

Domain	Objection	Policy Reference
DEVELOPABLE AREA	<p>The applicant states in their Design and Access statement that the area available for housing development is 6.67ha. This is incorrect. The capacity was set by the Site Capacity Analysis addendum 2018. This clearly states that the area available is 6.54ha. BUT, the Field Nursery (0.92ha) which was part of the SCA calculation did not come forward, thereby reducing the available land. Since this was not known at the time of the publication of the Local Plan, this must now be taken into account to produce an updated capacity analysis. Revised area available taking out the field nursery is 6.54 – 0.92 = 5.62ha</p> <p>Therefore, the developable area is only 5.62ha not 6.67ha as stated in the applicants DAS. The number of dwellings should therefore be reduced proportionally from 200 which is now outdated, to a maximum of 170dph to reflect the current facts.</p>	
DENSITY	<p>The Final capacity Analysis addendum 2017 which set the expected number of dwellings per hectare (dph) for the site, did not account for the many existing properties that are very close to the site edge. This should have led to some bordering land being regarded as undevelopable due to severe proximity issues (135A Brox Road is only 2M from the boundary). The current design does not take this into account leading to hugely increased immediate densities bordering the site. Current densities are 11-26dph but the design leads to pockets of densities at some bordering properties of greater than 40dph.</p>	
DENSITY	<p>Density of the site is also increased by the number of habitable rooms per hectare. Ottershaw is fully provisioned with 4 and 5 bedroom houses and the scheme includes many larger properties. Designing in large houses reduces headline dph but increases the concrete footprint and habitable room per hectare. Exchanging 4-5 bed for smaller homes will satisfy minimum dph and allow less crowding of the site. The local area requires more level access 2-bedroom properties as there is a shortage of accommodation to enable older residents to downsize and free up family homes. The scheme is particularly dense around the edges bordering existing properties.</p>	

<p>DENSITY</p>	<p>Very high density in pockets of the scheme especially at the site entrance and along the border with existing properties including several large parking courts, does not align with the village character and is more in keeping with 21st Century Urban in towns such as Addlestone. “The appropriate density will result from context” (Runnymede SPD Para 66p19). Clearly, context has not been taken into consideration around the site boundary. The planning committee must account for the area’s prevailing character as per NPPF guidance. It should blend in with existing properties and feather into increasing densities towards the centre of the scheme. The applicant’s design results in a jarring transition from old to new</p>	<p>(Policy EE1 paragraph 122 (d) NPPF achieving appropriate densities, paragraphs 170 (a) and (b))</p>
<p>DENSITY</p>	<p>With the density per hectare proposed, the design policies require a high-quality design. The proposal does not achieve this being generic, and just like the multiple high-volume schemes across the country which have attracted criticism leading to housing policy on design being reviewed by central government</p>	<p>(Build Back Better Govt White Paper)</p>
<p>DENSITY</p>	<p>The density and design of this proposal is unable to satisfy the requirements of Runnymede policies and be in keeping with context, vernacular, and local needs. The design standards in current policies must be considered the pre-eminent consideration over the need to satisfy the allocated density numbers produced by an outdated Local Plan. The numbers of dwellings should be reduced to around 170 to enable the higher quality design standards required in 2022. “The appropriate density will result from the context” (Runnymede SPD Para 66p19). Site capacity numbers on Ottershaw East produced over 5 years ago must be revised in light of the more detailed analysis of the site now available and the increased design standards. The numbers of larger 4/5 bed dwellings should be reduced in favour of smaller 3 bed homes and level access 2-bedroom homes which would address the local need for our older residents which is currently unmet. This would both satisfy the out-of-date suggested dph and reduce the overall concrete footprint and allow for a greener scheme in keeping with the local context.</p>	
<p>DENSITY</p>	<p>Although the NPPF encourages efficient use of the land, paragraph 1.53 also seeks to ensure that density and form of development reflects the character, accessibility, and infrastructure capacity of the local area. The granting of permission at Brox End near to the site will exacerbate congestion especially at peak times and school drop offs. There is insufficient road capacity already within the village which competes with several schools, nursery, and haulage firm. Ottershaw is a destination for visitors outside the village using the schools and GP surgery and has access at only 3 congested points at either end of Brox Road and Slade Road. An extra 128 car movements twice per day is beyond the capacity of the 2 roads within the village.</p>	

