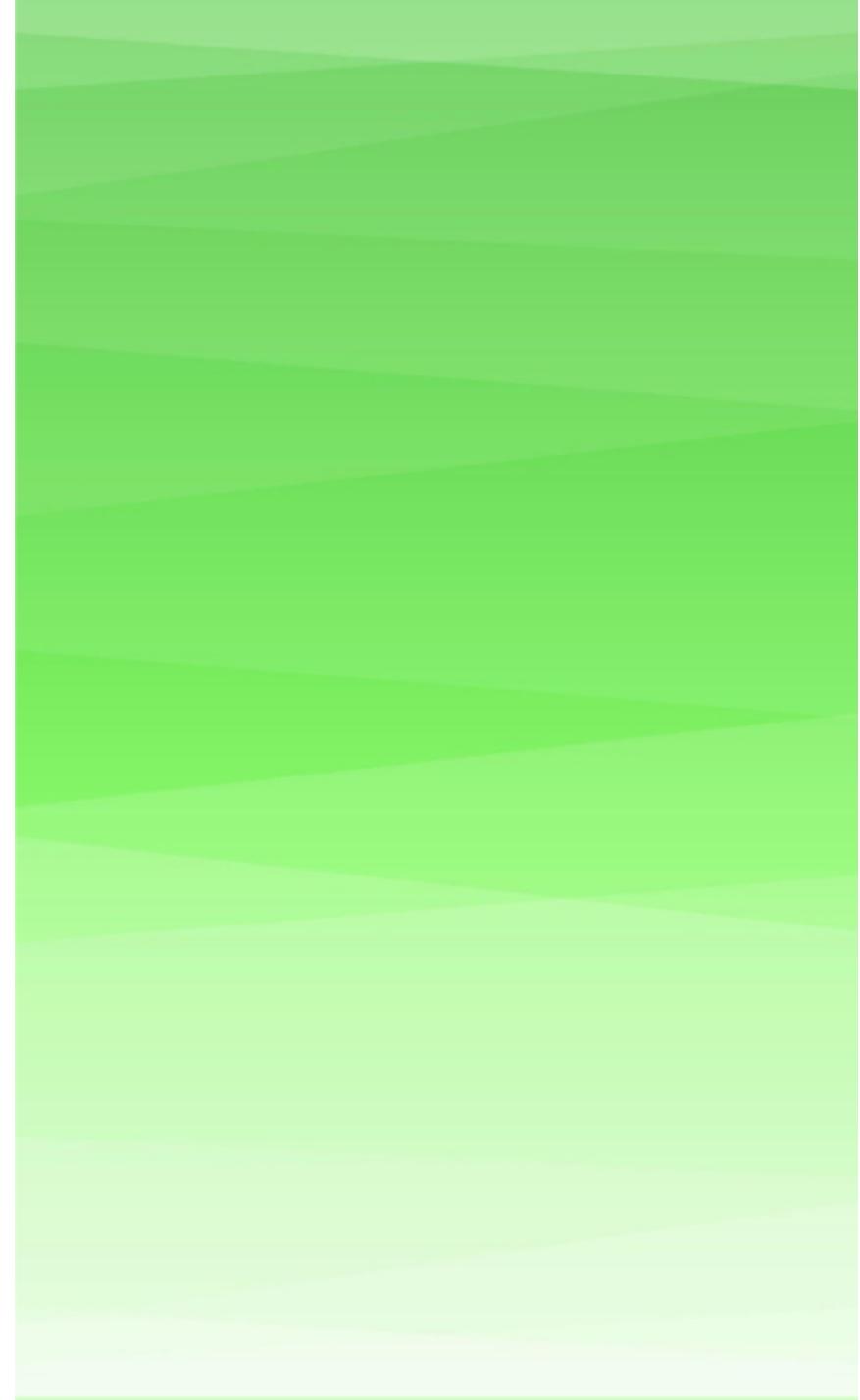


# Ottershaw East Planning Application

Objections



# Developable Area



1.00  
LAND OFF  
INTRO  
APPLICATION SUM

The Planning Application is  
been prepared to support t

“Full planning permission for  
agricultural land to publicly  
Suitable Alternative Natural  
land, including the demoliti  
of new pathways, associati  
earthworks. Creation of ne  
play areas and a communi  
comprising full planning ap

development (Use Class C3), 2 serviced gypsy/traveller pitches  
(Sui Generis); GP Surgery (Use Class E), landscaping and  
associated development.”

The application site measures 6.67 hectares and is located to the  
east of Brox Road towards the south of Ottershaw.

