking Survey
2. Sequential Test Information
3. Amended Parking Layout
4. New Swept Path Analysis
5. Changes to Fenestration

**1. Amended parking survey:**

The Planning Officer commented that residents may not be qualified to perform a survey, that the parking stress level observed was only 77% when stress is only considered at 100%, and that parking overspill from permitted developments and the effect of SCC Highways' new single yellow line cannot be considered, as they are uncertain until implemented.

However:

- Residents used the exact same survey methodology as Lanmore Consultants.
- In fact, Lanmore only surveyed 2 weekdays, during half term, one of which was a Friday. This is expressly against the best practise in Elmbridge and Lambeth guidelines. So, the residents survey over 6 weekdays, of which 5 were in term time, is more robust.
- 77% was only the average stress level. On term-time weekday mornings the stress level was 84-95% already, without the impact of 8-14 Oatlands Drive overspill or the planned yellow line.
- Elmbridge DM7 Parking Supplementary Document and the Lambeth Model both expressly state that planned development that would affect future parking should be considered. So the overspill from 8-14 Oatlands Drive and the planned single yellow line must be considered by EBC's own standards.

- The single yellow line proposed by SCC Highways would be implemented in 2024, before 16-18 Oatlands Drive development would be built and occupied, and therefore its impact on reducing local parking capacity must be considered. At current parking levels, not including any future 8-14 or 16-18 overspill, the parking stress levels would already be 119%-133% when the yellow line is implemented.
- In the Lambeth Model, it states “An assessment of potential vehicle ownership of future occupants is expected to be undertaken to understand the scale of any overspill parking. This is to be based on local census information for car and van ownership. The cumulative effect of other consented development in the immediate area is also to be taken into account when assessing the effect of parking on street.”
- Lanmore Consulting did not attempt to evaluate the potential overspill of either 16-18 or 8-14 Oatlands Drive.
- Residents used Elmbridge census data and planning guidelines to calculate 3 different estimates (car ownership @1.5 cars, car ownership percentages @ 0, 1, 2 cars etc, and EBC planning guidelines for number of cars per dwelling based on bedrooms) and took an average of these along with the developer’s proposed 1 per flat. This led to an estimate of 14 cars overspill for 8-14 Oatlands Drive and 12 for 16-18 OD, so 26 in total.
- Even without the single yellow line, 5 cars overspill each morning would take the stress in Ashley Close to 100%.
- Finally, even without the parking survey, Ashley Close has been established and accepted by SCC Highways as an area of parking congestion and stress causing road safety issues, which is why they are proposing the single yellow line in the first place.

Developments without adequate parking should not be permitted in an area of established parking stress as it would adversely affect the safety and amenity of current residents.

## **2.Sequential test rebuttal:**

The Planning Officer said that the sequential test has been met as no alternative, reasonably available sites could be identified with less chance of flooding.

While this means the test fails, it does demonstrate further that this development is far too big for the site. In fact, a review of the brownfield sites identified by the LPA on their register shows:

- All other residential sites of similar hectare size identified and evaluated by the LPA average only 16 dwellings and at 44 dph.

- In fact, all sites identified by the LPA that would fit 33 flats require an average of 0.55 hectares.
- We remain of the opinion that this site should not have been approved by Elmbridge's officers or their consultants as suitable for development because the proposed rear building would be situated right on the edge of Flood Zone 3b. Not only is the extent of possible future flooding hard to predict (a point made very clearly by the Planning Inspector when dismissing the appeal at 4-6 Oatlands Drive), but the rear building could not provide satisfactory accommodation for future residents of its lower-floor apartments due to the boggy nature of the ground. We maintain our view that this site is wholly unsuitable for such high-density development and that the proposed 94 dph grossly exceeds what should reasonably be permitted by Elmbridge Borough Council.

### **3. Increase in number of parking spaces:**

Our views on the inadequacy of the parking provision, even with the additional space now shown, are clearly laid out in our submission dated 4 November. Furthermore, we believe that by squeezing in two more surface parking spaces, the applicant has reduced and therefore compromised the turning area for refuse trucks (see next point.)

- There are only 34 spaces for the development, including visitors and trade.
- This includes 2 disabled, plus electric charging and car club spaces, which means there would not be an allocated car parking space per flat.
- 1 car parking space per flat is only the MINIMUM standard, as identified above, this is an area of parking stress with extremely limited capacity to safely absorb any overspill.

