Question 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?

1. We do not consider that Runnymede Borough Council’s (RBC) review of the Green Belt Reviews, Sustainability Appraisal (including suitable alternatives) or Habitat Regulation Assessment (HRA) were thorough or fully objective assessments that allowed for the identification of all suitable development sites. In particular, the Site Selection Methodology Assessment (SSMA) filtered out sites inconsistently based on the Green Belt Review (GBR) Part 2 and in some cases, allocated Green Belt sites for release which performed better against the Green Belt purposes than those which were discarded. A finer grain assessment of sites beyond the Green Belt Review Part 2 is required in order to identify additional sites and create a defensible Green Belt boundary that will endure beyond the lifetime of the Plan as required by paragraph 83 of the NPPF (2012).
2. Stage 5 of the SSMA Assessment relies on the findings of the GBR Part 2 assessment in considering whether to take sites forward for allocation. The SSMA states that “when determining which sites in the Green Belt could be released, greater weight... [should be] ... given to the protection of the strongest performing Green Belt parcels in terms of their contribution to the overall integrity, role and strategic function of the Green Belt” (paragraph 4.59).

3. The SSMA does not justify why, in some cases greater weight has been attached to bringing forward sites in order to meet the development needs of the borough whilst in other cases greater weight has been attached to protection of the Green Belt. The analysis applied to determining which sites should be taken forward for release has not been clearly made in either of the Green Belt Reviews and no justification has been provided for those sites which were discounted despite being scored similarly to other which were taken forward. The conclusions of the SSMA are therefore inconsistent and result in a number of sites remaining unallocated despite having been scored similarly to allocated sites and having the potential to support sustainable development.

Green Belt Reviews

4. Appendix 2 of our PSDLP Part 2 representations dated 29 June 2018 identified the following issues with the Green Belt Reviews:

   1. The parcels of land assessed in Green Belt Review (2014) were too large to allow useful conclusions to be drawn.
   2. The methodology does not take account of landscape character.
   3. It is considered that the definitions of Purpose 1 and Purpose 3 of the Green Belt are flawed.
   4. There is an inconsistency in the list of settlements used in the assessment of Purpose 1 and Purpose 2.
   5. There is no clear explanation of why some sub-areas have not been included within the summary of recommended areas provided in Green Belt Review Part 2 (2017).
5. The Green Belt Review (GBR) Part 2 (2017) provided a finer grain review of land parcels and further level of assessment beyond the Part 1 Review. We refer to and maintain the points set out within Appendix 2 of our representations submitted on the Pre-submission Draft Local Plan consultation in February 2018 which details our reservations of the scoring of sites at this stage. Importantly, there is no clear explanation of why some sub-areas have not been included with the summary of recommended areas provided in the Part 2 Green Belt Review.

6. Some sub-areas which scored “moderately” against the Green Belt purposes in GBR Part 2 were recommend for further assessment for release (sub-area refs: 28, 32, 50, 97 and 98), but the other 36 sub-areas that also scored “moderately” were not recommended for further assessment. Likewise, other sites that scored “moderately” and were considered to be “strategically less important sub-areas/clusters” were also released (sub-area refs: 18, 27, 29, 31 (strong), 35, 37, 38, 40, 47, 48, 52, 56, 70, 84, 94, 95, 02, 106).

7. This assessment of the sub-areas in the review is inconsistent and discarded certain sub-areas without justification. For example, at a detailed level, several sites which scored the same or better against the Green Belt purposes as sub-area 65 (within which the Home Farm site sits) were released. In the absence of a deliverable five-year housing land supply (5YHLS) a more detailed assessment beyond the GBR Part 2 is required to clarify why moderately performing sites were not recommend release in order to identify additional land that would be suitable for development.

8. In relation to the Home Farm site specifically, the Site was identified in General Parcel 9 in the GBR Part 1 Review. Paragraph 7.4.3 of the GBR Part 1 Review identified that this General Parcel (amongst others) was “suitable for development” and subsequently brought forward and assessed to the GBR Part 2 Review (as Resultant Land Parcel 65). The GBR Part 2 discounted the Site on the basis that it would promote encroachment into an open sensitive area of the countryside. A sub-area of Resultant Land Parcel 65 (Ref: 65i) to the south-west corner was re-assessed in December 2017 but again discounted on the basis that this segment would reduce the perceived gap between Thorpe and Virginia Water. As set out in our previous representations we have fundamental disagreements with this conclusion and consider that the site only partially perform the functions related to the Green Belt purposes due to the strong influence of urban development to the west and south and the
The presence of existing built form within its boundary as well as consent for further development. It is noted that the eastern edge is more open and densely wooded and as such development would be restricted to the western part of the parcel.

9. The inconsistency of the GBR Part 2 assessment has limited the RBC’s ability to allocate adequate sites to meet its OAN. The proposed level of Green Belt release undermines RBC’s broader Spatial Vision to protect the general extent of the Green Belt and brings into question whether the permanence of the Green Belt can realistically endure beyond the lifetime and the Plan, which would lead to unsustainable patterns of development. The durability of the Green Belt boundary has been further undermined by the reduction in the Plan period from 20 to 30 years in order to reduce its housing need.

Question 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?

Overview

10. Paragraphs 83 - 85 of the NPPF (2012) states that Green Belts should only be altered in exceptional circumstances and should be capable of enduring beyond the plan period and should promote sustainable patterns of development. The Council has set out its exceptional circumstances for releasing land within the Green Belt in order to principally meet its identified housing need (see paragraph 1.35 – 1.38 of RBC’s Exceptional Circumstance Paper Addendum, January 2018).

