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4624LO/DBe/KV

03 June 2015

Woking Green Belt Review and land proposed for release at Pyrford

Dear Cllr Kingsbury

Introduction

LDA Design has been appointed by the Pyrford Neighbourhood Forum ("PNF") to review the Woking Green Belt Review Final Report (January 2014) prepared by Peter Brett Associates ("the Green Belt Review") and to advise on general planning, environmental and settlement masterplanning matters. The PNF wrote to the Council on 29th December 2014 and 29th March 2015 and LDA Design have previously written on behalf of the PNF on the 6th May and 20th May to outline our concerns in relation to the PBA report and therefore the Site Allocations DPD process.

We understand that the PBA Green Belt Review 2014 forms part of the Development Planning Document (DPD) evidence base, and that recommendations from this report are reflected in the draft Site Allocations DPD.

We note that the Local Development Framework Working Group ("LDFG") has recently met and drafted recommendations concerning the Site Allocation DPD to be considered by the Council Executive on 4th June 2015. The context of this letter is pertinent to the on-going process of the Site Allocations DPD and it is intended to inform the meeting of the Council Executive. We are aware that information issued to the Executive in support of the meeting on 4 June has been made publicly available on the councils' web site. We have not had sufficient time to review these documents in any depth but intend to do so as part of the council's subsequent (regulation 18) consultation. We note upon a brief review of that documentation published on the website changes to certain suggested land allocations include the addition of land east of Upshot Lane and south of Aviary Road, Pyrford being added to the list of sites recommended to be released from Green Belt and safeguarded to meet development needs between 2027 and 2040.

Our review of the PBA Green Belt Review material, has, as we have noted, revealed a number of material shortcomings in its approach and application. As that material is a key part of the evidence

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base for the emerging AAP, in our professional opinion, the Executive should not recommend that the AAP be released for consultation, unless and until those shortcomings have been addressed.

We have over the past several weeks been preparing a number of detailed reports, which will be published as part of any Regulation 18 consultation process. In order however to assist the Executive as much as possible at this stage and to allow a full reconsideration of the deficiencies identified to date, we draw to your attention to a number of important headline matters that we consider a responsible authority, such as Woking Borough Council, should review before progressing with the recommendation to commence consultation on the Site Allocations DPD. These are as follows:

1) Overall Approach

- There are a number of inconsistencies in the application of assessment criteria throughout the Green Belt Review. Some sites are assessed at a 'Parcel' scale, whereas others are analysed at a more detailed 'Site' scale. This results in some sites being more thoroughly assessed than others with no apparent justification.
 - There is a lack of transparency regarding how Green Belt and sustainability considerations have been 'weighted' and how this influences the overall ranking of Parcels. While it is understood that this evidence has been made available to the Council in the form of a matrices, it is not appended to the report, making it very difficult to interpret or justify the way that judgements are made. This creates a lack of transparency in the Site Allocations DPD process and means that the public cannot fully interpret the conclusions reached.
 - Despite the Green Belt Review 'sieving' Parcels based on Green Belt function, sustainability measures and landscape capacity, 'site availability' is introduced as an overriding determinant towards the end of the review, and applied irrespective of the results of these previous assessments to inform the selection of the final recommended sites for release. This measure of "availability" re-introduces individual Sites within Parcels that have already been discounted through the sieving process. The review incorrectly considers site availability as a key indicator of deliverability for allocating sites beyond the plan period resulting in a skewing of recommended sites for Green Belt release. Data intended to inform a 5 year land supply should not be used to inform the long term allocation of sites for safeguarding to provide development capacity beyond the plan period. As such the Council should refer back to the outcome of the main sieving process to determine the total land supply and recommended sites for release. In addition, the site identification process that informed the PBA report (including WBC's 2013 annual call for sites) potentially discourages landowners located in Green Belt to promote their sites, (see below).
 - Purpose 4 of the Green Belt 'To preserve the setting and special character of historic towns' as defined in the National Planning Policy Framework (NPPF) is removed from the assessment as it considered irrelevant to Woking. The Green Belt Review consistently neglects to consider important historic assets and context at the local scale. It also does not consider other important 'local' functions of Green Belt that may be relevant to the setting of Woking and its outlying villages, which is a feature of some recent spatial planning exercises that have been endorsed by the Inspectorate.
 - It is unclear how findings and rankings of the previous stages of assessment have been used to inform each of the three delivery options proposed in the Green Belt Review. More fundamentally, there is no analysis of how each option performs in terms of overall Green Belt
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functionality. This lack of consideration as to the consequences on the overall shape and functioning of the Green Belt to inform the options presented underlines a general shortfall in strategic spatial planning to inform the review process.

