RESPONSE TO MATTER 6

REPRESENTOR ID 1998

HEARING STATEMENT
ON BEHALF OF WENTWORTH
RESIDENTS ASSOCIATION

RUNNYMEDE 2030
LOCAL PLAN EXAMINATION:
STAGE 2 HEARINGS

JANUARY 2019
Title: Hearing Statement Matter 6

Project: Runnymede 2030 Local Plan Examination

Client: Wentworth Residents Association

Issue: Final

Project No: 17134

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Checked by: James Brown MRTPI DiP TP
Introduction

1) This Hearing Statement has been produced by ShrimplinBrown on behalf of the Wentworth Residents Association ("WRA") (representor ID 1998) in relation to the examination into the Runnymede Borough Local Plan 2030 ("the draft Local Plan"). It responds to Matter 6 of the Stage 2 Hearing Sessions.

2) As made clear in previous objections to the Local Plan, the WRA wishes to participate at the hearing sessions where this Matter will be considered by the Inspector.

3) The WRA represents the residents living on the Wentworth Estate (being over 1,000 households) and business interests in Virginia Water in all matters affecting the Estate.

4) The WRA objects to the draft Local Plan, specifically: the failure by the Council properly to discharge its duty to co-operate; the failure by the Council properly to undertake a sustainability appraisal (and related processes) into the draft Local Plan; and three proposed housing allocations which it considers should be deleted from the emerging Local Plan:

   • Policy SD20: Longcross Garden Village;
   • Policy SL9: Housing Allocation at Virginia Water North; and
   • Policy SL10: Housing Allocation at Virginia Water South.
**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 plan-making 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?

5) As made clear during the Stage 1 Hearing Sessions, in particular regarding Matter 3, the allocation of sites is being entirely driven by the evidence gathering exercise. The assessment of individual sites has dictated the strategy for the District, rather than sites being assessed within the context of a considered and objective spatial strategy. This process of retro-fitting allocations is contrary to the principles of good planning as encapsulated in the NPPF.

6) Moreover, there is no assessment of the sustainability of Virginia Water as a whole to demonstrate that it has the physical and social infrastructure necessary to support the level of development envisaged. Nor is there any assessment about what mitigation is necessary or achievable. As demonstrated in our representations to Policy SD2 Spatial Development Strategy, the Runnymede Infrastructure Needs Assessment: Stage 1A and 1B Report (April 2017) assesses the needs generated by sites (Chapter 25). However, there is no assessment of the existing services. In particular, the road infrastructure in Virginia Water is ill equipped to cope with the
increased volume of cars that would be an inevitable consequence of the development of this site.

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?

Policy SL9: Housing Allocation at Virginia Water North

7) Both national and local policy place the highest importance on the protection of the Green Belt, making clear that “Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified” (NPPF, paragraph 136). It also makes clear that it should “optimise the potential of the site to accommodate development…” (paragraph 58). It is thus imperative that any Green Belt release(s) maximises the efficient use of land.

8) The Council’s own Final Capacity Analysis (December 2017) makes clear that “more efficient use of land should be made” but accepts that this is not possible in the case of Virginia Water North because of the “...need to take account of the context and distinctiveness of the surrounding area and Landscape Character objectives as well as the varying and at places steep topography of the site” (paragraph 3.102). A higher density is also not dwelling is also not possible because “The site is wooded in parts and this should be retained given the objectives of the Surrey Landscape Character Assessment for unit SW1 of securing a sense of seclusion with sparse settlement enclosed by woodland. The area covered by woodland is around 5ha [25% of the site]” (paragraph 3.98) which again will severely limit is capacity.

9) Despite the Analysis acknowledging that “…the varying topography of the site may reduce developable area further... this has not been factored into this capacity analysis at this time” (paragraph 3.101). In addition, as Gorse Hill Manor and Gorse Hill House/The Mulberry fall within the Wentworth Estate they are limited by covenants to six units, net increase of five (not six as suggested in the Local Plan). It is also not clear where the two additional units in the “rest of the site” will come
from. As a result the emerging Policy’s estimation of the site’s capacity is in fact an overestimation.

10) As explained in our Matter 4 Hearing Statement (paragraphs 13-21 and Table at Appendix 1 (the table is repeated and updated at Appendix 1 to this Hearing Statement)), the emerging Local Plan palpably fails to meet these objectives. Of the 18 proposed allocations, Virginia Water North has by far the lowest density, at 6dph. The promoter of Merlewood is suggesting fewer dwellings on their part of the site, which would result in 3.79-5.08dph across the site (see Appendix 1, repeated and updated from our Matter 4 Hearing Statement). If the other parts of the site do not come forward for development then density would drop to 2.05-3.33dph across the site.

11) Such a low density of development not only fails to make the best use of land but also does not meet the high bar set for exceptional circumstances justifying a release from the Green Belt.

Policy SL10: Housing Allocation at Virginia Water South

12) Green Belt has five purposes, including “(b) to prevent neighbouring towns merging into one another” (NPPF, paragraph 134). Development of this site would clearly fail this test as it would fill in the gap between the existing settlement of Virginia Water and the proposed new settlement of Longcross, narrowing the gap to as little as 40m (measured from site boundary to site boundary) or c175m (measured from dwelling to dwelling, as shown on the proposed layouts submitted by landowners. Within this narrow gap lies the significant urbanising feature of the M3 Motorway and mainline railway). Notwithstanding that the boundaries to these two sites are likely to be subject to soft landscape proposals, the physical separation between these two sites will be so narrow that some intervisibility may be possible.

13) There is some existing ribbon development of nine houses at the southern end of Virginia Water along the southern side of Trumps Green Road, but this does not set a precedent for development of land to the north of Trumps Green Road for 140
dwellings. In fact it reinforces the need to keep the land north of Trumps Green Road open in order to prevent neighbouring towns merging into one another. Moreover, as the Council’s own Final Capacity Analysis (December 2017) explains “Surrounding net density is 7 to 24dph” (paragraph 3.108) and so a density of 30dph will be out of keeping, especially in this edge of settlement location.

14) The Green Belt Review (December 2014) and Green Belt Review Part 2 (March 2017) assessed the site (Sub Area 52). The Green Belt Review Part 2 methodology says that in terms of Green Belt Purpose 2, to prevent Neighbouring towns from merging, the “Settlements” include Virginia Water and Longcross. However, the accompanying map (Figure 2.3) does not given an outline for Longcross, as it does for other Settlements. The detailed assessment of Sub Area 52 makes no mention whatsoever of Longcross, either in its existing form or as proposed to be allocated. The Review’s conclusion that Sub Area 52 does not perform any role in preventing neighbouring towns from merging, scoring zero out of five in this respect, is thus clearly flawed and cannot be given any weight in decision making.

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?

15) Testing the viability of proposed allocations is fundamental to demonstrate that the proposed allocations are deliverable. However, this commenced very late in the plan making process (the ‘Viability Whole Plan Testing – Draft Final Report’ (December 2017) and ‘Longcross Garden Village – Infrastructure and Viability Assessment’ (December 2017)) and effectively after decisions on proposed allocations had been made. It is therefore clear that the evidence is being used to retrofit to decisions that have already been made.
Policy SL9: Housing Allocation at Virginia Water North

16) We do not consider that the suggested earlier delivery of site is achievable or is based on reliable, clear and appropriate evidence. We have commissioned technical advice on highways; heritage; and landscape and ecology that clearly demonstrate the barriers to development of this site (Appendix 2).

17) In addition there are question marks over landownership (see plan at Appendix 2) that may prevent the site coming forward. Gorse Hill Manor and Gorse Hill House/The Mulberry (eastern part of the proposed allocation) and Kenwolde and the three rear back gardens (western part of the proposed allocation) have not been promoted for development by the respective landowners. Gorse Hill Manor and Gorse Hill House/The Mulberry fall within the Wentworth Estate and are restricted by covenants to 4 and 1 additional dwellings respectively. Hollow Lane, along which the Kenwolde, Merlewood and Mulberry would need to be accessed, is not an adopted highway and no evidence has been submitted to confirm that access along it can be achieved.

18) Policy SL9 makes clear that “The Council’s preference is for a development that will come forward in a single comprehensive scheme...”. Its acceptance that “...separate schemes on each of the parcels of land independent but complimentary to one another will not be resisted” is clearly on the basis that the whole site will, at some point, come forward. At this moment in time there is no evidence that the whole site will come forward (indeed, the evidence is that it will not come forward) and so a comprehensive scheme will not be possible. Moreover, piecemeal development would undermine the appropriate planning of the area and the delivery of infrastructure necessary to mitigate the impacts of the development. On this basis none of the site should be allocated for development.

19) Moreover, the Council’s own Strategic Land Availability Assessment (January 2018) raises question marks, even at this late stage of the plan process, about the ownership of Gorse Hill and the viability of development of the above mentioned plots:
“It is unclear whether Gorse Hill (the area to the east) is available, despite having written to the land owner overseas twice...

Whole Plan viability to be undertaken by consultants. In the most-part, no reason to believe that the site would be unviable; however for Gorse Hill, the land values are considered to be exceptionally high and development may not be viable on this part of the land even if it were confirmed available for development. Members of the Development Market Panel have suggested that the existing land values of the developable plots to the east and west of Merlewood, may prohibit development.”

20) At the Stage 1 Hearing Sessions a table (RBCLP 09) and plan (RBCLP 09a) was circulated listing SANG that could serve different development sites. The table explains that “land to the north of Hollow Lane” is “Publicly owned land, currently being managed, so would not be available in the short term. Land adjacent to land owned by one of the allocations, so together could provide a site of 10 ha or more.” The plan is indicative and does not outline specific boundaries, thus making it impossible to properly interrogate. As the land for the SANG is not within the ownership of the promoters of Virginia Water North and is not available in the short term there is significant doubt about its delivery and therefore about the delivery of Virginia Water North.

21) These factors have not been properly assessed by the Council. Had there been such an assessment, it would have been clear that this is a wholly inappropriate location for development.

Policy SL10: Housing Allocation at Virginia Water South

22) We do not consider that the suggested earlier delivery of site is achievable or is based on reliable, clear and appropriate evidence. We have commissioned technical advice on highways and landscape and ecology that clearly demonstrate the barriers to development of this site (Appendix 3).

23) In addition there are question marks over landownership that may prevent the site
coming forward. The site is being promoted by two separate landowners, Devine Homes and the landowners of Virginia Water South, there is no clarity about the relationship between the parties.

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?

24) As set out above, we consider that there are in principle issues with both Policy SL9: Housing Allocation at Virginia Water North and Policy SL10: Housing Allocation at Virginia Water South.

25) There have not been appropriate assessments of infrastructure required, flood protection, acceptable noise standards and air quality, and protection and enhancement of the natural environment. The proposed allocations therefore cannot, and do not, seek appropriate mitigation.

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?

