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Surrey County Council

via e-mail

FAO : Rosemary Cottrell – SCC Planning Support Team

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

Summary Statement.

Whilst we **strongly support** the provision of a C3 Extracare facility within Ottershaw, the current offering does not represent an appropriate development for this location.

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

In our opinion the issues of **Outline Design Appearance, Lack of Local Character, Proximity to Slade Road Boundary, Parking and Overspill, Height, Massing and Footprint Size and Overlooking** all represent significant issues which need to be addressed at this early stage in order to ensure a satisfactory outcome at Full PA submission. Failure to do so will result in an inappropriate solution already being determined for the location.

Standards.

The following standards have not been referenced or used and in our opinion should be:

- SCC LTP4 2021 [eg for Sustainability & Transport Study].

Overall Appearance & Design of Building.

The proposed development fails to comply in multiple areas with RBC Policy EE1 – Townscape & Landscape Quality. Policy EE1 States that:

*“.....all development proposals will be expected to achieve **high quality** and inclusive design which **responds to the local context including the built, natural and historic character of the area.**”*

And they must:

*“.....make a positive contribution to the Borough’s townscape, public realm and/or landscape setting.....paying particular regard **to layout, form, scale, materials, detailing and any guidance set out in adopted planning documents including Neighbourhood Plans and the Council’s Design SPD.**”*

To justify our comments at this outline proposal stage....EE1 also stipulates that:

*“...Development proposals **will be expected** to take account of a scheme’s design **at the earliest opportunity.**”*

Proposed Building Solution. The building proposed at this stage is clearly templated from a standard being implemented across other developments. Unfortunately, given its location embedded within the village a building of this type **fails to meet critical RBC EE1 policy requirements** and **Design SPD guidelines**. It also fails many of the policies for this character area in our draft Neighbourhood Plan. The critical elements relating to **RBC policy EE1** are:

- The height and mass of the building structure at over 13metres total and 10.5 metres to 3rd storey flat roof height **is completely out of character with any buildings in the surrounding area and dominates the landscape of the area.** (see Annex A-3)
- The flat roofed design of the building **reflects none of the character or features of any buildings near to the development or even across the whole of the village** thereby also setting an unwelcome precedent if approved. (see Annex A-1)
- A slab-sided building of this kind and of this size at this location is **completely out of character with all other buildings in the area.** (see Annex A-1)
- The footprint of the building **is significantly larger and of a different configuration** to that of the previous building. The mass of the structure is significantly out of proportion to the area of the site. (see Annex A-3)
- A reversed “U” design, whilst maximising square footage for accommodation and providing landscape space internally **is not the best shape for the site and location.** This causes space issues at the boundary limiting both parking, landscaping and residents space. (see Annex A-2)
- The 3 storey sides with **multiple** first and second floor balconies and living space windows **directly overlook the rear of Crawshaw Road at c17metres** and the **Frontages of 4-8 Slade Road only c15metres distant.** (see Annex A-2)
- The outlook of the main residents open space looks inwards directly onto unsightly blank walls of Slade Court just a few metres distant.
- The building positioning **within 5metres of the Slade Road site boundary and 2metres of the corner is not in alignment with any surrounding properties** (all 11metres +) and given its proportions **completely overpowers the streetscene.**

As such the proposed development in this size and form **will have an overbearing and significantly negative effect on the character of the local area and the streetscene within which it should integrate.** If compared to the previous 1-2 storey build set back from the roads the significant negative impact of the new building can be seen. (see Annex A-3)

At this location any new building needs to be sympathetically designed and must be of landmark significance, reflecting elements and cues from the historical elements of the surrounding area in order to blend into the landscape.

We would expect a design incorporating features such as 2.5 storey, pitched roof, feature gabling and textured/feature or appropriately coloured brick finish to the walls using sympathetically coloured materials in order to blend in properly with the surrounding area. (see Annex A-4)

REFUSE subject to redesign of the building to ensure compliance with policy EE1 addressing; scale, positioning and appearance to better fit the existing appearance and character of the surrounding area and streetscene.

Parking Provision.

Whilst we accept that both SCC and Runnymede Parking standards allow for a bespoke solution for this category of facility, the solution offered in the proposal falls far short of what is required for a facility of this capacity at this location.