11. We agree that exceptional circumstances exist to justify alterations to the Green Belt boundary, including the heavily constrained nature of the borough owing to flood risk, the presence of the Thames Basin Heath SPA (and its 5km buffer which covers the majority of the borough, ecological and agricultural factors and the presence of minerals and waste safeguarded areas. These constraints apply as well to RBC’s Urban Area of which, as set out in the Exceptional Circumstances paper (SD_004X) 31% suffers from significant constraints to development. There is also a significant need for additional housing to meet RBC’s OAN over the Plan period (both C3 housing and C2 specialist accommodation for older people) and contribute to the supply of affordable homes in the borough.
12. The Exceptional Circumstances paper (SD_004X) details the need to ensure that the Green Belt boundary is defensible and logical and Technical Review was undertaken to consider where the boundaries could be amended to make them more logical and/or defensible. Amendments to the boundary have been proposed, particularly in relation to the exclusion of the village of Thorpe from the Green Belt, however further consideration needs to be given the defensibility of the Green Belt that will remain following the adoption of the Plan. We do not consider that the number of sites proposed for released will result in a defensible Green Belt boundary that is durable beyond the Plan’s lifetime, and it is likely that additional Green Belt land will need to be released in order for RBC to meet its housing need.

13. Notwithstanding, we remain concerned that the revised extent of RBC’s Green Belt will not result in a logical defensible Green Belt boundary beyond the lifetime of the Plan.

14. As set out within the Local Plan Submission Version (LPSV), approximately 79% of Runnymede is designated within the Green Belt. Our previous representations and hearing statement for Matter 1 explain that the Council is unable to demonstrate a housing land supply over the lifetime of the Plan (as a result of an overestimated housing supply and underestimated housing need). In particular, the capacities of sites allocated within the LPSV are unreliable and in some cases are unrealistic and/or unachievable. The capacities of these sites (and the delivery timescales) were subsequently updated by RBC in the LPSV, although no justification was provided for the revisions (which also brought several of the sites into the 5YHLS). It remains our view that further release of Green Belt land will be required to meet RBC’s OAN and establish a durable Green Belt boundary beyond the lifetime of the Plan.

15. We maintain our position (as set out in our Matter 1 hearing statement and representations to the Preferred Options and Local Plan Part 1 and Part 2 consultations) which details the methodological issues with the Green Belt Reviews and Site Selection Methodology and Assessment that underpin the rationale for the selection of site allocations within the Local Plan. Because of these flaws, RBC has failed to identify several suitable sites. Allocation of such land, rather than prejudicing Green Belt purposes, would serve the statutory purpose of contributing to the achievement of sustainable development by sustainably meeting
RBC’s OAN, including for specialist accommodation, and ensuring the permanence of the Green Belt boundaries in the long-term.

16. The need to identify a significant amount of land to meet the housing needs of the borough, including the need for specialist accommodation is a key component of the exceptional circumstances, as fully detailed above, that justify the need for changes to RBC’s Green Belt boundary and the resulting boundary. The extent of the revised Green Belt proposed in the Local Plan will not create a defensible Green Belt boundary that will endure beyond the Plan period owing to the significant need for housing land. To remedy this the proposed Green Belt boundaries should be reviewed to consider the release of additional land. Additional site allocations are required to identify an achievable housing trajectory to deliver sustainable patterns of growth throughout the borough and there are sites within the Green Belt that are suitable for release and which could contribute to this supply.

Duty to Co-operate

17. At the time writing, RBC have outlined that they are unable to meet any unmet need for neighbouring authorities as set out in the LPSV and RBC’s Statement of Common Ground (SoCG) with Spelthorne Borough Council (SBC) and their separate SoCG with Woking and Elmbridge. Based on their current SLAA, SBC has an identified an annual housing delivery of 418dpa over 15 years (-172dpa against the standardised methodology) whilst Elmbridge Borough Council (EBC) has an OAN of 474dpa and an identified need of 517dpa for Woking.

18. Notwithstanding that RBC maintain that their identified housing supply results in a surplus against the delivery target (which we suggest is underestimated), RBC is required to assist in meeting the needs of neighbouring authorities in line with the Duty to Co-operate (DtC) (Paragraph 182). The failure to work collaboratively with the neighbouring boroughs to identify enough land to meet the housing need contributes to the exceptional circumstances that justify the revision of RBC’s Green Belt boundaries. Significant constraints to development exist across the RBC/SBC HMA (and neighbouring authorities). Not identifying a sufficient housing land supply for the entirety of the HMA to meet the identified needs of the area would likely compound existing issues in the housing market, including increased housing prices, lower affordability and inadequate accommodation.
Conclusion

19. In response to meeting the borough’s OAN and requirements under DtC, it remains our view that there are several sites which could be released from the Green Belt without undermining the Green Belt purposes and ensure its permanence beyond the lifetime of the plan. This includes the Site located at Home Farm in Virginia Water (Site Ref: 212). Furthermore, the Green Belt Review Part 2 (2017) does not consistently assess the potential for the release of Green Belt sites against the NPPF purposes, and largely seeks to defend the limited extent of Green Belt release. With regard to the Home Farm site specifically, there is no clear justification why this site was discounted when other, better-performing Green Belt sites were recommended for release.

20. Exceptional circumstances do exist to alter the established Green Belt boundary, however, we do not consider that the revised boundary established within the LPSV is adequate and defensible beyond the lifetime of the Plan, particularly in light of the shortened 15 year Plan period which has had the effect of supressing RBC’s OAN. As such the Local Plan does not accord with NPPF Paragraphs 83-85. To remedy these deficiencies RBC should review sites which were not taken forward past the GBR Part 2 to meet its OAN and need for specialist accommodation over the lifetime of the Plan and allow the new boundary to endure beyond the Plan period. This further review is imperative given the ongoing concerns related to the A320 works coming forward to support the housing supply.