26) No comment.
Appendix 1

Comparison of site densities across proposed allocations
<table>
<thead>
<tr>
<th>Policy</th>
<th>Area</th>
<th>Regulation 19 consultation (January 2018)</th>
<th>Dwellings per hectare</th>
<th>Regulation 19 consultation (May 2018)</th>
<th>Dwellings per hectare</th>
</tr>
</thead>
<tbody>
<tr>
<td>SD10</td>
<td>137ha</td>
<td>1700 dwellings</td>
<td>12.41</td>
<td>1700 dwellings</td>
<td>12.41</td>
</tr>
<tr>
<td>SL2</td>
<td>1.4ha</td>
<td>40 dwellings</td>
<td>28.57</td>
<td>40 dwellings</td>
<td>28.57</td>
</tr>
<tr>
<td>SL3</td>
<td>7.67ha</td>
<td>325 dwellings (130 under construction + 195 additional)</td>
<td>42.37</td>
<td>340 dwellings (130 under construction + 210 additional)</td>
<td>44.33</td>
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<tr>
<td>SL4</td>
<td>1.9ha</td>
<td>40 dwellings</td>
<td>21.05</td>
<td>40 dwellings</td>
<td>21.05</td>
</tr>
<tr>
<td>SL5</td>
<td>2.86ha</td>
<td>90 dwellings</td>
<td>31.47</td>
<td>100 dwellings</td>
<td>34.97</td>
</tr>
<tr>
<td>SL6</td>
<td>6.8ha</td>
<td>275 dwellings + 5 traveller pitches</td>
<td>40.44</td>
<td>275 dwellings + 5 traveller pitches</td>
<td>40.44</td>
</tr>
<tr>
<td>SL7</td>
<td>1.99ha</td>
<td>85 dwellings + 2 traveller pitches</td>
<td>42.71</td>
<td>90 dwellings + 2 traveller pitches</td>
<td>45.23</td>
</tr>
<tr>
<td>SL8</td>
<td>6.58ha</td>
<td>200 dwellings + 3 traveller pitches</td>
<td>30.40</td>
<td>250 dwellings + 3 traveller pitches</td>
<td>37.99</td>
</tr>
<tr>
<td>SL9</td>
<td>19.5ha</td>
<td>120 dwellings (86 – Merlewood, 34 – rest of site)</td>
<td>6.15</td>
<td>120 dwellings (86 – Merlewood, 34 – rest of site)</td>
<td>6.15</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>74-99 dwellings (40-65 – Merlewood*, 34 – rest of site)</td>
<td>3.79-5.08</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>40-65 dwellings (40-65 – Merlewood*)</td>
<td>2.05-3.33</td>
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<tr>
<td>SL10</td>
<td>5.27ha</td>
<td>150 dwellings + 2 traveller pitches</td>
<td>28.46</td>
<td>140 dwellings + 2 traveller pitches</td>
<td>26.57</td>
</tr>
<tr>
<td>SL11</td>
<td>4.7ha</td>
<td>150 dwellings + 2 traveller pitches</td>
<td>31.91</td>
<td>150 dwellings + 2 traveller pitches</td>
<td>31.91</td>
</tr>
<tr>
<td>SL12</td>
<td>14.1ha</td>
<td>230 dwellings + 2 traveller pitches</td>
<td>16.31</td>
<td>200 dwellings + 2 traveller pitches</td>
<td>14.18</td>
</tr>
<tr>
<td>SL13</td>
<td>12.1ha</td>
<td>400 dwellings</td>
<td>33.06</td>
<td>400 dwellings</td>
<td>33.06</td>
</tr>
<tr>
<td>SL14</td>
<td>7ha</td>
<td>175 dwellings</td>
<td>25</td>
<td>175 dwellings</td>
<td>25</td>
</tr>
<tr>
<td>SL15</td>
<td>3.9ha</td>
<td>110 dwellings + 2 traveller pitches</td>
<td>28.21</td>
<td>120 dwellings + 2 traveller pitches</td>
<td>30.77</td>
</tr>
<tr>
<td>SL16</td>
<td>1.93ha</td>
<td>35 dwellings + 1 traveller pitch</td>
<td>18.13</td>
<td>35 dwellings + 1 traveller pitch</td>
<td>18.13</td>
</tr>
<tr>
<td>SL17</td>
<td>4.14ha</td>
<td>125 dwellings</td>
<td>30.19</td>
<td>125 dwellings</td>
<td>30.19</td>
</tr>
<tr>
<td>SL18</td>
<td>3.1ha</td>
<td>70 dwellings</td>
<td>22.58</td>
<td>75 dwellings</td>
<td>22.58</td>
</tr>
</tbody>
</table>

* Landowner representations to Regulation 19 Part 2 (May 2018), pp3-4 (representor ID 744).
Appendix 2

Policy SL9: Housing Allocation at Virginia Water North

Technical advice on highways; heritage; landscape and ecology; and landownership
1.0 Introduction

1.1 We have been instructed by the Wentworth Residents Association (WRA) to object to Virginia Water North, Policy SL9 of the draft Runnymede Local Plan.

1.2 The objection is based on the submission put forward by Leigh Thomas of Colliers International on behalf of the promoter of the Merlewood part of the site, Elizabeth Finn (trading as Turn 2 US) and, in particular, the Transport Note prepared by JMP.

2.0 Virginia Water North (Policy SL9)

2.1 Having reviewed the JMP Transport Note we have the following concerns:

 ► The deficiency of the site access proposals;
 ► The inadequacy of Hollow Lane to serve development;
 ► The inadequacy of the junction of Callow Hill with Hollow Lane and Callow Hill itself;
 ► The traffic impact of the proposals; and,
 ► The sustainability of the site.

2.2 These concerns are explained below.

Site Access Proposals onto Hollow Lane

2.3 The JMP Transport Note refers (at paragraph 4.5) to the fact that Hollow Lane does not have a signed speed limit. It states that;

‘... it was observed that vehicles were driving at an appropriate speed for the nature of the road, which is to say between 20 and 30mph.’

2.4 Paragraph 4.6 then goes on to state that;

‘At this location, Hollow Lane is straight and the visibility requirements in Manual for Streets for a 20mph road (2.4 x 25.0m) can be achieved.’

2.5 It is thus noted that, firstly, the actual speed of vehicles on Hollow Callow Lane has not been properly assessed by a survey, and secondly, the lower of the assumed speeds has been taken for the design of the access proposals. This is not a suitable method of designing the access and could lead to safety concerns.

2.6 The ‘indicative site access design’ is shown on Drawing ST17258-01, given in Appendix C of the Technical Note. The drawing shows 2 sightlines, both based on vehicle speeds of 20mph (85th percentile). The first (shown green) is 2.4m x 25m, as described above, and in accordance with Manual for Streets. The second (shown red) is 2.4m x 70m in accordance with DMRB requirements. The first sightline can be accommodated within the land ownership of the promoter, whereas the second sightline cannot, as clearly shown on the drawing.

2.7 The assumption is that JMP, on behalf of the promoter, is not confident whether an adequate sightline can be achieved in terms of land ownership and the application of appropriate guidance.
Hollow Lane

2.8 Hollow Lane is generally about 4.5m wide between Callow Hill and the site access. Manual for Streets (Figure 7.1) illustrates that a width of 4.8m is appropriate for the passage of a car and HGV or 5.5m for 2 HGV’s. Given the potential of this site to accommodate approximately 40 dwellings (or more), the width should be at least 4.8m. The width of Hollow Lane is thus inadequate to serve the proposed development site and it is necessary to widen Hollow Lane to comply with the MFS guidelines.

2.9 There is no footway between the site access and Callow Hill. This is a significant deficiency in connecting the site to Callow Hill, and hence bus stops, the train station and other facilities.

2.10 It is also noted that there is a bridleway along Hollow Lane. It will thus be necessary to widen Hollow Lane to accommodate the passage of vehicles and the safe movement of pedestrians and cyclists. The promoter of the site has not put any widening of Hollow Lane forward presumably because of land ownership issues. This is a major deficiency of the scheme.

The Junction of Hollow Lane and Callow Hill

2.11 It is apparent that the sightlines at this junction are substandard. Callow Hill is a distributor road subject to a 40mph speed limit. With reference to the Design Manual for Roads and Bridges (DMRB), sightlines of 2.4m x 120m should be provided. From observation it is likely that the existing sightlines are less than half this. There may be some opportunities to improve the existing sightlines by clearing back vegetation, but it is apparent that the required sightlines cannot be achieved within highway land.

2.12 There are numerous concerns with regards to pedestrian access. Paragraph 4.8 of the JMP Transport Note refers to the site being:

‘...in an accessible location, with strong connections by foot and cycle with a footway approximately 1.0m wide, slightly below the 1.2m recommended width, present on the western side of Callow Hill....’

2.13 Several concerns arise from this. Firstly, pedestrians walking down Hollow Lane will need to cross to this footway at its junction with Callow Hill. As explained above, the available sightlines are below standard and thus pedestrians face a potential danger in crossing the road.

2.14 Secondly, the JMP Technical Note does not reference the guidance stating that 1.2m is the recommended width of a footway. Manual for Streets (Paragraph 6.3.22 states) that;

‘... the minimum unobstructed width for pedestrians should generally be 2m.’

2.15 MFS also refers to Inclusive Mobility guidance. In section 3.1 this guidance also refers to a clear width of 2m to allow 2 wheelchairs to pass one another comfortably and should be regarded as the minimum under normal circumstances. It goes on to state;

‘Where this is not possible because of a physical constraint 1.5m could be regarded as the minimum acceptable under most circumstances. The absolute minimum, where there is an obstacle, should be 1m clear space. The maximum length of restricted width should be 6m.’

2.16 It is readily apparent therefore, that a footway width of 1m is very substandard. Reference to MFS (Figure 6.8) shows that at 1m it is not possible for a pedestrian to pass a wheelchair (width 0.9m) without stepping onto the road. Similarly, a width of the 1.2m is required for a child to walk with adult. This means that the footway is not suitable for walking a child to school.

The Traffic Impact of the Proposals

2.17 The Transport Note assesses the traffic impact of the proposal based on 40 dwellings. However, the landowner’s representations to the Regulation 19 Part 2 (May 2018) Local Plan consultation suggest a range of 40-65 dwellings (pp3-4, representor ID 744). Moreover, the emerging Local Plan proposed to allocate the site for 120 dwellings. The Transport Note thus underestimates the likely traffic impact of the proposals and the implications of a development greater than 40 dwellings has not been assessed.
2.18 The Transport Note does not consider the traffic impact of the proposal on key junctions, most notably, the signalised junction of Sandhills Lane, Trumps Green Road, Stroude Road and Christchurch Road near the station or the junction of Christchurch Road with the A30 London Road. These junctions suffer congestion in the peak hours and should be assessed particularly, given the Transport Note has been based on the low end of possible development. Until these junctions have been assessed it is not possible to state whether the traffic impact of the proposal is acceptable.

**The Sustainability of the Site.**

2.19 The JMP Transport Note refers to the closest bus stops to the site as being located on Virginia Water Station Parade approximately 1.9km, or a 24 minute walk from the site. These stops are served by the 567 service connecting Staines, Egham and Virginia Water with a frequency of every 2-3 hours.

2.20 Additional bus stops are located on the A30 London Road to the west of Virginia Water, approximately 1.9km, or a 24 minute walk, from the site. These stops are served by the 500 service between Staines and Frimley Park Hospital via Virginia Water, Sunningdale and Camberley with a frequency of every 1.5 – 2 hours.

2.21 The JMP Transport Note, at paragraph 3.13, states that;

> These stops are within the preferred maximum walking distance for commuting or travelling to school and therefore would be acceptable for these trips.

2.22 The reference to guidance is not given but if it is assumed to be ‘Providing for Journeys on Foot’, CIHT, 2000’ the walk distance for commuting or schools is 500m desirable, 1,000m acceptable and 2,000 preferred maximum. However, this guidance has been incorrectly applied in that it is not the distance to a bus stop but the distance to a place of work or school. Given the infrequency of the available bus services it would certainly not be attractive to walk 1.9km or for 24 minutes to a bus service that runs every 1.5-3 hours.