A site plan diagram overlaid on an aerial photograph. It shows a residential development with numerous small building footprints, roads, and green spaces. A large blue pond is located on the right side of the site. The entire site is outlined in red.

Vistry DAS states site measures 6.67 ha  
They may well be including the SuDS as part of their calculation which is not part of the SL12 allocation

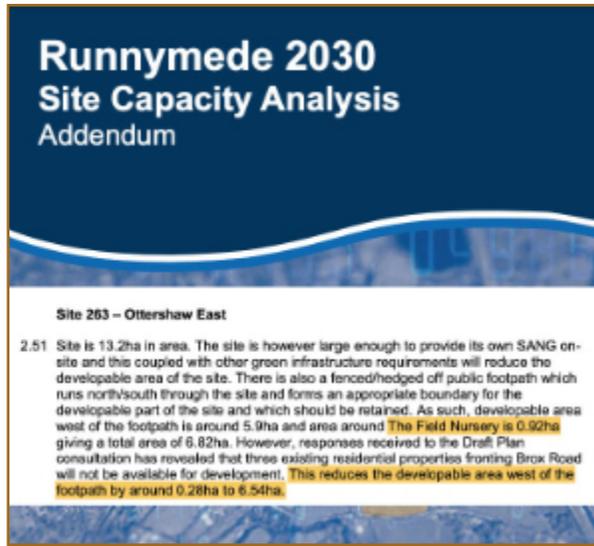
## Policy SL12: Housing Allocation at Ottershaw East, Ottershaw



SL12 shows that the developable area is west of the footpath. The area known as the Field Nursery did not come forward.

From Google mapping the remaining area is 5.3ha

(RBC suggesting any under-provision of green space on main site should be diverted to the Field Nursery – which is unfair on the owners of this site should it come forward in future)



According to the SCA which informed the LP, the FN is 0.92ha  
Therefore, developable area is  $6.54 - 0.92 = \underline{5.62ha}$   
Not 6.7ha as stated by Vistry.

SL12 assigned a minimum number of dwellings of 200 + 2 TPs  
Reducing the minimum dph by 16% to account for loss of the Field Nursery gives  
minimum number of dwellings of 172

Vistry application is for 186  
Gives density of 33dph (Net 37dph)  
(Surrounding housing density is 11–26dph)

That the site is too dense is aptly demonstrated by the response from DSO recycling pointing out that the entrance is tight, some areas are inaccessible and **“extra capacity in such a concentrated location does give cause for concern”**.  
It is worrying when the refuse people are concerned that the housing density is too tight.

We would argue for the lowest number of dwellings – 172  
Site is at edge of village, bordering greenbelt.  
Higher densities should be at village centre  
Other strategic sites at such as at GGF coming on stream and are more appropriate for higher densities as nearer village centre.

# Housing Mix – Cramming the site

**Policy SL19 sets the housing mix which aligns with the number of dwellings for the site**

Vistry Application inflates number of bedrooms

- Under provision of 1&2 beds
- Over provision of 3+ beds
- Increases the built footprint for the same number of dwellings causing increased density
- Inefficient use of land as occupancy rates for 4+ bed houses is low (SAMM)
- Ottershaw already over provided for 4 bed houses
- (42%) live in a home with two or more spare bedrooms, and more than three quarters (76%) live in a home with at least one spare bedroom
- Not enough gateway to ownership homes for younger people (AECOM)

	SL12	%age	Proposed	%age
1 bed	20	10	23	12.37
2 bed	67	33.5	41	22.04
3 bed	80	40	84	45.16
4 bed	33	16.5	38	20.43
	200	100	186	100

**Development proposals which depart significantly from the required mix of housing will only be supported where evidence demonstrates that such a mix would not be feasible or viable. (policy SL19)**

