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Runnymede Borough Council Planning Dept

Addlestone

Surrey KT15 2AH

via e-mail

## **Planning Application RU.24/0330 –The Field, Brox Lane, Ottershaw – ONF Comments**

Dear RBC Planning,

1. We refer to the above Planning Application which we recommend must address the following issues, many of which we consider are of major importance through amendments to the development document set, specifically the CEMP and the CTMP.

### **CTMP**

2. The CTMP should **NOT be approved** until there is sufficient detail in it covering the issues below. In its current form it constitutes only an unenforceable, high level template and broad statement of intent more suited to a pre-approval document. The document fails to mitigate the key risks of:
  - a. Construction Traffic Access through to completion.
  - b. Brox Lane/FP31 safety.
  - c. Brox Lane surface and subsurface infrastructure/utility protection.
  - d. Queuing for site access.
  - e. Overspill/parking.

Refer to text below for detail.

3. Construction Traffic Access. **The CTMP should NOT be approved until it has clearly defined an approved safe and practical access route for site traffic throughout the period of construction through to last occupation.** This is currently **NOT** the case for the following reasons:
  - a. Brox Lane is an unadopted road with frontages therefore owned by respective adjacent property owners. These and all other residents have to date been misled due to the planning application reflecting an intent to use Hawthorn Rd exclusively for all access during the construction phase.

- b. There have been no justifications or assessments provided throughout the process to clearly state why there is now a preference for using Brox Lane rather than the Oaklands development main street (Hawthorn Road – see 3a above) which ultimately will be the access point for The Field or indeed the original SL12 access via the Ottershaw East site.
- c. Brox Lane shares Footpath 21, links with FP30, is narrow, ditch edged and of a poor quality, unsurfaced to a larger extent. As you know the footpath element is SCC responsibility. **We are not aware of any planned safety mitigations for the large amount of pedestrian and other traffic using this Lane.** See Annex A for detail.
- d. Brox Lane/FP21 is effectively a cul-de-sac, closed off by the EW Morris Farm gated private land further up the lane. The lane has many regular users including:
- Walkers and official walking/rambling groups.
  - Mobility scooter users.
  - Dog walkers.
  - Parents and children walking to/from school in Ottershaw/New Haw.
  - Cyclists.
  - Horse riders.
  - Delivery drivers.
  - Emergency Services of all types.
  - Residents motor vehicles.
  - Farm and Brox Lane business vehicles.
  - Visitors motor vehicles.
  - Care support worker vehicles.
  - Utility workers vehicles.
  - Fishing Lake maintainers and members vehicles (Compass Angling).

There is only access through the EW Morris premises for pedestrians. **All other users rely totally on the Brox Road exit from the lane.**

- e. The turning point approaching and into The Field development is narrow and angled with a deep ditch adjacent, turning access is therefore problematical particularly for large vehicles. The Lane is regularly used by residents, business owners and users of the Brox Lane fishing lake. **Blocking the Lane for any period and at any time is therefore totally unacceptable.** It is not clear how the largest vehicles in particular those carrying the construction equipment will safely navigate the lane.
- f. The predicted traffic load for the site we are told is 20 large vehicles plus staff vehicles for parking on site (60-75 personnel). Given the total lack of suitable public transport to the area this means approx 140 movements per day along a narrow, unmade lane with no dedicated footpath and ditches at its fringes. **This is excessive and impractical for a road/footpath of this kind.**

- g. The Site Access for construction traffic proposed via Brox Lane involves a restricted and controlled, gated access point/process. The site access will therefore undoubtedly cause queuing along the Brox Lane particularly at construction peak times. **This is totally unsafe and unacceptable to users of the lane.**

**The CTMP must propose a process to mitigate this.**

- h. The unmade section of Brox Lane includes the main foul and clean water sewers for the local area including for the new 46 unit Oaklands development. **There has been no investigation thus far into the ability of this to withstand the burden of heavy construction traffic.**

**There are no considerations or mitigations in the CTMP.**

- i. Para 5.6 of the CTMP states:

“All construction traffic will enter the site via the existing entrance off Brox Lane.”

However diagram 2.2 states that Brox Lane access will be stopped up at 1<sup>st</sup> occupation and Hawthorn Road opened. The construction programme at 2.1 indicates a more than 7month period from potential first occupation to all unit completion. **There is therefore a period of at least 7 months where construction traffic will route via Hawthorn Road. All residents are unaware of this** and if this route is not used at the start why is it only acceptable for construction traffic at this point?

The CTMP also includes a number of statements concerning access **which all conflict, namely:**

Para 4.1 “blocked after first occupation.”

Para 4.11 “the access will be closed up nearer to the completion of the site.”

Para 5.3 “the primary access will be via Brox Lane.”

Para 5.6 “blocked after first occupation”.

**Most significantly the CTMP is therefore not clear on:**

- **Whether construction traffic will use Hawthorn Road post 1<sup>st</sup> occupation through to completion.**
- **Whether construction traffic will continue to use Brox Lane post 1<sup>st</sup> occupation.**

**The CTMP should NOT be approved until this key aspect is fully clarified.**

- j. Para 5.6 of the CTMP states:

“The existing access will be protected as necessary to carry heavy vehicles and avoid damage to the public footpath / buried services.”

