Representations on behalf of

The Gribble Family

In respect of land at Pyrcroft Road, Chertsey etc (Site SL6)

relating to the

Runnymede 2030 Draft Local Plan Examination

Matters 3 (cont). to 11.

Matter 6
Matter 6 - Site SL6 Housing Allocation at Pycroft Road, Chertsey.

Introduction

These representations are made by Carter Planning Limited (CPL) for the Stage 2 Hearing in respect of the Runnymede Local Plan 2030 Examination, on behalf of the land owners of most of site SL6 Pycroft Road, Chertsey, the Gribble Family.

CPL is promoting the development of land at Pycroft Road, Chertsey under Policy SL6. Discussions with the Council have been held with a view to the submission of a planning application for circa 175 dwellings as suggested for the bulk of the site early in the plan period. Much technical work demonstrating the site’s availability, suitability and achievability has already been carried out. Plans of how CPL envisage the development taking place are included as an Appendix to these representations, as this usefully identifies the location of the site and shows how the development area would relate to its surroundings. Most of this area is a reserve housing site R3 in the adopted Local Plan 2001.

However our original representations go further and explain how a larger area of land to the west (including and beyond that in SL6 now proposed by the Council) could also be developed to assist with any overall shortfall in housing or to replace any other sites which may not come forward. This area is in a sustainable location under our Clients control.

Note: Under Matter 6 are our comments are in response to the Inspector’s questions in so far as they relate to Site SL 6. Our comments have already been made in respect of the soundness of the overall spatial strategy under Matter 3 and our comments on review of the Green Belt have been submitted under Matter 4.
Matter 6: Other Allocations for Housing and Mixed Uses (Policies SD3, SL2-SL18 and supporting text)

6.1 Have the other site allocations in Policy SD3 and detailed in Policies SL2-SL18 emerged from a thorough, objective assessment of all potential sites, including review of Green Belt boundaries, sustainability appraisal and Habitats Regulations Assessment where necessary? In particular: a) In selecting the allocations, has the Council applied suitable methodologies in a consistent way? If not, what are the weaknesses in the evidence base, do they fundamentally undermine the planmaking process, and which of the allocations may be unsound? b) Is it clear why the Council has decided to allocate the specific sites and not others? c) Is the proposed development of each of the allocated sites consistent with the Plan’s spatial vision and objectives and with national planning policy?

General
In respect of the allocation of Site SL6 we believe that in general terms there has been a thorough, objective assessment of all potential sites, including review of Green Belt boundaries, sustainability appraisal and Habitats Regulations Assessment as necessary.

In particular: a) In selecting the allocation SL6 at Pycroft Road, the Council has applied suitable methodologies in a consistent way. We have a reservation in respect of the line and extent of the western boundary of the site. However this is a detailed matter and is not a weakness in the evidence base, and does fundamentally undermine the plan making process.

We believe the methodologies have generally been suitable.

b) Is it clear why the Council has decided to allocate the specific sites and not others?

We believe it is clear why the Council allocated this site in general terms. See below for further information.

The bulk of the site has been accepted as a reserve housing site for many years.

c) Is the proposed development of the allocated site would be consistent with the Plan’s spatial vision and objectives and with national planning policy.

The allocation of Site SL6 successfully balances the requirements of the Plan’s Spatial Vision and the various requirements of the National Planning Policy Framework.

In conclusion we believe this site allocation is consistent with the Plans spatial vision and objectives and national policy.
6.2 With regard to the specific characteristics of each of the allocations, are there exceptional circumstances that are sufficient to justify the proposed alterations to the Green Belt boundary?

With regard to this allocation, we believe the specific circumstances constitute exceptional circumstances that are sufficient to justify the proposed alterations to the Green Belt boundary to allow the enlargement of the existing housing site.

Our only concern is where the final western boundary of the site is drawn.

In our view the exceptional circumstances can be summarised as follows:-

The Local Plan

The bulk of the site is Reserve Housing site R3 listed in Policy HO6 of the adopted Local Plan from April 2001. See Appendix A. The site was one of eight which was safeguarded for future release from 2001 to 2006 to meet longer term housing needs. The allocation of the site is understood to have arisen from the 1986 Local Plan followed by a draft Plan in January 1995, a deposit draft in 1996 and a Local Plan Inquiry in 1997. Following modifications in 1999 the Plan was adopted in 2001.

The Core Strategy

The Core Strategy of February 2013 confirmed Chertsey as one of the three principal settlements for sustainable development (Policy LP01). Policy LP02 confirmed the site as a reserve site No.4 for review each year but if not required before 2026 to be retained for long term housing needs.