**No such evidence has been provided by the applicant**

# Density

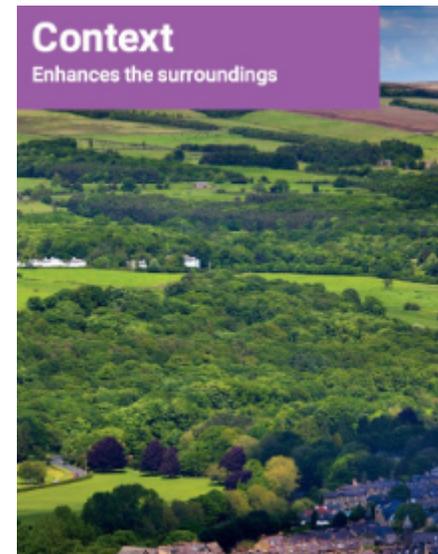
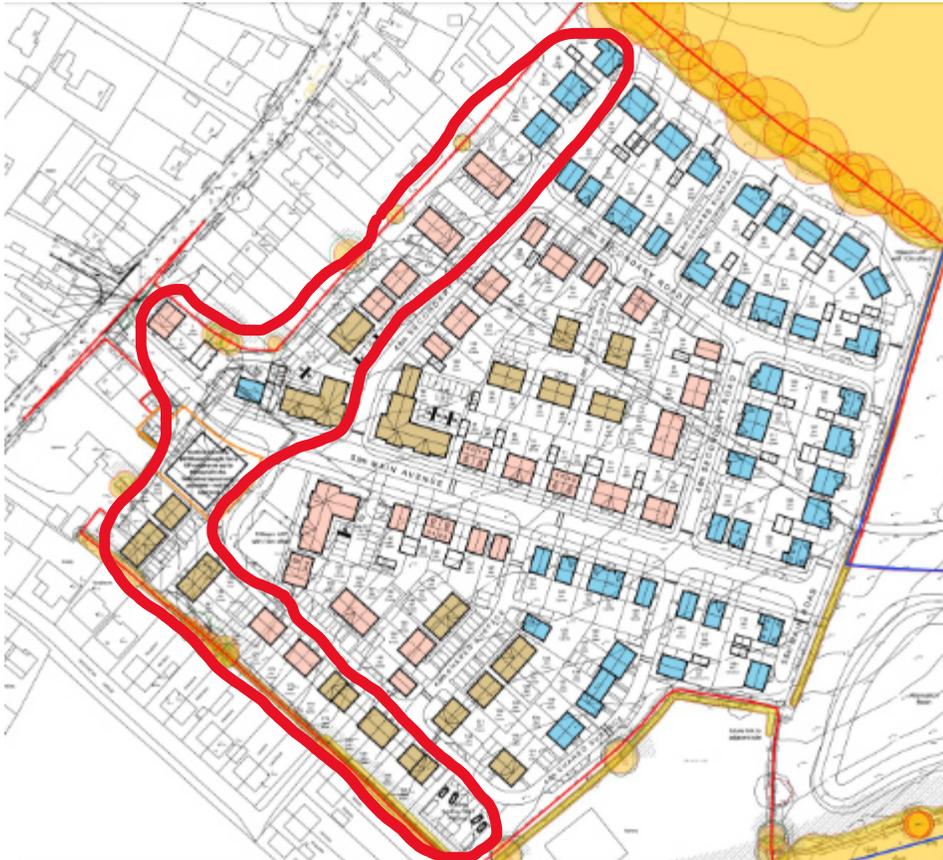
Density doubles against existing housing on the SW and NW border

Poor contextual relationships

National Design guide states new building should integrate well

“The appropriate density will result from context” (Runnymede SPD Para 66p19).

Note denser housing is adjacent to existing properties but not evident within the main site



- 38 **Context** is the location of the development and the attributes of its immediate, local and regional surroundings.
- 39 An understanding of the context, history and the cultural characteristics of a site, neighbourhood and region influences the location, siting and design of new developments. It means they are well grounded in their locality and more likely to be acceptable to existing communities. Creating a positive sense of place helps to foster a sense of belonging and contributes to well-being, inclusion and community cohesion.
- 40 Well-designed places are:
- based on a sound understanding of the features of the site and the surrounding context, using baseline studies as a starting point for design;
  - integrated into their surroundings so they relate well to them;
  - influenced by and influence their context positively; and
  - responsive to local history, culture and heritage.



Taylor Wimpey Site Green Lane. Note Green buffer around the site edges with existing dwellings

Note comparison with Taylor Wimpey site at Green Lane  
Bordering properties integrate well against the development and reflect the adjacent built form

Although this site was allocated for 173 dwellings in the Local Plan. Taylor Wimpey came in at 149 dwellings for a 7Ha site c.f. OE at 186 for a 5.6ha site.

