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11th May 2023

Runnymede Borough Council

Addlestone

Surrey KT15 2AH

via e-mail

Planning Application RU.23/0544, The Field Nursery, Brox Lane, Ottershaw.

Dear RBC Planning,

1. The following represent the endorsed comments, observations and objections of the Ottershaw Neighbourhood Forum Steering Committee on behalf of its membership.
2. In our opinion the application should be **REFUSED** pending resolution of the following issues documented below.
3. Should the Planning Committee choose to approve this application **CONDITIONS** should be applied where indicated below to ensure these aspects are fully addressed.

General

4. The document set in many cases does not address the existence of the Ottershaw East and Brox End "Oaklands" developments. As such some of the proposed solutions such as surface drainage and sewerage cannot be properly validated unless the impact of these is properly factored in. Additionally, we feel that key opportunities could also be missed through not looking more holistically at what each proposal is providing.

Recommendation: The application should be reviewed fully to ensure all deliverable documents consistently include all other approved developments in the surrounding area.

Density of Development

5. While the proposal has some merit, the number of dwellings proposed (19) is nearly double the number assessed and specified in the RBC 2030 Local

Plan, which recommended a minimum of 10 dwellings. This approaching twofold increase in density would in our opinion have a negative impact on the local environment and exacerbate existing problems in the area especially when taken together with the now progressing developments on Ottershaw East RU.22/0454 and the Brox End Nursery "Oaklands" sites. It is worthy of note that at one time the Oaklands development was to be 13 units, it is now 46.

Recommendation: The density of the proposed development should be reduced close to that originally specified in the 2030 Local plan. [REFUSAL]

Affordable Housing

6. The proposed apartment block is inappropriate given its proposed location adjacent to ancient woodland. Despite the modest buffer zone proposed, the placement of this block is not in keeping with Runnymede's Design SPD or the ONF draft Neighbourhood Plan & Design Code, which emphasise that development on settlement edges with adjacent greenbelt/open space should enhance both landscape character and biodiversity. It is also inconsistent with recent decisions made by the council for the adjacent development in Ottershaw East. All the apartment blocks for that development were sited close to existing properties with the justification that they could not be sited near the southern boundary of the site as this was too near greenfield and so would **not** be responding to context. In our opinion in this case there must be consistency in applying planning principles to achieve consistent effect.

Recommendation: The apartment block should be relocated north of the new access road, close to the Oaklands development site. [REFUSAL]

Traffic Movements

7. The proposed development will contribute an additional load to the already overburdened Brox Road, which has already become almost unnavigable at points due to the amount of parked cars, school traffic, buses, haulage and construction vehicles. This will be further impacted by the Oaklands and Ottershaw East housing developments, the new GP Surgery and the SANG.
8. The refusal of planning permission by RBC of the former Travis Perkins site for a local Co-Op has resulted in this now being used for another haulage and logistics type firm, further contributing to the burden of heavy vehicle traffic on Brox Road.
9. It is worthy of note that the planned SCC Brockhurst development on the confluence of Brox, Slade Roads and Bousley Rise presents a further traffic,

parking and congestion impact on the village. The current proposed solution will produce significant overspill parking onto local roads.

10. This massive overburdening of Brox Road will therefore be even further exacerbated by this doubling of the proposed density against the Site Capacity Analysis for policy SL12 of the local plan for the Field Nursery. This will apply to vehicle movements both during construction and when the site is fully occupied.
11. All 3 developments will add approx 250 new dwellings (a 20% overall increase for the village) to the already saturated road infrastructure of what is a small village with only one narrow congested road in and out.

Recommendation: A traffic assessment should be conducted as there has been significant change since the last one was produced for Ottershaw East which was also completed at the time of the pandemic which did not therefore represent the current or future predicted traffic movements within the village. [REFUSAL]

12. Finally, it should be noted that the A320HIF scheme and M25 Junction 11 construction impacts must also be fully considered and factored in. Any CTMP must reflect this.

Energy Solutions

13. Whilst it is recognised that the energy report does at least cover other sources it settles on Solar PV as the single solution once again and a saving of a meagre 10.27%, only 0.27% over the stated RBC Policy minimum. Whilst this is compliant the policy itself represents a very low bar in comparison to extant national and regional policies and guidance which now postdate this.
14. Whilst it is appreciated that many other energy sources may not be cost-effective or practical, a more extensive Solar PV offering would be worthy of consideration. It is perhaps worthy of note that shading from existing trees may also affect optimal building positioning and orientation.

Recommendation: In line with national policy drivers a more comprehensive Solar PV solution should be investigated to increase the energy saving for the site. [REFUSAL/CONDITION]

Surface drainage.

15. Although covered in the Design & Access Statement it should be noted that the Flood Risk and Drainage Strategy strategy appears to completely ignore the facts that:
 - a. Oaklands is now built with its own drainage strategy and will negatively impact the surrounding area and stress the systems.