Arup Green Belt Review (December 2014)

The allocation of land to the west of Chertsey was originally identified in the Arup Green Belt Review (December 2014) for residential development under General Area 16 because the housing reserve site was considered to be within the urban area of Chertsey. The whole of the land scored well against the original methodology and land in Area 16 was identified to be considered for Resulant Land Parcels (excluding any area which flooded). The Phase 1 Assessment mainly reduced marks because the whole was considered a gap; Phase 2 Absolute Constraints Assessment and Phase 3 Non Absolute Constraints assessment still showed potential. However when the NPPF reassessment was carried out it was concluded that Area 16 should remain Green Belt because it prevented the sprawl of Chertsey, there were few physical features and the existing boundary was natural.

Strategic Land Availability Assessment - SLAA (June 2016)

Chilsey Green Farm was identified as Site 60 within the SLAA and it was identified that the potential capacity for housing was for 100 dwellings with a delivery period of 6 to 10 years of the plan cycle.
Issues, Options & Preferred Approaches Consultation – IOPA (July-August 2016)

The IOPA Consultation published in July 2016 identified Site 60 as a reserve housing site having an indicative capacity of 60 houses.

Green Belt Review Part 2 (March 2017)

Following receipt of the responses to the IOPA the Council published an update on the website entitled Green Belt Review Part 2 (March 2017) which included a Green Belt Review Part Two Buffer Map to introduce a 400m buffer from the existing settlement boundary of Chertsey into the Green Belt.

Annexe 1B accepted the cross hatched area as site 56 commenting that “Parcel 16 was identified as moderately performing against purposes 1 (criterion (a)) and 3, but it is judged that the sub-area plays a lesser role than this wider area. While the sub-area performs moderately against purpose 1, it should be noted that the scale and form of outward growth would be restricted by the dense woodland and ridgeline immediately to the west; furthermore, in terms of outward growth, it is judged that this would be a natural area and strongly aligned with the Council's reserve housing site to the south-east. In terms of purpose 3, the sub-area plays a lesser role than the wider parcel as a result of its limited openness and semi-urban character.

Overall, it is judged that this area plays a limited role with respect to the wider strategic Green Belt and its loss would not harm the integrity of surrounding Green Belt”.

Planning Committee 10.05.17 – Local Plan ‘Runnymede 2035’ – Additional Sites and Options Consultation May/June 2017

The Council proposed to increase the size and capacity of the site available for development to include 275 dwellings, 5 pitches and 1.62 ha of green infrastructure.

The Council’s reasoning was that the GBR Part 2 recommended an additional area of land could be incorporated into the site which has increased its potentially developable area (subject to availability). The capacity of the site has been estimated through the Council’s site capacity work. Our representations were generally supportive but expressed concern about the western boundary.

Following this, and in response, Arups provided an advice note to the Council specific to the Pyrcroft Road site dated 20 December 2017. See Appendix B.

This can also be viewed on the Council’s website page entitled "Green Belt review"
Runnymede 2030 – Draft Local Plan Consultation

The Draft Local Plan Consultation (May/June 2018) proposes 275 dwellings (100 and 175) and 5 gypsy/traveller pitches on land identified as Housing Allocation SL6.

The release of Site SL6 would be entirely consistent with the Council’s strategy for directing new development towards urban areas at Chertsey and it can deliver sustainable development. It is land which it is unnecessary to keep permanently open given it is heavily influenced by adjoining development and the railway and it is well contained on all sides by physical boundaries. These boundary features are all permanent and can form a new Green Belt boundary to endure for the foreseeable future.

In conclusion the need for housing, the sustainable location, its limited role in Green Belt purposes and the history of the site justify the proposed alterations to the Green Belt boundary.
6.3 *Is each of the allocated sites viable and likely to be delivered within the expected timescale? Does the evidence, including any up-to-date information, support the housing trajectory for the individual sites?*

In relative terms the site is a reasonably straightforward green field site with no extraordinary costs. There is no evidence that the site is unviable.

The Representor's part of the site which is the bulk of it (the unshaded area) is likely to be delivered within the expected timescale if not before 2022.

Informal discussions that we have held with the owners of the cross hatched part of the site indicate that this too will be available as indicated within the 2022-2027 period.

However the allocation allows for a scenario where the Respondents site can come forward for 175 dwellings in advance of the cross hatched area as necessary. See sketch attached at Appendix C.