Question 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?

21. The capacity for the Council’s existing allocations critically over-estimates the number of units which can be delivered at these locations, which is crucially undermined by over-reliance on the A320 works. The Council’s subsequent site capacity study (April 2018) relies on surrounding density levels to establish appropriate site densities and does not robustly justify the capacity for sites identified. On this basis the site allocations and projected completions to contribute to meeting RBC’s OAN are not realistic or achievable.
22. The site capacity analysis set out in Appendix 5 (re-included in Appendix 1 to this hearing statement) of our representations submitted 29 June 2018 identifies that a total of 4,216 dwellings could be delivered on sites allocated within the Local Plan, which is 796 dwellings fewer than identified by RBC in the pre-submission draft of the Local Plan (PSDLP). This analysis is appended here for ease of reference. On Longcross Garden Village specifically, we agree that 1,700 homes could be delivered on this site, however, as acknowledged by RBC, the Site is considered to have a low accessibility value and therefore without the A320 mitigation works is unlikely to come forward within the specified timescales for delivery. We acknowledge that discussions between RBC, SCC and HE are ongoing and reserve our position in relation to these matters until the outcome of these discussions are known.

23. As set out within our hearing statement for Matter 1, it is not considered that the proposed site allocations are deliverable within the specified timescales, particularly because a significant number of these sites are reliant on the A320 works coming forward. As rehearsed in our Matter 3 statement, there is currently no agreement between RBC, SCC and HE regarding the deliverability of the A320 mitigation works needed to support RBC’s identified housing supply. Further, significant doubt remains as to whether the mitigation could be delivered within the timescales required to meet the 5YHLS.
Home Farm
Virginia Water

Local Plan Capacity Review
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Site 14 (SL2) Brox Road Nursery

The site area identified suggests an area of 1.4ha however on measuring the title details from the land registry it would suggest this area is closer to 1.3ha.

There is a TPO on the site and a number of single trees that add to the landscape significantly. As such these should be retained as part of the development. With the densities required to achieve the 40 dwellings suggested for this site, it is felt that it would be possible to integrate these constraints into the developed masterplan. The site does abut the Green Belt to the south east and as such there may need to be greater consideration here.

From a design point of view, it is felt that this site could take a capacity for 40 dwellings subject to other technical capability studies such as transport and the impact on the A320 due to its proximity.

Site 17 (SL4) Coombelands Lane, Rowton

Given the application for 43 dwellings was approved in August 2017 and the fact that the site has extensive tree coverage, a number of Priority Habitats and is covered on the National Forest Inventory, it is not felt that any further houses could be accommodated on this site.

Site 34 (SL17) Chertsey Bittams, Parcel D, Oracle Park

The site has an area of 4.14ha as stated in the Site Capacity analysis. There is an existing approval for a 93-bed care home with an area of 1.28ha. This leaves 2.86ha of land for further C3 development. The site is in the Green Belt however it is clearly a natural site to be released due to the surrounding context of development and network of roads. It is also noted that the road that is required for the C2 use has not been included in this area.

Consideration should, however, be taken of the stand of trees in the north west corner of the site that are designated as priority habitat deciduous woodland and are part of the National Forest inventory for broadleaf trees. This area, 0.27ha, should be removed from the developable area. There are a number of mature trees along the boundary with the existing development to the east of the site and along Bittams Lane to the south. It is suggested that these should be retained and as such 0.28ha removed from the developable area. This leaves 2.31ha for further development. Given the higher density of the care home and the need to maximise capacity on the site it is agreed that the site could support with 47dph. The play space of 0.22ha needs to also be removed from the above area leaving 2.09ha and with this revised area it is suggested that this site could have a capacity for about 100 homes subject to any technical capacity studies on the implications of the A320.

Site 48 (SL3) Hanworth Lane, Chertsey

The site has 130 units currently under construction with access off Pretoria Road. Further access to the land allocated to the south of this site indicates that this would also be accessed from the same point. It is questioned if a single point of access along a road of this nature would be sufficiently sized and appropriate to the surrounding character. Even if it were possible to access this southern section of the site from a secondary location, which it is not indicated as being, it is questioned if this would be sufficient. Hanworth lane would appear to need significant upgrades if it were to be considered and there is no evidence of this. Therefore, a link would need to be made through the ecological buffer and across the water course.

The land to the south also would appear to be used for a sports pitch and it is identified that this would need to be relocated which is contrary to Policy SL26.

It would appear that there are high voltage overhead cables just to the south of the trees that line the southern boundary of the site. Some of these have significant offsets for development. This may be accommodated in an improved buffer to these trees that line this edge.

The wedge of land north of the existing approved scheme is in close proximity to the railway and
was not included in the land sought for approval in the first instance. It is also understood to be in the ownership of Network Rail. Notwithstanding this point, it is felt that this is likely to have been with good design reason and would be better used to screen the developments to the south from noise associated with passing train traffic.

It is stated that the area to accommodate the trees to the north, west and south is 0.45ha. Given the constraints and necessity to improve the ecological buffer that will be put under greater stress by this further development, and the design desire to provide suitable screening for the new C3 units on this site from the industry to the west, and to maintain the important belt of trees (some covered with a TPO) to the south, it is suggested that the actual remaining area to be developed is 2.413ha.

The density of the site to the north is at 41dph (130 units over an area of 3.2ha). If there can be development technically on this southern pocket of land then a similar density would be appropriate.

