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7<sup>th</sup> October 2022

Runnymede Borough Council

Addlestone

Surrey KT15 2AH

via e-mail

**Planning Application RU.22/0454 Ottershaw East, Brox Road, Ottershaw – Revised Submission.**

Dear Sirs,

I refer to the above Planning Application which we understand has been amended and resubmitted for consideration.

1. The following represent the endorsed comments, observations and objections of the Ottershaw Neighbourhood Forum Steering Committee on behalf of its membership.

**General.**

2. In our opinion the proposal continues to fail significantly in a number of key areas and does not demonstrate adherence to national and borough policies and supporting guidance.
3. Whilst we recognise the need for housing, in its current form it represents a development which we would not wish to be built at this location in our village.
4. On this basis our opinion is the proposal should be **REFUSED** pending satisfactory redesign.

**Property Density.**

5. The proposed design is very significantly denser at 37dph than any of the surrounding area (11-26dph) and is located on the very fringes of the built element of Ottershaw where the appearance is predominately ribbon development, eclectic building design on large well-spaced plots of a rural rather than the more urban nature evident at the north end of Brox Road, some 600metres away. The proposed development should clearly reflect the sparser density and more varied character of

surrounding development in order to be in keeping with the area as a whole and to follow RBC policy guidance. Contrary to the RBC Design SPD the development proposed does not relate well to its neighbours.

### **Housing Mix.**

6. The proposed housing mix does not reflect or support the housing need for the local area. The Housing Need Analysis recently conducted on behalf of the ONF by AECOM and using standard models and sources including the 2018 RBC SHMA as a reference has clearly shown that:
  - a. The Ottershaw area is already overprovided with 3+ Bed homes.
  - b. The Ottershaw area is very significantly underprovided with affordable homes for rent and for purchase.
  - c. The Ottershaw area provides minimal opportunity for downsizing.
7. As a result, the proposed development:
  - a. Should have minimal 3+ bed homes offered.
  - b. Must meet or preferably exceed the 35% minimum for affordable home provision<sup>1</sup> and should maximise availability of properties to rent.
  - c. Additionally, should include M4(2) Category accessibility housing configurable for disabled/elderly habitation.

<sup>1</sup>: If the minimum is not met or exceeded it is unlikely this shortfall can be recouped in the foreseeable future and the property availability market in the area will progressively worsen for those on lower incomes or those wishing to downsize. The calculation to 2030 for Ottershaw is for approx 300 new affordable homes (purchase and rental) which is more than the total housing quota for this area in this time period.

### **Property Design.**

8. The building designs proposed are bland and of limited variance, of minimal character and do not integrate with the far more eclectic design of the whole of the surrounding area. The use of materials and colours such as white cladding is not in keeping with the surrounding area. The proposal should be amended to reflect more varied character rooflines and facades and more variation of building position on individual plots.
9. The development does not include any landmark buildings and offers minimal distinction between the 4 character areas in the proposed design. An objective should be to create a single character area which seamlessly integrates with the existing character area.

## **Parking.**

10. Although the minimum requirement has been met by the proposer, the following are issues that require addressing:

- a. The parking areas at the edges of the development are oversized at up to 12 bays compared to elsewhere in the development and contrary to RBC Policy EE1 clearly impact the amenity space of neighbouring properties.
- b. Having discussed the future of the GP Surgery with the Ottershaw practice leads, the parking provision for the 0.1ha site at the entry to the development allocated for the GP Surgery has insufficient parking as nearly all the available spaces will be used by employees leaving patients to park either on Brox Road or in the development. It should be noted that the Road Safety Audit Report recommends double yellow lines each side of the entrance to the development (for vehicle access reasons). If implemented, this is unacceptable as it will push patient parking on Brox Road even further away from the surgery. Ideally the parking capacity at the surgery site needs increasing.

## **Green Infrastructure.**

11. The proposed development fails to meet the NPPF/RBC SS4/SD7 & Green & Blue Infrastructure SPD requirements in that:

- a. There is only one street which is tree lined. This includes Hornbeams which are columnar in nature and offer minimal shade and small Acers which are also small and deciduous.
- b. Secondary streets have minimal tree provision. Trees proposed are largely non-native and all are of a small size when mature.
- c. 3 streets have no trees proposed and only smaller shrubs.
- d. The centre of the site has no trees.
- e. The site lacks a suitably proportioned green corridor/buffer zone around its perimeter. There is no perimeter at all on the SW side adjoining properties in Southwood Avenue or the NW side adjoining properties in Brox Road.
- f. Hedgerow provision is minimal and used primarily only for screening.
- g. There is no open green space in the centre of the development, only on the extreme fringes.
- h. At 60% of site, there is far too much hardscaping compared to soft landscaping.
- i. The development should make some attempt to follow the vegetation patterns and tree types of the surrounding area in order to integrate well. The present proposal does not achieve this.

## **Biodiversity.**

12. The Tyler Grange BNG site report advertises significant net gains, however there are some elements of the calculation that appear flawed:

- a. The pre development area used is 6.76ha. This appears to be close to the original SL12 figure including Field Nursery (0.92ha). The latter is not now included.
- b. 0.97km of hedgerow is stated as being created around the development. There appears to be minimal new contiguous hedgerow proposed in the design and the total boundary of the development is likely less than this.
- c. It is unclear whether the areas on and around the SANG footpaths and the play areas have been properly scoped in the calculation (ie removed).

13. In addition given that:

- a. Hardscape increases by approx 2.7ha.
- b. Grassland decreases by approx 5ha.
- c. Adds only 0.16ha of “urban” trees.
- d. Develops a net gain by including the SuDS – part of the SANG and not part of the housing development.
- e. Develops a net gain by adding in 0.44km hedgerow into the fringes of the SANG.
- f. Unfortunately, BNG calculations allow offsetting, offering a clear advantage to developers to make a case.
- g. Largely undisturbed private land – will become public used land.
- h. The development will displace larger creatures, badger, deer, fox, small mammals, reptiles, and birds including raptors.
- i. It is negatively affected through people, dogs, domestic cats etc.

14. A true calculation of the above has to result in a lower gain or even a net loss.

15. **Sustainability.** Whilst we acknowledge the limitations of current national and local policy in providing more stringent targets, we would wish to place on the record that this site, like many others in the borough meets only the bare minimum current standards and is seen as significantly backward rather than forward looking, presumably requiring future further interventions to bring it into line with net zero requirements. Key issues we see are:

- a. Provision of gas to the site providing owners the opportunity to retrofit gas heating solutions And to utilise as a heat and cooking source.
- b. Unsightly individual Solar PV provision which despite this is calculated as meeting only a mere 10% of the overall power requirement for the site.
- c. A failure to provide evidence of any local heat sources being at least considered such as Maclaren.
- d. No evidence being required or provided for any possible community power solutions such as ground source heat.

e. No evidence being required for any individual ground/air source solutions, including compatibility in the future.

Signed electronically

*ROliver*

Bob Oliver

Treasurer/Project Manager – ONF

On behalf of the Ottershaw Neighbourhood Forum

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