<p>INFRASTRUCTURE</p>	<p>Ottershaw village is poorly served by public transport and infrastructure being a dormitory village dependant on car use. The transport Assessment Scoping Report carried out by HUB stated that the location of the site was not considered sustainable with infrequent bus provision and poorly connected cycle and pedestrian links. The report states that infrastructure is poor. With the recently approved site for 46 houses in Brox End Nursery, the density of the proposed development is unsustainable. The Transport Assessment report found that the residential aspect of the Proposed Scheme is estimated to generate a maximum of 128 two-way trips in any peak period. This equates to just over two additional vehicles on the network every minute. Regarding the GP surgery, the Transport Assessment found that a maximum of 53 two-way trips would be generated in any peak period. This equates to almost one additional vehicle movement on the network every minute. These are significant additions to already 'poor infrastructure'. Parts of the development are not easy walking distance to shops and so car use will increase to link to rail services in Woking, Chertsey and Addlestone. The NPPF states that all housing development must be sustainable and reflect the infrastructure capacity of an area</p>	<p>(P16 Appendix A Transport Assessment Scoping Report Para 122 p36 NPPF EIA pg. 34)</p>
<p>ACCESS</p>	<p>The access, manoeuvrability, and obstruction to traffic flow that a waste disposal truck would cause have not been considered with regards to the width and layout of the roads within the site. There is only one access/exit point to the site so there is a possibility of a site gridlock at peak times, particularly around the site entrance as 3 roads converge at a densely built area</p>	<p>(Paragraph 102(a), (b) and (d) NPPF)</p>
<p>ACCESS</p>	<p>The access to the traveller pitches for large touring caravans passes through a tight Gateway with apartment blocks on either side and likely overspill parking on the roadside due to the density of building and the GP surgery, and then onto a secondary road. At 4.8M wide shared space with pedestrians, the secondary road leading to the traveller pitches is not adequate for vehicles up to 2.5M wide with the inevitable street parking which will occur.</p>	
<p>DESIGNING OUT CRIME</p>	<p>Research studying the distribution of burglary has shown that up to 85% of entries occur at the back of a home. Parking courts providing open access at the rear of existing properties is not best practice.</p>	

<p>DESIGNING OUT CRIME</p>	<p>"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" The proposal has several parking courts backing onto the rear of existing residents homes. This has implications on noise, overlooking, and security.</p>	<p>" (Design standard 11 pp29 RBC Design SPD)</p>
<p>DESIGNING OUT CRIME</p>	<p>Contrary to Runnymede design principles requiring a back-to-back arrangement, several existing bordering properties and new dwellings will have car parking courts directly behind the rear of their properties which are then open to public access creating security issues. 135A Brox Road has a 12-space parking court only 6M from its rear elevation. 2B Southwood Avenue has an 11-space parking court to the rear. If the application is to deviate from a clear design principle as set out in the Runnymede's policies, then mitigation must be implemented such as high screening hedges at appropriate distances to deter access from the rear, none of which are apparent in the scheme for those properties. Motion sensitive security lighting which is commonly fitted to residents' buildings will lead to light nuisance for the residents whose properties back onto the parking courts. Further reason why parking courts should not back onto rear elevations. Adherence to the Secured by Design Homes 2019 document be incorporated as a planning condition if approved or the application should be refused.</p>	<p>" (Design standard 11 pp29 RBC Design SPD) Secured By Design</p>
<p>AMENITY SPACE</p>	<p>At 0.19 spaces per dwelling, there is not enough provision for visitor parking. This will lead to inevitable street parking for trades vehicles which is of particular concern on the secondary road leading to the traveller pitches.</p>	
<p>PRIVACY AND OVERLOOKING Relation to existing buildings</p>	<p>The Runnymede local plan states that any design must "Ensure no adverse impact on the amenities of occupiers of the development or to neighbouring property or uses and provide an appropriate standard of private amenity space." Several bordering properties are adversely affected either by siting of parking courts at the rear or by placing buildings of large mass and bulk close to rear elevations causing overlooking and shadowing of habitable rooms</p>	<p>(pp123 point 4 Policy EE1 Runnymede 2020 Local plan)</p>

<p>PRIVACY AND OVERLOOKING Relation to existing buildings</p>	<p>Due to the inappropriately high densities proposed against existing properties, there will be an increase in noise, overlooking and reduction of privacy. Several parking courts are proposed backing on to the rear of existing properties. This will lead to noise from engines and light nuisance from the inevitable installation of motion sensitive security lighting by residents of new dwellings. This diverges from clear guidance in the Runnymede SPD which recommends back-to-back arrangements of dwellings. Parking pools should not back onto or side onto existing dwellings</p>	<p>(pp123 point 4 Policy EE1 Runnymede 2020 Local plan)</p>
<p>PRIVACY AND OVERLOOKING Relation to existing buildings</p>	<p>"Well-designed new development is integrated into its wider surroundings, physically, socially and visually"</p> <p>The proposed development does not integrate or feather in with the existing settlement. Density doubles. The style of housing proposed is generic and essentially similar to all of the applicants housing units at all its sites nationally and does not reflect the Ottershaw vernacular which is mixed styles representing multiple architectural styles of different periods</p>	<p>(Runnymede SPD)</p>
<p>PRIVACY AND OVERLOOKING Relation to existing buildings</p>	<p>There is concern that back-to-back distances for 119, 121 and 123 Brox road do not meet the minimum 22M distance for rear elevations and this must be confirmed. These houses are bungalows backing onto 2 story new dwellings and therefore a longer distance is usually required to prevent overlooking. The rear elevation of 135A Brox Road is 2M from the site border. Only 6 M separates the elevations between 135A and proposed new dwellings. For buildings sighted at perpendicular or obtuse angles the rule of thumb is that the 22M can be reduced by 25% which means that the rear elevations should be separated by around 17M from habitable rear windows. The 6M allowed in the application means this is not achieved. The 2 sets of 3-unit terraced houses should be moved back to align with the rear building line of the run of new semi-detached houses on the Northwest border. The terraced houses should be amended to 2 sets of semi-detached houses to align with plot rhythm and satisfy the separation distance. Indeed, this was proposed by planners at pre-app advice on 11/11/21 but has somehow been dropped in the final design. Midway Cottage on Southwood Avenue has 4 houses and 2 traveller pitches backing side on producing an immediate increase in density which is unacceptable and does not align with plot rhythm</p>	<p>(Runnymede SPD)</p>