As such it is felt that this site might be able to accommodate 98 additional homes.

**Site 60 – Pyrcroft Road, Chertsey**

Just under half of the site lies within the Green Belt (4.09ha) and much of the other half of the site lies in a flood zone. This flood zone is partially flood zone 2 and partially flood zone 3.

The Green Belt exceptions addendum document states that there are wooded boundaries to the north which is in part true. The railway to the south certainly provides a helpful boundary to contain future development. It is the western boundary that is certainly questionable and comparisons of aerial imagery (see series below) and the areas and shape of boundaries suggested would further draw this into question. There is no significant boundary marker to this western edge and nothing to stop further sprawl here. It is difficult to see how this can be called a ‘permanent’ or ‘durable’ boundary. It would seem that land has been taken beyond this boundary if the areas are to be believed as correct.
Across the boundary of the eastern corner of the site is the Grade II* listed Pyrcroft House. The building is currently the Chertsey Nursery School and the setting of the building has already been significantly compromised by the development to the other three sides. If there were development close to this building, on the eastern corner of this site, it would need to be done carefully and in consideration with the impact to the setting of this listed building. The setting currently is one of open, undeveloped space at what would have been the rear of the building originally. There are also two Grade II listed buildings to the north of Grange Farm however it is not felt that development on this site would have a significant impact on these buildings setting.

High spatial priority woodland habitat over much of the land on Grange Farm land.

Although mitigation can likely be integrated through careful detailing, it is worth noting that there is a protection designation for Priority Species with Lapwings across the whole site.

The site currently is indicated as a Farm Wildlife Packaged Area and a Sediment Issues Priority. As such discussions with the Countryside Stewardship and Natural England would likely be needed at an early stage to understand the constraints that may be necessary, if this area can be removed from this coverage and if there are any mitigations that might have an impact on development. The site also lies in Natural England’s medium risk zone identified for buffers of the relative vulnerability of priority habitats based on established climate change adaptation principles. These may not limit development but will require further analysis to properly understand if there will be an impact to development capability.

Following the guidance set out in the Government’s ‘Designing Gypsy and Travellers Sites’ Good Practice Guide, 5 traveller pitches will need to allow for and include an amenity building, space for a large trailer, a touring caravan (or two trailers), parking for two vehicles and a small garden area. Following the examples that given in this document, the space required just for these sites is in the order of 400-450sqm or a total of 0.25ha. This area is also backed up by figures used by Runnymede in analysis of some of the other sites being put forward, including Site 255A. Some sites require a site managers office as well but it is felt that with good planning this could be incorporated into the above area.

It is claimed that the 1.43ha of the site that lies within the floodplain or flood zone 3a could be used for green space provision or SuDS. The former is hard to assess having not seen the state of the land but it is felt this may be unlikely given ground conditions. The latter it is felt is highly unlikely given the basic principle that for drainage to work, there needs to be a simple provision of a lack of existing water in that location and at the very least capacity to take the increased drainage load before it reaches this critical zone. It is therefore felt that this is one of the most fundamental oversights of this site analysis.

The flood zones 2 and 3 take up a large proportion of the undeveloped, non greenbelt land on this site. Indeed floodzone 2 and 3 total, combined, 2.37ha of the site. While a sequential test may be possible it is highly unlikely that when this, and the need for increased drainage provisions are provided that a high density could be achieved.

When considering the site and the constraints and sensitivities of the green belt, the sense...
of openness that will be of consideration, the surrounding densities, the increased requirements for provision of sustainable drainage solutions, it is felt that an absolute maximum of 35dph could be achieved, and indeed it may be lower.

Looking at the areas stated for this site there is some variation in figures quoted. In the original allocation the figure of 6.8ha is provided and yet in the addendum this increases to 8.95ha. 1.43ha is stated as being in floodplain or flood zone 3a. This is not taken off the figures in the capacity studies in the addendum. Given the issues above, it is felt that this should be. On top of this the lower densities of the travellers pitches have not been taken off. As such the 5 pitches or 0.25ha needs to be taken off this figure as well. Taking this, the flood zone 3 area, the 0.25ha for the carehome and the areas suggested for open space (at the lower end of the capacity studies) leaves 5.512ha. At 35dph this would provide 193 units, plus the 5 pitches, and retained C2 units. Even at the higher density suggested for this assessment it would only achieve 226 units and 5 pitches being appropriate on this site.

There is a question on the availability the land at Chilsey Green Farm and Grance Farm/St Ann’s Lodge. If this parcel of land was removed the remaining 6.27ha would need the same treatment of analysis. The removal of the 5 pitches and floodzone 3a land would reduce the available land to 4.62ha. The same densities would be appropriate here, as above, resulting in 161 units and 5 pitches being appropriate on this site.

Site 99 (SD10) Longcross Garden Village

There is some discrepancy between the areas quoted for this site, however this site has been the subject of extensive review by the council, developer and SLR. The site’s development is in the early stages of its implementation but outline permission has been granted for a number of elements at various stages.

There are a number of constraints that do not appear to have been picked up in the supporting addendums. While there is no flood risk or AQMA identified for this site there is likely to be noise issues from the traffic along the M3. As such the screening along the M3 may need to be improved or combined with further noise attenuation. A buffer could form part of the onsite open space provision.

It is noted that there are two listed buildings in the pocket of land to the south that are not part of this site. The impact of development on these will need to be considered however with careful design this should be possible, it may simply limit the density or height of development in this area and would be subject to more detailed studies in due course.

