

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

Ottershaw is a village with a population of 3500, surrounded by greenbelt and with poor infrastructure. This scheme along with the current build at Brox End will increase the village population by nearly 20% in a very short time. This scheme is at the very margins of the village bordering greenbelt and should therefore be considered for the lowest density for efficient use of land that is acceptable within the local plan (30dph). Further SLAA sites coming onstream such as the land adjacent to Great Grove Farm is closer to the village centre where high densities are more appropriate. The design expectations and sensitivity to local character as of 2022 is now higher than that in 2017. This is demonstrated by the 2021 government white paper "Build Back Better," triggered by mass concern from voters. The proposal from the applicant does not meet the current higher standards for new developments on multiple counts.

DEVELOPABLE AREA

The developable area for housing is not 6.67 ha as stated in Vistry's Design and Access statement. It is in fact 5.62 ha. The developable area comes from the Site Capacity Analysis addendum 2018 which informed the Local Plan. This stated that the area available was west of footpath FP10 which was 6.54ha. However, part of the land known as 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 publication of the Local Plan, this must now be taken into account and the available land area revised accordingly. The number of dwellings should therefore be reduced proportionally from 200 which is now outdated, to a maximum of 170dph to reflect the current facts.



Once the GP surgery and pitches (0.2ha) and the play areas (0.32ha) are considered, then the area for housing reduces to 5.1ha. The applicant proposes 186 houses giving a dph of 36.5. not 27.8 dph as advertised in the applicant's DAS. This is over the 30dph which could reasonably be accepted by the planning committee for development at the village margin and well over the 11-26dph in the immediate vicinity for efficient use of land.

DENSITY

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.

Ottershaw is sufficient in 4+ bedroom houses. Designing in large houses is land use inefficient and increases the concrete footprint. Exchanging these for smaller homes will satisfy expected local plan numbers of dwellings and reduce crowding of the site. The local area requires more level access 2-bedroom mansion apartments as there is a shortage of accommodation to enable older residents to downsize and free up family homes. Substituting land hungry 4+ bed detached houses which Ottershaw does not need for mansion blocks with larger spacious level access 2 bed apartments, would address the requirement for our older residents which is currently unmet and reduce built footprint for the same number of dwellings.

There is very high density in pockets of the scheme especially along the border with existing properties which is out of context to its immediate surroundings. This includes several large parking courts, more in keeping with an urban nature. "The appropriate density will result from context" (Runnymede SPD Para 66p19). The applicant's design results in a jarring transition which is out of context with the surrounding built form. (Policy EE1 paragraph 122 (d) NPPF achieving appropriate densities, paragraphs 170 (a) and (b))

This high density of the development fails to comply with the requirements of the Runnymede Design policy and the National Planning Policy Framework. Site capacity numbers on Ottershaw East produced over 5 years ago must be revised considering the more detailed analysis of the site now available and the increased design standards required in 2022. (Policy EE1 Runnymede Local Plan 2030, Paragraph 122 (d), National Planning Policy Framework (NPPF) achieving appropriate densities, Paragraphs 170 (a) and (b) NPPF Paragraphs 102 (a), (b) and (d) NPPF)

INFRASTRUCTURE

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, and the infrastructure is poor with infrequent bus provision and poorly connected cycle and pedestrian links. 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. Parts of the development are not easy walking distance to shops and car use will increase to link to rail services. The NPPF states that all housing development must be sustainable and reflect the infrastructure capacity of an area (P16 Appendix A Transport Assessment Scoping Report Para122 p36 NPPF EIA pg. 34)

ACCESS

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 (Paragraph 102(a), (b) and (d) NPPF)

The access to the traveller pitches for large touring caravans at 2.5M wide 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.

PARKING COURTS

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.

"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)

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. Additionally, there will be noise nuisance from parking manoeuvres and security lighting which will be inevitably installed by new residents as the parking courts are unlit.

AMENITY SPACE

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. The GP surgery which will take over the proposed new building has told us that they will have up to 10 staff and yet the number of parking bays provided will be insufficient for both staff and patients.