2.23 With this length of walk and the potential uncertainty of the timing of bus services to the stop, there would be risk of missing the bus and having to wait hours for the next one. This would not encourage sustainable travel. Indeed, the JMP report, at paragraph 3.16 recognises this fully by stating;

> ...it is unlikely that they will use the local bus service to access employment (commuting trips), instead using the train or car. This is likely due to high levels of car ownership and the limited bus services available in Virginia Water due to lack of demand.

2.24 Finally, paragraph 4.10 of the JMP Transport Note, states;

> To enhance the sustainability of the site and encourage future residents to travel by sustainable modes, reasonable contributions in compliance with policy ‘tests’ could be made to local transport improvements in the vicinity of the site and may include pedestrian and cycle links.

2.25 The difficulty with this statement is that there are no specific proposals made and it is difficult to imagine any that could come forward. As explained above, the width of Hollow Lane is narrow and cannot accommodate any footway provision and, similarly, the width of the existing footway on Callow Hill cannot be improved. The offer of a contribution for local transport improvements should not carry any weight.

2.26 It is thus readily apparent that the site is not sustainably located.

**3.0 Conclusions**

3.1 It is thus concluded as follows:

- It has not been proved that the site access proposals onto Hollow Lane are acceptable;
- Hollow Lane is unsuitable to accommodate vehicles, pedestrians and cyclists as it is narrow with no footway and cannot be widened within public highway;
- The junction of Hollow Lane and Callow Hill is substandard and cannot be improved within public highway;
► The width of the footway on the western side of Callow Hill is substandard and cannot be improved;
► The traffic impact of the proposals has been underestimated; and,
► The site is not in a sustainable location given its distance to bus stops, the railway station and local facilities and the available bus service is infrequent.

3.2 It follows that the site should be deleted from the draft Runnymede Local Plan.
Virginia Water North Site Allocation ID 258

Built Heritage Appraisal

Savills Heritage Planning on behalf of the Wentworth Estate Residents Association
1. Background and scope

1.1. The following Appraisal has been undertaken on behalf of the Wentworth Residents Association by the Savills Heritage Planning Team at Savills (UK) Ltd and has been prepared by Paul Robertshaw IHBC AssocRTPI BA(Hons) MA, Associate Director, Heritage Planning.

1.2. Mr Robertshaw holds an undergraduate degree (Bachelor of Arts) in History of Art and Architecture from the University of York and a postgraduate degree (Master of Arts) in Historic Building Conservation from the University of Newcastle Upon Tyne. He has fourteen years professional experience in building conservation gained in the public, private and charity sectors.

1.3. Before joining Savills (UK) Ltd, Mr Robertshaw was Senior Design and Conservation Officer at the City of London Corporation, Conservation Officer at the London Borough of Croydon, and Caseworker at the Georgian Group. In those roles, he held responsibility for advising on development proposals affecting a wide range of heritage assets, contributing to local planning policy and design guidance and processing planning and listed building consent applications.

1.4. The assessment has been carried out in accordance with Historic England guidance in respect to the identification of the significance of heritage assets and the impact of proposals upon that significance. The assessment is based on desk-based research and a visual site survey undertaken from public vantage points at its perimeter. Archaeology is outside the scope of this report, which is focused on historical development and built heritage.

2. The Site, its history and wider context

2.1. The area under consideration, hereafter ‘the Site’, is in the Virginia Water area of Surrey, located north of Christchurch Road and the Wentworth Estate, east of Callow Hill and south of Hollow Lane. The Site comprises three parcels of land which are, east to west, Gorse Hill House and Gorse Hill Manor, Merlewood and Kenwolde which are substantial houses in extensive gardens with ancillary buildings (see Figure 1).

2.2. Windsor Great Park and Virginia Water lies to the north and west of the Site, while to the east side of the railway line is the former Holloway Sanatorium converted as part of the Virginia Park residential estate in the 1990s. The area is dominated by pinewood trees which line the roads and fill spaces between development. The landscape character of the area has been assessed in the Surrey Landscape Character Assessment (April 2015, HDA) and is included in the ‘SS4 Wentworth to Sheerwater Settled and Wooded Sandy Farmland’ character area, which has identified characteristics which include a number of watercourses and ponds, considerable areas of woodland including some ancient woodland, dispersed settlement, and a general sense of seclusion.
2.3. There is evidence that in the area’s early history the Roman road between London and Silchester ran close by\(^1\), while the presence of Hollow Lane implies a route of historic interest. The large fishpond and additional smaller pond within the Site boundary, south of Merlewood are suggestive of medieval activity, with fishponds being commonly being utilised by large country estates for food production and recreational purposes in that period. The medieval forest of Windsor is believed to have historically extended at its southern edge to the stream running from Virginia Water, or the Bourne, which lies a short distance to the south\(^2\). Although Windsor Great Park has terminated beyond the northern edge of the site since at least the 19\(^{th}\) century, this implies the site was within its extents in an earlier period, with its mature wooded landscape character attesting to this fact (see Figure 3). These aspects of the Site, including the significance of historic routes and potentially significant historic landscape features including the fishpond/s, would benefit from further detailed study outside the scope of this report.

2.4. The Virginia Brook was dammed from the 1740s to create the Virginia Water Lake, with extensive associated landscaping works and folly structures erected over successive decades. Between the current extents of the Park and the Site is the Clockcase tower, an elevated belvedere dating from the 1750s.

2.5. The development of the area in the 19\(^{th}\) century followed the arrival of a railway station at Virginia Water in 1856, with substantial houses and estates built including those detailed below. Christchurch, Virginia Water (unlisted) was built in 1838 and has a number of historic memorials within its churchyard, including the Grade II listed tomb of Count and Countess Morella of Wentworth House. The former Royal Holloway Sanatorium was built east of the railway line within 23 acre grounds from 1873 by philanthropist Thomas Holloway and is considered one of the Victorian era’s most notable buildings (see Figures 4-6).

3. **Heritage Assets - description, setting and significance**

3.1. The Site does not lie within a conservation area or include any statutorily listed buildings, but there are a number of designated and non-designated assets whose setting have the potential to be impacted by its development (See Figure 2).

3.2. To the east of the site lies the Grade I listed former Holloway Sanatorium (List Entry Number: 1189632) and its Grade II* former chapel (List Entry Number: 1119659). Despite their monumental scale, these buildings have no visual or historical connection with the Site, being separated by the deep railway cutting, and therefore they will not be considered further in this report. The Grade II listed Tomb of the Count and Countess Morella (List Entry Number: 1028903) is within the Churchyard of Christchurch, Virginia Water.

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\(^1\) [http://www.jimgoddard.myfreeola.uk/romanegham/lostrd.htm](http://www.jimgoddard.myfreeola.uk/romanegham/lostrd.htm)

Near the site are two further locally listed houses: Hangmoor and Hollow Lane House, which have settings limited to their respective, private enclosed grounds.

3.3. The following assets are considered of relevance to the potential development of the Site and their significance is summarised below:

**The Royal Estate Windsor, Windsor Great Park, Virginia Water including fort Belvedere and Clockcase – Grade I Registered Park and Garden**

3.4. Windsor Great Park lies to the west of the Site as part of the extensive designated area of the Royal Estate. A small separate circular designated area closer to the Site’s western edge denotes the location of the 18th century Clockcase belvedere tower. The Park is highly significant in historical, aesthetic, communal and evidential terms, owing to its long history and links to royals, notable events, architects and designers. The Clockcase tower and adjacent keepers house, whilst apparently not listed or locally listed, are similarly highly significant as an 18th century structures with clear links to the main Royal Estate.

3.5. The setting of the Clockcase Belvedere is primarily to the west in the direction of the Lake, being presumably designed as a location to view the Lake and gardens. Originally built on a non-wooded hill, the tower has since been enveloped in woodland that restricts any views to and from the building, although in recent years the woodland has been opened up to re-establish a visual connection between the Great Park/Virginia Water and the tower.

3.6. The Site shares a historical relationship with the Registered Park and Garden and could therefore be considered to fall within its setting. However, since the 19th century (and possibly earlier) this relationship has been eroded and through the development of the Site and its environs for private residential estates. The undeveloped, wooded part of the Site, which includes features of historic interest has the potential to relate to the Royal Estate and medieval activity in the area subject to further assessment.

**Merlewood, Hollow Lane (locally listed)**

3.7. Merlewood is a substantial mid-Victorian house in an elevated position north of the site, currently occupying approximately 23 acres of grounds which incorporate ancillary buildings and mature trees and landscaping. Imposing and architecturally attractive, the building is considered to possess aesthetic and to be of medium significance. Its landscaped garden setting to the south, overlooking the area of the Site, is considered to contribute its significance.
3.8. Despite the addition of modern extensions associated with its present use as a care home, the building retains a great deal of its 19th century character and setting. The vacant lodge to Merlewood to its north-west is similarly attractive, contributes to the value of the main house, and could be considered a non-designated heritage asset in its own right.

**Wentworth Estate (non-designated)**

3.9. The Estate was initially laid out between 1922 and 1931 by W.G. Tarrant in the grounds of Wentworth House, a Gothic-revival mansion of 1805 now the Wentworth golf club house. Pevsner describes the houses of the Estate as ‘immaculately laid out’ and part of ‘the best expensive suburb in Surrey…worth a visit’, as well as identifying the area as one of the best examples of a village suburb in Surrey, and noting particular houses of interest (Nairn and Pevsner, Buildings of England: Surrey, 1971). The Estate is characterised by large detached houses with mature gardens, set amongst a natural pinewood landscape with well-maintained roads and spaces incorporating high quality bespoke signage and boundary treatments. Houses date from between 1922 and the present day, being of a variety of styles heavily influenced by Surrey vernacular and Arts and Crafts architecture.

3.10. The Wentworth Estate is not designated as a conservation area and does not include any statutorily or locally listed buildings, but could however be considered to possess a degree of aesthetic and historic interest which is worthy of protection. It is worth noting that a comparable estate identified by Pevsner, Upper Woodcote Village in Purley, has been designated as a conservation Area since 1973 with the adjoining Webb Estate designated in 1983. The Webb Estate conservation area includes a number of locally listed 1920s houses and shares a number of characteristics with the Wentworth Estate. The Site has a close relationship with the Wentworth Estate and provides it with a semi-rural setting which helps to reinforce its strong garden village character and significance.

**Kenwolde Place/Manor, Kenwolde Lodge and Kenwolde Coach House, Callow Hill (non-designated)**

3.11. A substantial Victorian residence with coach house and lodge building now in use as separate dwellings. They can be seen to exist from the 1870s based on OS maps. Like Merlewood, the properties are within substantial mature landscaped gardens and enjoy an open aspect to the lower ground of the allocation site. Although altered as part of their conversion and subdivision, the buildings are attractive examples of their type which make a strong contribution to the local character and distinctiveness of the area. Individually and as a group the buildings are deemed to possess aesthetic value which provides a level of significance that could be eligible for consideration as non-designated heritage assets / locally listed buildings based on Historic England guidance.

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3 [https://www.croydon.gov.uk/sites/default/files/articles/downloads/Webb_Estate_CA_Appraisal_SP1.pdf](https://www.croydon.gov.uk/sites/default/files/articles/downloads/Webb_Estate_CA_Appraisal_SP1.pdf)
Additional potential assets

3.12. In addition to the designated and non-designated assets currently identified, a number of buildings within or in the vicinity of the Site have the potential to be considered non-designated heritage assets should a review be undertaken in accordance with Historic England guidance.