Extracts from the proposal state:

*“The proposal is for a **total of 23** (including one drop-off bay) parking spaces to be provided on site. A total of five parking spaces will be provided to accommodate staff, two bookable visitors parking spaces, one drop-off bay and **15 parking spaces for residents** including two disabled and one car club bay. The disabled bays and a separate drop-off layby will be located close to the site entrance and can be used by visitors picking up/dropping off residents.”*

The Transport Statement states.....:

*“RBC’s local parking standards are based on Surrey County Council’s ‘Vehicular, Electric Vehicle and Cycle Parking Guidance for New Developments 2021’. This guidance states for residential institutions elderly (sheltered) **maximum vehicular parking levels is 1 car space per 1 or 2 bed self-contained unit OR 0.5 per communal unit OR Individual Assessment.** As agreed with RBC during scoping, the proposed development should provide vehicle parking in accordance with this SCC standard.”*

It is not clear which part of the SCC Guidance quoted above the proposed solution aligns with.

If it is to comply with the maximum 1 space per unit requirement **44 resident spaces would be needed.**

If as we suspect it is to “comply” with the individual assessment part of the standard it is not clear what this might be. **This must be clarified in the proposal at this stage as it is crucial to the defining the practical capacity of the development.**

Regardless of the lack of clarity in the SCC guidelines the parking provision is inadequate for the following reasons:

- The proposal provides **only 15 spaces** for residents and only 14 if you subtract the car club space. This equates to only just over **0.3 spaces per unit** (not 0.5 as stated in the Design & Access Statement Pt 2, 3.1), so an assumption that **only one in 3 residential units will require car parking. This is badly flawed.**

- The proposal makes assumptions about occupancy and vehicle ownership based upon models taken from other similar facilities. Many of these are linked to well serviced urban areas and do not reflect Ottershaw's village location. **These assumptions are therefore flawed and incorrect.**
- No attempt has been made to calculate the likely average total number of residents in the facility at any one time. **Our view is it would be at least 60.** This must be addressed to fully scope the parking requirement. Cohabiting residents are more likely to retain a vehicle than single residents.
- We can find **no assumptions for the indicative numbers of daily care providers and other services who will require spaces** to ensure the residents are cared for. **This must be factored into the requirements.** It should be noted that the timings for this type of care support is often similar each day and could also coincide with schools and surgery peak times.
- Only **2 disabled spaces are provided.** For a facility of this kind this is **too low.**

Contrary to the Transport Statement assertions, Ottershaw is **neither well connected** or sufficiently serviced by public transport to support schools or employment and is **completely remote from all rail transport.** For this reason, the trends in Ottershaw remain that **vehicle ownership is and remains higher than average.**

Elderly people in the area seek to retain their independence and vehicle ownership remains a key element of this. **This must be taken into account when scoping the parking as SCC have stated that the residents are to be predominately local.**

In our opinion the current provision for parking in the new development is therefore inadequate and not sufficiently sensitive to the area where the development is proposed. Examples provided use areas such as Camberley, close to urban centres and rail links which is not aligned with that of Ottershaw.

REFUSE subject to fully addressing the deficiencies in the on-site parking solution listed above.

Overspill Parking.

The Transport Statement Appendix A (Consultee) States:

*"For elderly sheltered accommodation, our parking standards require one space per 1 or 2 bed unit. For a care home it is 1 space per 2 residents. In both scenarios, **the parking does fall below our standards, so as it should be demonstrated that this shortfall in parking will not lead to any highway safety concerns.**"*

The proposal fails to quantify or address the above risk from any potential overspill, a high risk in our opinion if the parking provision remains at the low levels currently specified in the proposal.

At this location with:

- 4 schools within 200metres, generating twice daily major street parking and congestion issues.

- A busy and rapidly expanding GP surgery 50metres away in Bousely Rise with minimal parking provision (4 spaces).
- 2 Bus Stops within 50 metres (one directly outside).
- A dangerous junction and blind corner immediately adjacent.
- Parking at a premium in the small frontage nearby residential housing on Brox Road.
- A soon to be developed site opposite which itself will produce overspill onto the streets.

