

4624 - Land at Pyrford Village

Summary of LDA Design Reports

July 2015

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1.0 Introduction

1.1. Context

LDA Design, on behalf of the Pyrford Neighbourhood Forum ("PNF"), has reviewed the Woking Green Belt Review Final Report (January 2014) prepared by Peter Brett Associates ("the Green Belt Review") and to advise on the findings of the assessment in identifying parcels of land for release from the Green Belt.

LDA Design has undertaken five key stages of work as part of the review.

- A review of the Green Belt Review methodology and its application.
- A review of the 'preferred parcels' identified in the Green Belt Review and their suitability for Green Belt release (this report)
- A review of technical constraints of Sites 9a and 9b (within Parcel 9), which are located near Pyrford Village and adjacent to Pyrford Court.
- Consideration of how urban areas, like Woking, could be properly planned to encourage sustainable development and prevent incremental growth.
- A review of the Site Allocations DPD and underpinning evidence contained in the Sustainability Appraisal.

This report provides a summary of all of the above reports.

1.2. Terminology

References to 'Parcel 9' relates to the entire Parcel identified in the Green Belt Review.

Through the Green Belt Review process, Parcel 9 was subsequently 'narrowed down' to a single field adjacent to Pyrford and to the west of Upshot Lane. This was referred to as Site WGB009a in the Green Belt Review, and identified for Green Belt release.

Although no other sites within Parcel 9 were identified for Green Belt release within the Green Belt Review, we understand that the field to the east of Upshot Lane was being promoted for development. Therefore, for the purposes of the majority of the LDA Design reports, the two sites are referred to as Site 9a i.e. land to the west of Upshot Lane and Site 9b i.e. land to the east of Upshot Lane.

Sites 9a and 9b have subsequently has been identified as a potential Green Belt release site within the Site Allocations Development Plan ("DPD") and its accompanying Sustainability Appraisal Report ("SA"). These are referred to as sites GB12 (9a) and GB13 (9b). We therefore use these site references in the context of DPD and SA report.

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2.0 Green Belt Review Methodology

Having undertaken a general evaluation of the Green Belt Review several issues that undermine the study as a key evidence base for the Site Allocations Development Planning Document preparations process have emerged.

There are a number of inconsistencies in the application of assessment criteria throughout the assessments stages. In particular the process for progressing sites for Green Belt release from Stage 2 to 3 of the Green Belt Review is unclear.

Introducing 'availability' as an overriding determinant is problematic as it directly undermines the methodology designed to identify the importance of the land for Green Belt purposes according to the NPPF, and indicates a disregard for the assessment method established by the Green Belt Review to rank the land parcels according to their Green Belt purposes and sustainability credentials.

Several important baseline studies are missing from the assessment, in particular and up to date Landscape Character Assessment and Conservation Area appraisals. This has resulted in important landscape and heritage characteristics being missed that would have influenced the outcome of the assessment.

The weight that has been given to 'deliverability' based on short term availability criteria in selecting sites for Green Belt removal beyond the plan period is a significant concern of the Green Belt Review process.

Data based on narrow site availability criteria at a fixed point in time should not be the overriding parameter for prioritising or justifying sites Green Belt release in the long term (i.e. beyond the plan period), especially if they have been assessed as performing critical Green Belt functions. Equally, sites that are potentially suitable for Green Belt release should not be discounted from the process based on them not being actively promoted at the time of review, particularly if it is not made clear to landowners that their land is within an area that could be suitable for Green Belt release.

It is considered that too much weight has been placed on site availability as a key indicator of deliverability for allocating sites for Green Belt release 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. The options presented in the Green Belt Review do not reflect the study's own findings in terms of presenting the most suitable sites for development first. More fundamentally, there is a lack of consideration as to the consequences on the overall shape and functioning of the Green Belt to inform decision makes as to the consequences of perusing any one option over another.

Our own assessments have identified a number of parcels, and individual sites within them, that we consider as suitable for possible Green Belt release that have not been presented as potential development options the Green Belt Review, for instance parcels 7, 13, 20 and 31.

