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23rd March 2024
Surrey County Council
via e-mail
FAO : Charlotte Parker – SCC Planning Support Team

cc: RBC Planning Dept.

SCC 2023-0045 – Former Brockhurst Care Home Outline Planning Application Revisions - ONF Representations

1. Thank you for your letter regarding the above revised Outline Application dated 15th March 24.
2. The following are ONF comments, issues and objections.

Summary Statement.

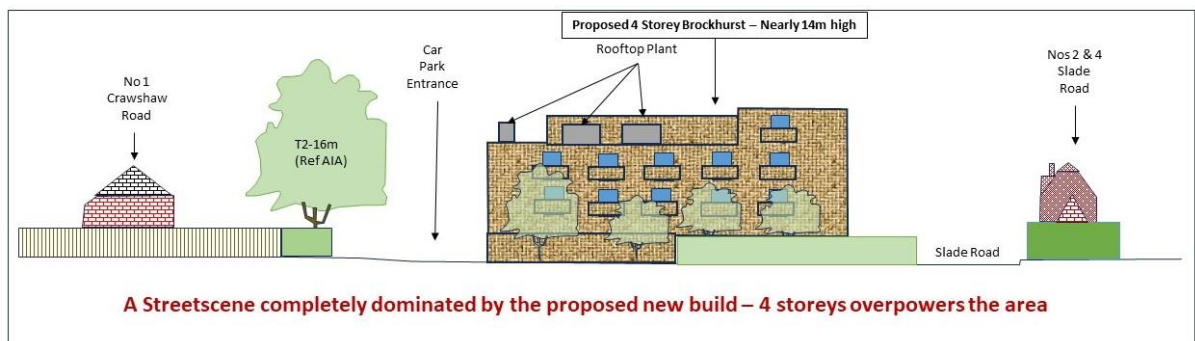
3. We remain **strongly in support** the provision of a C3 Extracare facility within Ottershaw and welcome a number of the amendments from the previous submission which mitigate some issues we had raised, however it is our view that the outline design **still fails to meet the objectives of design and practicality in a number of key areas.**
4. It appears that SCC are determined to increase the capacity of the facility to the detriment of the solution and the surrounding area. In our view this is neither tolerable or practicable at this location remote from the village centre.
5. It is our view that these issues need to be fully addressed before proceeding to full detailed application.

We therefore recommend the proposal is REFUSED subject to resolving the issues indicated below.

Height and Massing

6. Whilst the building has been reconfigured to a reverse “L” shape it now has a **significant size additional fourth floor element directly onto the streetscenes of Brox and Slade Road whilst still retaining the same position regarding its proximity wih Brox and Slade Roads.** At over 13metres high and with its large area and perpendicular walls to roof level it is our view that this excessive massing at

this key location will **significantly and negatively dominate the local streetscene**. The four floor design **fails to comply with RBC policy EE1, the Design SPD and our draft Neighbourhood Plan Design Codes** which advocate a “feathering” of a design into the streetscene at a location such as this or conversely a distinct landmark building which takes cues from the surrounding area and contributes positively to the streetscene. The current proposed design falls well short of achieving either of these objectives instead providing an unattractive and ill proportioned construction. Examples of its negative impact upon the streetscene are shown below.



7. It should be noted that all the design examples shown in the DAS Addendum all show buildings which do not exceed the height of those in the immediate area and in some cases the building is actually lower than others.
8. We note that the 3D conceptual views show trees in many places where they would either be insufficient space or they would shade areas of the building severely and particularly at the corner. It is our view that the outwards facing façade would be largely unmasked by vegetation. **As such the size and appearance of the building is critical.** The proposal already accepts that other existing trees will be lost.
9. We note that the building accommodation capacity has increased from 44 to 51 from what appears to be an SCC requirement and that this constitutes a significant element of the new top floor (7 units). We fail to see any clear justification for this increase. **In our opinion this site cannot safely or practically tolerate a building of this size and capacity.**
10. It should be noted that **there are no buildings above 3 storeys within Ottershaw and only one group at 3 storeys within 400meters (Moat Court in Shaw Close).** The latter is completely hidden by vegetation from Brox and Guildford Road (see below).



