

FEDORA

The Voice for Oxshott

This **objection** to the development of the site the developer proposes to call The Paddocks is submitted by FEDORA-The Voice for Oxshott CIC.

In our opinion the application as presented should not be approved.

Elmbridge Borough Council (EBC) officers and planning committee members will need to consider whether the concerns raised in the consultation process can be sufficiently mitigated. If potential mitigations cannot address the many concerns, this application should be rejected. If sufficient mitigations are possible then they should be set as conditions to which the developer, and where appropriate Surrey County Council (SCC), must commit before approval can be given.

The Paddocks would be a major development relative to the size of Stoke D'Abernon and the profound implications for existing residents must be considered. The impact of the proposed development on infrastructure and the environment has wider implications including for the residents of Oxshott that FEDORA represents. Significantly, the application fails to address the inadequacy of current infrastructure.

The scale of the proposed development requires many complex and detailed issues to be addressed. At this stage our principal concerns and comments are set out below:

Inappropriate use of Green Belt

The site is on Green Belt land. We appreciate that the new National Planning Policy Framework (NPPF) introduces the concept of Grey Belt which is land that does not strongly contribute to any of the Green Belt purposes set out in (a), (b) and (d) in Para 143 of the NPPF.

However, s143(a) is intended to check the unrestricted sprawl of large built-up areas.

The Paddocks development would largely remove a clear green space that separates Oxshott from Stoke D'Abernon which acts to prevent such an unrestricted sprawl. A development of this scale would endanger the long held identities of both Oxshott and Stoke D'Abernon as separate communities/settlements. While we recognise that the practical interpretation of Grey Belt is still developing, this site meets one of the clear purposes for which the Green Belt should not be developed.

Build design is inappropriate

The application is for outline permission for development and detailed design is to follow. However, the *Parameter Heights - Building Plans* included in the application indicate a building height of 14 metres for a large part of the site which would make the development very visible from Blundel Lane. Buildings of this scale and mass would be quite out of keeping with other buildings that currently exist in the vicinity. For a development to be permitted it must be of a scale and design that is in keeping with the much smaller build design found opposite and to the north and south of the site on Blundel Lane.

Does not meet sustainability tests.

The NPPF requires any release of Green Belt to be for sustainable development. This application does not adequately meet that test. Current transport infrastructure is not good and the applicant's comments and proposals do not adequately address the deficiencies. Until the working and leisure patterns of prospective residents are known it is not possible to be precise about future requirements, but:

- Rail travel: The applicants own figures show that Oxshott station is not within easy walking distance (c2 miles) so Cobham and Stoke D'Abernon would be the only convenient rail station. However, at a distance of 1.35 miles that is an impractical distance to travel on foot, let alone in inclement weather particularly given the increasingly heavy rain fall patterns resulting from climate change. Pedestrian access to the station requires crossing the Stoke Road next to a junction which already has safety issues and would be subject to much increased traffic. Experience in Oxshott shows that people prefer driving for journeys of this distance and therefore adequate provision for vehicle traffic needs to be made. The capacity of the current train service to accommodate additional travellers has not been addressed.
- Bus travel: While the applicant has referred to bus services and proposed improvements to the siting of bus stops, the timing of current services is inadequate for many workers who will need to travel before the first service and return home after the last.

- Cycling and walking: Blundel Lane does not currently provide safe passage for cyclists and pedestrians. The proposals, particularly for travel towards Oxshott, are both speculative and inadequate. Further details are given below.
- There are inadequate public transport links to parts of Elmbridge that might otherwise provide local jobs for those living in the affordable/social housing as proposed by the development.

Flood risk

The applicant's own assessment is shallow and does not recognise the existing problems. SCC as the Lead Flood Authority will need to carry out a thorough assessment which must reflect the run-off and flood problems already experienced by residents of Blundel Lane. It should be a clear condition of any assessment that no local resident should face greater flood risk than they do at present whilst work continues to reduce the risk. The assessment must reflect the changing rainfall patterns which are reflected in the March 2025 Government flood maps, and which have resulted in greater flooding throughout Oxshott and the eastern end of Blundel Lane in recent years.