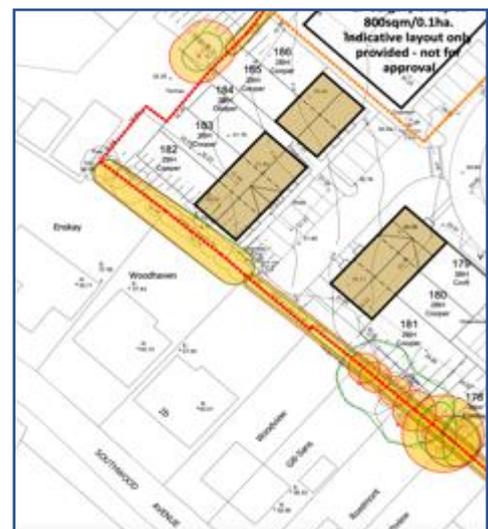
CONTEXT WITH SURROUNDING BUILT FORM

Context is the location of the development and the attributes of its immediate, local, and regional surroundings. New building should respond positively to its immediate neighbours and integrate well. (National Design Guide)

Although the applicant has taken care to provide minimum separation distances between dwellings to maximise daylight and privacy within the development, the same cannot be said for the relationships for bordering existing residents. There are pockets of poor design adjacent to some existing properties as illustrated below

THE RELATIONSHIP WITH WOODHAVEN, 2B AND WOODVIEW (SOUTHWOOD AVE)

The three properties of Woodhaven, 2B and Woodview are detached houses. The proposed design has an overly dense arrangement of terraced housing. It is out of context and does not relate well. Landscaping is not a solution to poor design. Runnymede design policies



specify a back-to-back arrangement which is ignored here.

The height, bulk and mass of the housing blocks is intrusive and overbearing.

“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)

Due to the visual dominance of these large structures, the outlook from Woodhaven, 2B and Woodview on Southwood Avenue will be dominated by a large expanse of brick gable end. A 10-space parking court serves to further reduce their outlook. Since their principal source of light comes from the east, overshadowing will occur to gardens for Enskay, Woodhaven and 2B Southwood Avenue leading to loss of daylight as their gardens are kept in gloom for portions of the day.

It is notable that this arrangement does not occur *within* the development. Where side on layouts occur, the design takes care to ensure orientation maximises sunlight, separation distances are better and parking courts appear in context

Large parking courts within the site are associated with apartment blocks which is in context with the built form. However, there are 3 large parking courts situated closely against the rear of existing detached dwellings (see diagram). This is out of context and should be removed.