Moat Court – View from Brox Rd



Moat Court – View from Guildford Rd

11. It should also be noted that several planning applications in the immediate area for building extension to **3 storeys have all been refused by Runnymede**, in part due to this having a negative effect on the character and appearance of the immediate area and setting an unwanted precedent. These include 64 Brox Rd opposite and 24 Brox Rd nearer the village centre. A telecoms mast (20m) has also been refused for the corner of Brox/Slade Rd for similar reasons. In addition, larger buildings such as WS Hunts on the opposite corner whilst only 2 storeys have a pitched roof style to further soften the effect.
12. The effect upon the Old School locally listed building opposite should also be considered to avoid any negative impact and provide cues for design..
13. As such the introduction of a structure of these proportions **goes completely against local council policies guidance for the area**. A building of 4 storeys and this capacity is not tolerable at this location and sets an unwanted precedent for other developments to propose similar designs and succeed. This must be considered an unwanted precedent in a small village of this kind.

14. Finally, the proposal refers to use of the roof as a terrace. Any arbour or other structure would then take the structure's height to 16metres, far too high for this area. There would likely also be issues with overlooking from this height.

Possible Mitigations.

15. A fourth floor **should NOT be permitted. This should be removed from the design completely.**
16. Provide a solution which:
- a. Is retained near the original 44 unit capacity.
 - b. Considers expanding the basement to accommodate plant and other ancillary functions such as kitchen, changing and refuse storage to release ground floor space for accommodation.
 - c. Provides some basement car parking under the end of the wing near Crawshaw Road (see parking & overspill).

Design and Character

17. Whilst we are aware that the finer detail will be the subject of the detailed application to follow it is our view that **at this stage a number of the more significant issues need to be addressed and comprehended if the building is to become a positive feature of the neighbourhood.**
18. Despite the "rounding off" of the corner facing the Brox/Slade Road junction this small change is considered **completely insufficient to meet the claims of this becoming a characterful design, integrated into the streetscene.** Most significantly it **fails to meet design requirements for a landmark building** which would be the expectation at this location in the village. It also currently **shows no evidence of taking any visual cues from the surrounding area.** It should also be noted that the legacy trees shown in the 3D views covering the corner **will all be removed.**

Possible Mitigations.

19. We believe that a **no more than three storey design is absolutely critical at this location.**
20. Given the large proportions of even a three storey design, far more effort should be made to **raise the design to landmark building status.** Some suggestions would include:
- a. Further enhancement of the corner feature in terms of detailing and roof shape/type.
 - b. A softening/shaping of the leading edges of the roof to better mask it and provide more of an architectural feature and/or a move to a low pitched design.

- c. Some careful consideration and early indication at a high level of indicative materials to integrate well with the character and appearance of the area, this including brick/fascia style/colour, detailing proposals, cills, lintels and fenestration. This would assist comprehension of what the building would be able to tolerate. We see it as critical that this is understood early given the significant effect of this building upon the streetscenes of Brox and Slade Roads. If the building had a more sympathetic overall outline this would be less necessary at this stage.
- d. Some thought regarding the design of the many balconies in order to provide an attractive perspective whilst maintaining safety and providing functional utility.

Parking and Overspill

- 21. Despite the slight increase by two spaces in parking capacity it is our view that **this is wholly inadequate to meet the needs of the facility**. It should be noted that this increase is more than matched by the increase in number of units by 7. **The issue is therefore worse than before.**
- 22. Parking provision is quoted as 25 at 0.5spaces/unit, however this fails to include the staff requirement. If this is factored in the requirement **is for a minimum of 30 spaces** plus provision for ambulances and other transit vehicles.
- 23. Claims that there are local car parks are untrue. Our village car park operates at capacity and is not in close proximity being a minimum of 400metres away. The local streets are all choked, particularly at peak times by school traffic from the 3 nearby schools and a busy and expanding GP Surgery, this being recently further exacerbated by the new occupants of the site opposite who now regularly have an overspill of many large and small vehicles onto the roads at all times. There is also no spare parking space along Brox Road towards the village centre.
- 24. It is our view that this facility **must make maximum effort to ensure minimal or no overspill** onto the roads as there are already **significant capacity and safety issues at this location**. It should be noted that the previous facilities parking requirement was completely met by its on-site provision.
- 25. It should also be noted that the double yellow line parking restrictions in the immediate area on Brox Road are also soon to be extended by RBC due to the existing issues with parking thus further constraining the available on-street parking.
- 26. Additionally, it remains our view that only 2 disabled **spaces is inadequate for a facility of this kind** with all its units wheelchair accessible.

Possible Mitigations.

- 27. We propose that the path and a very small part of the “traditional orchard” could be utilised to add a further up to 7 parking spaces without detriment to the design (see Extract below). Hedging could be relocated maintaining the overall ambience of the

facility. To limit space further these parking bays could be made diagonal using the turning bay at the end to exit. If this configuration is used, these bays may better serve as staff bays.