Of greater significance to the development on site is the Ancient Scheduled monument of the Bowl Barrow, 200m west of Barrowhills. There will need to be considerable engagement with Historic England and county archaeologists as part of the development and while it is difficult to advise what impact this would have on the design at this stage it is likely to require careful mitigation. The land rises up to this point by more than 30m at this point which may mean that it could be used as a key focal point to the design. The description of the Bowl Barrow is given as follows:

The monument includes a bowl barrow, one of an original group of three, situated on the crest of a rise in the Bagshot series of sands and gravels.

The barrow has a mound 39m in diameter and 2m high, surrounded by a ditch from which
material was quarried during the construction of the monument. This has become partially infilled over the years but is visible as an earthwork to the east of the mound 0.3m deep and between 3m and 4m wide; the remainder survives as a buried feature.

The three mounds were noted in the 13th century in a copy of the charter of Chertsey Abbey as the ‘Threm Burghen’. A Bronze Age spearhead was discovered when one of the barrows was cut into c.1930.

The description goes on to state:

The bowl barrow 200m west of Barrowhills survives well and is one of the largest examples in Surrey. It contains both archaeological remains and environmental evidence relating to the monument and the landscape in which it was constructed and, along with other burial mounds in the vicinity, it provides an insight into the occupation and settlement of the area during the Bronze Age period.

It is unlikely given the above that this area could not be developed upon, and there are a large number of trees in any event on this site. As a result, a minimum area of approximately 5ha would need to be removed from the developable area. The tree buffer along these edges are significantly larger than that shown on the TPO and as such a minimum of 8ha should be removed from the developable area of this site. Significant areas of priority habitat deciduous woodland and the trees provide a significant contribution to the National Forest inventory of Broadleaved trees. The area to the south of the Barrow Ball is indicated as a priority habitat inventory. All these are yet further considerations to be integrated into a complex site as it comes forward.

The capacity studies shown for the different scales of density do not appear to pick up these constraints, nor indeed the primary school at 2.5ha, or the commercial space, or community space that the EIA scoping suggests is to be included which would reduce the area by approximately another 1ha. If a presumption that much of the wooded areas could be incorporated into the play area, this would mean that further reductions to the 71.06ha identified for development would be reduced by 5ha for the SAM, 3.5ha for the above totalling 62.5ha. If the care home is to be provided off site as suggested by SLR then this would require a density of 27dph, which given the principals being sought would just seem reasonable. It is felt however, that further detailed study of the quality of the trees on site that will need to be removed should be considered which may remove further developable area which could add further pressure to this total aspired to for this site and any further losses to developable land would compromise the garden village concept and appropriateness of development on this southern half of the site. The land to the north may be currently showing a net loss of 14 units on reserved matters but given the size of the site in question it is felt that if further capacity was required, this additional number would not be difficult to include elsewhere.

Site 156 - Blay’s House, Blay’s Lane, Englefield Green

The majority of the site is in the Green Belt, with the exception of a narrow strip of land to the south east. The council have set out that this site has limited openness yet there are only a small number of buildings on the site and these are mainly focused to the north. There are large areas of hardstanding which may be seen as previously developed land but there is nothing built on these carparks. Indeed, the lack of screening to the northern half of the site made, more apparent by the denser trees to the south, exacerbates the sense of openness felt on the site. The two principal smaller buildings, the locally listed building and the small property accessed off Wicks Road are surrounded by trees which helps with their setting as separate and isolated buildings within the Green Belt.

The southern half of the site has a large number of trees with an approximate 20m buffer of trees along this edge. To the south of the Wicks Road is the Registered Park and Garden of Windsor Great
Park, an asset that has protected designations. As such the setting along this edge is key to the protection of this asset from harm on its significance. If there were buildings along this edge it would have a significant harm and as such this 20m buffer should be seen as a minimum. This current buffer does not entirely block views through and therefore it is suggested that this should be increased by at least the depth of an additional line of mature trees which would require an increase of 10m.

The orientation of the site and this belt of existing mature trees means that properties built along this southern edge will need to be set back further from this edge. Aerial photographs suggest shadows of up to 15m can be measured and it is felt that gardens should start from this point, and not hard up against the trees to ensure proper amenity enjoyment can be had for new properties.

There is a block of trees that extend up from this belt to the south east of the site. This block of trees has a deciduous tree priority habitat on it and as such should be protected. The same offsets as above are suggested.

In the south west corner of the site is the locally listed Park House. There is an approval to split this into 8 properties which seems reasonable. The setting of the surrounding area is important and given the development to the north and as such, the lawned areas to the east of the property become all the more important to the setting as a result. As such it is felt that a significant amount of this should be retained. This will also help preserve the buffer with the Park to the south and avoid additional planting or shadow filled gardens.

To the south east of the site is a sliver of land that lies outside the Green Belt designation and lies adjacent to the approved Queenswood Crescent development. There is a narrow road that runs through this area and it may be possible to have a number of semi and detached properties along this but this would be at a density of no more than 25dph. The area of this part of the site is 0.28ha and therefore may be able to have a maximum of 5 houses.

On the question of maintaining the openness of the Green Belt, the existing volume of properties should be considered in relation to that of any new development or replacement on the site. The hard standing does not impact on openness but could be offset against some of the new roads that are required through the site.

With the considerations of the above it would seem that the northern half of the site may be appropriate to have new housing on, given the context of the adjacent development on the northern boundary and the existing points of access onto the site.

Although mitigation can likely be integrated through careful detailing, it is worth noting that there are two protection designations for Priority Species with Lapwings across the whole site and Redshank along the western edge of the site.

There is significant variation in the areas quoted from Areas discrepancy – The original designation for the site is 2.89 hectares. The addendum increases this to 3.56Ha without obvious changes in the red line.