**The above statement is not specific enough to ensure the risks from construction traffic are properly managed. We propose an amendment as follows:**

*“All parts of Brox Lane used by construction traffic should be protected throughout the construction phase sufficient to avoid damage to all surface and sub-surface infrastructure and utilities.”*

**The CTMP should include all the proposed measures required to achieve the above.**

- k. The CTMP does not recognise the existence of TPO191 and TPO384 trees which fringe the unmade and partially made parts of the Brox Lane access and consider whether any protection measures will be required to their respective Root Protection Areas (RPAs). In addition it does not address protection measures which may be required for the hedges which fringe the Lane.

**The CTMP should include all the proposed measures required to achieve the above.**

- l. CTMP Para 4.1 states:

“Deliveries will be scheduled to reduce congestion.”

Brox Lane cannot tolerate any level of congestion given its single track nature shared with a footpath with no alternative route for residents and businesses..

**The CTMP must ensure that this is achieved.**

- 4. Operating Hours. We note the intention to operate the site on a Saturday morning and also the intent to negotiate Sunday and public holiday operation as an when required. **We question whether this is reasonable in a setting such as this.**
- 5. Parking. We note the intent to have 60-75 personnel on-site throughout. Parking provision on-site appears to only be approx 18spaces and there is minimal opportunity to utilise spaces of completed units. There is no bus service which will adequately support the proposed working hours and no rail connections in the area. There is no parking in Brox Lane. There is therefore an implied overspill of many vehicles (up to 50 per day) onto the local roads. The local area cannot tolerate numbers of this kind. **The CTMP should NOT be approved until:**
  - a. A feasible solution for accommodating site worker traffic is proposed which successfully mitigates the above risks and proposes how the overspill will be safely and practically managed throughout construction through to final occupation.

6. Site Logistics/Queuing for Site Access. Whilst it is noted that this is a complex issue and one which must ultimately be negotiated with sub-contractors, the CTMP as it stands **proposes no solution at any level of detail** and only highlights the risks pertinent to this site alone. The CTMP should include more detail to address risks and uncertainties if it is to become a useful and enforceable document for the LPA. The following issues need to be addressed and **included in the CTMP prior to approval**:
- a. The frequency of construction traffic “arrivals and departures” during a shortened day will necessitate queuing for site access. This cannot be effected on Brox Lane. There is no plan presented to quantify and manage this issue such that:
    - i. Brox Road through traffic is not obstructed or impaired.
    - ii. Brox Road resident on and off road parking is not affected.
    - iii. Brox Road Bus Stops and other restricted parking areas are not affected.
    - iv. Brox Road safety is not compromised.
    - v. Brox Lane is unobstructed throughout.
    - vi. Hawthorn Road is unobstructed throughout.
  - b. Site logistics must also take into account the construction traffic plans for the now commenced, larger Ottershaw East development which has the same route for construction arrivals and departures and will have its own dedicated site access and queuing system for construction traffic. This is critical to ensure that Brox Road can continue to function safely and effectively.

## **CEMP**

- 7. The CEMP should **NOT** be approved until the following risks and issues are fully considered and mitigated.
- 8. It is noted that HERAS fencing is to be used to protect the grassland area at the top of the site and a walk round and stop up solution used to prevent badger ingress around the boundary during construction. We raise two issues of risk/concern:
  - a. Badger ingress is likely through **any** soft boundary yet there is no solution proposed to protect the site from this. If normal routes are blocked the badgers will simply find another way in. It should be noted that the setts are very close to the development. It should also be noted that footpath 30 boundary solution with the adjacent SANG is likely to change. If stock fencing is used as currently specified badgers are more likely to forage around the path.

**The CEMP should include a boundary solution which provides perimeter protection around the site for pedestrians (where applicable) and animals.**

- b. We highlight a safety issue with the heavily used Footpaths 21, running along Brox Lane and the narrow FP30 connecting with Bousley Rise.
  - i. The lack of any internal protective construction fencing adjacent to FP30 places a risk of harm to FP users.
  - ii. The use of the FP21 route for construction traffic places the FP users at significant increased risk. There are no mitigations for this unless construction traffic is rerouted another way.

### **Bin and Cycle Store For Apartments**

9. Bin Store. As currently specified the proposed apartment bin store appears to only have capacity for 4 large, 2 medium and 1 small bin. It is assumed this is shared across the 6 units, however with fortnightly collection it may prove to be inadequate to have one bin of each type shared between 2 units.

10. Cycle Store. The following aspects should be addressed:

- a. As currently specified the store can only accommodate 6 cycles, 1 per unit. This is inadequate for the accommodation which is likely to have 2 occupants and no other place to store cycles. We recommend this is increased to 12.

As a minimum it is recommended that the unit is widened to allow sufficient space for 2 cycles to be locked to each of the 6 Sheffield stands.

- b. There is only one e-bike charging point in the store, this should be increased to a minimum of 3.
- c. The bike store should have an internal PIR sensor light.

### **Comments Regarding Conditions.**

11. In our opinion there appear to be issues which transpire from poor crafting of conditions and this appears to be common across developments. It is recommended that RBC consider tightening up the CTMP conditions for future developments to ensure:

- a. That the requirement to specify site access is requested with supporting evidence.
- b. That the requirement for frequency, type and volume of construction traffic is requested.
- c. The CTMP conditions address all phases of construction through to completion.
- d. CTMPs fully address access risk mitigations during construction.

Signed electronically:

*ROliver*

Bob Oliver

Treasurer/Project Manager – ONF

For and on behalf of the Ottershaw Neighbourhood Forum

