

14<sup>th</sup> October 2017

Dear Ms Walker,

Re: Application 17/01483/FUL – 126, Manor Lane, Sunbury TW16 6QJ

#### Proposed Elevations

Within this planning document, the application indicated by the red broken line superimposed on the proposed elevations (RSH002\_02\_05) is predicated on a previous application (17/00649/FUL) which was **withdrawn** by the applicant without ever having been determined by the local planning authority. It follows therefore, that it represents an illusory and deceptive red herring presented to residents by its portrayal as a generous concession for which we should presumably feel grateful. To be clear, given the withdrawal of 17/00649/FUL before determination by the LPA, the indicative broken red outline has absolutely no relevance or evidential value when considering the current proposal. It would have been more honest if the broken red line had been used to illustrate the outline of the existing property on the site rather than that which was previously proposed.

#### Transport Statement

The Transport Statement states that the development will be provided with a mere 7 parking spaces. The Parking Standards Supplementary Planning Document (SPD) 2011 requires that 2 bedroom dwellings have 1.5 parking spaces per dwelling which should be rounded up to the nearest whole number; ie, 11 spaces.

A Reduction of parking requirements will normally only be allowed in the following situations: within the Borough's 4 town centres defined in the Core Strategy and Policies DPD. Manor Lane and Green Street are not within the Sunbury town centre.

To persuade the LPA that an exception should be made, the developer states that "There is precedent for similar schemes with similar levels of parking in Spelthorne." (para 6.26) He is then able to quote just one, at 8 – 12 Clarendon Road, Ashford. This is not a precedent however, as Clarendon Road is situated within Ashford town centre (and therefore allowed within the terms of the Parking Standards SPD). Furthermore, Manor Lane and Green Street are *classified unnumbered* ie, smaller roads intended to connect together unclassified roads with A and B roads, and often linking a housing estate or a village to the rest of the network, sometimes known unofficially as C roads. In contrast, Clarendon Road is *unclassified* ie; a local road intended for local traffic.

Notwithstanding the above, every application should be judged on its own merits and precedents should only be considered where similarities extend into the wider geographical environment. Unlike Clarendon Road, Ashford; Manor Lane and Green Street are busy peak hours roads and, additionally, facilitate journeys to a number of local schools: Hawkedale Infants, St Ignatius RC Primary School, Springfield Primary School, St Paul's Catholic College, Sunbury Manor School and The Bishop Wand Church of England. There is, therefore, no similarity with Clarendon Road, Ashford.

#### Design of New Development

Policy EN1 (a) requires that the building "should respect and make a positive contribution to the street scene and the character of the area in which they are situated, paying due regard to the scale, height, proportions, building lines, layout, materials and other characteristics of adjoining buildings and land." Further, Policy EN1 (b) requires that the building will "achieve a satisfactory relationship to adjoining properties avoiding significant harmful impact in terms of loss of privacy, daylight or sunlight, or overbearing effect due to bulk and proximity of outlook."

In support of the application, Figures 13 and 14 in the Design and Access Statement (DAS) are offered as examples of local increases in scale. They are not, however, remotely 'adjoining buildings' and, in any event, are set back some distance from the pavement edge of Green Street unlike the proposal at Figure 21.

Furthermore, The Listed buildings officer and statutory consultee, Mr Andrew Hill, states that *"the Grade II listed building on the opposite corner of Manor Lane, No. 124 Green Street, is currently the dominant feature in this part of the street (image shown). The current building on the subject site is almost invisible leaving the building beyond as the next meaningful structure. Whilst the proposal is not hugely dominant it does come forward of the current footprint and thus has a major effect on the setting (and dominance) of the listed building. I consider the setting will be harmed by the scale of the proposal, and am not convinced that any public benefit will outweigh this harm"*. (My bold). It is the view of both Mr Hill and this Association that the proposed development fails to satisfy policy EN5 (f) – "requiring development proposals for any sites affecting the setting of a listed building to have special regard to the need to preserve its setting". (In this connection, it's interesting to note that para 3.19 of the DAS has been lifted in its entirety from para 4.19 of the Planning Statement accompanying the withdrawn application 17/00649/FUL. Both paragraphs refer to underground parking!).

At para. 6.4 the applicant rightly points out that interpretation of EN1 policy is subjective and a matter of opinion. There is no disagreement with that proposition but the salience of local opinion and that of the Listed Buildings officer must surely trump that of a remotely located, out-of-town developer.

For the reasons outlined above, I urge you to recommend refusal of application 17/01483/FUL.

Yours sincerely,

John Hirsh,  
Hon. Vice-chairman, Lower Sunbury Residents' Association (LOSRA),  
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Sunbury,  
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