# Relationships with built environment

**New building should respond positively to its immediate neighbours and integrate well. (National Design Guide)**

- Overly dense arrangement of terrace houses against existing properties – poor integration
- Provides minimum separation distances between dwellings within the development for new properties.
- But the same treatment not evident for existing residents on the SW and NW borders

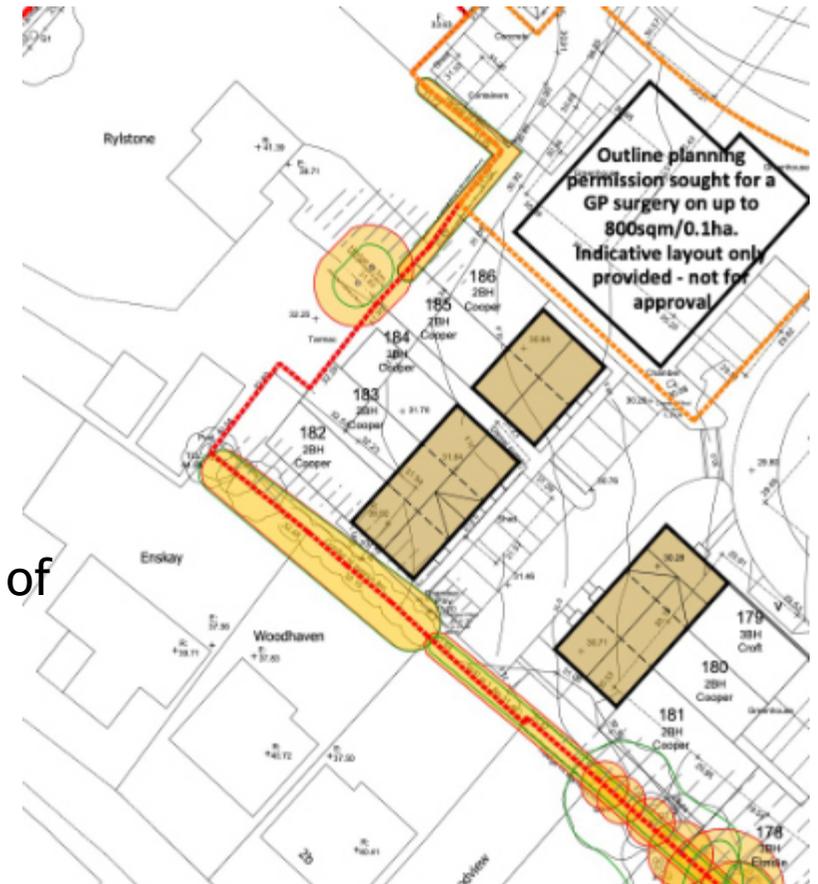
## THE RELATIONSHIP SW CORNER

Detached houses juxtaposed with an overly dense arrangement of terraced housing.

5 properties plus GP surgery backs onto Rylance

Out of context and does not relate well.

Contrived landscaping is not a solution to poor design.



**“Development must not have a detrimental effect on the amenity of neighbouring properties. Amenity “includes privacy, outlook, overlooking, daylight, overshadowing and visual dominance.” (p77 of the Runnymede Design SPD)**

- Runnymede design policies specify a back-to-back arrangement which is ignored here.
- Large parking courts backing on to detached housing is out of context, does not relate well or integrate
- Security issues providing easy access to the rear of existing properties, privacy and nuisance from car turning and headlights
- Woodview suffers loss of outlook as large gable end eclipses garden.
- Minimum separation distance not complied with (should be 17M)
- Suffers overshadowing and visual dominance
- Blank gable ends obscuring outlook for existing properties contrary to best practice



In context



Out of context

**"The fronts of buildings should relate to other fronts across streets or other areas of public realm, while the backs should relate to other backs to make a more private zone"** (Design standard 11 pp29 RBC Design SPD)

# Ensure no adverse impact on the amenities of occupiers of the development proposed or to neighbouring property (Policy EE1 LP2030)

## Separation Distances

Bordering properties treated less favorably

Within the development

- Back to gable end distances range from 12–20M
- Orientation maximises solar gain and reduces overshadowing
- Back-to-back layout evident
- Parking courts not placed behind gardens

Existing properties are given less consideration



Noted to be a vulnerable property. And yet:

- Separation distance is a mere 8M compared with 12–20M within the development
- The 2 terraced blocks are placed to cause maximum overshadowing as daylight is derived from a SE direction.
- Overlooking occurs from close angular distances
- Proximity causes loss of outlook.
- The large size and proximity of these housing blocks causes intrusion and visual dominance.
- The usual rule of thumb for oblique orientation is to reduce minimum B2B distance by 25% therefore should be 17M not 8M
- 12 bay open parking court provides easy access to rear of property. Full beam headlights directed straight into living rooms at night.
- Back-to-back requirement of Runnymede design SPD ignored
- Blank gable ends eclipse and box in the gardens which are set out to the side