The work carried out so far and the pre application discussions held with the Council to date confirm the amount of development and the timing of development. Indeed it appears that development could proceed at an earlier date and (depending on where the final western boundary) is drawn could also make a greater contribution to housing development in the Borough.

In conclusion the evidence, including up-to-date information, supports the housing trajectory for the site.
6.4 Taking account of each of the Policies SL2-SL18, are the specific requirements for development of the sites justified, consistent with national planning policy, and likely to be effective? And in particular, do they make sound provisions for the number and types of dwellings, pitches for Gypsies and Travellers, the range of infrastructure required, flood protection, acceptable noise standards and air quality, and protection and enhancement of the natural environment?

The specific requirements for development of the site SL6 are justified, consistent with national planning policy particularly in relation to sustainability, design, transport, making effective use of the site, flooding and the natural environment, and are likely to be effective.

In particular in our view it can make sound provision for the number and types of dwellings, pitches for Travellers, the range of infrastructure required, flood protection, acceptable noise standards and air quality, and protection and enhancement of the natural environment etc.

The Respondents are in support of the allocation. The site represents the best possible allocation for the Borough given it’s availability in terms of deliverability. The landowners have confirmed that the land is available and ready to provide housing. The site has been assessed by the County Highways Authority and deemed to be able to accommodate 175 dwellings and not have a detrimental impact on highway safety. The site is capable of providing open space and play areas etc and can be developed to a density that allows for open spaces and landscaping. The proposal will have significant benefit to the local economy through the creation of jobs and include much needed affordable homes.

Whether or not the cross hatched area is included the site is of sufficient size to allow a mix of houses and flats, in public and private ownership and discussions with the Council have included up to three storeys in height.

Work on such factors as ecology, arboriculture, SUDS, flooding and noise do not indicate any obstacles to development. The layout allows for flooding along the brook on the eastern side of the site. Ecology reveals some slowworms which require to be translocated to the western/undeveloped side of the site. Specimen trees and hedgerows can be retained. There need be no material impact on the amenities of neighbours. Links to the surrounding area can be developed on and off site. Noise from the railway can be dealt with through the layout and house designs. Contributions are required towards the Thames Basin Heaths Special Protection Area for birds and the A320 etc.

Whilst physically they can be accommodated we have reservations about the incorporation of pitches within a residential development in general terms for funding reasons but that is the subject of separate representations.
6.5 With regard to paragraph 5.30 of the Plan and the proposed changes to the Policies Map, are there exceptional circumstances for the removal of Thorpe Village from the Green Belt? In the light of NPPF (July 2018) and paragraph 136 in particular, should the Plan be modified to clarify that detailed amendments to the Green Belt boundary of Thorpe Village may be brought forward through the neighbourhood plan, and if so, how should the scope of any proposed boundary changes be guided by the Plan? Would it be justified to make any consequential modifications to the Plan, for example, to provide guidance for other neighbourhood plans that may be brought forward?

Not applicable. No comment.
1 Introduction

Following completion of the Green Belt Review Part 2 in March 2017, Arup was commissioned by Runnymede Borough Council to support the analysis of, and responses to, representations received through the Council’s Regulation 18 Consultation on the Additional Sites and Options Consultation Document (May/June 2017). The aim of this exercise was to establish the need for any revisions or updates to the Green Belt Review Part 2.

Through this process, Arup identified a small number of representations which raised points worthy of further detailed consideration, and where amendments/additions to the Green Belt Part 2 were likely required. However, it was judged that one such representation relating to the Pycroft Road site would be better addressed through a separate advice note to the Council.

The Note refers to three different spatial areas throughout (illustrated in Figure 1):

- Pycroft Road Reserve Site
- SLAA Site ID 60
- Proposed Extension Site

1.1 Pycroft Road Reserve Site

The Pycroft Road Reserve Site is an existing Reserve Site allocation in the 2001 Runnymede Local Plan, but was originally allocated for residential development as early as the 1970s (see Figure 1). It lies outside of the Green Belt. However, the site has not, to date, come forward for development.

The site was assessed through the Green Belt Review Part 1 as General Area B. The Review considered all land that falls outside the urban area (as defined in the saved policies from the 2001 adopted Local Plan) that is not currently covered by a Green Belt designation. In practice, this corresponded with six extant Reserve Sites (including Pycroft Road) which were identified for long term consideration for housing development in the saved policies of the 2001 Local Plan.