While technically the Green Belt Review does consider sustainability as part of its assessment parameters within the 'broad location for growth' identified in Policy CS1 of the Woking Core Strategy, it does not explore potential opportunities for more comprehensive urban extensions or new settlement.

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This approach is unlikely to result in coherent or sustainable patterns of growth for Woking, and is not supported by best practice guidance and case studies which encourages considering a variety of growth options and taking a contextual approach to determine how growth can best fit with existing settlement and landscape patterns. This best practice is set out in the accompanying Settlement Planning report.

This lack of clear spatial guidance is compounded by the lack of 'strategic level' landscape assessment. The Green Belt Review only considered development parcels in isolation without referring back to an overarching set of sustainability or growth objectives.

As a result there is no way of considering what contributions different combinations of parcels could make in terms of overall sustainability. Instead, the Green Belt Review considers individual parcels and sites on an incremental/ site by site basis which is unlikely to result in coherent or sustainable patterns of growth.

This omission reveals a general lack in strategic thinking with regard to the long term growth and development of Woking in spatial planning terms.

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3.0 Preferred Parcels

The methodology adopted in the Green Belt Review to select areas for release from the Green Belt to accommodate development is unconvincing and inconsistent.

The Green Belt Review has not made objectively informed decisions, disregarding the assessment findings when identifying the most suitable parcels/sites for release. In particular, land use and availability considerations have been drawn into the assessment process and are given great weight, resulting in parcels being identified for Green Belt release which perform 'Critical' Green Belt purposes and are unlikely to deliver sustainable development.

The weighting applied to the various strands of the assessment process i.e. Green Belt purposes, sustainability criteria and landscape capacity - is not transparent, making it difficult to draw comparisons between different Parcels. In particular there is no matrix contained within the Green Belt Review which demonstrates how the 'Identification of Areas of Search' matrix has been applied or utilised in comparing the performance of parcels.

There are also inconsistencies in the way Parcels have been assessed. Some have been given 'split' score in relation to landscape capacity, while others have benefited from a more detailed analysis of particular area or sites within the Parcel. Interestingly the two additional sites identified as 'available' at Stage 3 (WGB009a and WBG022a) are given 'split' scores in Stage 2, allowing for a more detailed assessment to be undertaken and suggesting that 'availability' was a factor from the outset.

Our own independent ranking of the preferred parcels based upon the methodology set out in the Method Statement demonstrates that Parcel 9 ranks as the least suitable land area when compared to all of them. The Green Belt Review indicates that Parcel 9 has 'low-medium' sustainability performance; 'little/no' and 'low' capacity for change; 'major' environmental constraints; and fulfilling 2 'critical' Green Belt purposes. There is no alternative evidence within the Green Belt Review (notwithstanding availability) to indicate that Parcel 9 is appropriate for Green Belt release.

We agree that Parcels 3, 5 and 6 have potential for Green Belt release, and also suggest that parcels 2, 7, 13, 20 and 31 warrant further investigation. All of these parcels perform better than Parcel 9 and we have identified areas within these parcels that may be suitable for Green Belt release.

LDA Design in conjunction with the Pyrford Neighbourhood Forum have identified an additional site which has not been considered in the Green Belt Review's preferred parcels. The site formed part of Parcel 8 which scored 'Low' in terms of relative suitability as an area of search, but is considered to be *Moderately* sustainable and have a *Moderate* capacity for change in the Green Belt Review, with only *Minor* environmental constraints.

Whilst we are unable to assess this site thoroughly, as we do not have access to databases used within the Green Belt Review for equal assessment, the performance of Parcel 8 is

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demonstrated in the individual scoring to be more suitable than Parcel 9. We recognise that Parcel 8 was not identified as a Preferred Parcel to be assessed in Stage 3, however the investigation into suitable sites within this parcel should have come before the recommendation of sites within Parcel 9.

Overall it is our view that there is a stage missing from the Green Belt Review which should have undertaken a more refined assessment of individual sites within the high or mid-ranking Parcels.

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4.0 Technical constraints of Sites 9a and 9b

Overall, we consider the judgements and assessment relating to the Green Belt functions, sustainability, environmental constraints and landscape capacity of Parcel 9 to be broadly correct. While we recognise that Parcel 9 has some local variations in character, it is predominately rural in character and contributes to the setting of the urban and the historic environment.