2) Evidence Base

Several important baseline studies, which good practice would indicate:

- a) are useful tools to inform an understanding of the assets of an area;
- b) inform good spatial planning; and
- c) should meaningfully inform judgements about any particular sites contribution to an area in proper context;

are missing from the Green Belt Review. Specifically;

- The Green Belt Review does not benefit from an up to date Landscape Character Assessment (LCA). Reference to the 'The Future of Surrey's Landscape and Woodlands' study (Surrey County Council, 1997) is included, however this document is outdated and provides little local information. In relation to a LCA, National Planning Practice Guidance published by the government notes:
 - Reference ID: 8-001-20140306: *'One of the core principles in the National Planning Policy Framework is that planning should recognise the intrinsic character and beauty of the countryside. Local plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. This includes designated landscapes but also the wider countryside.'*
 - *'Where appropriate, landscape character assessments should be prepared to complement Natural England's National Character Area profiles. Landscape Character Assessment is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change and may be undertaken at a scale appropriate to local and neighbourhood plan-making. Natural England provides guidance on undertaking these assessments'*

Whilst this lack of information is acknowledged in the report, given the recognised importance of Landscape Character Assessments to understanding the holistic value of Green Belt land, a more rigorous assessment of landscape character and should have been undertaken to inform the Green Belt Review.

- There are no Conservation Area Appraisals to inform an understanding of the sensitivity of Pyrford to potential development. In relation to Conservation Areas and historic assets the NPPF notes with reference to plan making policy:
 - Paragraph 169: *'Local planning authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment. They should also use it to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future. Local planning authorities should either maintain or have access to a historic environment record.'*

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In addition, it is understood that the Heritage of Woking (2000) document referred to in the Green Belt Review is based on 1990's information and no up-dating has been undertaken.

The consequences of these omissions have resulted in important landscape characteristics being missed that would have influenced the outcome of the assessment. This this is explored below at points 5 and 6.

- 3) Site Identification
 - The Parcels included in the Green Belt Review are based on the Council's annual 'call for sites', along with sites within the Green Belt that were promoted in the 2011 SHLAA. The site identification process adopted by Woking Borough Council in its 'call for sites' includes guidance that discourages promotion of sites within the Green Belt. As such, the Green Belt Review is not predicated on a full and proper review of site availability.
 - 4) Parcel 9 as a Preferred Site
 - Having undertaken a systematic study to identify potential Green Belt release sites for development, Parcel 9 is identified as fulfilling two 'Critical' Green Belt purposes, with poor sustainability and high landscape sensitivity. However, Site 9a is subsequently identified as a preferred site following a more detailed assessment that seeks to build a case for the merits of the site based on the site's availability.
 - It can be clearly demonstrated through the Green Belt Review assessment process that there are other Parcels, such as Parcel 7 and 13, which are more suitable in relation to their Green Belt function. They are also more sustainable than Parcel 9. Parcel 7 identified as 'potentially suitable' in the delivery options has been given less weight in the overall assessment than can be objectively justified because the land is not currently being promoted and there are uncertainties over its potential availability, regardless of Green Belt, sustainability, and landscape criteria.
 - 5) Environmental Impacts of Developing on Site 9a - Landscape Character
 - When considered in the wider context, Site 9a, together with the adjoining woodland and fields –forms a relatively narrow tract of land that provides a continuous stretch of uninterrupted countryside between the elevated town and river valley. This tract of countryside is curtailed by surrounding golf courses which is a common feature of the 'countryside' edge of the town. Therefore, Parcel 9 (and Site 9a) plays an important role in containing the southern edge Woking, and provides a strong and immediate countryside context for the urban area. Countryside of this type is relatively unusual in the borough and is an important asset for Woking, which would have been identified had the Green Belt review been informed by an up to date Landscape Character Assessment.
 - This tract of countryside also contains a number of important heritage assets including Pyrford Court Registered Park and Garden, several listed buildings, a Conservation Area (Pyrford) and forms the context of an old road network that dates from at least 1630. Parcel 9 plays an important role and contributes to the countryside context of these assets, which would be adversely affected should Site 9a or indeed adjacent land east of Upshot Lane be developed.
 - 6) Environmental Impacts of Developing on Site 9a - Historic Environment
 - The Surrey Historic Landscape Characterisation and historic mapping identifies the Site as part of an area of farmed landscape related to Pyrford village (designated as a Conservation Area and
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containing several Listed Buildings). This landscape is judged to form part of the setting of Pyrford Village and development would further reduce its true countryside context, an issue which we consider to be underrepresented in the Green Belt Review