The Green Belt Review Part 1 found that the Pycroft Road Reserve Site met Green Belt purposes 1 and 3 moderately and did not meet purpose 2. The Study concluded that there was merit in considering it further for Green Belt designation, but noted that the site would be more preferential for development as a result of the limited constraints affecting it.

1.2 SLAA Site ID 60

A revised site area (Chislew Green Farm, Pycroft Road (SLAA site ID 60)) was assessed in the Council’s Interim SLAA (June 2016). This included the Pycroft Road Reserve Site and an additional area of land to the north-west. The interim site assessment concluded that the site should be included in the SLAA ‘with a capacity of 50 net dwellings in years 6-10’, noting that the
additional land outside the existing Reserve Site currently remains designated as Green Belt and is thus unsuitable for development.

Consideration was afforded as to whether SLAA Site ID 60 should be assessed as part of the Green Belt Review Part 2, but as the majority of the site area fell outside of the Green Belt and given the proposed amendment to the site area represented a relatively minor adjustment, it was judged to be outside the scope of the Study (which primarily focused on the performance of smaller areas of Green Belt against the Green Belt purposes). However, Arup provided informal advice on the identification of a more robust boundary feature with which to align the Green Belt Boundary along the western edge of the site.

Through its Regulation 18 Consultation, the Council consulted upon a revised version of SLAA Site ID 60 (see Figure 1). This drew on Arup’s informal advice and the findings of the Green Belt Review Part 2 (March 2017), which recommended that adjacent weakly performing sub-area should be considered for potential removal from the Green Belt by the Council.

1.3 Regulation 18 Representation (Proposed Extension Site)

A representation relating to SLAA Site ID 60 was received from Carter Planner through the Council’s Regulation 18 Consultation. The representation supported the enlarged site area but stated that it could be enlarged further still to contribute to meeting the Borough’s overall housing need. It was noted in the representation that SLAA Site ID 60 provides a sustainable option, and can accommodate greater capacity without harm to the Green Belt. The representation suggested that land to the south of Grange Farm, and additional land to the west of Chilsey Farm, should be included as part of the housing allocation. The representation states:

‘...what both versions of the GBR failed to do was to examine the area to the rear of or the south of Area 56, between it and the railway line. In other words a westward expansion of the existing reserve housing site. We submit that this exercise should have been undertaken.’

For the purposes of this note, the further enlarged site is referred to as the Proposed Extension Site (see Figure 1).

1.4 Scope of Additional Assessment

Through the analysis of the Regulation 18 representations, it was identified that further assessment could be undertaken in relation to Pyrcroft Road. As the Green Belt Review Part 2 was undertaken on the basis of the previously promoted sites, it is judged that this assessment fell outside of its scope of the Study (and thus any such addendum). As the Pyrcroft Road site was included as one of the Council’s preferred options in the Regulation 18 Consultation, and relates (in part) to an existing extant Reserve Site (where the principle of development has already been supported), it was judged pragmatic to undertake additional assessment to establish whether the promoter’s proposed further amendments to the site area would have any further impact upon the Strategic Green Belt, and whether robust Green Belt boundaries can be established (in line with the NPPF). This additional assessment is provided in the following sections.
2 Additional Assessment

The additional assessment has been informed by desk based resources and a visit to the site in November 2017.

2.1 Harm to the strategic Green Belt

The Pycroft Road Reserve Site falls outside of the Green Belt and is therefore not subject to any further assessment.

The Proposed Extension Site was assessed in the Green Belt Review Part 1 as part of the wider General Area 16. General Area 16 scored:

- **moderately** against purpose 1 (criterion (a)), preventing the outward sprawl of Chertsey;
- **strongly** against purpose 1 criterion (b) as a result of the lack of durable boundaries between the Green Belt and the large built-up area;
- **weakly** against purpose 2 as a result of the scale of the gap between Chertsey and Thorpe;
- **moderately** against purpose 3, preventing encroachment into countryside with a largely unspoilt character.

The Proposed Extension Site demonstrates a similar level of openness to Pycroft Road Reserve Housing Site, comprising pastoral fields (Purpose 3). However, the Proposed Extension Site is orientated visually towards the existing Reserve Site and the urban area of Chertsey beyond as a result of the steeply rising topography in the west, thus limiting any substantive additional encroachment into the countryside. The topography of the Proposed Extension Site, together with other existing physical features (including dense woodland to the north, tree-belt to the west and the railway line to the south), ensure a sense of separation from the wider countryside. These features also restrict the scale and form of outward growth (Purpose 1), thus limiting the role of the Proposed Extension Site in preventing the sprawl of Chertsey. Given the wider General Area already performs a limited role in preventing the merging of settlements (Purpose 2) (as assessed in the Green Belt Review Part 1), it is judged that Proposed Extension Site would not physically or perceptually reduce the gap between Chertsey and Thorpe.

