

URGENT

Mr Stephen Wallis,
Planning Casework Unit
Planning Inspectorate

By email to: east2@planninginspectorate.gov.uk

Our reference: 22021

9th March 2022

Dear Mr Wallis,

Planning Applications: 2020/0437 (Appeal Ref: APP/K3605/W/21/327589), 2020/0438 (Appeal Ref: APP/K3605/W/21/3275803), 2020/0439 (Appeal Ref: APP/K3605/W/21/3275808), and 2020/0440 (Appeal Ref: APP/K3605/W/21/3275811) - Esher Place, 30 Esher Place Avenue, Esher, Surrey, KT10 8PZ.

SAVE Britain's Heritage has previously objected to the above planning applications but was only recently alerted to the applicant's appeal against their refusal in November 2021, and the public inquiry which we understand is scheduled for the 15th March 2022.

Ahead of the inquiry, we wish to reiterate our strong objection to these planning applications (and their listed building consent counterparts) and ask that our previous comments and those outlined below be made available for consideration by the inspector during the inquiry.

Additional comments

In light of the recent application lodged with Historic England by local residents to upgrade the listing of Esher Place (Ref: 1480410), we call on the Planning Inspectorate to defer any decision on this appeal until this listing assessment is completed and to request that full access is granted by the owner to allow for its interiors to be inspected, which has up till now been refused by the owner.

It is clear from historical evidence that the interiors of Esher Place are of exceptional quality and of much higher heritage significance than previously understood or recognised. Historic England acknowledge in their own guidance note Domestic 3: Suburban and Country Houses (p.22) that "lists of the 1970s ... may contain houses which are under-graded ... many houses were listed without the benefit of internal inspection which may reveal further claims to special interest." We consider Esher Place to be a prime example of this, especially given that it was first listed in February 1975.

Having a comprehensive and up-to-date listing record is paramount to assessing the impact of any proposals on a listed building, as required under the provisions of paragraph 194 of the NPPF (2021) and the Planning (Listed Buildings & Conservation Areas) Act 1990 for the protection and enhancement of the nation's listed buildings. Given the significant and extensive changes proposed to the internal and external fabric of Esher Place under these applications, it is therefore incumbent on the planning inspectorate to ensure the listing of Esher Place is properly reviewed at the advice of Historic England, ahead of its assessment of the planning balance in this case.

We also wish to reiterate our objection to the applicant's approach to submitting their plans for Esher Place and grounds in multiple parts. Esher Place is a single designated heritage asset whose setting and fabric is impacted by all the above applications in various and often substantial ways. We therefore consider the applicant's decision to submit multiple planning and listed building consent applications to inhibit comprehensive and transparent assessment of the individual and cumulative impacts their proposals will have on a single building and its setting. In our view, presenting such fragmented and often overlapping planning applications is poor planning practice.

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

Yours sincerely,

A handwritten signature in black ink that reads "Ben Oakley". The signature is written in a cursive, slightly slanted style.

Benedict Oakley
Conservation Officer