The location **does not therefore allow any capacity for overspill onto the nearby roads without significantly impacting the safety and utility of the wider local area.**

The development proposal must **provide clear evidence** that a **very high percentage of expected parking can be fully accommodated within the development site** with minimal risk of overspill onto the surrounding roads.

REFUSE Subject to quantifying overspill requirements and providing evidence that the solution can absorb approaching 100% of the likely overspill requirement for the site.

Parking Design and Scoping.

The location and capacity, together with overspill issues of this proposal clearly justifies the need to be as prescriptive about the overall solution as possible at an early stage. Failure to do so will result in inappropriately scaled building and/or parking.

Although we suspect not a consideration at this early stage we would expect the parking provided to be part permeable surface and carefully/hand excavated to protect the root protection areas of the existing trees in this vicinity. If this is observed there may be potential for additional spaces near the trees at the front of the site.

We do however recognise that safety is paramount for residents and the solution will have to align with their mobility needs.

Ensure the development addresses the use of permeable surface materials wherever possible and practicable.

Alternative Parking Solutions.

It is noted that a part basement is being developed for catering and services in the wing on the Crawshaw Road side. Given this we wonder whether consideration has been given to some underground parking for up to 10 vehicles (potentially a staff car park).

Consider underground parking as a part solution to capacity & overspill issues.

Practical Capacity of Site.

The previous development was a care home with only approx 40 bedrooms with no en-suite facilities and no residents having their own vehicles. The proposed development is for **44 self-contained residential units**. This **represents a 3-to-4-fold increase in the number of residential rooms** and a **significant uplift in the number of residents**. Evidence should

be provided to ensure that the proposed scale of the development is appropriate to the size and location of the site. This should also include parking.

REFUSE Subject to furnishing evidence that the site overall capacity is appropriately scoped.

Construction Traffic – A320 HIF timing and routing.

Whilst it is appreciated that at outline stage with no contractor appointed any detail in the CTMP will be minimal. The following points should be noted:

The routing of construction traffic **will be a key issue** and will need to take into account the impacts and diversions driven by a number of major local highways development schemes including:

- The A320 HIF scheme to Chertsey including the likely closure of the Otter roundabout.
- The M25 junction 11 upgrade.

A number of other developments occurring in and around the village in a similar timeframe, namely:

- Ottershaw East housing development, Brox Road.
- Ottershaw East Surgery development, Brox Road.
- Development of the former Travis Perkins site opposite the development.
- Plot 2000 development Hillswood Business Park.
- Chertsey Bittams housing developments.

Include reference to the above in the CTMP for addressing in detail at Full PA stage.

Signed electronically: *R Oliver* (R Oliver)

For and on behalf of the ONF Steering Committee

A-1. Character Assessment.

The Brockhurst site is located at the southern tip of the Village Centre Character Area (Ref: Ottershaw Draft Neighbourhood Plan).

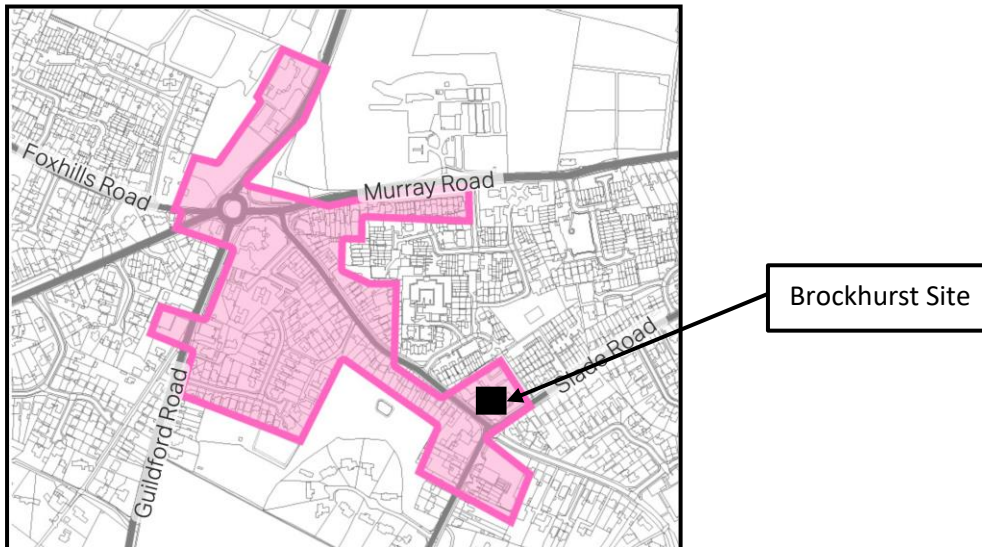


Fig A-1.1: Ottershaw Village Centre Character Area.