The addendum states that there should be a buffer to the SNCI and Historic Park and garden of 0.4ha. This area correlates to the existing tree buffer only. As stated above it is felt that if development was to be located on this southern edge then this buffer would need to be increased. The setting of the locally listed building may in fact negate this need for additional planting as no additional houses would be possible in this area. This figure also does not account for the body of trees that stretches into the site. The total area therefore of the trees to the site totals 0.83ha. This correlates with the figure in the addendum for the area allowed for the ‘water course, SNCI buffer and TPO’ though it is not clear from the information available where the water course exactly lies or where this TPO is. 0.28ha is allowed for the setting of the locally
Listed Park House, however this is insufficient and should be increased to 0.35ha when taking into account the house and its setting and the surrounding trees. The result of this means that the total area available is 2.38ha. Taking the strip of land on the south eastern edge of the site away, allowing for the 5 houses above, this leaves 2.18ha.

In order to deliver 100 units, the addendum identifies that 0.18ha of play space would be required reducing the total area available to 2ha. In order to therefore achieve the 100 houses identified in this area, a net density of 50dph would be required. This is significantly higher than the existing development to the north and east.

In order to achieve this density a large number of apartments would be required and with it the additional expanse of parking. The resultant character would be much more urban than this rural edge site would suggest is appropriate. Given the fact that this is a site in the Green Belt, the balance of maintaining a sense of openness in the Green Belt with considerations of existing volumes of development on the site, and the sensitivities of the surrounding Registered Park and Gardens it is felt that this would be an entirely inappropriate density of development for this site.

Given the areas above, and taking the suggested density of 44dph this would suggest that 94 units would be possible on this site, including those on the eastern edge, even without the noted Green Belt considerations. Given the sensitivities of the site, the edge condition recognised in the Green Belt Exceptional Circumstances assessment, and the character of the site, it is felt that a lower density of nearer the minimum 35dph would be more appropriate. Allowing for the reduced requirement for play area as a result of the reduced population, this site would only have capacity for 77 units.

It is worth noting that if the developed land was limited to the area of land that is currently developed or is hardstanding the overall developable area drops to 1.95ha. With the noted reductions above this would reduce the site capacity further to 90 dwellings or the lower 73 units.

**NOTE:** It is not clear in the analysis if the existing units are included in the site allocation. I am not sure they are looking at the calculations.
Site 217 (SL18) Chertsey Bittams, Parcel E, Land East of Wheelers Green

The area stated for this site is 3.1ha. The red line shown however appears to be over land that is in the ownership of Highways England and is in close proximity to the busy dual carriageway of the A320. This land is also covered in mature trees that provide a useful natural buffer to any development on this site.

Even with this, and measuring the actual land shown in the Local Plan capacity analysis, it would suggest that the site total is in fact 2.2ha. If the land identified as adopted highways of 0.36ha is removed, this leaves 1.84ha.

SLR identify in their analysis of the site that a further buffer may be required as a result of topography, green infrastructure and further offsets from the road. Into this the impact of these large trees over shading the amenity of the gardens that line this side of the development would suggest that a further 0.15ha should be removed. It is possible that this additional area could on balance be used in part for the play space which might limit the reduction of total developable area.

From this the land covered under the TPO to the north, and the additional buffer of mature trees that have developed around this, and form part of the distinct character to the north of this site are taken into account this reduces the developable area by a further 0.38ha. This is not to say that some of the trees here cannot be removed but provides an intermediary point for this analysis.

There is also the Grade II listed Wheelers Green to the eastern edge, with a further TPO to its west, that provides a buffer that could be used to provide some protection to any harm on the setting of this building. This would require 0.26ha to be removed from the developable area. The ability to convert this building into 5 units would seem reasonable and would be added to the final net figure.

With these three areas above the developable area of this site is reduced to 1.05ha. Notwithstanding the sensitivities that would be required along the edge with the Listed Building, it is felt that the overall site densities might be increased towards the care home and reduced towards the edges. Without the constraints on amenity and the listed building it might have been possible to increase the density given the proximity to the road however in order to step the density down at the edges, and accommodate these constraints, it is felt that a lower density of 55dph would be appropriate. This would still be largely a flat focused development but the number of storeys would be reduced towards the edges. This would result in 58 units, as well as the 5 converted units in Wheelers Green, totalling 63 units for this site.

SITE 231: Housing allocation at St Peter’s Hospital, Chertsey

The site is approximately 31.7ha and includes a number of buildings associated with the existing hospital complex. The majority of the existing 2-storey hospital is to be retained on site, resulting in a reduced site area across two plots of land. On the western side of the site is the larger parcel of 11.1ha of land, and on the northeast side of the hospital is a further 1 ha of land, which yields a total area land allocation of 12.1ha.

As noted in the Draft Local Plan Consultation (part 2) and the Local Plan Site Capacity Analysis there are a number of significant on-site constraints for the site.

The hospital comprises 19.6ha of the overall 31.7ha site.
The Capacity Analysis suggests a removal of 1.12ha from developable area for existing vegetation (0.8ha) and the TPO (0.32ha) respectively. We feel this figure should be higher; whilst a standalone TPO trees may exist within the private realm, substantial clusters of TPO trees generally need to be located outside of private land given the maintenance needs and their obvious assets as a public amenity. In order to retain these assets, a more accurate figure of 1.48ha is suggested for development loss. This land could be used for public open space and will also assist in the requested “net gains in biodiversity”.