In context



Out of context

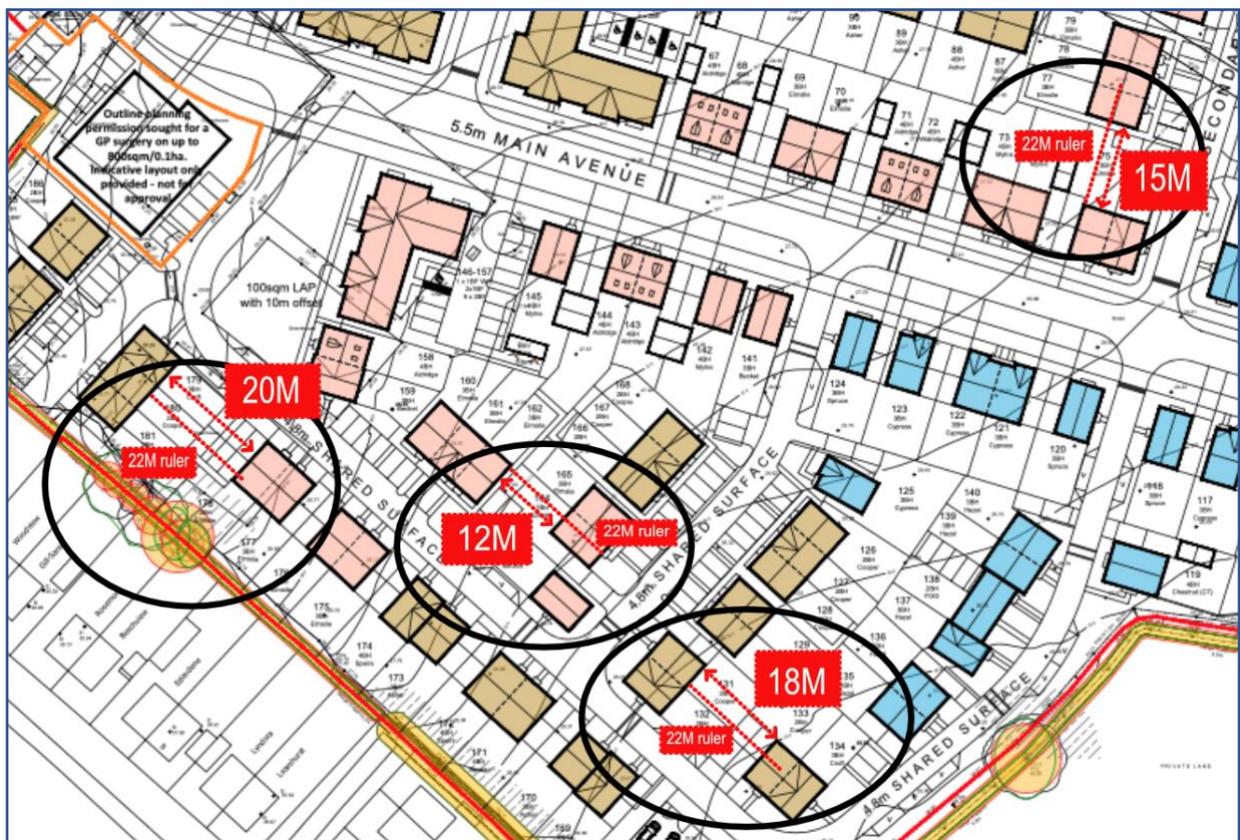
SEPARATION DISTANCES COMPARING EXISTING DWELLINGS AND THOSE OF NEW DWELLINGS

Existing bordering dwellings are treated less favourably than new proposed dwellings. This is undoubtedly to maximise profit and is counter to good design principles as outlined in Runnymede’s Design policies and the National Planning Policy Framework. Development must:

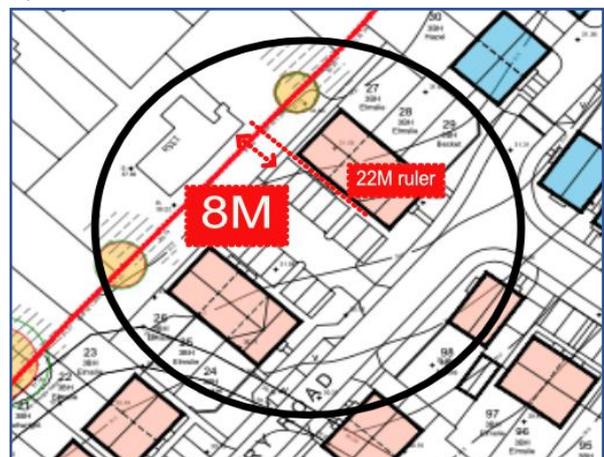
“Ensure no adverse impact on the amenities of occupiers of the development or to neighbouring property or uses and provide an appropriate standard of private amenity space.”
(pp123 point 4 Policy EE1 Runnymede 2020 Local plan)

Contrary to specific guidance in Runnymede’s design policy requiring a back-to-back arrangement of new housing, there are several properties where side to back layout is evident or backing onto large parking courts to maximise land use. Interestingly, where this occurs within the development, some effort is made to ensure a minimum basic separation of elevations to preserve outlook, prevent overlooking and intrusion of large and bulky housing blocks in close proximity.

The diagram below shows minimum distances between those dwellings *within* the development that are offset side to back arrangements. The distances range between 12 – 20M. They are carefully orientated so that rear gardens obtain the maximum amount of daylight.



Compare this to the layout behind 135A Brox Road, where the distance is a mere 8M. The 2 terraced blocks are placed to cause overshadowing of this property as it derives its daylight from a southeast direction. Overlooking occurs from close angular distances, and proximity causes loss of outlook. The large size of these housing blocks causes intrusion and visual dominance at very short distance. This arrangement is not evident for the commercially valuable new dwellings.



Poor alignment to context and design deficiencies are covered up by contrived elements of landscaping.

SOLUTIONS

We suggest 2 easy solutions to solve these issues

The solution to correct the relationship behind Woodhaven, 2B and Woodview on Southwood Avenue would be to delete plots 179 – 186 and replace them with 3 sets of semi-detached houses



This immediately improves the relationship and context with its neighbours. The new semi-detached houses relate better behind the existing dwellings. Overshadowing and intrusion are lessened. The parking court is deleted complying with Runnymede's policies on the importance of back-to-back arrangements, and valuable green space is added to what is a very urbanised site.

For 135A Brox Road



Replacing the 2 terraced blocks with 2 sets of semi-detached houses reduces the overshadowing, dominance, and overbearing nature of the structures so close to the existing dwelling. The relationship and response to context are improved. The parking court is reduced from 12 to 8 spaces and moved further back in mitigation for departing from a back-to-back arrangement. The break between the existing and new dwellings helps to relieve the built form and allow for natural landscaping adding valuable green space.

