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2nd November 2022

Runnymede Borough Council

Addlestone

Surrey KT15 2AH

via e-mail

Planning Application RU.22/0479 Ottershaw East, Brox Road, Ottershaw – SANG

Dear Sirs,

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.

General Comments.

3. Whilst it is recognised that the primary function of the SANG is to provide mitigation for the SPA, the SANG should still itself aim to balance the protection and development of wildlife and vegetation with that of providing amenity space for residents. The current solution fails to achieve this. As such it offers too much freedom for residents to roam across the whole of the site and little or no protection to the habitat.
4. The SANG should seek to return the area towards its historical origins. As such greater emphasis should be placed upon indigenous species reforestation and hedgerow creation.
5. It is encouraged that, as intimated in the documentation, the detailed design of the SANG is developed in close cooperation with the local community in order to ensure its expectations are met. This should be effected through liaison with the local council, Ottershaw Neighbourhood Forum and other community groups as required. This will also provide opportunity to leverage knowledge and resources from others managing and supervising the many other SANGS in the local area. It should be

noted that no specific consultations regarding the SANG have taken place with the ONF or other community groups. Discussions held in February 2022 focussed on the housing development and not the villages expectations for the SANG.

6. The SANG should seek to reflect the practice and functions of the other SANGS in the local area which seek to limit public access mainly to footpaths and immediate surrounding areas whilst providing only minimal other activity amenity space as stated in the Natural England, Thames Basin & Heaths and RBC, SANG requirements/SPDs.
7. It is recommended that the SANG development should include a pictorial and written vision for the space which looks approx. 50years into the future. This will help to inform the detailed development of the solution to ensure it is delivered to best effect and provide a checkpoint as time passes.

Major Issues.

8. SANG Categorisation. There is inconsistency in how the areas of the housing development and the SANG are quoted and used across the 2 Ottershaw East applications (0454/0479). Although the SuDS area is embedded in the SANG and is listed many times as an amenity to be used by the SANG users, its acreage has been removed from the SANG total area. The result of this is a SANG of less than 10ha rather than more and as such a different set of requirements are seen to be applicable. In our opinion this is incorrect and the full area of over 10ha should be used.
9. Vehicle Parking. It is not clear from the application what category this SANG falls into and it is perceived this will also affect the solution (see above). Looking at its size of around 10ha it is our largest SANG by some margin. As such it is unclear whether the intent is to serve only the local population up to 400metres or wider. It is unclear how the SANG requirements are applied in this case, however the current application includes no provision for vehicle parking. As such the catchment is stated as 400metres. This is clearly arbitrary and unrealistic as external users from a wider catchment cannot be deterred unless you restrict public access to the SANG.
10. In our experience regarding our other SANGs we see clear evidence of a wider catchment area for about a third of users, eg Memorial Field dog walkers (of which there are many) using its car parks will doubtless wish to use this SANG as a regular alternative. Without dedicated car parking they will simply park on Brox Road.
11. For this SANG, given its size and varied nature we would see wider access being even higher. In order to meet the wider case there are firm requirements to provide the following:

- a. Dedicated vehicle parking within close proximity of the SANG (ie adjacent).
- b. Dedicated disabled vehicle parking as a part of the provision.

The above should therefore be included in the solutions for RU22.0454/0479.

Note: In addition, there should be provision for cycle parking.

12. The implications of not providing parking will result in completely unacceptable increased congestion and safety risk along Brox Road (in addition to new surgery users (which has insufficient parking), buses and residents).
13. Badger Habitats. A number of badger setts have been identified within the SANG area. Whilst it is recognised that laws exist only to protect the sett and its occupants from incursion, we are concerned that the current SANG solution appears to take no regard for their presence with many of the footpaths coming in very close proximity or actually right on top of the setts. Additionally, there is no consideration of their foraging areas. We recommend that the SANG layout is carefully reconsidered in order to ensure the safety of this species. It should be noted that, given the close proximity of the housing development it is realistic to assume that dog walkers will exercise after dark when the badgers are active. An overlaid SANG map showing locations is at Annex A.
14. The current proposed solution does not comply with the requirements for species protection stated/referenced in the Natural England response ref 408394 dated 5 Oct 22 (Annex).

