

Planning, Development Management
Runnymede Borough Council
Civic Centre
Station Road
Addlestone KT15 2AH

24 May 2022

Dear Sir/Madam

Planning Application RU.22/0454
Land to the east of Brox Road, Ottershaw KT16 0LQ

I write on behalf of the Brox Road Action Group, which represents local residents affected by this proposal, to raise objection to the above application seeking full planning permission for the demolition of the existing buildings, provision of replacement garages for 155 and 157 Brox Road and delivery of residential development comprising 186 dwellings (including 35% affordable housing) and two gypsy and traveller pitches, informal and formal open space and associated works; and seeking outline planning permission for the provision of a GP surgery and associated parking and landscaping.

We are aware that this site is allocated for housing within the statutory development plan. Local residents understand and accept that the site will be developed. However, the Council will be equally aware that an allocation in the Local Plan does not automatically mean that a detailed scheme will be acceptable in planning terms. Much depends on the detailed circumstances. The onus is on the applicant to demonstrate that a particular proposal would satisfy *all the relevant planning requirements* and not simply achieve a specified number of units or an indicative measure of housing density.

In particular, this proposal must demonstrate high quality and inclusive design which responds to the local context in order to comply with Policy EE1 of the adopted Runnymede Local Plan 2020. Development is required to make a positive contribution to the local townscape and its landscape setting whilst ensuring no adverse impact results to the amenities of neighbouring occupiers.

National planning policy, as set out in the National Planning Policy Framework, is equally clear. Development should function well and add to the overall quality of the area. It should be sympathetic to local character, including the surrounding built environment, and establish or maintain a strong sense of place. A high standard of amenity should be secured for existing and future users.

The density of development cannot be assessed without also considering the built form and layout, both within the proposed development and in terms of its townscape context. The transition onto the adjoining open countryside is also of critical importance in maintaining an appropriate soft edge to the built-up area. In all these respects, we find the proposal now before the Council to be deficient.

The design and layout within the site adopts a highly standardised and formulaic approach, the primary purpose of which is simply to maximise the number of units. Plot sizes are based on the minimum garden length given in the Council's guidelines for separation distances between dwellings, as set out in Design Standard 24 (Ensuring Residential Amenity) of the Council's adopted Design Supplementary Planning Document. The dwellings are small in the manner of standard estate housing and employ generic designs that contribute nothing of significance in terms of local distinctiveness.

The entirely predictable result is an over-intensive, bland and anonymous housing estate, which singularly fails to integrate with the lower density, suburban housing bordering the site. This is particularly evident with regard to the long garden plots within Brox Road and Southwood Avenue. No attempt has been made to achieve a suitable transition between the lower density, suburban form and character of the existing houses and the adjoining proposed development.

The treatment of the northwest site boundary is particularly problematic in our opinion. Here the layout includes two large parking courts, which would subject existing neighbouring occupiers in Brox Road to significant noise and disturbance as a result of vehicle movements. Minimal separation is provided to the boundary and there is insufficient space to provide any form of effective landscaping, which might otherwise have provided valuable screening and a much needed buffer between the existing and proposed homes and gardens.

Neither has any account been taken of the proximity of 135A Brox Road to the common boundary. Existing and future occupiers of this dwelling would suffer significant overshadowing and visual intrusion, greatly reducing their light, outlook and privacy and compromising their quiet enjoyment of their home and private garden amenity areas. We have written separately on

behalf of the owner/occupiers of 135A Brox Road setting out our objections in this respect, and we would refer you to this for further detail.

We would also highlight the cramped form and layout of Plots 179-186, which fail to provide even the minimum 11m separation to the adjoining homes and gardens within Southwood Avenue. The existing properties at Woodhaven, Woodview and 2B would be particularly affected, and the occupiers would suffer severe loss of light, outlook and privacy. Here again, where a more intensive form of development is adopted, parking and turning areas would be introduced immediately adjoining private rear gardens, subjecting neighbouring occupiers to excessive and unreasonable levels of vehicular noise and disturbance.

It is telling that such an arrangement is avoided within the development site itself, where some care has evidently been taken to arrange garden plots in a back-to-back layout. And yet neighbouring occupiers, who have historically benefited from relatively long garden plots, are not afforded the same consideration. This is clearly unacceptable, given the need to maintain appropriate standards of amenity for adjoining occupiers and having regard to the general standards of the area.

The only area of significant landscaping would be adjacent to the northeast boundary. However, adjoining the much longer southeast boundary only minimal landscaping is shown. This is insufficient to provide an appropriate transition to the surrounding open countryside and fails to maintain a suitable soft edge to the built-up area. The existing long garden plots within Brox Road and Southwood Avenue currently provide a much softer transition. The over-intensive form and layout of this proposal would erode the soft edge of the built-up area and have a most inappropriate and obtrusive urbanising effect on the form and setting of the settlement.

Even within the development site, the street scene would be dominated by the estate roads and hard surfaced car parking. Front gardens are virtually non-existent. Here again, the design and layout of the proposal fails to respect and maintain the pleasant suburban character of existing adjoining development, whereby the dwellings are set back from the street, relieving the built form and maintain a pleasing sense of spaciousness. These qualities are entirely absent from the proposed scheme.

Taken as a whole, it is difficult to avoid the conclusion that the proposed development fails to respond to local character and context, maintain local distinctiveness and contribute positively to the local area, whilst preserving high standards of amenity for neighbouring occupiers, as required by Local Plan Policy EE1 and the National Planning Policy Framework.

Neither is the proposal justified in terms of making full and effective use of previously developed land. In the first instance, we have already highlighted the need for applications to comply with other important planning policies for the protection of local character, amenities and the overall quality of the environment. Secondly, the proposal is over-reliant on larger family homes, for which there is no demonstrable local need, presumably for the purpose of maximising the developer's profit. Including a greater proportion of smaller units would still make efficient use of the developable area whilst reducing the built footprint and allowing more space for much needed soft landscaping and increased separation to adjoining homes and gardens.

We have further concerns about the limited provision to be made for visitor parking, the intensity of traffic generation using local roads and the increased pressure on existing infrastructure and services. These considerations underline our firm view that this proposal would fundamentally overdevelop a site that is simply not capable of accommodating the form and density of development proposed without causing severe and irrevocable harm to the character, appearance and amenities of the local area, in contravention of the adopted development plan and national planning policies set out above.

We would reiterate our starting premise that residents accept this site will be developed. However, the current proposal fails to satisfy the relevant planning policies and cannot be supported in its current form. Residents wish to see increased separation and landscaping to the site boundaries, both in relation to adjoining homes and gardens and in terms of the wider form and setting of the settlement and its relationship with the adjoining open countryside. Parking courts should be moved away from existing residential gardens and Plots 26-29 and 179-186 should be deleted and replaced with a reduced number of detached or semi-detached units in order to maintain appropriate separation to the adjacent properties.

We trust the Council will support local residents in upholding its own adopted policies and the provisions of national planning policy. If an acceptable design and layout cannot be achieved, we urge the Council to uphold those policies and refuse planning permission for the reasons stated.

Yours faithfully

Simon Miles

Simon Miles
Chartered Town Planner