Fig A-1.2: Brox Road view towards Village Centre

Brockhurst Frontage onto Brox Road. The proposed frontage, whilst being set back a similar distance as the previous build from the boundary, has a full building width frontage of flat façade, 3 storeys high with a flat roof and services on the roof also visible. (Fig A-1.3). The implied design at this outline **stage is one which takes no cues from the surrounding area at all.** If not addressed in some way at this stage this unacceptable design will be irreversible. The intent is to try to “hide” the development rather than integrate it. This has clearly not been achieved.

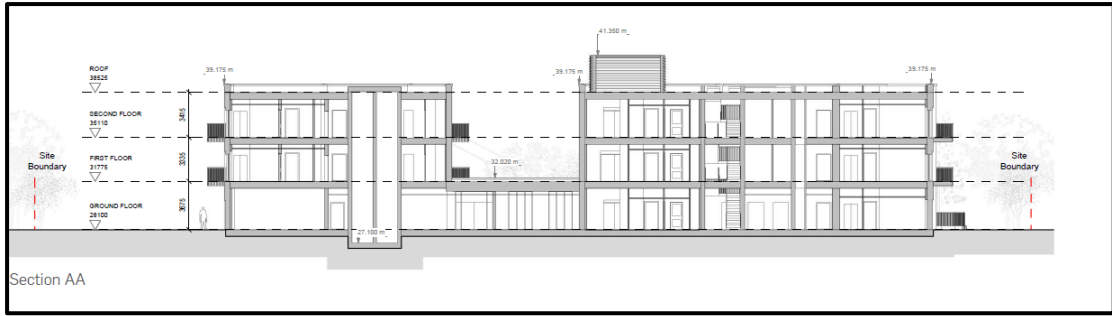


Fig A-1.3: Proposed Solution – Frontage onto Brox Road (from Design & Access Statement)



Fig A-1.3: Brox Road Rooflines. View towards Village Centre



Fig A-1.4: Crawshaw Road Properties adjacent to site.

As can be seen from the above views (Fig A-1.3 & 4), all buildings along these sections of Brox Road and Crawshaw Road which backs onto the development from the north, despite being of various ages are **all characterful 2 storey, with pitched and tiled roofs and a mixture of feature gabling styles, fenestration and facades**. Plot positioning is varied and façade treatment is predominately brick with some render and tile hanging. The character is relatively eclectic but with **a complete absence of any flat façade or flat**

roofed structures. No structure exceeds 2 storeys and there have been recent planning applications for 64 Brox Road opposite and nearer the village centre which have been refused on these grounds. **A planning precedent has therefore been set to not exceed 2.5 storeys.**



Fig A-1.5: Brox Road view towards Guildford Road South exit. Old School LLB.

The site is opposite the old school building, a Locally Listed Building of traditional brick with pitch roof and deep gabling (Fig A-1.5). There has been **no attempt to take any visual cues from this building either**, further compounding the structures negative effect on the streetscene.

From this perspective it is therefore clear that the proposed development lacks any continuity with the surrounding areas in Brox Road and has no intrinsic features which tie it in to the surrounding building landscape and streetscene.



Fig A-1.6: Slade road View from Junction with Brox Road



Fig A-1.7: Slade Court adjacent Brockhurst Site



Fig A-1.8: Holt Close, Slade Road, second housing group from Brockhurst Site.

The southern edge of the site borders on Slade Road with the end furthest from the entrance backing onto Slade Court. The next development away from the site is Holt Close. All these developments are relatively recent, **none exceed 2.5 storeys** and **all have gabled styling with small dormers or roof lights set into roofs**. All are pitched roof, characterful in their own right and have features such as attractive gabling, tile hanging, feature brickwork and pitched roofs. The frontages onto Slade Road are all set deeply into their plots (Fig A-1.6-8).