Other Specific Comments.

15. Woodland Play/Trim Trail. The woodland play area is embedded in an area of ancient woodland which is too remote from the housing development and therefore unsafe. If the requirement for the area remains, it should be relocated. The NA/TB&H/RBC requirements do not appear to permit this and specify these areas should be in close proximity to the development. The trim trail equipment location also appears to not comply with this requirement.
16. SANG Boundary. Currently the SANG area has minimal “hard” boundaries. A timber and post netting solution has been proposed which is only augmented with additional hedging to the east of the site. This hedging is not shown as contiguous. Whilst the boundary through the ancient woodland must be introduced to ensure residents do not trespass on private land it is recommended that additional hedging is introduced throughout the boundary to provide screening of the boundary fence and positively contribute to the Biodiversity Net Gains for the development.
17. Footpath alignments. The footpaths through the forested area in general are in too close proximity to the boundary. Whilst it is understood these alignments are

indicative, it is recommended that these are moved a small distance further into the SANG.

18. SuDS Outfall. It is unclear whether a full impact assessment has been completed to demonstrate whether the ditch to the south of the development proposed for the outfall and its capacity is sufficient to avoid any increase to flood risk elsewhere as the run off from the hard landscaping will be far greater than that currently experienced. It should be noted that the River Bourne into which this drains has a flood risk area at the south end of Brox Lane, the land adjacent being regularly subject to inundation.
19. Tall Edge Planting/Mature Trees. These plantings should seek to mirror the tree species mix of the adjacent ancient forest. Fast growing, small and non-indigenous species should not be encouraged.
20. Community Orchard. In our opinion a community orchard is more aligned with an urban rather than a rural setting. We would recommend this is replaced with more irregular indigenous species woodland. This could include eg nut trees and would be more in keeping with the wider area.
21. Public Access on Foot. Improved access to SANGS is a stated requirement to ensure usage is maximised and impact on the SPA is minimised. Brox Lane is a heavily used route for local pedestrians and dog walkers. Many of these users are residents of Rowtown. The introduction of the SANG provides the opportunity for these residents to directly benefit from this new space in a similar way that they do for the Hare Hill open Space/SANG. It would also provide access by sustainable means for Rowtown residents to the new GP Surgery (Rowtown is in the surgery catchment area). In our opinion this new asset should be shared and not restricted to Ottershaw residents. Additionally, this would also better meet the requirement for access to longer walking routes (5km+). As such we propose that the SANG boundary onto Brox Lane in the SE corner of the area is opened to allow pedestrian/cycle access. Providing wider access is pertinent considering the significant size of the SANG when compared to the proposed housing development. This would also provide some benefit with respect to active & sustainable travel.
22. SANG Management Plan. Whilst annualised cost estimates have been provided for management and replacement of SANG furniture etc, it is unclear for how long the applicant is required to meet the requirement "in perpetuity". This needs clarification. Logically it should at least mirror the life expectancy of the proposed housing stock.
23. Cyclepath Opportunity – Active & Sustainable Travel. There is an opportunity to provide a cyclepath connection from FP30 through the SANG onto Brox Lane in the SE corner. This will provide a shorter, safe route for schoolchildren and other

residents accessing the Rowtown, New Haw, West Byfleet/Brooklands areas. It should be noted that Ottershaw has no secondary schools and bus services to these areas are inadequate at 2hour/daily intervals. Provision of this would therefore potentially significantly reduce the amount of vehicle usage, particularly at and around peak times, contributing positively to the proportion of active & sustainable travel in the area. An indicative route is shown at Annex B (orange).

Signed electronically

ROliver

Bob Oliver

Treasurer/Project Manager – ONF

On behalf of the Ottershaw Neighbourhood Forum