**Development must relate well to the amenities of neighbouring properties, including their gardens. (Surrey Design SPD)**

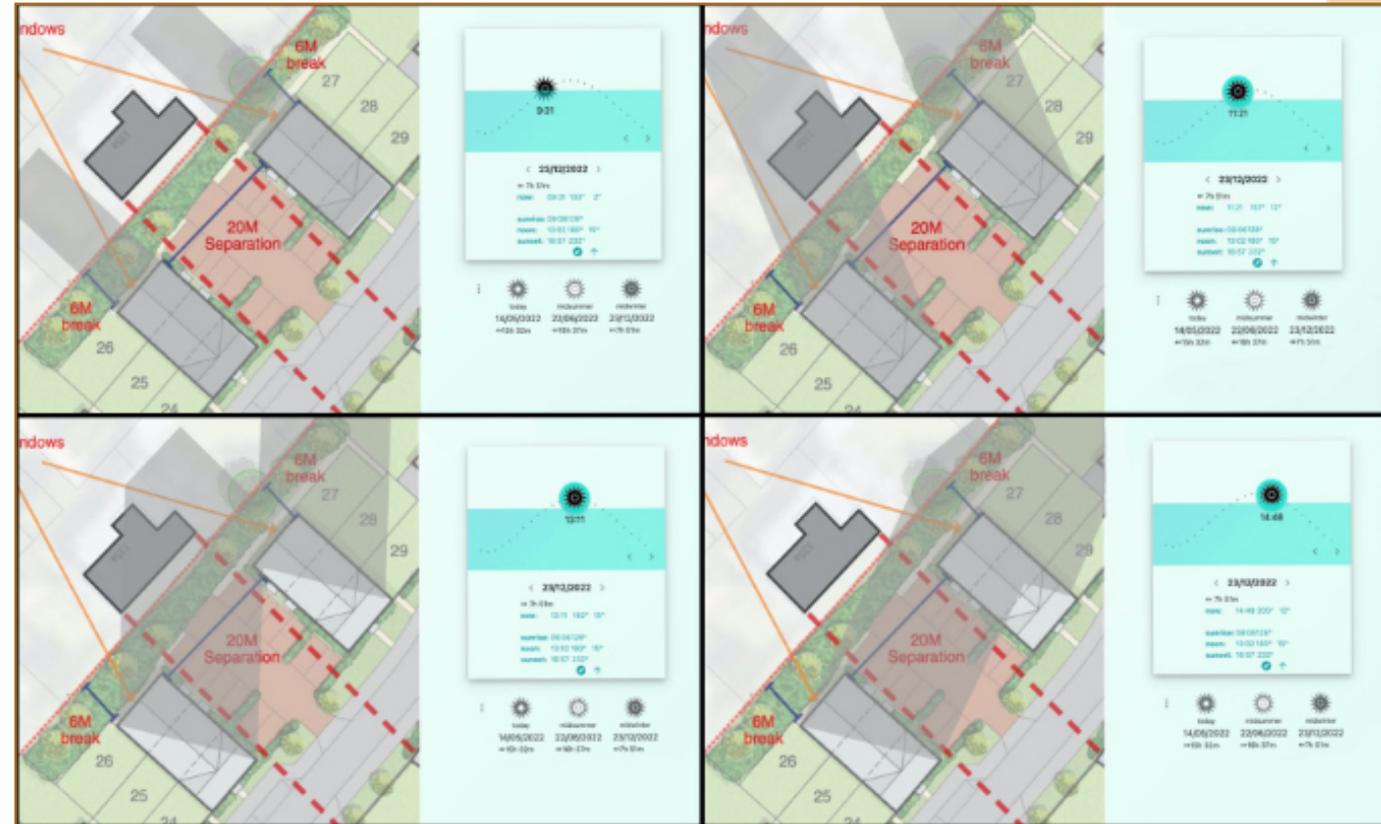
# 135A Brox Road



## Policy SD7: Sustainable Design

c) Maximise opportunities for passive solar gain and passive cooling through the orientation and layout of development;

- 135A is a passive house
- Proximity and orientation of 2 large terraced housing blocks causes maximum overshadowing as shown by shadow map opposite
- Massively reduces solar gain as light falls from SE direction
- Causes increase in fossil fuel usage
- Large built footprint throughout site increases concrete to green ratio thereby reducing passive cooling by trees and vegetation