3.13. These include Christchurch and associated monuments within its churchyard, Christchurch Road, and the lodge to Merlewood, Hollow Lane, and the 19th century Kenwolde buildings. As noted above, the Wentworth Estate shares a number of characteristics with existing designated conservation areas, while examples of the best earlier houses in the Estate may also warrant local listing subject to a future review.

4. Impacts

4.1. The above high level assessment has identified a number of designated and previously identified non-designated heritage assets which have the potential to be impacted by the development of the Site. In assessing the impacts, and in accordance with NPPF policies, any harm identified would need to be balanced against the benefits of the proposals.

4.2. The Site has a historic relationship with Windsor Great Park, with map and documentary evidence suggesting it formally lay within the wider parkland, as well as indicating the presence of historic features. The Clockhouse Belvedere tower lies between the Park and Site in an elevation position which was historically open in aspect. The Site is therefore considered to make a modest contribution to the significance of the Grade I Registered Park and Garden and features within it. Its development has the potential to result in minor harm to the asset’s setting and significance.

4.3. Merlewood is significant as a locally listed building, with its ancillary buildings and landscaped garden setting contributing to its significance. The buildings at Kenwolde are considered of comparable heritage value to Merlewood, being of a similar date, scale and character, but not currently locally listed. The development of housing within the grounds / on the site of these properties is likely to diminish their heritage value and potentially cause harm to their significance.

4.4. The Wentworth Estate has historic origins and characteristics which are suggestive of heritage value. As a garden village incorporating numerous high quality individual properties, identified by Pevsner as being of notable quality, and comparing favourably with an existing designated conservation area, the Estate is considered to possess heritage significance. The Site is within the setting of the Estate and consequently its development has the potential to diminish its setting and significance by undermining its distinctive garden village character.
5. Conclusions

5.1. As assessed within this heritage appraisal, it is considered that the Site makes a contribution to the setting and significance of the Grade I Registered Park and Garden of Windsor Great Park. Locally listed and other potential non-designated heritage assets within and near the Site, as well as the Wentworth Estate, are found to have heritage significance.

5.2. Furthermore, the Site has features that suggest archaeological potential and additional historic significance.

5.3. The development of the Site is likely to undermine the value of the assets, and could have a detrimental, and potentially harmful, impact on their significance. Any harm identified would need to be balanced against the benefits of the proposals.

6. Maps and Images

Figure 1: aerial image showing the site allocation area (outlined in red)
Figure 2: listed and locally listed buildings in the vicinity of the site. Runnymede District Council.

Figure 3: Excerpt from Rocque Map of Surrey, 1767 (general area of the Site in red)
Figure 4. OS Map 1869-70. Mapping provided by Groundsure

Figure 5. OS Map 1894. Mapping provided by Groundsure
Figure 6. OS Map 1934. Mapping provided by Groundsure

Figure 7. OS Map 1960. Mapping provided by Groundsure
LANDSCAPE AND VISUAL REPRESENTATIONS

POLICY SL9: VIRGINIA WATER NORTH
FOR THE RUNNYMEDE LOCAL PLAN EXAMINATION, SURREY

on behalf of

Wentworth Residents Association

HDA ref: 915.1 v2
January 2019
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**PLANS**

HDA VWN1: Key Landscape Characteristics
INTRODUCTION

1.1 This assessment has been prepared on behalf of Wentworth Residents Association (WRA) by Hankinson Duckett Associates (HDA) to accompany WRA’s response to the Examination in Public of Runnymede Borough Council’s 2030 Local Plan (RBC LP). This report should be read in conjunction with the Hearing Statement produced by Shrimplin Brown Planning & Development Ltd, to support WRA’s representations to the Local Plan (this report is an appendix to the Hearing Statement).

1.2 WRA objects to the proposed Policy SL9: Virginia Water North site (VWN) for 120 new homes. The VWN site includes part of the Wentworth Estate (where it coincides with the properties of Gorse Hill House/Mulberry House and Gorse Hill Manor), the boundaries of which wrap around the site, except on its western edge, where it adjoins the road of Callow Hill, and excludes the property of Corner Wood, to the north of Hollow Lane at its junction with Callow Hill. This report summarises the main landscape and visual effects of siting proposed housing development in this suggested location.

SITE CONTEXT

2.1 General Description

2.1.1 The site is located on the northern edge of Virginia Water, which is described as ‘a commuter village’ with a population of 5,940 at the 2011 census. The site is approximately 2km from the interchange between the M25 and M3 motorway, which lies to the south-east of the site. The site is bound to its west by the road of Callow Hill, to the north by Hollow Lane and to the south and east by Gorse Hill Road. The site has an area of 19.5 hectares, with approximately 6.94/9.4ha (development site area excluding and including nursing home) of that occupied by the Merlewood Nursing Home (run by Elizabeth Finn Care trading as Turn 2 Us). The site is accessed from Hollow Lane, which is a single track road and public bridleway, connecting Callow Hill to the west with Gorse Hill Road to the east (though for pedestrians only).

2.1.2 Existing residences to the south and east of the site lie within the Wentworth Estate, which is a 1920s-founded estate of houses and woodland across 7 square kilometres around the Wentworth Golf Club. As the roads were laid out in the 1920s, when horses were the accepted mode of transport, the estate roads are narrow and winding, and form part of the semi-rural character of the Wentworth Estate.

2.1.3 The majority of the properties adjoining the site date from the interwar period. All properties on the Wentworth Estate are subject to a number of covenants designed to maintain the character of the estate. Planning applications within the estate’s statutory boundary are considered by the Wentworth Estate Roads Committee. Planning guidance promotes the following:
“Individual private houses for family occupation, each separated from every other in a predominantly tree covered setting, giving a rural feel. The Committee will not allow sub-division of an Estate plot or multiple dwellings on a single Estate plot. Any proposed development should be designed and sited so it does not detract from the character of the Estate.

2.1.4 Residents of the Wentworth Estate are thus constrained in their proposals for the development of their property with regard to its distance from boundaries, its height, the placing of outbuildings, entrance gates and security features, trees, landscaping and external lighting, and renewable energy solutions. The current landscape character of the Estate is, in part, a direct result of this careful management since the 1960s. If development were permitted on the VWN site, then developers of the site (and subsequent home-owners) would not be subject to the same level of scrutiny or the same level of constraints as exist for adjacent landowners. For example, extensions or outbuildings could be permitted which would bring built development in close proximity of boundaries of existing dwellings to the south of the site.

2.2 Key Landscape Characteristics

2.2.1 Hollow Lane is aligned along a localised ridge of high ground which rises to a maximum height of approximately 70m Above Ordnance Datum (AOD). From this ridge, the site falls to the south, towards the valley of the River Bourne, to approximately 45m AOD at the site’s lowest point. The properties of Kenwolde Manor (in the north-west corner of the site), Merlewood and Gorse Hill House/Mulberry House are located on relatively level, though high ground, along the northern edge of the site. To the south of these properties, the land falls quite steeply in places. The Council’s Site Capacity Analysis (December 2017) notes that “the varying topography of the site may reduce developable area further”.

2.2.2 The north-west corner of the site consists of private gardens associated with Kenwolde Manor, which has been sub-divided into four, together with the properties of Kenwolde Lodge and The Coach House, which front onto Hollow Lane. These gardens back onto woodland enclosing the south-west edge of the site. The central part of the site is occupied by the Merlewood Nursing Home. This is a large 19th Century house, which has been extended to its east. The car park for the Nursing Home fronts onto Hollow Lane. Merlewood overlooks its associated formal garden area immediately to its south, beyond which lies unmanaged grassland with a parkland character. This parkland is separated from the formal garden area by a belt of mixed woodland and slopes down to a large pond, surrounded by trees (with potential for Great Crested Newts). To the east of Merlewood lies the property of Gorse Hill House/Mulberry House with its extensive gardens (part of the Wentworth Estate). Between this property and Gorse Hill Manor in the north-east corner of the site (also part of the Wentworth Estate) lies an open paddock, which contains a small pond (surrounding by decking).
2.2.3 The site is well-wooded in parts and contains several fine mature specimen trees (e.g. Cedars, Redwood, Spruce, Larch, Cooper Beech and Lime). In the ‘Landscape Guidelines’ section of the Surrey Landscape Character Assessment for Character Area SW1 (in which the site lies, see Section 2.3 below) it recommends that ‘Built Development’ should “conserve the sense of seclusion with sparse settlement enclosed by woodland”. Despite the site containing many fine specimen trees, none are the subject of Tree Preservation Orders (TPO). The site does, however, form an important treed backdrop to properties on the Wentworth Estate to the south. No formal investigation of the ecological value of the site appears to have been undertaken either by the Council or the site’s promoter ahead of its allocation, the results of which may have a bearing on the delivery of the site for housing.

2.2.4 Hollow Lane is a narrow, no-through road, with woodland encroaching upon its northern edge, which gives it a rural character. Along its southern edge, it is bound by high brick walls, particularly where it is adjacent to the former walled garden of Merlewood. There is a paucity of public rights of way in the area around the site, therefore Hollow Lane has added importance as a public recreational route and its high usage is evident from wear on the ground.

2.3 Landscape Character

National Scale

2.3.1 The site lies on the north-eastern edge of the Thames Basin Heath National Character Area (NCA 129, Natural England, February 2014), with the boundary of the adjoining NCA 115 – Thames Valley, formed by the A30, lying 800m to the north-west of the site. The key characteristics of NCA 129 of relevance to the area around the site include ‘high woodland cover’ with ‘conifers and large plantations on former heathland’ being ‘dominant features in the east’. It is also noted that “acid, leached soils mean that farming on the plateaux is limited to rough pasture, and that alternative land uses (such as forestry, golf courses and horse paddocks) have emerged”.

District Scale

2.3.2 Landscape character at the district-scale is defined in the RBC section of the Surrey Landscape Character Assessment (April 2015, HDA). The site lies within the county-wide ‘Sandy Woodland’ landscape type, and more specifically in the ‘SW1: Virginia Water Sandy Woodland’ character area. The key characteristics of the SW1 character area include:

- An undulating landscape;
- Extensive areas of deciduous and coniferous woodland and plantation, including areas of ancient woodland…….Views are obscured by woodland generally, but there are often long vistas along routes cleared through woodland;
There are occasional scattered large houses, small groups of low density dwellings along roads, and complexes of buildings.... Buildings are contained within surrounding woodland and are not overly intrusive.

This is a generally enclosed, intimate landscape, with remote peaceful areas of woodland, however, heavy recreational use does reduce the sense of tranquillity in many areas. Human influence including roads and filtered views of settlement limits remoteness in places, more noticeably to the east. However, the eastern part of the character area separates Egham from the settlement of Virginia Water, and provides a wooded setting to the Thames Valley floor adjacent to the east.

2.3.3 In the ‘Evaluation’ section for the ‘Sandy Woodland’ landscape type, the following ‘key positive landscape attributes’ are of relevance to the site:

- Areas of dense, dark, undisturbed woodland;
- Peaceful, mostly secluded landscape with limited settlement;
- Sense of intimacy, with views contained by woodland.