- There would be an impact on the countryside context of Pyrford Court Registered Park and Garden and Listed Buildings. The countryside context is valuable in its own right as defined by policy and is an important consideration related to how the park and garden expresses itself in the landscape.
- The roads that form the southern and eastern boundaries of Site 9a are evident on historic mapping and their antiquity may be further reflected in the presence of the Pyrford Stone. The stone, thought to be prehistoric in origin, was historically located at the junction of the roads but moved to the side of the road in recent times as part of road widening works. Routes shown on historic mapping define the northern boundary of Site 9a (this is a footpath called Tegg's Lane and Littell Lane in 1630). The landscape context of these historic routes should be protected.
- In our opinion it is unacceptable for the Green Belt Review to identify a site for Green Belt release that concludes that its suitability is subject to an assessment of development effects on the setting of the Registered Park and Garden. This merely erroneously defers the consideration of this important matter of cultural heritage effects to a judgement on a planning application rather than as a point of principle during strategic planning.

7) Environmental Impacts of Developing on Parcel 9a - Access

- The B367/Upshot Lane Priority Junction is situated on the southern corner of Site 9a immediately opposite the access to Pyrford Court creating a crossroad layout. Consideration of a 4/5 arm roundabout at this location would require a very large circa 50m circle diameter junction, unsuitable for the area, and would result in significant tree loss as a consequence of road realignment.
- Access into Site 9a from Upshot Lane is considered to be problematic due to the existing, dense, tree line/hedgerow that borders the land which if implemented would result in extensive clearance of vegetation.
- Site 9a could potentially be accessed from the B367 Pyrford Common Road, bordering the Site's southern boundary. However, there are a number of complications in adopting this approach, including the need for a new priority T-junction access resulting in significant tree loss; relatively large visibility splays; and lack of footway provision.
- Overall, although technically feasible, significant highways works would be required to deliver development within the necessary design standards and requirements, which could adversely impact upon the wider landscape setting.

8) Site 9a Site Capacity

- Given that Site 9a has been identified for Green Belt release, a broad analysis of potential development capacity of Site 9a has been undertaken to test the yield proposed by the PBA Green Belt Review.
- The Green Belt Review identified that Site 9a could accommodate up to 223 dwellings. In light of the constraints identified by the site appraisals undertaken to inform our assessment, in

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particular the likely access requirements, it is considered the development proposals will need to accommodate the following:

- Access to the site from Pyrford Common Road;
 - Offset from surrounding trees (all of which are protected by Tree Preservation Order), allowing for root protection and creating habitat corridors;
 - Space for surface water drainage, including an attenuation feature at the lowest point of the site; and
 - Public open space, informed by WBC open space standards.
- Overall it has been calculated that there is a net developable area of approximately 5ha, and the would suggest that Site 9a can accommodate around 65 fewer dwellings than indicated in the Green Belt Review.

The above points represent a summary of some of our main findings of our work to date and which is supported by more in depth studies and further additional areas that Woking Borough Council need urgently review as part of their Site Allocations DPD process.

As we have already stated above, the purpose of writing to the Council at this stage is to allow an opportunity to revise the Site Allocations DPD process now, rather than be required to re-evaluate and then potentially re-consult upon the Site Allocations DPD at a later stage.

We would respectfully request that the Executive agrees not to recommend the draft DPD for consultation due to the significance of a number of matters that in our opinion question the soundness of the proposed allocations in so far as they relate to the PBA Green Belt Review. As stated above, we are progressing a review of the DPD documentation submitted to the Executive last week and consider from an initial review, that there will be a number of additional points we will be making on the soundness of the process.

We would like to extend our offer of a meeting to discuss these matters in person, and look forward to receiving your response.

Yours Sincerely



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CC: Cllr David Bittleston
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Mr Ernest Amoako

Cllr Ashley Bowes

Mr Martin Doyle

Mr Geoff Geaves

Mr Ray Morgan

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