The ordinary watercourses, which run through the site do not appear to be associated with flooding, however they will likely be subject to an ecological buffer and certainly will contribute to the requested “net gains in biodiversity”. As such a standard offset of 5 metres has been applied along the watercourses. This yields a gross loss of developable area of 0.60ha, however some of this overlaps with the previously listed TPO and vegetation and so only represents a net developable loss of 0.57ha.

There is a suggestion of the provision of a C2 70 bed care/nursing accommodation within the supporting documents for this site. The Capacity Analysis suggests this could be positioned on 0.5ha area, however our experience in this field suggests that such an area limitation would yield an 8-storey facility. This would not be appropriate for the location. Noting that the existing site and area is almost exclusively 2 storey, we feel that a 2.5/3 storey facility would be more appropriate. Based on past experience, this would require a minimum 1.3ha of the developable land.

We agree with the assumptions made in the Capacity Analysis that the surrounding density is between 15-29 dph, but that a higher density could be sough on site given the intensive use of the adjacent hospital. We feel that up to 35 dph is appropriate, and indeed, could have gone even higher if it were not for a contextual height constraint of 2 storeys.

As SANG and sports pitches are being considered offsite, all of the necessary play required can fit within the allocated 1.48 ha of land for TPO 244 and boundary vegetation, as mentioned above.

Two options are presented for how the site could come forward:

OPTION 1: Given the above site constraints, we find that we have a developable area of:

12.1 ha (site) – 1.48 ha (TPO/vegetation) - 0.57 (water) – 1.3 (care/nursing) = 8.75 ha developable area. At a density of 35dph this would provide 306 units as well as the 70 bed C2 provision.

OPTION 2: If we consider that the site is not appropriate for a care/nursing facility, we can achieve a developable area of:

12.1 ha (site) – 1.48 ha (TPO/vegetation) - 0.57 (water) = 10.05 ha developable area. At a density of 35dph this would provide 351 units.

Site 254 (SL11) – Parcel B, Veterinary Laboratory Site, Rowtown

The site area of 4.7ha stated in the Site Capacity documents tallies with that measured on the land registry records, as does the suggestion for the buffer area of reducing the site by 0.17ha. SLR's analysis would suggest a density of 42dph and it is agreed that this would be appropriate given the context of the higher density found in the adjacent development to the east of the site.

The development to the east does set a precedent for development into what would appear to be a very sensitive edge of the Green Belt. This is not helped by limited screening along the southern edge of the site. It would therefore be expected that further strengthening of this edge be integrated into the future development which would reduce the developable area, if planted, by a further 0.25ha.

As such, the developable area of 4.7ha, minus the 0.42ha for buffers, 0.1ha for the two traveller's pitches, 0.82ha of play space leaves 3.36ha, which at 42dph would provide 141 units and 2 traveller's pitches.

Finally, it is questioned whether the road proposed for the access would be sufficiently sized to take the vehicles required for construction and the volume of traffic that would be generated by those living at this new development.
Site 255A – Parcel A, Chertsey Bittams, (Green Lane)

The site lies in the Green Belt and is bounded by the M25 to the north west, Salesian School to the north east, with other existing development wrapping around the site to the south. The nature of these boundaries would suggest that this is an easily contained site in the Green Belt and that there is a logic for development on this site. The M25 provides a hard, built barrier to stop further interconnection of settlements.

The position of the public rights of way should not limit development if considered at the start of the design process and tied into the movement networks that form the basis for the masterplan development.

Although mitigation can likely be integrated through careful detailing, it is worth noting that there are two protection designations for Priority Species with Lapwings across the whole site.

The site currently is indicated as a Farm Wildlife Packaged Area and a Sediment Issues Priority. As such discussions with the Countryside Stewardship and Natural England would likely be needed at an early stage to understand the constraints that may be necessary, if this area can be removed from this coverage and if there are any mitigations that might have an impact on development. The site also lies in Natural England’s medium risk zone identified for buffers of the relative vulnerability of priority habitats based on established climate change adaptation principles. These may not limit development but will require further analysis to properly understand if there will be an impact to development capability.

Following the guidance set out in the Governments ‘Designing Gypsy and Travellers Sites’ Good Practice Guide, 5 traveller pitches will need to allow for and include an amenity building, space for a large trailer, a touring caravan (or two trailers), parking for two vehicles and a small garden area. Following the examples that given in this document, the space required just for these sites is in the order of 400-450sqm or a total of 0.25ha. This area is also backed up by figures used by Runnymede in analysis of some of the other sites being put forward, including this site. Some sites require a site managers office as well but it is felt that with good planning this could be incorporated into the above area.

The area of flood zone 3, and to a lesser concern 2, lies along the majority of the possible entry to this site. While this will not mitigate development, and indeed there is space without this constraint it will need to be taken into consideration as part of the development. The total area of these two zones of 0.37ha should be removed from the developable area.

The site area matches that set out in the addendum.

The draft local plan states that the proposals should take account of the TPO, site boundary vegetation (which aligns with a footpath), and that the landscape strategy needs to take proper consideration of the SS3, Settled and Wooded Sandy Farmland, landscape character of the site as set out in the Surrey Landscape Character Assessment. In terms of impact on development, the principal characteristics of this are the gentle rolling topography, the openness of farmland and where there is development is it low density. Surrounding development would appear to reinforce that with the low levels of density achieved. That said it is agreed that higher density nearer the motorway may be appropriate and therefore a higher than average density might be possible.

There is an AQMA along the edge of the M25 that requires a buffer. The buffer allowed would appear to be reasonable. Of equal concern however is the impact of noise. Not only the engine noise, but the sound of tyres. This latter point remains of higher importance in these high speed locations and the increase of electric cars will not reduce this impact. While this technology may be able to improve the AQMA, it is unlikely that this is going to happen within the timeframes of this plan and as such it is not believed that this could be mitigated. When coupled with the need for noise attenuation and the use of this buffer as a landscaped buffer to limit the impact on the wider green belt it is felt that this zone of under-developed land serves a useful and long term purpose on this site.