28. A second option would be to include some basement parking beneath the end of the wing facing Crawshaw Road. It would appear this would not necessarily drive costs as a part basement is already planned.
29. Another mitigation which we propose in concert with the above would be to retain the facility at or below its original capacity of 44 units, in our opinion the tolerable maximum for the site.
30. We propose that several more of the standard parking spaces should be expanded to meet the size criteria for disabled spaces. This would cater for both residents and visitors.

Emergency Services and Risk

31. We bring the following recently emerging issue to your attention. The recent reoccupation of the brownfield site opposite at 66-72 Brox Road should be considered from a risk perspective. The site is occupied by a hoarding company who have HGV and other vehicles regularly using the site. Whilst the site operates a notification system for the larger vehicles, they park outside nearby and can only enter the site by reversing under supervision. There is therefore a risk that the entrance to the care facility could be blocked and eg prevent access or egress by emergency services.
32. The on road manoeuvres by the HGV vehicles operating from WS Hunts on the opposite corner should also be considered.

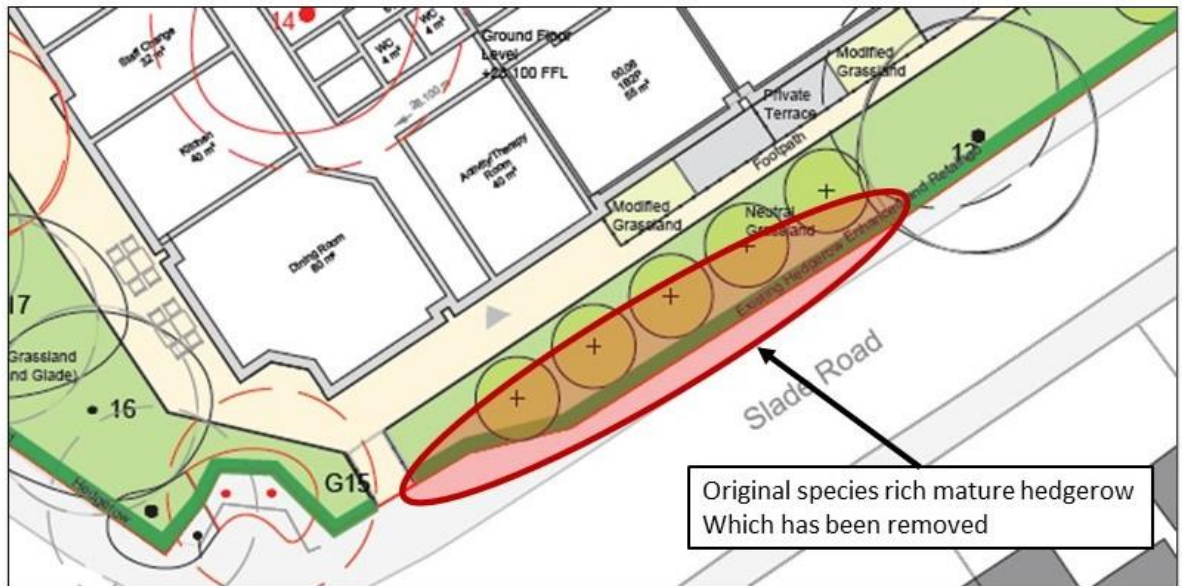
Possible Mitigations.

33. The operating patterns of the other site need to be comprehended and the entrance design for Brockhurst will need to be sufficient to reduce or remove the risk of

blocking of the entranceway. This may require consideration of widening and/or changing of the sweep angles at the entranceway.

Landscaping and BNG

34. It should be noted that the BNG calculation baseline should include the large area of mature, species rich hedgerow which was removed by SCC at the time demolition was to commence. This is currently showed in the Landscape Proving Plan (see extract below) as in existence but this is not the case. This will necessitate an increase in the BNG solution.



Other Aspects of Design

35. We assume there will be ample opportunity to address other more detailed configuration issues in the detailed submission, examples of these are:
- a. The location of the Refuse storage area facing onto the community terrace and embedded in the building where access does not appear ideal or minimally disruptive to residents.
36. We note that there appear to be aspirations to construct a roof terrace. It is unclear how this would be achieved given the location of the PV arrays and the plant housing (we assume for air source heat pumps) currently. In the current proposed design it would likely raise the levels of structure to over **16metres which would be intolerable at this location.**
37. We would welcome any opportunity to discuss the above or any related aspects with the SCC team, we see the design of this development, the largest single building in our area as absolutely key if it is to contribute positively to the neighbourhood's character and feel.

Signed electronically
R Oliver
Treasurer/Project Manager – ONF

On behalf of the Ottershaw Neighbourhood Forum
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