

[REDACTED]

Cc:

Subject: FW: [EXTERNAL] OBJECTION - Bugle Nurseries, Upper Halliford Road, Shepperton, TW17 8SN (22/01615/OUT)

Attachments: OBJECTION to Bugle Nurseries (22_01615_OUT) - 2nd Feb 2023 FINAL.pdf

[REDACTED]

Hi Kelly, hi Paul,

Please find summary below and detail attached of my objection to the new planning application for Bugle Nurseries (22/01615/OUT).

In summary I'm objecting on the following grounds:

1. Insufficient consideration given to **views of residents**, lack of effective community engagement (and their support misrepresented).
[REDACTED]
3. Insufficient consideration given to **environmental concerns** e.g. regarding biodiversity.
4. Insufficient weight given to **harm to Green Belt** by the encroachment of the scheme and "urban creep".
5. Conversely, **too much weight is given to the "Strategic Gap"** which the developer (and Council) claim will be reinforced by allowing the change to the Green Belt boundary.
6. Insufficient consideration of **sustainable transport modes**.
7. **Transport Assessment and Travel Plan** are inadequate and overstate claims of sustainable location and ability to drive modal shift.
8. Insufficient consideration of **parking needs** (car and cycle).
9. The incremental benefit of this new application for 79 new homes vs. the application granted on appeal for 31 new homes **does not offset the incremental harm**.
10. Insufficient weight given to **imminent planning reforms to the NPPF** and the Council's insistence it must meet a government housing target (which is not a target).
11. Insufficient consideration given to the Council's new **Climate Change Strategy 2022-2030**.
12. Insufficient **infrastructure** which fails to keep pace with development.
13. Further information required on **affordable homes**.
14. Further information required on **upkeep and maintenance of roads and open space**.
15. Further information required on **proposed housing and changes in footprint**.

Planning statement arguments for the new application which are diminished or could fall away entirely:

- Plan to release part of site from Green Belt as part of Local Plan may yet be revoked due to proposed changes to NPPF (although Council are strongly resisting changing course)
- "Significant weight" attached to community engagement (contributing to "very special circumstances" for development of Green Belt) is much diminished without Shepperton Residents' Association's support
- Validity of Spelthorne's Green Belt Assessment has not yet been tested by Planning Inspector and this is being contested by some (Stage 3 was only added summer 2022, midway through Reg 19 consultation)

- Applicant's statement that this application provides a much better neighbour than current users of site is diminished by the fact that there is extant planning permission for a 31-unit application (which would arguably be an even better neighbour)
- Biodiversity Net Gain of 10% will take up to 30 years to achieve (and provides little if any incremental benefit vs. the 31-unit application)

Thanks very much for accepting and considering the above and the attached.