2.3.4 The ‘Evaluation’ section for the ‘Sandy Woodland’ landscape type also suggests that “pressure for expansion of settlement and roads” is one of the ‘future potential forces for change’. In the ‘Landscape Guidance’ section for this landscape type, under ‘Built Development’ the following guidance is recommended:

- Conserve the sense of seclusion with sparse settlement enclosed by woodland;
- Maintain the wooded and undeveloped skyline.

2.3.5 RBC’s landscape evidence to support the emerging Local Plan seems to rely wholly on the Surrey Landscape Character Assessment, though the descriptions of the landscape character areas do not provide judgements regarding the sensitivity of specific sites to changes arising from development in landscape and visual terms. Other than the Green Belt Review reports produced on behalf of RBC by Ove Arup and Partners (Arup), no landscape and visual appraisals have been undertaken by the Council, or external consultants on its behalf, for the emerging allocations for housing development.

2.3.6 A Landscape and Green Belt Appraisal (LGBA) has been prepared on behalf of the promoters for the Merlewood part of the VWN site (by The Landscape Partnership (TLP), August 2016). The TLP LGBA was submitted, together with a preliminary indicative masterplan prepared by Ayre Chamberlain Gaunt, as part of the representations made by Colliers International to the Issues, Options and Preferred Approaches (IOPA) consultation on behalf of Elizabeth Finn Care trading as Turn 2 Us (Rep 744).

2.3.7 RBC produced an ‘Urban Area Character Appraisal’ (September 2009) which defines the Virginia Water urban area as having “a distinct urban character in contrast to the rural and semi-rural Green Belt surroundings which include very low density housing including part of the Wentworth Estate”. The site lies outside the defined urban area, but adjoins one of
six broad character sub-areas; ‘The Wentworth Estate in the urban area’, which it describes as “the closer-knit part of the Estate north and south of Christchurch Road, bounded by the railway to the east and Wellington Avenue (Callow Hill) to the west”. The character of the land uses surrounding the VWN site is thus of very low density housing. If the VWN site were to be developed, this distinctive local character should be respected, however, the proposed density of development would not be able to reflect RBC’s aspirations for 30 dwellings per hectare without being out of character.

2.4 Landscape Planning Designations

2.4.1 The whole site is within the Metropolitan Green Belt, with the Green Belt boundary aligned along the site’s southern boundary. The impact and significance of this designation are discussed later in this report. The site also falls within the Thames Basin Heaths SPA 5km Buffer Zone (thus development of the VWN site would trigger a requirement for the provision of Suitable Alternative Natural Greenspace - SANG). At the Stage 1 Hearing Sessions a table (RBCLP 09) and plan (RBCLP 09a) was circulated listing SANG that could serve different development sites. The table explains that “land to the north of Hollow Lane” is “Publicly owned land, currently being managed, so would not be available in the short term. Land adjacent to land owned by one of the allocations, so together could provide a site of 10 ha or more.” The plan is indicative and does not outline specific boundaries, thus making it impossible to properly interrogate. As the land for the SANG is not within the ownership of the promoters of VWN and is not available in the short term there is significant doubt about its delivery and therefore about the delivery of VWN.

2.4.2 The original part of the house of Merlewood dates from 1850 and is included in RBC’s list of ‘Buildings of Local Architectural or Historical Interest’. Local Plan Policy BE13 addresses Locally Listed Buildings. The Surrey Historic Environment Record provides the following description for Merlewood (reference SSHER 13645):

A small estate of mid-19th century with pleasure gardens and an open setting to the south. The house is redeveloped but does not impinge upon the general character of the grounds that remain from the 19th century with some small additions and adjustments. It is adjoined on the west by Kenwalde (HER 13641), a contemporary house and grounds, and together they reinforce each other’s interest.

2.4.3 The adjacent Kenwalde Court, as referred to above, is also described in the Surrey Historic Environment Record as follows:

A large garden of the mid-19th century that retains its essential character despite late 20th century division of the house. Documents mention 15 acres or so of gardens, pleasure grounds, tennis courts, croquet lawn and a particular feature of an elliptical rose garden. The house was offered for sale in 1920 and c. 1950 it was bought by the London County Council and opened as an old people’s home. It is adjoined on the east by Merlewood (HER 13645), a contemporary house and grounds, and together they reinforce each other’s interest.
2.4.4  The area to the north of Hollow Lane is designated in the current Runnymede Local Plan as an Area of Landscape Importance (Policy NE8). In this area (Coopers Hill, Egham Hill, Callow Hill and Runnymede Meadows), the Council will apply the following policies:-

1)  *Special care will be taken in relation to any proposed development to ensure its siting, scale, height, design and materials are in keeping with the surrounding landscape.*

2)  *The Council will safeguard the tree cover and require extensive landscaping of new development.*

3)  *Informal recreational use of and public access to these areas will normally be encouraged.*

2.4.5  The area east of the railway line (within 0.3km of the site) is designated as a ‘Landscape Problem Area’ (Policy NE10). In this area (Stroude/St Ann’s Heath), the Council will “seek to improve the appearance of the landscape through development control and other powers and negotiations. This policy applies only within the Green Belt and sites covered by Policy GB8’.

2.4.6  The area north-west of the A30 (within 0.8km of the site) is ‘Windsor Great Park’, which is included on Historic England’s Register of Parks and Gardens of Historic Interest, and includes the Grade I Virginia Water and Savill Garden (Policy BE8). Although there is no intervisibility between the VWN site and the historic park, its presence so close to the site is an indication of the high landscape quality of the surrounding area.

2.4.7  To the north of the site lie large areas of woodland, including single-age, coniferous plantations and within 90m of the site, to its north-east, an area of Ancient Woodland (Policy NE12) known as The Dell Wood/Great Wood. These woodlands add to the enclosed nature of the area.

2.4.8  In summary, the landscape character of the site is dictated by its sloping landform, its wooded nature and parkland features, which results in the site’s intimate, enclosed character. The low density of adjacent development in combination with the site’s tranquillity and relative remoteness results in a landscape of High sensitivity to development.

2.5  **Visual Receptors**

2.5.1  Vegetation within the site and along its boundaries limits most views into the site from publically accessible locations, however, where views are not curtailed by adjacent built development, opportunities to obtain views into and across the site are possible from Hollow Lane, which is also a public bridleway.
2.5.2 Given the elevated nature of the northern part of the site, it is possible to experience long distance views out from the site over the valley of the River Bourne towards the elevated, wooded skyline of Knowle Hill.

2.5.3 Private residences on the southern edge of the site along Gorse Hill Road (eight properties) and Woodland Road East (two properties) are likely to have views into the southern part of the site. Motorists on these private roads have views of the wooded backdrop of the site beyond the gardens of these properties.

3 ANALYSIS OF LANDSCAPE AND VISUAL PARAMETERS OF THE SITE AND ITS SUITABILITY FOR PROPOSED DEVELOPMENT

3.1 Landscape Assessment

3.1.1 Access to the site was not possible, however on the basis of views from surrounding roads and footpaths, including Hollow Lane, Gorse Hill Road and Woodlands Road, and aerial images, the site is determined as having a predominantly parkland character and as such has the qualities of a valued landscape (paragraph 170 of the Framework). The site’s evident high landscape and historic qualities should, on their own merits, be sufficient to dismiss this site as being unacceptable for new development notwithstanding any other constraints, such as highways.

3.1.2 The Framework seeks to ensure that the density and form of development does not adversely affect local character or harm local distinctiveness. The density of adjacent existing development is low, and this has been taken into consideration in the Council’s Site Capacity Analysis document, which identifies the total minimum capacity for the VWN site as 120 residential dwellings (thus 6.15 dwellings per hectare if the whole 19.5ha is delivered). The promoters of the Merlewood part of the VWN site have indicated that, given the site’s constraints, their site (6.94ha, excluding the nursing home) would be able to accommodate approximately 40-50 homes, with the majority being 4 and 5 bedroom detached dwellings. This gross density of 5.76 to 7.2 dwellings per hectare would be broadly in line with the density of adjacent existing development, and with the Council’s suggested density, however would be contrary to government policy which seeks to make the most efficient use of land. For this site to achieve the housing numbers suggested by the Council, more land within the overall site would need to come forward, however the reality of this is in doubt, particularly given that some land coincides with the Wentworth Estate.

3.2 Visual Assessment

3.2.1 Users of Hollow Lane would have their current views of the parkland character of the site changed by the construction of the site access along this frontage, which would open up views of housing within the body of the site. Alterations to Hollow Lane to accommodate
potential increases in traffic generated by the proposed development would harm the rural character of this lane and result in increased levels of visual intrusion to the residents of Kenwolde Lodge and The Coach House. Elsewhere around the site, it is visually enclosed from publically accessible routes.

3.2.2 In contrast, private houses on the southern edge of the site (on Gorse Hill Road and Woodlands Road East) would have direct views of the proposed development on rising ground, though their views would be filtered through their own garden vegetation and woodland buffers on the perimeter of the site. Nonetheless, these filtered views would be a marked change from their current views of the open, parkland setting of the southern end of the site. Long distance views from the southern side of the River Bourne valley may also be possible, increasing the site’s sensitivity to development.

4 GREEN BELT

4.1 National Green Belt Policy

4.1.1 The whole site is within Green Belt, with the Green Belt boundary aligned along the site’s southern boundary. The National Planning Policy Framework (NPPF, Ministry of Housing, Communities and Local Government, July 2018) states the following:

*The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (paragraph 133).*

4.1.2 Paragraph 134 of the NPPF lists the five purposes of the Green Belt. These are:

a) to check the unrestricted sprawl of large built-up areas;
b) to prevent neighbouring towns merging into one another;
c) to assist in safeguarding the countryside from encroachment;
d) to preserve the setting and special character of historic towns; and
e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

4.2 Local Green Belt Policy

4.2.1 Local Green Belt policy is set out within the Runnymede Local Plan 2001 under saved Policy GB1 ‘Development in the Green Belt’ which states the following:

*Within the Green Belt, except for the area within the settlement of Thorpe, there will be a strong presumption against development that would conflict with the purposes of the Green Belt or adversely affect its open character.*

4.3 Green Belt Review

4.3.1 In December 2014, Arup produced, on behalf of RBC, an independent borough-wide review of the Green Belt. The review was updated by Arup in March 2017 (Green Belt Review Part 2). The site lies within the defined buffers for the Part 2 review, which
considered a 400m buffer around the 2001-defined settlement boundary of Virginia Water (Town Centre/key service centre). The site reference in the Part 2 review is Sub-Area 70. A comparison of the results from the Part 2 review against HDA’s assessment are provided in Table 1 below.