Further technical studies have been undertaken to understand the baseline conditions and technical constraints associated with Sites 9a and 9b.

In relation to land use, Sites 9a and 9b encompass two arable fields, which are separated by Upshot Lane. Site 9a has mature trees and hedgerows along much of the site boundary, although the site is open to Pyrford Common Road. The trees along the northern and western are a particularly prominent feature, approximately 20m high and creating a strong boundary between the urban area and surrounding countryside. All of the trees and woodland within Site 9a are protected by a Tree Preservation Order (TPO). Site 9b also has trees and hedgerows along much of its boundary, although the hedgerow along the eastern boundary is more open and 'gappy' in places.

In relation to access, Sites 9a and 9b are bordered by B367 Pyrford Common Road to the south, while Upshot Lane runs between the Sites and extends from a priority junction with the B367. The Access Appraisal considers number of different access options, including a roundabout at the priority junction; alteration of the existing priority arrangements; and access points off Upshot Lane. Overall it is included that the delivery of an acceptable vehicle access would be partially challenging given visibility splay requirements; potential land take; and impact on protected trees. The roundabout option in particular would be out of keeping with the rural character of the area.

In relation to landscape character, Site 9a and 9b form part of a relatively narrow tract of land, curtailed by golf courses, that provides a continuous stretch of uninterrupted countryside between the elevated town and River Wey valley. It also contains a number of important heritage assets. The Sites therefore play an important role in containing the southern edge of Woking; providing a strong landscape context for the urban area of Pyrford; providing context for heritage assets; and is a relatively rare example of an area of rural landscape south of Woking that has not been lost to golf course development. Site 9b is also identified as an area of 'Escarpment and Rising Ground of Landscape Importance', designated by Woking Borough Council to protect the character of the escarpment. Overall it is concluded that the development of all or part of Sites 9a and 9b will inevitably change the character of the land itself and its immediate surroundings, and will result in harm to landscape character and views and alter the countryside context of the Registered Park and Garden, Avery Road Conservation Area and Pyrford Village. This parcel is identifiable as countryside which is of inherent value even though it has no formal statutory protective

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designation. The development of Site 9b in particular would be contrary to planning policy guidance, which seeks to protect the character of the escarpment.

In relation to ecology, the fields themselves have very limited ecological value, however, the field margins and woodland belts have potential to provide valuable habitat for dormice, bats, badgers and invertebrates. There are also two water bodies within 250 m of the Sites which may have potential to support great crested newts. Overall it is likely that any adverse effects on ecology can be mitigated through good design. It is recommended that the field boundaries are retained as habitat corridors, and an appropriate off-set provided to protect tree roots/canopies and enhance opportunities for species movement and foraging.

In relation to heritage, Sites 9a and 9b adjoin two Conservation Areas (Pryfrod Village and Aviary Road); Pyrford Court Registered Park and Garden; a number of Listed Buildings; and an Area of High Archaeological Potential. It is judged that the Sites have an important role in maintaining a rural setting to Pyrford Court and - whilst development would not affect views from the house and park across the Wey valley to the North Downs - development could potentially erode the rural setting of Pyrford Court and in particular on accessing the property from along Pyrford Common Road and Upshot Lane. The development could also potentially significantly erode the rural setting of the Pyrford Village, which would have traditionally had access to surrounding fields for growing crops. Indeed, the analysis of the historic landscape characterisation (HLC) and old maps illustrate that the surrounding fields were once farmed by the residents of Pyrford. It is also judged that it is judged that development could potentially erode the remaining rural setting of the Aviary Road Conservation Area.

The Green Belt Review identified that Site 9a could accommodate up to 223 dwellings. In light of the constraints identified above, in particular the likely access requirements, it is considered that any development proposals will need to include sufficient land for access; offset from surrounding trees, allowing for root protection and creating habitat corridors; space for surface water drainage; and public open space, informed by WBC open space standards. A study of land use and development capacity has therefore demonstrated that Site 9a have deliver 155 dwellings, which is 65 fewer dwellings than indicated in the Green Belt Review.