On the opposite side of Slade Road at this point are a mixture of semi and detached 2 storey houses of varying age and design, All with pitched and tiled roofs and varied plot positioning. In the middle distance the property types change to detached bungalows with pitched and tiled roofs on generous plots (Fig A-1.9).



Fig A-1.9: Slade Road streetscene opposite Brockhurst Site.

The proposed elevation facing onto Slade Road, whilst being **only about 5metres from the boundary, far closer than any adjacent properties** displays all the negative attributes of the frontage further exacerbated by the one-dimensional styling due to the lack of the entrance features evident in the frontage. Second and third floor residents will have a feeling of “overhanging” the street due to the proximity of the balconies to the boundary. This is totally out of character with any other structure in our area, having an urban appearance. There are also overlooking issues with the properties some 15metres distant opposite.



Fig A-1.10: View from Brox Road into Slade Road (from Design & Access Statement)

It should be noted that in the above figure A-1.10 the large trees shown on the corner of the development will not exist and are to be removed.

It is clear that the proposed development lacks any continuity with the surrounding areas in Slade Road, Slade Court or Holt Close and has no intrinsic features which tie it in to the surrounding landscape and streetscene. It also has an overbearing effect on the streetscene due to its size, appearance and proximity to the boundary.

Conclusions.

The development currently proposed makes no effort to integrate with the existing area and requires redesign to ensure it does so.

A-2. Proximity & Building Positioning

These key tenets of the proposed development are addressed below.



Fig A-2.1: Brockhurst Care Home – Previous Development - Proximity.

The previous building footprint was a wing design located rearwards from Brox Road and in the centre of the site across the other axis. The proposed solution extends **15metres closer to the Slade Road boundary** (Fig A-2.1 & 2).



Fig A-2.2: Brockhurst Care Home – Previous Development. Slade Road Elevation 20+ metres from boundary..

The above view shows the small dimensions of the Slade Road facing elevation and the large setback from the road with a large area of landscaped garden space in between.



Fig A-2.7 Proposed New Development – View from Slade Road looking towards Brox Road.

Fig A-2.7 above clearly illustrates the proximity of the proposed solution to the Slade Road site boundary and the misalignment with any surrounding buildings.



Fig A-2.3: Proposed Development – View from Crawshaw Road Properties. (from Design & Access Statement)



Fig A-2.4: Proposed Development – 3D View From Crawshaw Road. (from Design & Access Statement)

The previous build is roughly equidistant from the rear of the Crawshaw Road housing compared to the proposed solution. The proposed solution however is **predominately 3 storeys with approx 15 second and third floor balconies facing/overlooking** (Fig A2.1, 3 & 4). The previous elevation was similar to Fig A-2.2 above.

The proposed building is **only 10metres** from the Crawshaw Road rear garden boundaries and **17metres** to the rear of the properties. Although the proposal demonstrates minimal loss of light, there is clearly an overlooking issue from the multiple balconies. **For a 3 storey structure this is therefore too close.**



Fig A-2.5: Slade Road Building positioning.

The building positioning and distances to footways of all properties adjacent to the site is a **minimum of 11metres**. The proposed solution is **within 5 metres** of the Slade Road boundary (Fig A-2.1 & 5). The previous 2 storey building was set back **more than 20metres** from the Slade Road footway. **The new development is therefore far too close to the site boundary at this location.**