4.3.2 In summary, the Arup study suggested that the VWN site “scores moderately against Purpose 3” and “weakly against Purposes 1 and 2”. We agree with the Arup study, that the site “reflects the general character and openness of the much wider parcel”, thus the wider Green Belt to the north of the site. However, it is considered that the Arup study places too much emphasis on the “configuration of development around its fringes” as being a constraining factor in the site’s integration into the wider Green Belt. The density of built development along Hollow Lane is very low, it provides minimal containment of the site from the wider countryside and does not significantly affect the openess of the Green Belt in this area.
Table 1: Comparative Green Belt Assessment

<table>
<thead>
<tr>
<th>Purpose</th>
<th>Criteria</th>
<th>Arup Assessment</th>
<th>Arup Score</th>
<th>HDA Comments</th>
<th>HDA Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 – To check the unrestricted sprawl of large built-up areas</td>
<td>Prevents the outward, irregular spread of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another.</td>
<td>The sub-area is not physically or perceptually connected to a distinct large built-up area.</td>
<td>0/5</td>
<td>The site is connected to the existing built-up area along its southern edge. Although the northern edge of the site contains the large buildings of Merlewood, Kenwolde and Gorse Hill House, these only form partial containment of the site.</td>
<td>2/5</td>
</tr>
<tr>
<td>2 – To prevent neighbouring towns from merging</td>
<td>Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements.</td>
<td>The sub-area forms a small, less essential part of the gap between Virginia Water and Egham/Englefield Green. It has a contained feel as a result of built-form and dense planting along Hollow Lane, and rising topography to the north contributes further to the sense of severance from the wider countryside. Overall, the gap is of sufficient scale and character that the settlements are unlikely to merge.</td>
<td>1/5</td>
<td>The site is not wholly enclosed by the settlement of Virginia Water and it contributes to the gap between settlements to the north (Egham and Englefield).</td>
<td>2/5</td>
</tr>
<tr>
<td>Purpose</td>
<td>Criteria</td>
<td>Arup Assessment</td>
<td>Arup Score</td>
<td>HDA Comments</td>
<td>HDA Score</td>
</tr>
<tr>
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<td>------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>-----------</td>
</tr>
<tr>
<td>Assist in safeguarding the countryside from encroachment</td>
<td>Protects land which provides immediate and wider context for historic settlement, including views and vistas between settlement and the surrounding countryside.</td>
<td>Approximately 5% of sub-area is covered by built-form. This is concentrated along the northern and western edges of the sub-area, comprising a care home and a manor house with outbuildings and grounds. Long distance views across the sub-area are largely restricted by dense planting, which contributes to a compartmentalised feel, while rising topography to the north limits visual connections with the wider countryside beyond. The east of the sub-area has a more open feel, and overall the sub-area has a largely rural character</td>
<td>3/5</td>
<td>The site has a varied mix of woodland and areas of open, undeveloped land with a parkland character, which is closely associated with sporadic built form (as stated, only about 5% of the site). The site is orientated towards the urban area rather than facing towards to the countryside (and the rest of the Green Belt). The ridge of high ground aligned along Hollow Lane provides visual containment to the site, but this provides the urban fringe with a rural backdrop.</td>
<td>5/5</td>
</tr>
</tbody>
</table>
CONCLUSIONS

5.1 It is concluded from the assessment of available evidence not only from RBC, but also from the developer, that development of the VWN site for 40-50 dwellings as suggested by the developer, would result in irreversible and significant harm to the landscape character of the area and to the visual amenity of existing residents adjacent to the site.

5.2 The site makes a positive contribution towards the purposes of the Green Belt, particularly in its contribution towards safeguarding the countryside from encroachment. The existing urban fringe of Virginia Water, as provided by housing along Gorse Hill Road and Woodlands Road East, has a minor influence on the site and does not overwhelm the site’s strong parkland character and its historic intactness. The site has a prevailing sense of peace and remoteness which warrants protection.
HDA Document Control and Quality Assurance Record

Project Title: L&V Reps for Virginia Water North Site (to the Runnymede Local Plan Examination in Public)
Project Reference: 915.1
Document Title: Landscape and Visual Representations
Commissioning Party: Wentworth Residents Association

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<td>First draft (v.1)</td>
<td>January 2019</td>
<td></td>
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<tr>
<td></td>
<td>Draft with track changes</td>
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<tr>
<td>Author</td>
<td>Christine Marsh</td>
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<tr>
<td>Approved for issue</td>
<td>Brian Duckett</td>
</tr>
<tr>
<td></td>
<td>Associate Landscape Architect</td>
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<td></td>
<td>Director</td>
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Low density development in Green Belt

Loose knit development in Green Belt

Hollow Lane

Trumps Green

Merlewood

Kenwolde Manor

Merlewood

Gorse Hill House/Mulberry House

Wentworth Estate

Runnymede Landscape Character Area

Runnymede Urban Character Areas

Green Belt (Policy GB1)

Thames Basin Heaths SPA 5km Buffer

Area of Landscape Importance

(Policy NE8)

Landscape Problem Area (Policy NE10)

Historic Parks and Gardens (Policy BE8)

Ancient Woodland (Policy BE12)

CLIENT:
Wentworth Residents Association

PROJECT:
Wentworth Reps

TITLE:
Key Landscape Characteristics

SCALE AT A3: 1:12,500

DATE:
January 2019

955.1/01A

Based on Ordnance Survey Mapping with permission of the Ordnance Survey Office Licence No.44/9551/13

HDA VWN1

HDA Landscape Architecture
Masterplanning
Ecology
Gorse Hill Manor formed by 2 ‘D’ plots. One allows 4 dwellings, the other 1 dwelling.

Gorse Hill House/The Mulberry formed by 2 ‘D’ plots.

Merlewood

Kenwolde

Hillside House

Carnanton House

East House

Inwood

Parcel boundaries

'D' plots

Plots within Wentworth estate (AKA demarcated or D” plots)

Policy SL9: Virginia Water North

Wentworth Estate boundary

Extended garden boundaries

Expanded gardens of adjacent properties

Projected

Policy SL9: Housing Allocation at Virginia Water North

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NOT TO SCALE FOR ILLUSTRATIVE PURPOSES ONLY
Appendix 3

Policy SL10: Housing Allocation at Virginia Water South

Technical advice on highways and landscape and ecology
1.0 Introduction

1.1 We have been instructed by the Wentworth Residents Association (WRA) to object to Virginia Water South, Policy SL10 of the draft Runnymede Local Plan.

1.2 The objection is based on Representation 1505 submitted by Kevin Scott of the Kevin Scott Consultancy on behalf of the landowners of the site, in particular, the Initial Design Report and Masterplan IDRM, February 2018, Chapter 4 prepared by EAS and Representation 370 submitted by James Finn of Barton Wilmore on behalf of Divine Homes PLC.

2.0 Virginia Water North (Policy SL9)

2.1 Having reviewed the IRDM, we have the following concerns:

► The deficiency of the site access proposals;
► The sustainability of the site; and,
► The traffic impact of the proposals.

The Deficiency of the Site Access Proposals.

2.2 It is stated that the roundabout has been designed in accordance with the Design Manual for Roads and Bridges TD 16/07 ‘Geometric Design of Roundabouts’ using the largest (16.5m) articulated vehicle. The associated Auto track diagram shows the movement of this vehicle along Trumps Green Road passing through the roundabout.

2.3 The Auto track diagram demonstrates that the design of the roundabout is too tight to allow the passage of this vehicle as it shows the vehicle going very close to or clipping the entry and exit radii and central island. Additionally, the right turn movement from Trumps Green Road into the site is not shown and so it is not known if this is possible.

2.4 Furthermore, the layout of the connection of the retained section of Trumps Green Road serving properties adjacent to the roundabout is not shown. It is not known if this can be achieved in a suitable manner.

The Sustainability of the Site

2.5 The site is located 850m from the nearest bus stop served by the 566/567 service. This service operates on an approximate 2-3 hours frequency.

2.6 A maximum distance of 400m is usually taken as the distance that will encourage public transport use when serving new development. Given the distance to the nearest bus stop and the frequency of the available service it is unlikely that residents of the new development would use public transport.

2.7 The following table sets summarises walk distances from Providing for Journeys on Foot’, CIHT, 2000.
Table 1: Distances to Virginia Water Rail Station and local facilities

<table>
<thead>
<tr>
<th>Facility</th>
<th>Distance</th>
<th>Desirable</th>
<th>Acceptable</th>
<th>Preferred Maximum</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rail Station</td>
<td>2,200</td>
<td>500</td>
<td>1,000</td>
<td>2,000</td>
</tr>
<tr>
<td>Shops</td>
<td>1,300</td>
<td>400</td>
<td>800</td>
<td>1,200</td>
</tr>
<tr>
<td>Primary School</td>
<td>1,300</td>
<td>500</td>
<td>1,000</td>
<td>2,000</td>
</tr>
<tr>
<td>Secondary School</td>
<td>5,100</td>
<td>500</td>
<td>1,000</td>
<td>2,000</td>
</tr>
<tr>
<td>Health Centre</td>
<td>2,700</td>
<td>400</td>
<td>800</td>
<td>1,200</td>
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2.8 The above table demonstrates that none of the destinations are within the desirable or acceptable distances recommended by the guidance and only one, the primary school, is within the preferred maximum distance. Even then, 1,300m is equivalent to a 16 minutes’ walk which is relatively lengthy for a primary school aged child.

2.9 The representation does not consider the traffic impact of the proposal on key junctions, most notably, the signalised junction of Sandhills Lane, Trumps Green Road, Stroude Road and Christchurch Road near the station. This junction suffers congestion in the peak hours and should be assessed. Until this junction has been assessed it is not possible to state whether the traffic impact of the proposal is acceptable.

3.0 Conclusions

3.1 We thus conclude that the site has deficient access proposals and is not sustainably located. It should therefore not be allocated in the draft Runnymede Local Plan.
LANDSCAPE AND VISUAL REPRESENTATIONS

POLICY SL10: VIRGINIA WATER SOUTH
FOR THE RUNNYMEDE LOCAL PLAN EXAMINATION, SURREY

on behalf of

Wentworth Residents Association

HDA ref: 915.1 v2
January 2019

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### PLANS

HDA VWS1: Key Landscape Characteristics
1 INTRODUCTION

1.1 This assessment has been prepared on behalf of Wentworth Residents Association (WRA) by Hankinson Duckett Associates (HDA) to accompany WRA’s response to the Examination in Public of Runnymede Borough Council’s 2030 Local Plan (RBC LP). This report should be read in conjunction with the Hearing Statement produced by Shrimplin Brown Planning & Development Ltd, to support WRA’s representations to the Local Plan (this report is an appendix to the Hearing Statement).

1.2 WRA objects to the proposed Policy SL10: Virginia Water South (VWS) for 140 new homes. The VWS site adjoins the Wentworth Estate on its western boundary and along the eastern end of Beechwood Road. The Estate lies predominantly to the north of the site, beyond the private road of Knowle Hill (which is excluded from the Estate boundary). This report summarises the main landscape and visual effects of siting proposed housing development in this suggested location.

2 SITE CONTEXT

2.1 General Description

2.1.1 The site is located on the southern edge of Virginia Water, which is described as ‘a commuter village’ with a population of 5,940 at the 2011 census. The site is approximately 3km from the interchange between the M25 and M3 motorway, which lies to the north-east of the site. The site is bound to its north by houses on the south side of Knowle Hill, to its south and east by Trumpsgreen Road and to its west by the Wentworth Golf Course. Further to the south of the site lies the mainline railway (Reading to Waterloo) in cutting, with the M3 motorway lying beyond this. The site has an area of 5.27 hectares (suggested developable area of approximately 5.09ha – RBC Site Capacity Analysis for Site 261). The site is currently accessed by two field gates off Trumpsgreen Road.

2.1.2 The internationally renowned Wentworth Golf Course to the immediate west of the site (and further to its north beyond Knowle Hill), lies within the Wentworth Estate, which is a 1920s-founded estate of houses and woodland across 7 square kilometres. As the roads across the estate were laid out in the 1920s, when horses were the accepted mode of transport, the estate’s private roads are narrow and winding, which forms part of the semi-rural character of Wentworth.