Overall, it is judged that the Proposed Extension Site plays a limited role with respect to the wider strategic Green Belt and its removal from the Green Belt would not cause further harm to the integrity of surrounding Green Belt. Furthermore, it would provide an opportunity to establish a stronger, more logical Green Belt boundary.

It is judged that the Proposed Extension Site would not materially increase harm to the wider strategic Green Belt subject to:

- Establishing a readily recognisable boundary that is likely to be permanent (discussed below);
- Retention and enhancement of existing visual buffers to the south and west;
- Sensitive layout which minimises visual harm to the Green Belt beyond.

It is suggested that these requirements could be necessitated through policies in the new Local Plan.
2.2 Green Belt Boundary

The existing Green Belt boundary along the western edge of the Pycroft Road Reserve Site (as allocated in the 2001 Runnymede Local Plan) is partially aligned with a small ditch and the access road to Grange Farm, but otherwise cuts across open fields. In its current form, it is therefore neither readily recognisable nor likely to be permanent (as per the requirements in paragraph 85 of the NPPF).

Figure 2 Annotated plan of key boundaries around SLAA Site ID 60
The proposed alteration to the Green Belt boundary around SLAA Site ID 60, as set out in the Council’s Regulation 18 Consultation would, to some extent strengthen and regularise the boundary, aligning it with the small ditch along its full length, as well as a tree belt and the edge of a woodland plantation. When surveyed in November 2017, it was clear that the ditch to the south of Grange Farm would require strengthening and additional buffering to ensure its visibility and permanence in the longer term (see Figure 2). Historic Ordnance Survey mapping dating to 1869, however, illustrates that a feature has existed in this vicinity in the landscape for at least 150 years (and likely considerably longer) (Figure 3). Therefore, drawing on the Green Belt Review Part 2 which stated that “where remnant or degraded features exist… the potential to restore / replace these features should be explored”, this would appear to be a logical and reasonable feature with which the Green Belt boundary could be aligned.

Figure 3 Extract from Middlesex XXIV Ordnance Survey Six-inch England and Wales (1869)
The Proposed Extension Site would extend westwards to the summit of the ridgeline and would be bounded to the north by the densely wooded plantation and to the south by the railway line (which, at the western edge of the site, is in a cutting). These features are readily recognisable and it is judged that there is a reasonable likelihood that they will be permanent (see Figure 5).

The westernmost boundary, as proposed, would be aligned with a fragmented tree belt at the edge of the promoter’s landholding. The southern half of this tree belt is well established (as illustrated in Figure 7), but the planting in the northern half (illustrated in Figure 5) has been removed. While this would not preclude this Green Belt boundary alteration, the tree belt would require strengthening and further buffering to ensure it is suitably recognisable and to ensure a greater likelihood of permanence in the longer term. Such strengthening could be secured through a detailed policy requirement in the forthcoming Local Plan.
Figure 5 Annotated plan of key boundaries around Proposed Extension Site
Figure 6 Facing west from the eastern edge of the Proposed Extension Site, illustrating the established tree belt which weakens further north

Also of particular note to the site is the substantial change in topography. Beyond the ridgeline at the westernmost part of the site there are long vistas across Chertsey and other parts of Runnymede Borough. The crest of the hill is therefore visually sensitive in the context of the surrounding town; should development be located on the upper parts of the ridge, this would likely have a negative impact on the rural context of Chertsey and impact visually upon the countryside beyond, thus increasing perceptions of “encroachment into the countryside” (Purpose 3). A lower contour line could provide an alternative boundary alignment for the allocation site, ensuring the upper part of the ridge is protected from development; for example, the existing ditch at the edge of SLAA Site 60 (as illustrated in Figure 5) would be consistent with this principle. Alternatively, if the boundary were to sit further west, this would require the establishment of a completely new defensible boundary for the Green Belt. Otherwise, the westernmost part of the site could be removed from the Green Belt and protected through alternative policy designations.
Figure 7 Facing south along the proposed western boundary of the Proposed Extension Site, illustrating the transition in the boundary’s strength and regularity

Figure 8 Long vistas across Chertsey and the wider Borough, facing east from the westernmost edge of the Proposed Extension Site