<p>PRIVACY AND OVERLOOKING Relation to existing buildings</p>	<p>“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”</p> <p>The development poorly integrates around the border with existing residents properties on the Northwest and Southwest edge. There are pockets of poor integration and high density arrangements of new housing backing on.</p>	<p>(Runnymede SPD p31-32)</p>
<p>119 - 135A Brox Road Existing properties in Southwood Avenue</p>	<p>“Plots should be configured so that new development relates well to its neighbours.”</p> <p>This is not the case for the arrangement with existing properties on the border. Siting 2 sets of 3-unit terraces directly behind 135A Brox Road does not align with plot rhythm for existing buildings or the run of new semi-detached houses adjacent to it. Nor does it respond sympathetically to context.</p> <p>Detail from applicants Design and Access statement pre-App advice on 11/11/22 showed the recommended arrangement of dwellings behind 135A Brox Road, level with the rear building line of the row of new housing bordering the Northwest border. This is now dropped from the final scheme. Why? Back-to-back distances for 119-123 Brox Road bungalows against 2 story houses must be confirmed to be more than 22M</p> <p>2B and Meadway on Southwood Avenue are poorly treated by the design with large number parking courts or huge increases in immediate density from new dwellings. This is an adverse effect on the amenity of these residents contrary to policy EE1</p>	<p>(Runnymede SPD p31-32)</p> <p>(National Design Guide MHCLG, Design standard 11 pp29 RBC Design SPD)</p> <p>(pp123 point 4 Policy EE1 Runnymede 2020 Local plan)</p>
<p>OPEN SPACE</p>	<p>The LAP has been integrated within the buffer area at the edge of the development. There is no green or social space within the centre of the development to detract from the uniform monotony of the central area. It is clearly stated within both the National Design Guide and National Planning Policy that developments of this size should integrate a variety of open green spaces in a variety of sizes and locations</p>	<p>(NPPF Ch.8,12,14,15 N1 p27 National Design Guide MHCLG)</p>

<p>TREATMENT OF THE SITE EDGE BORDERING EXISTING PROPERTIES</p>	<p>There is no green edge around the site and no buffer or green corridor to enable the requirement for biodiversity and corridors for wildlife. The slightly deeper hedging behind 135A Brox Road is insufficient for the size of the site. Compare this with Taylor Wimpey’s proposed site at Green Lane only 5mins away. This is a superior design with a green border against existing dwellings. Although this site was allocated for 173 dwellings in the Local Plan (which had already made allowance for proximity to the M25). Taylor Wimpey came in at 149 dwellings for a 7Ha site compared with Ottershaw East at 186 for a much smaller site. The green border against existing dwellings is a design choice by Taylor Wimpey and helps acceptance of the development. In comparison to this site, the scheme for Ottershaw East has thin hedging barely separating existing from new dwellings for most of the site border. Ottershaw East should be treated to the same standard of green infrastructure for existing residents at the edges as the proposed new Taylor Wimpey site at Green Lane.</p>	<p>https://greenlan.echertsey.co.uk/</p>
<p>TREATMENT OF THE SITE EDGE BORDERING EXISTING PROPERTIES</p>	<p>Biodiversity should be enhanced as part of new development and should be d</p>	<p>(Design standard 22 Runnymede SPD)</p>

<p>DESIGN OF NEW HOUSING</p>	<p>The layout and streetscape apart from the central avenue is indistinct, featureless, and monotonous. The applicants Design and Access Statement provides cherry picked existing local housing examples that fit into its nationwide generic model housing unit. Although 12 housing types are presented, they are almost identical. However, Ottershaw has a mix of housing from grade 2 listed homes, Arts and Crafts, 18th Century through to post war and contemporary. There is no doubt the applicant has done this to cut costs to enable bulk buying of materials for all its sites nationally. This does not constitute high quality design. There are no distinct or landmark buildings within the site. 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. A quick search of the applicants many sites around the country will show the same generic homes again and again. No attempt has been made to align the new housing with the local character of Ottershaw as they state in their design and access statement.</p> <p>The Runnymede design SPD emphasises throughout that good design should reflect local vernacular and include variety including landmark buildings, points of interest and variations of style. The applicant fails miserably here providing the same content available at all its sites across the country. The application should fail on this point.</p>	<p>Applicants DAS</p>
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