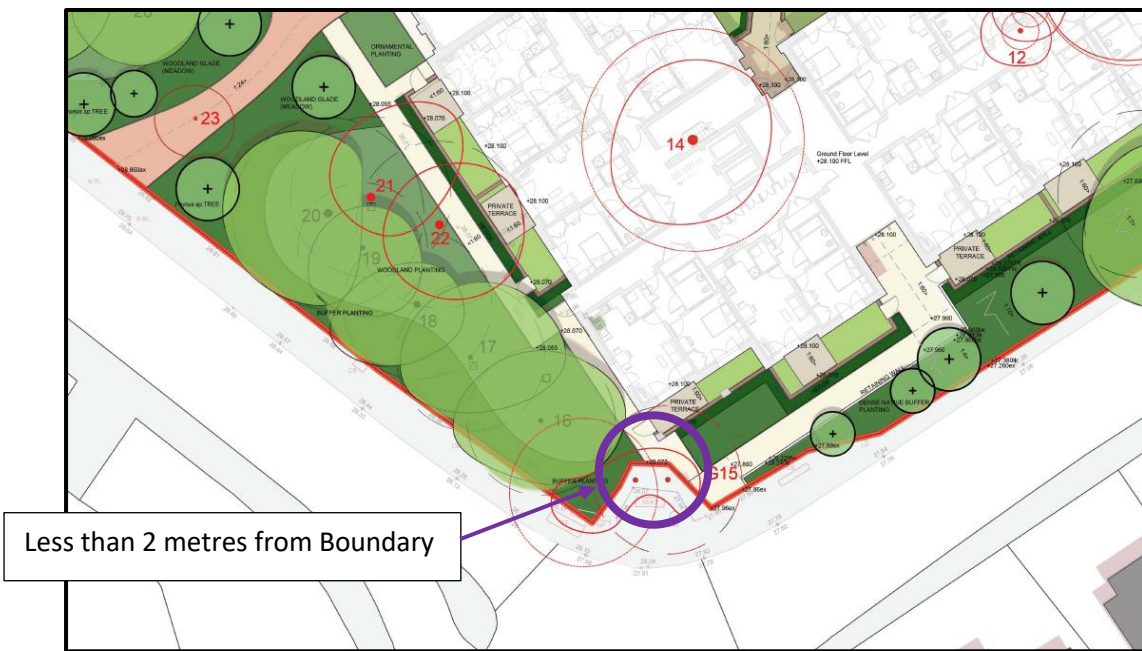


Fig A-2.6 Proposed new Development – Proximity to Corner Slade/Brox Roads.

The corner of the proposed new build (3 storeys at this point) is **within 2metres of the property boundary and unmasked by any vegetation or trees. This is far too close** and emphasises the overbearing effect of the building whilst also affecting utility and limiting free movement around the building.

It should be noted that the tree shaded seat on the corner of Brox and Slade Roads will be completely compromised through the loss of all the trees and proximity of the new building to the boundary (see Fig A-2.6).

Summary of issues.

The previous development as a care home whilst being of relatively unattractive utilitarian build nevertheless had a number of key positive attributes which allowed it to have a less negative effect on the surrounding area, namely:

- The Slade Road elevation **was 20+metres from the property boundary**, the new proposed solution is **only 5 metres distant**. This is far too close to the site boundary (Fig A-2.1).
- The Slade Road elevation was **only 2 storey with a very small facing area and no overlooking windows** (Fig A-2.2). The proposed new development is predominately 3 storey with multiple open balconies at second and third storey facing and overlooking the street.
- The Crawshaw Road facing elevations were of **similar small proportions with no balconies/overlooking**. The proposed new development is **predominately 3 storey with multiple open balconies facing/overlooking** (Figs A-2.3 & 4).
- The Slade Court elevation **backed entirely onto the sides of the adjacent properties**. Slade Court was 11metres from this small façade elevation.

Additionally, the following issues relate to the New proposed Building:

- The Slade Road properties adjacent to the site **are a minimum of 12 metres from the public footway**. The alignment of the new build should therefore as a minimum be set back a similar amount (Fig A-2.5).
- The building's corner at the confluence of Brox and Slade Roads is **less than 2 metres** from the site boundary. A building of these proportions this close to the boundary is unacceptable and compromised the seating on the corner (Fig A-2.6).
- The Crawshaw Road predominately 3 storey elevation and balconies is **only 10metres from Crawshaw Road Gardens and 17metres from the rear of properties**. This is far too close.

Conclusions.

The proposed solution is one of predominately 3 storeys with approaching another floor of services on the roof. When combined with the bland and essentially flat non gabled styling the solution **completely overpowers the streetscene at these locations** creating a **narrow and urban "tunnel" effect** at a location where the effect is transitioning into a rural appearance. It is effectively the wrong style and proportioned building, poorly positioned on its plot.