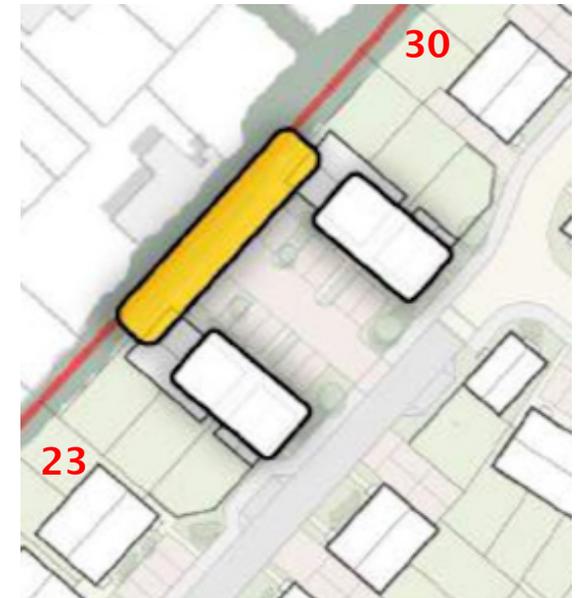


**“Accommodation must be designed to provide suitable levels of natural daylight and sunlight to new and existing properties” (Design standard 24 Runnymede Design SPD)**

# Ignoring planning advice

Pre-app discussion on 11/11/21 discussed arrangement where new housing is aligned with rear building line of plots 23 and 30 but this has been ignored in the final layout

The terraces are 12% higher in ridge height than 135A presenting increased bulk and mass



Runnymede design SPD p.77 states:

“As a guide, two-storey rear extensions should not extend beyond a 45% line from the centre of the nearest adjoining neighbour’s window.”

Although it is not a rear extension of an adjacent property, the proximity of the terraces and their height and bulk, to the rear elevation of 135A is sufficient as to have the same effect.

# Refused planning decision Brox Rd

A recent planning application RU.21/1067 was refused due to overlooking and siting of car park. Separation distance in this refused application was over 18M from no. 62

The applicant proposes much shorter distances (8M) than in this refused application combined with placing of parking courts to the rear of properties causing open public access, overlooking and loss of security due to easy approach from an undefended rear. The neighbour's privacy and garden amenity in this case was deemed compromised despite the location being nearer the village centre characterised by higher housing density and having established commercial premises.

Consistency and fairness in the planning response is vital whether it be small or large developments



**Proposed Co-op with flats above.  
Separation distance around 18M**



# The unacceptability of big differences in density between existing and proposed new dwellings

Refusal by the Planning Inspector of application in Hampshire.

Overlooking, and loss of privacy exacerbated by the density of housing proposed backing onto existing dwellings. Multiple new housing backing onto existing dwellings had a detrimental effect on existing resident's amenity and privacy. (Appeal Ref: APP/M1710/A/ 14/2229095 Land to the rear of Nos 191 -211 Lovedean Lane, Waterlooville, Hampshire PO8 9RT)

## **Ask yourself – Does this application comply with the following Runnymede policy statements?**

**"Well-designed new development is integrated into its wider surroundings, physically, socially and visually"**

**"Plots should be configured so that new development relates well to its neighbours."**

**"Development must respond to the plot and building rhythm within the local context"**

**"Attention should be paid to the impact of the development within the streetscape (e.g., form, massing, building line and space between buildings" (Runnymede SPD p31-32)**

**"All development proposals will be expected to achieve high quality and inclusive design which responds to the local context including the built, natural and historic character of the area" (Policy EE1)**

Runnymede design SPD emphasises that good design should reflect local vernacular and include variety including **landmark buildings, points of interest** and **variations of style**.

We are now familiar with the standard housing layouts found all over the UK. The result is that everywhere could be anywhere. This happens when context is ignored. (Surrey cc Design guide 3.0.2)



Ottershaw has a variety of styles from listed buildings, arts and crafts, post war and contemporary. Applicant cherry picks local examples to fit into its generic national housing model



