



CONSULTEE RESPONSE

Ms Dana Nickson
Planning Services
Elmbridge Borough Council
Esher, Surrey KT10 9SD

By email to: tplan@elmbridge.gov.uk

Our reference: 20085

4th September 2020

Dear Ms Nickson,

Site: Esher Place, 30 Esher Place Avenue, Esher, Surrey, KT10 8PZ
Applications: 2020/0437, 2020/0567, 2020/0568, 2020/0438, 2020/0440, 2020/0439

SAVE Britain's Heritage writes to object to the above planning and listed building applications which proposed substantial alterations and additions to the grade II listed Esher Place to create 22 no. flats; construction of a three storey extension with 8 no. flats, construction of a two storey terrace with 3 no. dwellings; and construction of 2 no. two storey semi-detached buildings containing 4 no. dwellings in its gardens. For the reasons outlined below we call on the Local Planning Authority to refuse planning permission

Inability to assess cumulative impact

SAVE objects to the format by which the proposed scheme for converting Esher Place and its grounds has been submitted for planning approval. The submission of four separate applications inhibits any assessment of the cumulative impact these substantial proposals will have on the grade II listed house and gardens. Given that the alterations and additions proposed in each of the four applications substantially overlap and form part of one overall development, the impacts they will each have cannot be considered in isolation, but rather must be assessed in the round as part of one planning application. We are further concerned that splitting the proposed development into four applications bypasses the Environmental Impact Assessment that would otherwise be required for a single development of this size.

Insufficient Heritage Assessment

We are also concerned by the lack of detail provided within the various heritage statements and statements of significance submitted with each application. In our view, they do not provide the level of detail required to properly document or recognise the importance of Esher Place's interiors and gardens. Without such information it is not possible to assess or justify the proposed development. On this basis these applications fail to comply with national and local policy for preserving Elmbridge's historic environment.

For example, page 7 of the Statement of Significance notes the Mandela Room was originally a theatre gifted to the d'Abernon family by King Edward VIII. A partition wall has been previously erected to turn the raised stage area into a

corridor, but the stage remains in situ and can still be seen in the Mandela Room, as shown in figure 74 on page 27. The statement (page 7) goes on to say that despite the partitioning, the 'space presents a high level of architectural and historic interest which should be retained'. However, proposed ground floor plan (Ref. P150) indicates that the stage structure is to be removed and a new WC and stair are to be built in its place. There is almost no discussion in the documentation about the role or importance of the theatre within the house, and why it was a gift from the King, or justification for the potential loss of historic building fabric of this nature.

This is just one example of many where insufficient heritage detail is provided to be able to make a fair and informed assessment of the alterations proposed on this important heritage asset. Paragraph 189 of National Planning Policy Framework, 2019 (NPPF 2019) states that: "In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance." We therefore consider a significantly more detailed and comprehensive heritage statement and statement of significance to be required for a development scheme of this scale.

Proposed extensions

We strongly object to the proposed 8no. apartment extension between the main house and the former tennis court wing. This extension is entirely out of context and its location and design do not compliment or enhance the elevations of the main grade II listed building, but rather intrudes into views of the house from the west side.

SAVE therefore considers the harm this would cause to be substantial in line with para 194 of NPPF 2019, which states that: "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of grade II registered parks or gardens, should be exceptional." Given the high value and significance of Esher Place and its setting, an extension of the height and modern form proposed will substantially harm both the historic character and relationship between the listed house and the landscape it is sited within. The documentation provided with these applications fails to justify why such an extension is required or the harm the harm it will cause.

As noted above with the theatre/ Mandela Room, insufficient information is provided in the heritage statement about the gardens, listed by means of their association with Esher Place, to be able to assess the harm the proposed extension will have on any historic features, vistas, and views of the main house, as required by para 189 of NPPF, 2019.

Conclusions

For the reasons stated above, SAVE strongly objects to all the above applications in their current form and recommends the Local Planning Authority refuses planning consent and requires the applicant to resubmit their proposals as single comprehensive planning and listed building applications. Such comprehensive applications must also be supported by a commensurate heritage statement and statement of significance that fully identifies and addresses the significance of the building, its fine interiors and gardens, and the cumulative impacts of the overall development.

I trust these comments are useful to you and I ask that you keep me informed of further developments with this application.

Yours sincerely,



Ben Oakley
Conservation Officer