The building should therefore be reconfigured and repositioned such as to ensure that its effect on the streetscene is complimentary rather than the reverse as is currently the case.

A-3. Building Heights, Massing & Footprint



Fig A-3.1: Holt Close – 2.5 Storeys.



Fig A-3.2: Slade Court - 2.5 Storeys.

The surrounding developments in Crawshaw, Brox, Slade Road, Slade Court and Holt Close **are no more than 2.5 storeys and predominately 2 storeys** (Fig A-3.1 & 2).

There is only one 3 storey development in the Ottershaw Neighbourhood Area, Moat Court, a completely unobtrusive, tree surrounded building of flats embedded in the middle of the urban village centre.



Fig A-3.3: Brockhurst Site – Previous & New Development Footprints.

The footprint size and massing of the proposed new development compared to the **previous is significantly larger** and as such has an overbearing effect on the streetscenes. (Fig A-3.3)



Fig A-3.4 Proposed Solution – View from Slade Road towards Brox Road. (from Design & Access Statement)

The proposed new build with its angular elevations, large expanse of flat roof and significant height completely dominates the landscape of the area (Fig A-3.4). The trees at the corner of Brox and Slade Roads will not exist and are too close to the development to be replaced.



Fig A-3.5: Proposed Solution – Elevation onto Slade Road (5 metres distant) (from Design & Access Statement)

There are **18 balconies 5 metres from the footway** at first and second floor levels directly overlooking Slade Road (Fig A-3.5).



Fig A-3.5: Previous Development – Elevation onto Slade Road.(20metres distant)

The positioning of the proposed development on the site is very close to Slade Road and more than 5 metres closer to the footway than other adjacent properties on Slade Road. The area of the exposed elevation is more than 5 times that of the previous build which also had no balconies on this elevation. (Fig A-3.4 & 5)

This will create an enclosed “urban tunnel” effect to the entrance to Slade Road entirely out of character with any features in the surrounding area.



Fig A-3.5: Proposed Solution – Frontage onto Brox Road(from Design & Access Statement)



Fig A-3.6: Previous Development – Elevation onto Brox Road.

Whilst the positioning relative to the site boundary for the Brox Road elevation is broadly the same as the previous development (Fig A-3.3), the area of the elevation however **is several times more than previous and an additional storey higher**. Whereas the previous build sat into the landscape (Fig A-3.6), the new build uses vegetation to try to mask its presence.

Conclusions.

The above plans, elevations and images provide evidence of the comparative proportions of the proposed development and also offer a comparison to the previous building that occupied this site. It is clear that:

- The height **significantly exceeds** that of the previous development.
- The area of flat roof at the heights shown is **completely out of character** with all surrounding buildings which at best only have a ridge line at approaching these levels.
- The footprint size **significantly exceeds** that of the previous development.
- The footprint size and shape **completely dominates the site and surrounding landscape**.
- The massing of the building with its large area and volume and angular proportions **completely overpowers** the local landscape.

The proposed development's effect on the surrounding area is an **overbearing one in a negative sense**. This can only be mitigated by **reducing footprint, height and matching property lines** with those adjacent in Slade Road.

A-4. Landmark Buildings – Characterful Design

Landmark buildings are a feature which should be evident in the landscape in particular at points of prominence in new developments and where significantly proportioned new structures are being introduced into the built environment.

The location of the proposed development of this proportion on a major junction embedded deep in the village clearly justifies any design being either small and unobtrusive (ie similar to the previous build) or possessing features of quality and distinction drawing from the heritage and character of the area.

Some examples of landmark builds which reflect this are in the ensuing photos.



Fig A-4.1: Feature Brickwork, stone lintels, attractive fenestration, pitched roof with part dormers.



Fig A-4.2: Tower feature, Feature Brickwork, tile hanging, pitched roof.

The above solution Fig A-4.2 which takes many visual cues from the surrounding buildings.



Fig A-4.3: Feature Brickwork, stone lintels, attractive fenestration, pitched roof with part dormers.

Conclusions.

The current proposal lacks any visual cues from any surrounding buildings, heritage or otherwise and whilst being very dominant in the streetscene does not represent a building of landmark and character value.

As such in its currently proposed form the design is an unacceptable solution for Ottershaw.