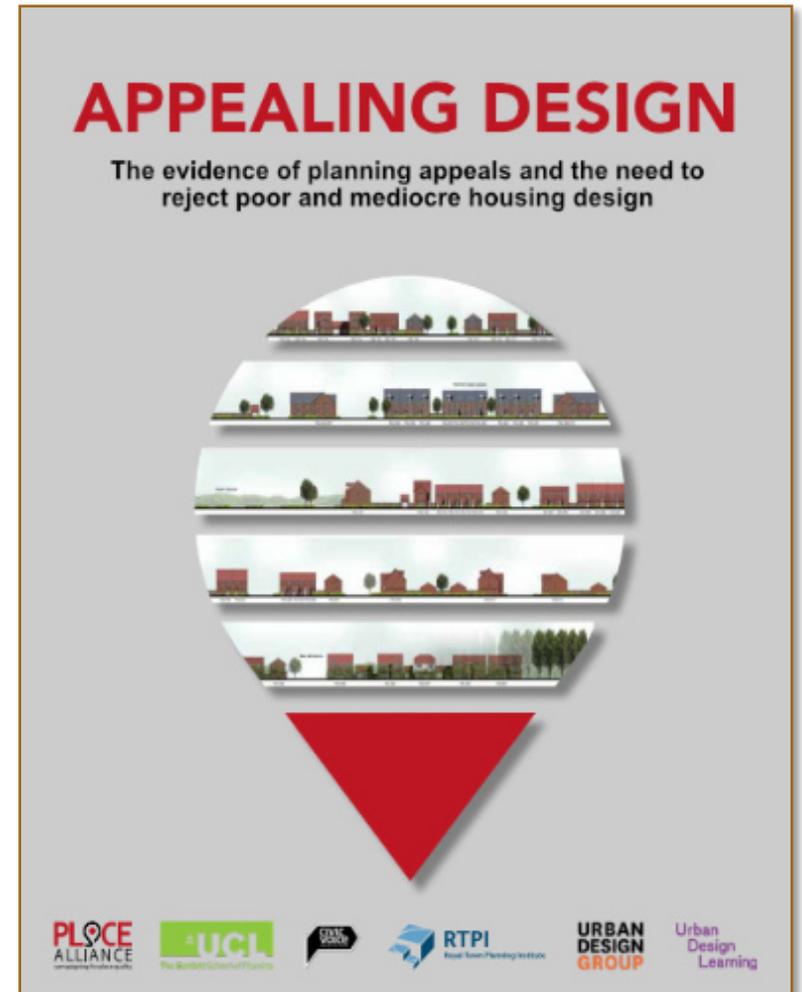
The style of housing is almost identical to those at all its sites across the country like this one in Mindenhurst

- Little variety
- No landmark buildings
- No placemaking, not distinctive
- Little distinction between so called "character areas"
- Identikit housing estate
- Enables bulk buying of materials nationally for all sites

# Rejecting Poor Design and Identikit Estates

- Since publication of the new 2020 NPPF there has been a marked reduction in tolerance for poor design (Place Alliance).
- Since the changes, most decisions by the planning inspectorate have backed the local authority's original refusal on design grounds.
- They also found that even if the developer is successful at appeal, costs are unlikely to be awarded if the planning process was correctly followed.
- Local planning authorities should ensure that they make appropriate use of, tools and processes for assessing and improving the design of development. These include workshops to engage the local community (NPPF).
- The local community were not consulted on design contrary to NPPF guidance above

**Ask yourself – Is this a high-quality design as required by policy SL12?  
Or a mediocre offering indistinguishable from mass housing across the country?**



# Compliance with Policy SS4

**SS4 also states that planting should enhance existing and new development and be sympathetic to the wider pattern of settlement**

**Design should promote the use of local tree species such as oak, birch and Scots pine**

**Appropriate landscaping strategy which takes account of existing and proposed townscape/landscape character and features**

The local settlement contains large garden trees and front gardens

The development contains small and medium urban trees such as acer and hornbeam not reflecting the local pattern of settlement

Not a single Scots pine or oak tree is offered and only 5 small birch trees  
Density of the site prevents larger tree planting reaching maturity



# Compliance with Policy SS4/SD7/ G&BI SPD

**Planning policies and decisions should ensure that new streets are tree-lined, (NPPF)**

- Only 1 street is tree-lined
- Secondary streets have occasional small trees
- 3 streets have no trees
- No green corridor around the site (c.f. Greenlane)
- No large trees within development (cooling/sustainability Policy SD7, B&GI policy)
- Only 1 hedgerow behind 135A and enhancement of hedgerow behind 2 houses Southwood
- Centre of site no tree cover (cooling)
- No green open space within centre of the development
- Trees should be larger than ridge heights to provide shade
- Hardscaping is 60% of the site. Will inc. with sheds, garden toys and patios
- With climate change the development will have a very hot microclimate. Small trees risk dying.



