



Email: info@ottershawforum.com Website: www.ottershawforum.com

23rd May 2021

Runnymede Borough Council

Addlestone

Surrey KT15 2AH

via e-mail

Outline Planning Application RU.21/0672 Ottershaw East, Brox Road, Ottershaw

Dear Sirs,

I refer to the above Outline Planning Application.

1. The following represent the endorsed comments, observations and objections of the Ottershaw Neighbourhood Forum Steering Committee on behalf of its membership.
2. Please note that two current members of the ONF Steering Committee, Malcolm Cressey and Carl Mann Who are Runnymede Borough Councillors and are also involved with the RBC Planning Committee have abstained from comment or voting on this application due to their declared conflict of interest.

Scope of Consent.

3. The Application suggests that it is only seeking Outline Planning Consent for the access bell mouth element of the development and that all other matters relating to the proposed development are reserved for future consideration. Our subsequent correspondence with RBC Planning has only partly cleared this issue and there remains some uncertainty of the scope sought for approval. Given the due date for responses is fast approaching we have included comments on all potential areas which may be being considered for approval.

Bell Mouth Design.

Vehicle Ingress/Egress.

4. Although appearing to meet SCC highways design, this is only for simple low volume access. It is our view that this development does not fall within this category for the following reasons:
 - a. The volume of normal vehicle traffic is in excess of that assumed, as such the narrow access will create an unsafe and impractical bottleneck.
 - b. The requirement for frequent larger vehicle access for GP Surgery, travellers pitches, refuse collection etc and commercial trades cannot be safely accommodated in the current design.

Defer or Refuse Until: Access road at bell mouth is widened and reshaped and pavement design and shape is adjusted.

Brox Road – On Street Parking.

5. Parking in the proximity of the new development access road has not been properly considered. The GP surgery as proposed will create a parking overspill onto Brox Road as will the underprovisioned parking of the proposed new housing. This, when combined with current on street parking and noting that some properties nearby do not have off street parking will render this junction unsafe, create another bottleneck in Brox Road and prevent larger vehicle ingress and egress to and from the development.

Defer or Refuse Until: Parking requirements are fully reviewed based upon recent data and parking restrictions assigned to Brox Road in immediate proximity to the site in order to facilitate a safe and fully functional junction.

Proposed Buildings on Junction.

6. The proposal includes several apartment buildings which whilst being completely out of character with the surrounding area and therefore not compliant with Policy EE1 of the Local Plan, have in one instance been located at the entrance to the development. Locating a property of these proportions at this location is considered impractical and unsafe, limiting visibility and further restricting access.

Defer or Refuse Until: Apartment block is reduced to a standard 2 storey dwelling, positioned with careful consideration of sight lines for ingress and egress to/from site. Ensure all other 3 storey buildings in the design are reduced to 2 storey maximum to ensure they blend with the character and appearance of the surrounding area.

Transport Infrastructure/Traffic Related Issues.

Infrastructure Impacts/Sustainability.

7. The Transport Assessment Scoping Report carried out by HUB stated that the location of the site was not considered sustainable with poor bus provision and poorly connected cycle and pedestrian links to the wider area. With the recently approved site for 46 houses in Brox End Nursery, the numbers and density of the proposed development is in our opinion unsustainable.
8. The Transport Infrastructure Assessment in support of the Applications found that the residential aspect of the Proposed Scheme is estimated to generate a maximum of 128 two-way trips in any peak period. Regarding the GP surgery, the TIA found that a maximum of 53 two-way trips would be generated in any peak period. Overall, the 360+ trips from this location at peak times are considered very significant additions to our already 'poor infrastructure'.
9. Additionally, the development is not easy walking distance to railway, local shops and other amenities. Vehicle use will therefore be expected to further increase to meet these needs. This has not been properly considered.
10. It is worth noting that the Environmental Impact Assessment (EIA) submitted under RU 21/0633 is also flawed due to its incorrect assessment parameters.