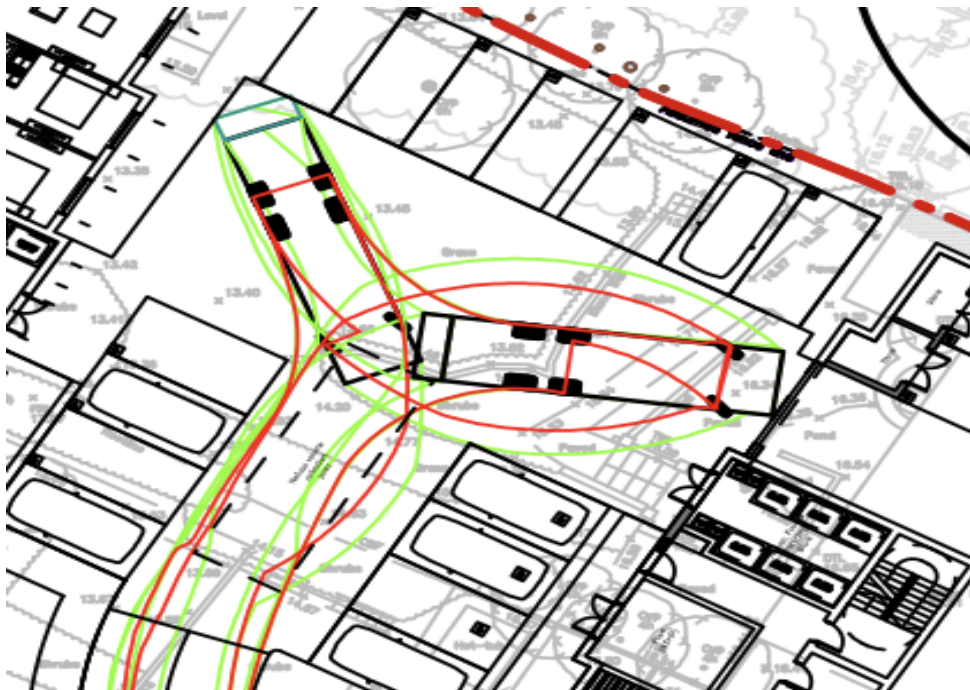
### **4. Swept path analysis indicated on plans:**

One of the latest objections noted that Joint Waste Solutions had NOT been consulted about the amended swept path plans. These amendments were submitted to allow for 2 extra parking spaces and there was no mention of this amendment in the latest Committee Report. This omission was flagged up with the Planning Officer. JWS were subsequently contacted and the updates sheet states there was no objection from Joint Waste Solutions to the amended swept-path plans (correspondence attached).

However, there is no official confirmation from JWS that this is acceptable - in fact they comment that the turning circle looks tight. The response from Savills also does not answer the questions about minimum requirements set out by JWS, which includes the distance between kerbs and walls.

“Adequate turning space should be provided if the vehicle is expected to access the development. For tracking purposes, the dimensions of the current collection vehicles are 10.6 metres long and 3 metres wide. The minimum turning circles are 19.9 metres (kerb to kerb) and 21.6 metres (between walls).”

Also, it appears to us that the refuse trucks would have to reverse almost into the walls of the buildings to turn around (see attached drawing). Surely given how tight this is JWS would have to review the swept path analysis themselves to confirm they have no objection.



#### **5. Removal of outward opening doors on the top floor of each block:**

In the updates, the developer has changed sliding doors onto the flat roofed areas to be door sized windows that do not open. This would mean that 4 bedrooms in top floor flats would not have any openable windows. These rooms would therefore have no source of ventilation whatsoever, leading to unacceptable living conditions for future residents.

Moreover, the large glass, door-sized windows proposed for the living rooms would also not be openable. This would also lead to uncomfortable living conditions. They should be openable windows with internal cills. There is no reason to install full length windows here, unless the developer hopes to replace them in future with doors as he has done at 8-14 Oatlands Drive, which has led to compliance issues relating to non-permitted roof terraces.

This implication of the applicant's proposal to install all non-opening side windows on the upper floors should have been noticed and queried by the Planning Officer before completion of the Committee Report, and the design changed to have conventional windows which meet EBC's standards.

### **CONCLUSION**

**In conclusion, we maintain ALL of our multiple objections to the proposals for the site at 16-18 Oatlands Drive which includes the contradictions in the Planning Officer's Report. The proposal represents a gross overdevelopment of the site which would cause damage to both the street-scene and the greenbelt in Cowey Sale to the rear (see the photos below for potential before and after images). Dave Page of EBC's Greenspaces has objected strongly to the planning application because of the damage it would cause to the amenity and habitat at Cowey Sale. The planning officer acknowledges these enormous yellow buildings would not enhance the character of the area or reach the high standards of the Governments 'Build Beauty' notion. We would urge all members of the Planning Committee to REFUSE planning permission.**

Thank you for reading and considering our communications.

**Rosemary Roach**

**Sharon Finch**

**Jane Murray**

**17 Oatlands Drive**

**20 Oatlands Drive**

**22 Oatlands Drive**

13 November 2023



**Existing gardens at 16-18 Oatlands Drive:**



**Construction site next door at 8-14 Oatlands Drive (“Riverside Gardens”):**