2.1.3 To the south of the railway lies the former Ministry of Defence site of Longcross, currently used for various commercial purposes, including film studios and a test track facility. An area bounded by the railway to the north, the B386 Longcross Road to the south, Kimsmead Lane to the east and Chobham Commom (SPA) to the west has a proposed allocation for a Garden Village (Policies SD3 and SD10). The boundary of this proposed allocation lies within 40m of the VWS site (measured from site boundary to site boundary) or c175m
(measured from dwelling to dwelling, as shown on the proposed layouts submitted by landowners. Within this narrow gap lies is the significant urbanising features of the M3 Motorway and mainline railway). Notwithstanding that the boundaries to these two sites are likely to be subject to soft landscape proposals, the physical separation between these two sites will be so narrow that some intervisibility may be possible.

### 2.2 Key Landscape Characteristics

#### 2.2.1 The private road of Knowle Hill, to the north of the VWS site, is aligned along a localised ridge of high ground which rises to a maximum height of approximately 65m Above Ordnance Datum (AOD). From this ridge, the site falls to the south, towards a tributary of the River Bourne, to 47m AOD at its lowest point (indicated by a spot height on Beechwood Road). The properties along the southern side of Knowle Road are thus located on high ground, with views possible across the landscape to both north and south. The rear gardens of these detached private residences thus back onto the site (11 out of the 15 properties along Knowle Hill have boundaries contiguous with the site boundary). The landform of the site thus slopes broadly from north-east to south-west (gradients exceed 1 in 20, which may be a constraint to certain types of development).

#### 2.2.2 The north-east corner of the VWS site consists of the private property of Appledram and its garden (0.35ha within the site boundary). A secondary access to the site may be possible through land associated with Appledram. To the east of Appledram lie four detached properties (from north to south, The Bothie, Mulberry House, Millwood Lodge and Silky Oaks) fronting on to Trumpsgreen Road.

#### 2.2.3 To its south and east, the site fronts onto Trumpsgreen Road, to the east of which lies a row of recently-built, detached houses (9no). To the north of the junction between Trumpsgreen Road and Beechwood Road, lies a belt of predominantly Silver Birch trees (subject to a Tree Preservation Order (TPO)), which have been augmented recently by new planting. This tree belt continues along the western boundary of the site (not TPO), and combines with mature tree belts which lie beyond on the Wentworth Golf Course. Trees along the south-western and western site boundaries provided visual containment of the site from the west. The site is currently sub-divided by fences into open areas of small-holdings, and a complex of barns is centrally located on the site. The site has evidently been used for agricultural purposes in the past and only recently appears to be less intensively managed. No formal investigation of the ecological value of the site appears to have been undertaken either by the Council or the site’s promoter ahead of its allocation, the results of which may have a bearing on the delivery of the site for housing.

#### 2.2.4 The VWS site has well-wooded boundaries, except along its frontage with Trumpsgreen Road, where the vegetation has reduced depth. The ‘Landscape Guidelines’ section of
the Surrey Landscape Character Assessment for Character Area SS4 (in which the site lies, see Section 2.3 below) provides the following recommendation (in the ‘Built Development’ section) “ensure that new development is designed to retain tree cover that is essential to the character of this area and consider opportunities for new woodland planting to enhance existing and new development and integrate it within the landscape”.

The site forms an important treed interface with the Wentworth Estate to the west.

2.2.5 No public rights of way exist across or adjacent to the site, except for the public highway of Trumpsgreen Road to the south-east of the site. Trumpsgreen Road thus provides the only publically accessible route from which views into the site are possible. When approaching Virginia Water from the south, the bridge that carries Trumpsgreen Road over the railway forms a ‘gateway’ approach to the built up area. From this busy road, the site is visible through boundary vegetation, rising to the houses on Knowle Hill.

2.3 Landscape Character

National Scale

2.3.1 The site lies on the north-eastern edge of the Thames Basin Heath National Character Area (NCA 129, Natural England, February 2014), with the boundary of the adjoining NCA 115 – Thames Valley, formed by the junction of the A30 with the A329, lying 2.2km to the north-west of the site. The key characteristics of NCA 129 of relevance to the area around the site include ‘high woodland cover’ with ‘conifers and large plantations on former heathland’ being ‘dominant features in the east’. It is also noted that “acid, leached soils mean that farming on the plateaux is limited to rough pasture, and that alternative land uses (such as forestry, golf courses and horse paddocks) have emerged”.

District Scale

2.3.2 Landscape character at the district-scale is defined in the RBC section of the Surrey Landscape Character Assessment (April 2015, HDA). The site lies within the county-wide ‘Settled and Wooded Sandy Farmland’ landscape type, and more specifically in the ‘SS4: Wentworth to Sheerwater Settled and Wooded Sandy Farmland’ character area. The key characteristics of the SS4 character area include:

- An undulating landscape;
- Locally falls towards a number of watercourses and ponds, across the character area;
- The character area consists of considerable areas of woodland, including some areas of ancient woodland. To the north of the character area is Wentworth golf course set in clearing in the woodland;
- Field boundaries are generally well vegetated with hedges and trees;
- Although dispersed, settlement in the form of areas of very low density large dwellings, scattered small groups of settlement and farmsteads, is spread across the majority of the character area, mostly hidden by surrounding tree cover;
• Occasionally there are views across fields to the nearest woodland, but long distance views are restricted by tree cover in most parts of the character area;
• Human influence, including settlement is obvious in places, and tempers the sense of remoteness. This is however, generally a secluded landscape, with woodland providing tranquillity.

2.3.3 In the ‘Evaluation’ section for the ‘Settled and Wooded Sandy Farmland’ landscape type, the following ‘key positive landscape attributes’ are of relevance to the site:

• Areas of rural, intimate and peaceful character;
• Commons with their heathland vegetation of high biodiversity interest, open access land which function as both a recreational resource for more built-up areas to the north, and as a rural setting for villages and roadside settlement;
• Varied woodlands including 19th century plantations and small belts and copses giving an enclosed secret character to parts of the area;
• Pattern of dispersed and small scale linear settlement facing onto commons or roads.

2.3.4 The ‘Evaluation’ section for the ‘Settled and Wooded Sandy Farmland’ landscape type also suggests the following as ‘forces for change/sensitivities/pressures’, either as ‘past change’ or ‘future potential forces for change’:

**Past change**

• Piecemeal linear settlement development associated with or along transport connections including railways and roads;
• Industrial developments including utilities, research centres, telecommunication establishments, including masts, etc.;
• Loss of hedgerows;
• Secondary woodland encroachment onto pastures.

**Future potential forces for change**

• Pressure for expansion of settlement along rural roads leading to merging of villages and hamlets and loss of rural character.

2.3.5 RBC’s landscape evidence to support the emerging Local Plan seems to rely wholly on the Surrey Landscape Character Assessment, though the descriptions of the landscape character areas do not provide judgements regarding the sensitivity of specific sites to changes arising from development in landscape and visual terms. Other than the Green Belt Review reports produced on behalf of RBC by Ove Arup and Partners (Arup), no landscape and visual appraisals have been undertaken by the Council, or external consultants on its behalf, for the emerging allocations for housing development.

2.3.6 An Initial Design Report and Masterplan has been prepared on behalf of the promoters for the VWS site (by WaM Architecture, February 2018), but this did not include any landscape and visual appraisal of the site. The report was submitted, together with other technical studies (topographical survey by Maltby Surveys Ltd, tree survey by GHA Trees, transport
assessment by EAS, an FRA/Drainage report by WE (Water/Environment)), as part of the representations made by Kevin Scott Consultancy Ltd (Planning Consultants) to the Issues, Options and Preferred Approaches (IOPA) consultation on behalf of the landowners (Belinda Davie, Robyn Close, Blyth Baker and Elizabeth Palfrey and Devine Homes PLC (Rep 1505)). Separate Representation 370 has been submitted by James Finn of Barton Willmore on behalf of Devine Homes PLC.

2.3.7 RBC produced an ‘Urban Area Character Appraisal’ (September 2009) which defines the Virginia Water urban area as having “a distinct urban character in contrast to the rural and semi-rural Green Belt surroundings which include very low density housing including part of the Wentworth Estate”. The VWS site lies within the defined urban area, and is split into two of six broad character sub-areas, ‘Trumps Green’ to the east and ‘The Wentworth Estate – isolated pockets of low density development in the Green Belt’ to the west. The ‘Trumps Green’ character area is described as “an area of predominantly C20/C21 housing to the south of the River Bourne with its own shopping and community facilities”. The ‘Wentworth Estate’ west of Wellington Road is described as “containing very loose-knit pockets of development in the Green Belt”. In terms of historic housing growth, land to the west of the site was developed predominantly inter-war, whereas houses at Knowle Hill, and opposite the site on the south side of Trumpsgreen Road and within the cul-de-sac development of Corrie Gardens, date from the late 20th and early 21st century.

2.3.8 The character of the land uses to the west of the VWS site is thus of very low density housing (e.g. properties along South, East and West Drive are within the golf course). If the VWS site were to be developed, then this distinctive local character to the west should be respected, however, the proposed density of development would not be able to reflect RBC’s aspirations for 30 dwellings per hectare without being out of character. The promoter’s masterplan suggests high density development in the western part of the site, which contrary to the RBC’s urban character assessment.

2.4 Landscape Planning Designations

2.4.1 The whole site is within the Metropolitan Green Belt, with the Green Belt boundary wrapping around all but the site’s western and south-western boundaries. The impact and significance of this designation are discussed later in this report. The site also falls within the Thames Basin Heaths SPA 5km Buffer Zone (thus development of the VWS site would trigger a requirement for the provision of Suitable Alternative Natural Greenspace - SANG). The site is within 1.3km of the boundary of the SPA (Special Protection Area) of Chobham Common, an extensive area of heathland to the west of the site.

2.4.2 Land to the west of the VWS site, north of Beechwood Road coincides with the Wentworth Golf Course/Beech Wood/Knowle Hill SNCI (Sites of Nature Conservation Importance
(Policy NE17)). If the site were to be developed then the biodiversity of this SNCI should be safeguarded “in the design and layout of the site through an appropriately designed green infrastructure buffer” (from Policy SL10 of consultation version of LP, May 2018). Such buffers are likely to restrict the amount of developable area for housing on this potential allocation.

2.4.3 Woodland to north of the road of Knowle Hill and along Trumpsgreen Road, to its junction with Wellington Avenue, is an area of Ancient Woodland (Policy NE12). This woodland is also protected by a TPO and falls within the SNCI. This woodland occupies an elevated position and forms a skyline feature in views across the site from Trumpsgreen Road. This woodland and vegetation on the perimeter of the site add to the wooded nature of the area.

2.4.4 The area north-west of the A30 (over 2.1km from the site) is ‘Windsor Great Park’, which is included on Historic England’s Register of Parks and Gardens of Historic Interest, and includes the Grade I Virginia Water and Savill Garden (Policy BE8). Although there is no intervisibility between the VWS site and the historic park, its proximity to the site is an indication of the high landscape quality of the surrounding area.

2.4.5 As stated above (Section 2.1), the potential Garden Village at Longcross (Policies SD3 and SD10) lies in close proximity of the VNS site. The former DERA (Defence Evaluation and Research Agency) site at Longcross is supported by the developer (Crest Nicholson/Aviva Investors) and by Surrey Heath Borough Council and RBC. Current proposals for Longcross include approximately 1,500 homes and over 850,000 square feet of new commercial floorspace. The draft masterplan also proposes a new primary school, shops, cafes and restaurants in a new Village centre, in additional to the new commercial floorspace focussed around the existing Longcross railway station.