Recent experience of mitigating steps such as sustainable drainage systems shows that their operation in other developments has not been satisfactory, possibly as result of poor design. An essential requirement is that responsibilities for the operation of any arrangements are clarified and properly funded. The maintenance of proposed flood mitigation measures has not been adequately addressed in the application nor in responses to our questions when meeting representatives of the applicant.

Highway safety concerns not adequately addressed.

Other objections have provided detail of the concerns at the junction of Blundel Lane and Stoke Road reflecting the historic accident record and the need to accommodate vehicles turning, pedestrians crossing and bus movements, all of which will be exacerbated by the proposed development.

The applicants own figures show that average speeds on Blundel Lane are in the region of 35-37 mph, well in excess of the speed limit of 30 mph. This is on a road without adequate pavements and a railway bridge which, as the applicant notes, is devoid of any pavement for pedestrian use, AND, as the applicant does not properly acknowledge, is an existing safety concern for cyclists and horse riders who do use the bridge. The bends in the carriageway, narrow width, lack of central road markings and lack of any warning or speed control all contribute to a dangerous road for non-vehicle users. The application states that no safety concerns have been raised in relation to the bridge which is not correct - FEDORA is

currently in discussion with Surrey Highways to improve both signage and central road markings because of safety concerns raised with us.

The applicant's proposal of a cycle and pedestrian stage call system (with insufficient mention of horse riders) to the east of the bridge is contrived, does not address all safety concerns and inadequately addresses others.

The applicant's own figures show considerable traffic volumes now on Blundel Lane of c4500 vehicle movements a day and its own modelling suggests the most common destination for vehicle use by residents of The Paddocks would be Oxshott (28%) so will serve to increase vehicular use of this bridge. We have not carried out independent modelling but the applicant's figure of 28% appears in all probability too low given that Oxshott will be the most likely destination for schooling and medical services. The applicant also suggests that much traffic in this direction will travel up Steels Lane to join the A244 at that point - however that is a difficult junction on a hill and it is more likely that vehicles travelling in this direction will choose (as already happens) to turn off Steels Lane and travel either i) up Oakshade Road, past a primary school (Royal Kent), where recorded traffic speeds already exceed the 20mph speed limit; or ii) along Holtwood Road - a residential road which also hosts a local school, Bevendean.

The applicant has set out 20 measures for a sustainable transport strategy. Those proposed to be undertaken by the applicant are inadequate for the reasons mentioned above, are only an offer at this stage, and represent only half of those set out, with local authorities shown as responsible for the other half.

If the application is to merit approval a more comprehensive solution is required which properly addresses the issues of road safety, in particular for pedestrians, cyclists and horse riders at the Blundel Lane railway bridge. Despite the complexities involved this should include a foot/cyclist route over the railway. Importantly, delivery of the changes required should be guaranteed where appropriate by condition of a s278 Highways Act agreement between the developer and SCC.

We also note with surprise that National Highways is not shown as a consultee - it should be.

Elmbridge's dependence on other consultees

FEDORA is aware that EBC is not directly responsible for provision of the infrastructure necessary to support development including the issues raised above in relation to sustainability, highways safety and flood risk. EBC will though need to ensure that the concerns raised have been adequately addressed by other bodies, principally SCC, based on

an **informed assessment** of the issues after **consultation with representatives of local residents**.

In addition to these specific concerns, it will be necessary to ensure that SCC and the NHS have adequately assessed the impact of increased demand on schools (particularly for those with special needs) and medical provision. The application does not address these needs in detail and in the absence of further information **we remain concerned that SCC will not prove able to deliver the capacity required**, particularly in the light of increased demands generated by other local developments. For example, Royal Kent School in Oxshott has no spare capacity for additional pupils.