The cost of these improvements is the loss of only 4 units of housing. We feel that implementing this improvement is the minimum required to align with Local Plan policy EE1, Runnymede's Design SPD and the National Planning Policy Framework. We urge the council to uphold these policies in full.

The unacceptability of big differences in density between existing and proposed new dwellings is demonstrated by the refusal on appeal by the Planning Inspector of an application in Hampshire. Overlooking, and loss of privacy was exacerbated by the density of housing proposed backing onto existing dwellings. The inspector commented that 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)

"Well-designed new development is integrated into its wider surroundings, physically, socially and visually" (Runnymede SPD)

There is concern that back-to-back distances for 119, 121 and 123 Brox road do not meet the minimum distances 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. Midway Cottage on Southmead 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

"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)

OPEN SPACE

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. (NPPF Ch.8,12,14,15 N1 p27 National Design Guide MHCLG)

TRAVELLER PITCHES

There is uncertainty as to who will be responsible for owning and managing the traveller pitches. This must be confirmed. There appears to be gates at the entrance to the area where the traveller pitches will be situated. The gates would promote separation rather than integration and they therefore should be removed.

TREATMENT OF THE SITE EDGE BORDERING EXISTING PROPERTIES

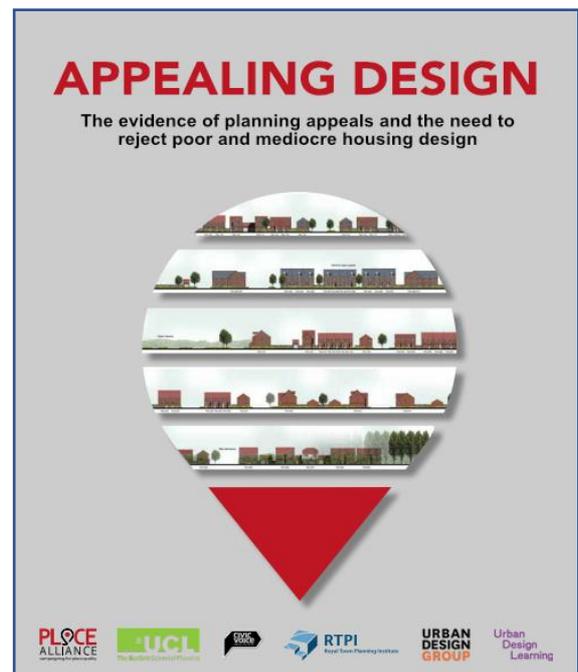
There is no green edge around the site and no buffer or green corridor to enable the requirement for biodiversity and corridors for wildlife. Compare this with Taylor Wimpey's development at Green Lane only 5mins away. This is a superior design with a green border against existing dwellings. Although 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 smaller site. The green border against existing dwellings improves biodiversity and helps acceptance of the development. The scheme for 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.



Biodiversity should be enhanced as part of new development and should be designed to maximise gains. (Design standard 22 Runnymede SPD). The development at Ottershaw East will find difficulty in providing a biodiversity net gain. The site for the SANG is currently private land and so deer, badgers and ground nesting animals will be replaced by people and dogs. The Ottershaw East site proposal is very urbanised, green provision is poor and so biodiversity net gain will not be possible. The inclusion of a few bat boxes will not be sufficient.

DESIGN OF NEW HOUSING

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, Mansion houses, Arts and Crafts, 18th Century through to post war and contemporary. There is no doubt the applicant has done this to cut costs and 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.



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.

PERCEPTUAL ASPECTS AND ACCEPTANCE BY RESIDENTS

The consultation exercise run by the applicant is done to satisfy the requirements of the planning application and serves as a tick box exercise. Most of the important concerns around density at the edges of the site and improving green infrastructure have been ignored.

Runnymede Design SPD 2020 states the:

“Importance of gaining and building support amongst our local communities for new developments”

As Runnymede prepares for its 2040 Local plan, support for this will depend to a large extent on how it handles the implementation of the 2030 Local Plan and its compliance and sympathetic application of the design principles to the current allocations. The current design and density proposed for Ottershaw East does not align with this on numerous important aspects and therefore will reduce resident’s confidence and support in the 2040 Local Plan. We urge the council to uphold the policies contained within the Local Plan policy EE1, Runnymede’s Design supplementary policies and the National Planning Policy Framework. If the applicant cannot meet these requirements, the application should be refused.

Brox Road Action Group (BRAG)

Gemma Pickett
Jane Tilley
Lindsay Hofgartner
Nina Cavanagh

Brox Road KT16 OLG