2.4.6 In summary, the landscape character of the site is dictated by its sloping landform, its wooded perimeters and small open pasture fields, which results in the site’s semi-enclosed character. The low density of adjacent land uses in combination with the site’s open pastures results in a landscape of Medium to High sensitivity to development.

2.5 Visual Receptors

2.5.1 Vegetation around the site’s boundaries limits most views into the site, except from the only adjacent publically accessible route of Trumpsgreen Road, where views are less restricted by trees. From this road, views into and across the site are of its open pasture fields seen against the backdrop of private houses on the elevated ground of Knowle Hill.

2.5.2 Given the elevated nature of the northern part of the site, it is possible for private dwellings along this edge (nine properties along Knowle Hill) to experience long distance views over
the site towards the woodland belts along the M3 motorway and on the periphery of the Longcross site.

2.5.3 Private residences on the southern edge of the site along Trumpsgreen Road (nine properties) and to the east of the site (three properties) are likely to have views into the site.

3 ANALYSIS OF LANDSCAPE AND VISUAL PARAMETERS OF THE SITE AND ITS SUITABILITY FOR PROPOSED DEVELOPMENT

3.1 Landscape Assessment
3.1.1 Access to the VWS site was not possible, however on the basis of views from Trumpsgreen Road and aerial images, the site is determined as having a prevailing rural character and landscape features of high quality which warrant. The openness of the site’s pasture fields form the landscape setting to Virginia Water, elevating this site’s importance as a rural gateway to the ‘village’. The site’s evident medium-high landscape quality should, on its own merits, be sufficient to dismiss this site as being unacceptable for new development notwithstanding any other constraints, such as highways.

3.1.2 The Council’s Site Capacity Analysis document identified the total minimum capacity for the VWS site as 140/150 residential dwellings (and 2 gypsy/traveller pitches). The promoters of the VWS site have prepared concept masterplans showing the site’s potential to accommodate this number of dwellings, including five dwellings on the plot of Appledram. To achieve this density of development within the constraints of the site (such as avoidance of the TPO area), the south-western corner of the site has been proposed as high density apartment villas or flats. This would be inappropriate and contrary to the landscape character and settlement pattern of the surrounding area. This would be particularly evident on the western edge of the site where it is contiguous with the countryside of the Green Belt; should development be found acceptable in this location a lower density development edge would be more appropriate, to avoid significant adverse impacts on the surrounding countryside.

3.2 Visual Assessment
3.2.1 The visibility of the site is relatively well contained to a localised area due to a combination of the sloping nature of the site, adjacent built development and screening vegetation around the perimeter of the site. However, as the baseline assessment identified, there are existing open views into the site from Trumpsgreen Road. If the site were developed, then visual receptors using this road (motorized and non-motorized) have the potential to experience Substantial Adverse visual effects as a result of the proposed development extending up the slope of the site. Such high visual effects would result as a consequence of the receptors being in close proximity to the site, with views of high density flats along
this frontage, which would be out of character with the surrounding area. The site is
experienced from Trumpsgreen Road as a green approach/entrance to the village.

3.2.2 Existing houses wrap around about half the site’s perimeter, and for more than 20
properties, their current views will change significantly if development were to take place
on the site. For the properties on Knowle Hill, views from their south-facing rear gardens,
currently across open fields, filtered by garden planting, towards woodland along the M3
motorway, would be replaced by new houses in close proximity, with any long distance
views replaced by the roofscape of proposed houses and flats. Similarly, properties on
the south side of Trumpsgreen Road, whilst having views of passing traffic, would have
their current views of the open fields beyond the road replaced by rows of new houses
rising up the hill, with rear garden boundaries facing onto Trumpsgreen Road. In addition
to the loss of this valuable open space to potential built development, the suggested
orientation of houses onto Trumpsgreen Green would have adverse effects on the local
street scene, as existing houses in the immediate vicinity of the site all front onto this road.

4 GREEN BELT

4.1 National Green Belt Policy

4.1.1 The whole site is within Green Belt, with the Green Belt boundary aligned along the site’s
southern boundary. The National Planning Policy Framework (NPPF, Ministry of Housing,
Communities and Local Government, July 2018) states the following:

The Government attaches great importance to Green Belts. The fundamental aim
of Green Belt policy is to prevent urban sprawl by keeping land permanently open;
the essential characteristics of Green Belts are their openness and their
permanence (paragraph 133).

4.1.2 Paragraph 134 of the NPPF lists the five purposes of the Green Belt. These are:

a) to check the unrestricted sprawl of large built-up areas;
b) to prevent neighbouring towns merging into one another;
c) to assist in safeguarding the countryside from encroachment;
d) to preserve the setting and special character of historic towns; and
e) to assist in urban regeneration, by encouraging the recycling of derelict and other
urban land

4.2 Local Green Belt Policy

4.2.1 Local Green Belt policy is set out within the Runnymede Local Plan 2001 under saved
Policy GB1 ‘Development in the Green Belt’ which states the following:

Within the Green Belt, except for the area within the settlement of Thorpe, there will
be a strong presumption against development that would conflict with the purposes
of the Green Belt or adversely affect its open character.
4.3 Green Belt Review

4.3.1 In December 2014, Arup produced, on behalf of RBC, an independent borough-wide review of the Green Belt. The review was updated by Arup in March 2017 (Green Belt Review Part 2). The site lies within the defined buffers for the Part 2 review, which considered a 400m buffer around the 2001-defined settlement boundary of Virginia Water (Town Centre/key service centre). The site reference in the Part 2 review is Sub-Area 52. A comparison of the results from the Part 2 review against HDA's assessment are provided in Table 1 below.

4.3.2 The Green Belt Review methodology says that in terms of Green Belt Purpose 2, to prevent neighbouring towns from merging, the “Settlements” include Virginia Water and Longcross. However, the accompanying map (Figure 2.3) does not given an outline for Longcross, as it does for other Settlements. The detailed assessment of Sub Area 52 makes no mention whatsoever of Longcross, either in its existing form or as proposed to be allocated. The Review's conclusion that Sub Area 52 does not perform any role in preventing neighbouring towns from merging, scoring zero out of five in this respect, is thus clearly flawed and cannot be given any weight in decision making.

4.3.3 In summary, the Arup study suggested that the VWS site “fails to meet Purposes 1 and 2 but scores moderately against Purpose 3”. Whilst it is agreed that existing development wraps around about half of the perimeter of the site, the woodland belt along the western site boundary should not necessarily be seen as detaching this parcel of land from the wider Green Belt. In a landscape that is dominated by woodland, the Green Belt in this area is characteristically sub divided into smaller parcels. Despite some immediate urban edge influences, the site has a predominantly rural character, with vegetation on the site contributing to and connecting with the wider rural setting. For these reasons, the site should score more highly against Purpose 3 than the Arup study suggests. In addition, the site makes a significant contribution to Purpose 2 in that it plays a role in separating Virginia Water from Longcross.
Table 1: Comparative Green Belt Assessment

<table>
<thead>
<tr>
<th>Purpose</th>
<th>Criteria</th>
<th>Arup Assessment</th>
<th>Arup Score</th>
<th>HDA Comments</th>
<th>HDA Score</th>
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<tr>
<td>1 – To check the unrestricted sprawl of large built-up areas</td>
<td>Prevents the outward, irregular spread of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another.</td>
<td>The sub-area is not physically or perceptually connected to a distinct large built-up area.</td>
<td>0/5</td>
<td>The site is contiguous with existing built-up areas of Virginia Water along its northern, eastern and southern edges. Although this development wraps around about half of the site’s boundary, it still has connections with countryside to its west.</td>
<td>2/5</td>
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<td>2 – To prevent neighbouring towns from merging</td>
<td>Prevents development that would result in merging or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements.</td>
<td>As a result of its very small scale, the configuration of surrounding developments in Virginia Water, which creates an enclosed feel, and the role of man-made features as additional buffers (including the railway line to the south), it is judged that the sub-area does not provide a gap between any settlements and makes no discernible contribution to separation.</td>
<td>0/5</td>
<td>The site is not wholly enclosed by the settlement of Virginia Water and it has the potential to contribute to the gap between the settlements of Virginia Water to the north and the proposed expansion of Longcross Garden Village to the south.</td>
<td>4/5</td>
</tr>
<tr>
<td>Purpose</td>
<td>Criteria</td>
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<td>3 – Assist in safeguarding the countryside from encroachment</td>
<td>Protects land which provides immediate and wider context for historic settlement, including views and vistas between settlement and the surrounding countryside.</td>
<td>Approximately 1.3% of the sub-area is covered by built-form, which comprises allotments and paddock fields. However, while the sub-area is predominantly open land, it is visually disconnected from the wider countryside by densely planted buffers around its fringes, and has a stronger relationship to the built edge of Virginia Water. Residential development wraps around the sub-area on three sides, though overall the sub-area retains a largely rural character.</td>
<td>3/5</td>
<td>The site has a varied mix of woodland (predominantly on the perimeters and in the western part of the site) and areas of open space in the form of paddocks and allotments (as stated, only about 1.3% of the site – The Barn and Appledram). The site displays a strong rural character. The site is orientated towards the countryside (and the rest of the Green Belt). The ridge of high ground aligned along Knowle Hill provides visual containment to the site from the rest of the urban fringe.</td>
<td>4/5</td>
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5 CONCLUSIONS

5.1 It is concluded from the assessment of available evidence not only from RBC, but also from the developer, that development of the VWS site for 140-150 dwellings, as suggested by the developer, would result in irreversible and significant harm to the landscape character of the area and to the visual amenity of existing residents adjacent to the site.

5.2 The site provides a moderate contribution towards the purposes of the Green Belt, particularly in its contribution towards safeguarding the countryside from encroachment. Whilst human influences are apparent around the site, these are seen in the rural context of the site and the wider wooded setting which is prevalent to the west and south of the site. The site also has an important contribution to make in preventing the merging of built-up areas, namely Virginia Water and the potential expansion of Longcross.
HDA Document Control and Quality Assurance Record

Project Title: L&V Reps for Virginia Water South Site (to the Runnymede Local Plan Examination in Public)
Project Reference: 915.1
Document Title: Landscape and Visual Representations
Commissioning Party: Wentworth Residents Association

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<td>First draft (v.1)</td>
<td>January 2019</td>
<td></td>
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<tr>
<td>2</td>
<td>Draft with track changes</td>
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<tr>
<td>Author</td>
<td>Christine Marsh</td>
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<tr>
<td>Approved for issue</td>
<td>Brian Duckett</td>
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Runnymede Borough
Surrey Heath Borough

KEY
- Virginia Water South Site
- Wentworth Estate
- Longcross Garden Village Allocation (Policy SD3 & SD10)
- District/Borough Boundary
- Tree Protection Order
- Runnymede Landscape Character Area (SS4)
- Runnymede Urban Character Areas
- Special Protection Area
- Sites of Nature Conservation Importance (Policy NE17)
- Ancient Woodland (Policy NE12)
- Green Belt (Policy GB1)
- Historic Parks and Gardens (Policy BE8)

1:12,500 at A3 - kilometres:
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Historic Parks and Gardens (Policy BE8)

CLIENT: Wentworth Residents Association
PROJECT: Wentworth Reps
TITLE: Key Landscape Characteristics
SCALE AT A3: DATE: 1:12,500 January 2019

Low density development in Green Belt

River Bourne

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January 2019

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