- b. Ottershaw East is now approved with 184 + 2 units going in with a SuDS and drainage strategy into the existing ditch network.

- 16. As such the proposed drainage approach for the development must be clearly proven taking into account the impact of all the surrounding developments and their own drainage solutions and not just assume they are open fields.
- 17. This will ensure that the impact of this development in addition to the more controlled outfall from the Ottershaw East development SuDS plus the uncontrolled run off from the raised SANG can be factored in to ensure the capacity can be managed without increasing the flood risk at the outfall into the River near the Rowtown end of Brox Lane. It should be noted that the outfall is already in a high risk flood area which floods regularly throughout the winter months.

Recommendation: The Flood Risk and Drainage Strategy should be revised to include all the new developments and their respective drainage solutions. Where this is not certain, assumptions should be made to control the proposed solution for this site. Opportunities to connect this development eg into Ottershaw East SuDS should be explored. [REFUSAL]

- 18. The Surface Drainage Strategy (indicative) currently uses a combination of permeable paving and direct runoff into the nearby ditch system which drains into the River Bourne. At this stage it is stated by the proposer that they have not investigated where the ditches go and what area they drain into. We think this lack of evidence is not sufficient at this stage. Whilst it does state that the permeable paving solution cannot leech into the soil due to the underlying geology and that attenuation tanks are to be used, capacities and controls are not specified.

Recommendation: A full capacity analysis should be conducted to demonstrate the suitability of the proposed solution. As above this will necessitate factoring in the proposed and new developments in the surrounding area. [REFUSAL/CONDITION]

Foul Water/Sewerage

- 19. The impact of this development on the foul water network should be measured factoring in the other two developments at this location and the proposed Brockhurst development which also significantly increases the burden on the network. We are concerned that this network which presented a sewerage flood risk in the past (network augmented in early 2000s) will again present a risk. We wonder whether a strategic assessment of capacity is now in order given the 20% + increase in population of this area.

Recommendation. Query with Thames Water whether a strategic assessment of foul water capacity should be conducted in the near future. [REFUSAL/CONDITION]

Landscaping.

20. We note that there does not appear to be any landscaping plan provided and the scheme appears to be relatively bare of vegetation which does not represent the characteristics of the site as it now is or the surrounding area within which it resides. Additionally the other two development sites have full landscaping solutions in hand. It is our view that a development of this size (of area) should include one to show all proposed planting, landscape surface types, boundary locations and types and other associated features.

Recommendation: A Landscaping Plan should be provided to include all the elements referred to in the above para. [REFUSAL]

Trees

21. According to the Arboricultural Report more than 20 trees are to be removed for the development, many of these in good condition. From a biodiversity perspective we would like to see these replaced with indigenous species within the development and reflected in the above proposed Landscaping plan. This will also seek to preserve the inherent character of the area.

Recommendation: Provide a one for one and like for like maturity replacement of all felled trees on the site using indigenous species and include in landscaping plan. [REFUSAL/CONDITION]

22. T2 Oak and Access Road. We note the proposed felling of a mature Oak to accommodate the access road. We would recommend that the feasibility of moving the access road eastwards by a few metres to avoid this tree is investigated.

Recommendation: Investigate feasibility of moving access road eastwards to avoid oak. [REFUSAL/CONDITION]

Boundaries.

23. The southern boundary of the development with Brox Lake site should be specified and agreed with the landowners. A boundary which does not prevent the movement of all the recognised wildlife of the area is recommended.

Recommendation: Include proposed boundary solution for southern boundary. [CONDITION]

Wildlife.

24. We note the scarcity of information or provision of any elements relating to Green & Blue Infrastructure and thus wildlife, ecology habitat location, provision and migration. Given its location adjacent woodland, lakes SANG and drainage and know habitat and foraging areas of deer, badgers small mammals, bats and many bird species we would expect this to be properly addressed. It is noted that Natural England have requested a Habitat Regulations Assessment (HRA).

Recommendation: Proposal should cover all species present in the local area and provide habitat and for migration to ensure the proposal is sensitive to its location and natural environment. [REFUSAL]

Footpath (FP30)

25. We note that the proposed access road traverses FP30 which is a critical element of Ottershaw's infrastructure. The proposal should specify how this intersection is to be developed.

Recommendation: FP30 intersection with access road should be fully addressed in the proposal. [REFUSAL/CONDITION]

26. The integrity and quality (surface, width, boundary) of FP30 for the full extent where it is adjacent to the development should be fully considered and any impacts properly mitigated.

Recommendation: FP30 integrity and quality (surface, width, boundary) for the full extent where it is adjacent to the development should be fully considered and any impacts properly mitigated. [REFUSAL/CONDITION]

Signed electronically

ROliver

Bob Oliver

Treasurer/Project Manager – ONF

On behalf of the Ottershaw Neighbourhood Forum