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5.0 Planning for sustainable development

The purpose of the Green Belt Review was to review the land beyond the existing urban area of Woking, with a view to identifying areas of land suitable for housing. This was mainly in response to the Core Strategy for Woking Borough (part of the emerging development plan), which established that sufficient land could not be identified within the existing urban areas to accommodate all the housing that is required.

While the Core Strategy states that the Green Belt Review will identify specific sites for growth, the Green Belt Review does not seem to provide an overall strategy or strategic vision for the direction of growth for Woking, or explore potential opportunities for more comprehensive urban extensions or new settlement. Accordingly the Green Belt Review considers development parcels in isolation, with each parcel delivering between 12 and 592 new homes. Based on the estimated yield of 12 preferred parcels, each site would deliver around 150 dwellings on average.

This approach is unlikely to result in coherent or sustainable patterns of growth for Woking, and is not supported by best practice guidance and case studies which encourages considering a variety of growth options and taking a contextual approach to determine how growth can best fit with existing settlement and landscape patterns.

A number of documents exist which provide guidance on delivering high quality settlement planning. Both the CABE and Town and Country Planning Association (TCPA) publications recommend that in any situation considering a range of quite different growth scenarios or options measured against agreed objectives is important before deciding which is the best solution for that place. The range of publications from the TCPA also highlights the benefits of garden cities and garden suburbs to help meet the nation's housing needs.

Set in this context WBC should be encouraged to think strategically and consider the following:

- Develop a strategic vision and spatial strategy based on evaluating a number of options or scenarios. This could include aggregating the housing need into one area.
- Take a contextual approach to determine how growth can best fit with existing settlement pattern and landscape character.
- Consider the need for social, economic and environmental sustainability, and seek to secure meaningful community benefits that can be achieved from consolidated areas growth as opposed to smaller scale, incremental development.
- Ensure that there are physical links provided by new or existing infrastructure (transport, green infrastructure etc) between new settlements and existing places, aiding connectivity and integration.

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6.0 Review of the Site Allocations DPD and SA

The Council has not demonstrated it has fully met the requirements for the Sustainability Appraisal and of the proposed spatial strategy and its reasonable alternatives. As a result, the draft Site Allocations DPD is not justified as it fails to properly consider reasonable alternatives before committing to its preferred spatial strategy. According to the tests of NPPF paragraph 182, this would mean that plan is not justified and therefore not sound. The requirement for a consistent approach to appraising alternatives is set out in national guidance.

The preferred allocation of sites GB12 and GB13 in the Site Allocations DPD suggests that the proper consideration of some options has been retrofitted and therefore there is the possibility that the consultation DPD, having progressed in a certain direction, may have missed more sustainable opportunities.

As set out in the Review of Preferred Parcels report there are other sites which have not been assessed in the Green Belt Review, or have been unequally assessed. This has been compounded by the Sustainability Appraisal. Evidence presented in the Green Belt Review finds there are more suitable sites for release from the Green Belt and to provide safeguarded land for sustainable development for the period of 2027-2040 than sites GB12 and GB13. This in itself raises doubts that the process followed to identify the preferred strategy was based on a full and consistent understanding and assessment of the alternative options available to meet the development requirements over the plan period.

A particular example of where we consider that the Sustainability Appraisal process has not been followed properly or effectively is the recommendation of site GB13, contrary to the Green Belt Review's findings. The allocation is not supported by the necessary evidence to justify alteration of the Green Belt boundary at this location and is contrary to paragraph 83 NPPF.

In respect of the proportionate evidence used by the DPD, there is an omission of a Borough wide Landscape Character Assessment which would identify sites within their wider context, rather than individual and unrelated appraisals. There is no up-to-date survey of heritage assets or historic landscape characterisation to inform judgment about their significance. These omissions devalue the planning judgments made within the Sustainability Appraisal.

Finally, no alternative distribution options are considered with the DPD as the plan rules out consideration of potential viable alternatives in the Sustainability Appraisal despite differing conclusions being reached in the Green Belt Review.