11. The NPPF states that all housing development must be sustainable and reflect the infrastructure capacity of an area. Apart from the A320 Highway Scheme upon which this development clearly depends (noting the Brox Road/Guildford Road junction has now been removed from scope), the EIA and TIA are flawed in their assumptions and statements and do not represent the true situation.

Defer or Refuse Until: This Outline application is reassessed alongside the EIA and TIA under the above reference and the public representations made in regard to both.

Brox Road Traffic Management.

12. Recent SCC Highways studies have already demonstrated a high incidence of speeding issues along Brox Road. With the significantly increased volumes of traffic and on street parking generated from this and its adjacent development it is considered that this will become unsafe and unmanageable without some intervention.

Defer or Refuse Until: Improved speed control/traffic calming solutions are proposed to improve safety and reduce noise.

13. As mentioned earlier, the Brox Road/Guildford Road junction improvements have now we believe been removed from the scope for the A320 highway improvement scheme. This is very short sighted given the additional burden to be placed upon this junction by the 2 new developments.

Defer or Refuse Until: SCC junction improvements are studied and proposed in light of significantly increased traffic volumes.

Development Parking Provision and Wider Impacts.

14. Car parking space allocations on the Master Plan provided with the application are in our opinion substantially inadequate when compared to evidence existing of per dwelling car ownership in this and surrounding areas with poor transport infrastructure. The policy upon which this is based is now some 20years old and therefore falls well short of reflecting the current requirements.

15. The current proposed solution based upon 220 dwellings will doubtless result in a significant amount of additional vehicle parking on verges and roadsides within the development and on an already congested Brox Road.

Defer or Refuse Until: Parking requirements are studied using up to date data and parking provision within the development is increased and redesigned to reflect the new data and demands of the surrounding area rather than generic national policy.

GP Surgery.

16. Whilst we accept that the current GP Surgery is in a location where it cannot be upscaled to cope with demand and that this and the adjacent development will place an unmanageable burden on it, the relocation of the centre to this part of the village is wholly illogical and impractical for the wider community it is scoped to serve, the issues are:

17. The relocation of the surgery here places it at the furthest populated edge of its catchment area which stretches to the M25 to the east and to Lyne in the North. This means the vast majority of patients will have to drive to this location which is achieving the opposite result to that desired across the village from a practical and environmental perspective. (reduced traffic, reduced noise/pollution, increased footfall).

18. Relocation to this development moves it well outside the village centre and away from its support services such as the pharmacy. This is also illogical, uneconomic and impractical. The majority of "traffic" between the medical centre and pharmacy is currently footfall, this will become vehicular if the centre is moved here.
19. Relocation to Ottershaw East moves the facility away from current and planned elderly and less able care facilities, again this will reduce convenience whilst increasing traffic and reducing footfall.
20. Despite the increased, dedicated car parking in the new proposal, our view is that relocation will remove one choke point at Bousley Rise (where the main issue is the schools rather than the GP Surgery) and replace it at Brox Road where the overspill will cause serious traffic and parking issues in a more rural part of the village.
21. Relocation will have a negative impact on the village due to reduced footfall and reduced use of associated retail. This is directly counter to the objectives of creating and maintaining a sustainable village centre at its current location an aim supported by the Ottershaw community.
22. This Forum is investigating options for the relocation of the GP Surgery as a key element of our infrastructure led neighbourhood plan and would welcome the opportunity to work alongside RBC in order to successfully resolve this issue.
23. It is our view that the Ottershaw East applicant should be required to contribute the attributable land value and provision contribution by way of S 106 Agreement, to a more appropriate site.

Refuse: All options for the relocation of the GP Surgery require assessment in order to provide sufficient evidence to guide the relocation of this critical community facility. Recommend working collaboratively with the ONF to seek an acceptable solution (a point more central to the village and its catchment area). The Ottershaw East applicant should be required to contribute the attributable land value and provision contribution by way of S 106 Agreement, to a more appropriate site.

Dwelling Density.