# Biodiversity

Minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures (NPPF 2021)

Table 2.1 Pre-development habitats

Habitat Type	Condition Assessment	Distinctiveness	Hectares
Developed land, sealed surface	N/A	Very Low	0.39
Vacant/derelict land/ bare ground	Poor	Low	0.29
Modified grassland	Moderate	Low	5.75
Other neutral grassland	Moderate	Medium	0.25
Other woodland, mixed	Good	Medium	0.1
<b>Total</b>			<b>6.76 ha</b>

Table 2.2 Pre-development hedgerow habitats

Habitat Type	Condition Assessment	Distinctiveness	Km
Native Hedgerow with trees	Good	High	0.17
Native Species Rich Hedgerow	Good	Medium	0.11
Hedge ornamental non-native	Poor	Very low	0.01
<b>Total</b>			<b>0.29 km</b>

Table 2.4 Post-development habitat - creation

Habitat Type	Condition Assessment	Distinctiveness	Hectares
Developed land, sealed surface	N/A	Very Low	3.16
Sustainable urban drainage feature	Moderate	Low	0.45
Vegetated garden	Poor	Low	2
Other neutral grassland	Good	Medium	0.6
Modified grassland	Good	Low	0.11
Urban Tree	Good	Medium	0.16
Mixed scrub	Good	Medium	0.07
Mixed woodland	Good	Medium	0.04
<b>Total</b>			<b>6.41 ha</b>

Table 2.5 Post-development hedgerow - creation

Habitat Type	Condition Assessment	Distinctiveness	Km
Native Hedgerow with trees	Good	Medium	0.1
Native Hedgerow	Good	Low	0.37
<b>Total</b>			<b>0.47 km</b>

- Hardscape increases 0.39 ha
- Grassland decreases 5.98 ha
- Adds in only 0.16 urban tree
- Develops a net gain by including the SuDS – not part of the housing development
- Develops a net gain by adding in 0.44 km hedgerow into the SANG

- Unfortunately, BNG calcs allow offsetting
- Currently undisturbed private land – will become public land
- The development will displace larger creatures, badger, deer, fox, small mammals, circling raptors
- Displaced by people, dogs, domestic cats
- BNG calculation is easily gamed. Common sense – Development will lead to a biodiversity loss

# SD12 Policy requires High Quality Design

The site is dense due to cramming by inflating the number of bedrooms per dwelling above that stipulated in policy SL19

Green elements are insufficient

- Garden sizes are minimum
- Lack of adequate green infrastructure on site to protect against climate change
- Landscaping plan is thin particularly around border with existing properties

Design of site is cramped and identikit

- Poor contextual arrangements against existing dwellings
- Character areas inadequate
- No landmark buildings
- No placemaking

# Summary

- 🙄 Poor contextual relationships (terraced housing blocks backing onto detached housing). Does not integrate with existing settlement on the NW and SW edge (EE1 and Design SPD). Housing density doubles against existing properties
- 🙄 Does not align with the village character and more in line with urban townscape.
- 🙄 Multiple examples where parking courts back onto the rear of existing dwellings contrary to policy requiring back-to-back arrangements causing security issues/easy access to the rear of existing properties (Design SPD)
- 🙄 Minimum garden distances therefore tight build tolerances. Risk of gardens being undersized as no margin for error
- 🙄 No soft green edge around the north and south-western borders. Minimal trees within development. 60% of the site will be build, hard standing or tarmac and up to 70% when garden patios added leading to future overheating contrary to NPPF, SS4 and B&GI policy

# Summary - continued

- 🙄 No integrated green social space within the centre of the development. (National Design Guide, Runnymede Design SPD)
- 🙄 Identikit housing estate, character areas poor and indistinctive. No landmarks, no placemaking. Could be anywhere in the country.
- 🙄 Bulky high-volume housing close to existing dwellings leading to intrusion due to bulk and mass, overlooking, overshadowing. Severe loss of amenity to existing residents contrary to EE1
- 🙄 A common-sense obvious loss of biodiversity despite a remote desktop calculation
- 🙄 An overly dense development due to net density of 37 dph and inflating the number of bedrooms per dwelling contrary to that set within policy SL12.
- 🙄 Even refuse collection are concerned at how concentrated the proposed housing is

# Final Thoughts

---

High quality –must meet or exceed all policy requirements within the Local Plan

---

Where it is technically not possible, high–quality mitigation should be substituted. Contrived landscaping to hide poor design not acceptable

---

It is totally the applicant’s responsibility to produce a compliant design

---

It is not for RBC to enable the applicant by compromising on policy requirements to get the site over the line

---

If a single element is non–compliant, the whole scheme can be rejected

---

The rate of successful appeals with costs is low if the planning process is followed correctly