24. Local plan policy SL12 site capacity analysis recommended 200 units, 31 dwellings per hectare. Although the plot brought forward for development is significantly smaller, the number of dwellings proposed is higher at 220. This equates to a density of more than 43dph after the areas of the GP Surgery and Travellers pitches have been removed and significantly more than that stated in the proposal. This represents an overdevelopment of in excess of 25% more than that stated in the Local Plan.
25. Ottershaw is categorised as "formal suburban" in Runnymede's policies. However, the proposed density at 43.5dph is more in keeping with the category of "21st Century Urban" which is more appropriate for town edges such as Addlestone or Chertsey. According to Runnymede design policy, "The appropriate density will result from the context" it is clear to

us that context has not been taken into consideration. Planning committees must look to maintain an area's prevailing character as stipulated in NPPF guidance.

26. At the proposed density of 43.5dph, it is difficult to envisage a high-quality design which also aligns with Runnymede's policies as they relate to the context of a village such as Ottershaw. A high-quality design requires that the masterplan does not merely comply with the minimum standards but exceeds them comfortably. The density proposed is unlikely to allow for this to be achieved. Minimum density standards should be used for city and town centres and other locations that are well served by public transport. Ottershaw is a village, poorly served by public transport and therefore high densities are inappropriate, out of character and unsustainable. The bus service is regular as stipulated in the EIA, but it runs infrequently (every hour) and has limited reach.
27. The Final Capacity Analysis which informed the Local Plan of housing density at the site of Ottershaw East recommended the density of 31dph regardless of identifying that the net density in the immediate vicinity of the site is 11 to 26 to dph. This document states that there is capacity to marginally increase density over its recommendations, but this must not be at the expense of high-quality design. The proposal seeks to increase the density by 25% at 43.5dph which is well over a marginal increase. It would be perverse for the council to ignore both the recommendations of a report of its own commissioning and the capacity stated in the Local Plan.

Refuse: Proposal is significantly outside acceptable parameters for the numbers of dwellings on this reduced site and will additionally compromise the quality and character of the design. It will not reflect the characteristics of its surrounding area.

Building Heights.

28. Buildings over 2-storey as proposed by Richborough Estates in their offering have not been justified (other than to gain land value) and are not coherent with the architecture or context in the local vicinity of the site. All properties within several hundred metres of the proposed site boundary are detached or semi-detached, 1 or 2 storey dwellings. Anything over 2 storeys should therefore not be built on site to adhere to the current applicable RBC SPD and NPPF design standards.

Refuse: Proposal does not reflect the requirements of extant policy or the character and appearance of its surrounding area.

Travellers Pitches.

29. The provision of 2 travellers pitches on this site seems illogical and "token" by its very size. We are not yet fully conversant with the wishes of our traveller community, however it would suggest a preference for pitch provisions to be located and integrated onto larger traveller sites such as those elsewhere in the surrounding area rather than blistered onto other housing developments. Whilst it is accepted there is a need to meet quotas, this type of implementation does not seem to meet the needs of the community it serves. Additionally:

- a. Its presence will likely affect the value and saleability of property in this development and the wider area.

- b. The location in the southern corner of the development seems illogical, it would appear better located in the NE corner away from other existing property.

Defer or Refuse until: Policy on the location of travellers pitches is fully considered and position on this site fully reviewed. If retained the location to be reviewed to achieve optimal positioning.

Amenity Upscaling.

30. It is clear the impact of this and its adjacent development upon local social infrastructure is significant with the aspects of medical, Pre-school, infants school and junior school already over or close to capacity. The council should note this impact and ensure contingency plans are in place to cater for the impacts of the 25% increase in population resultant from this. Additionally, recreational facilities will be also rendered inadequate. This Forum are planning to study these issues in detail as a part of our infrastructure led neighbourhood plan and would be keen to collaborate closely on all issues of this kind.

Defer Until: Impacts are clearly understood for all critical social infrastructure and mitigation plans identified.

Signed electronically

ROliver

Bob Oliver

Treasurer/Project Manager – ONF

On behalf of the Ottershaw Neighbourhood Forum