Within the calculations of density, the Runnymede addendum states 0.33ha of play space is required but then only totals this at 0.32ha. Turning to the number of units, the 7ha site, minus the 0.25ha for traveller sites, the 0.37ha for flood zones, the 0.18ha for the TPO constraints and 1.8ha for the
AQMA and 0.33ha for play space, this leaves a total of 4.4ha. At the lower net density of 35dph, allowing therefore for some higher density and the rest to following surrounding areas, this would suggest 154 units, plus 5 pitches. At 39dph suggested this would be 172 units, plus 5 pitches.

Site analysis

Site 255B (SL15), Parcel B, Chertsey Bittams, Woodside Farm

The area bounded in red covers land under the ownership of Highways England, however this is acknowledged in the existing site analysis, and the suggested figures reflect this accurately. It may be beneficial to increase the planted buffer along the busy A320 that would reduce the developable area by 0.3ha.

It is noted that the woodland to the western edge of the site is designated as priority habitat deciduous woodland and is part of the National Forestry Inventory for broad leafed trees. Although it is not covered by a TPO and is off the site boundary, care would be needed along this edge to ensure that there was no increased pressure caused by run off.

Although mitigation can likely be integrated through careful detailing, it is worth noting that there is a protection designation for Priority Species with Lapwings across the whole site.

Given the edge condition of this site, and its proximity to the A320 the increased density of 40dph might in fact be appropriate. As such the increased target of 120 units would seem appropriate.

Site 255C – Parcel C, Chertsey Bittams, Land East of Woodside Farm

This parcel of land identified for development, once the land that is under the control of Highways England and the land identified for the traveller’s pitches is in fact 1.07ha. Of this 0.19ha lies in the AQMA. The mature trees along the M25, on land owned by Highways England will provide some screening to help with the noise and air quality issues. In addition to the recognised air quality issues is the impact of noise on this development. Not only the engine noise, but the sound of tyres. This latter point remains of higher importance in these high-speed locations and the increase of electric cars will not reduce this issue. While this technology may be able to improve the AQMA, it is unlikely that this is going to happen within the timeframes of this plan and as such it is not believed that this could be mitigated. When coupled with the need for noise attenuation this buffer may need to work harder than currently covered in the AQMA zone. If the area identified as being in the AQMA was planted and additional acoustic work was undertaken this could significantly improve this situation.

Of further note is the land that has been identified for the traveller’s pitch to the north is largely in the AQMA. The larger area that is being provided, above the suggested norm set out in the Government’s ‘Designing Gypsy and Travellers Sites’ Good Practice Guide, should however allow sufficient space for this site, with the more sensitive areas located outside this zone.
These conditions do, however, leave just 0.89ha for development. The density suggested of 38dph might be pushed to 40dph to match the adjacent proposed site. On this reduced area there would be 35 units, however further land is required for play space. The areas required, as set out in the capacity studies for this site would suggest that 0.068ha is required for this sort of population which would allowing for a reduced population as a result of this reduced area would reduce this overall figure to 33 units in addition to the 2 travellers’ pitches.

DP9 – Please note that the following sites are without the benefit of the level of detail available for the sites above due to the lack of detailed original capacity analysis in the Runnymede Final Site Capacity Analysis (December 2017) document or in analysis from SLR that seemed to accept these all as read.

Site 256 – Parcel A and B, Thorpe Lea Road North (Thorpe Lea Manor)

This analysis combines both parcels together. The addendum only refers to parcel A, however in the revised local plan, the increase is across both parcels. This site lies entirely within the Green Belt. The site is screened to the north by a belt of trees and beyond playing fields which provide the only buffer between settlements. The land to the north is owned by Runnymede Borough Council and appears to be play and sporting fields. To the west and east there are significant bodies of trees, both are recognised as primary habitat deciduous woodland. The eastern edge of the site is part of the National Forest inventory of Broadleaf woodland and therefore care would be needed with any development along this eastern edge. The trees do provide a natural break to future development in both these directions. This edge of trees wraps around the south edge of the site as well. There is developed land otherwise along this southern edge.

Within site parcel A there are two pockets of substantial trees that will have an impact on development. The site appraisals mention the TPO having an impact of 0.05Ha however it is felt that the necessity to maintain the boundary buffers to the west, north and east, and the need to maintain this remaining landscape feature on this largely developed site, would necessitate nearer 0.37ha to be removed from the developable area. Some of this could be used for open space on the site.

Although mitigation can likely be integrated through careful detailing, it is worth noting that there is a protection designation for Priority Species with Lapwings across the whole site.

The site currently is indicated as a Farm Wildlife Packaged Area and a Phosphate Issues Priority. As such discussions with the Countryside Stewardship and Natural England would likely be needed at an early stage to understand the constraints that may be necessary, if this area can be removed from this coverage and if there are any mitigations that might have an impact on development. These may not limit development but will require further analysis to properly understand if there will be an impact to development capability.

The flood risk zones on this combined site largely lies in site B and totals 0.11ha. Given the council’s desire to see this brought forward as a complete site this has been included in the total site figures below.

The existing site has a traveller pitch which has been identified as having potential to be changed to two pitches.

The addendum suggests that the surrounding area has a net dph of more than 50dph. Such density normally requires a large number of 3 and 4 storey flatted development. The existing buildings on site are up to 2.5 storeys in height. Looking at the surrounding development the majority of the land would appear to be 2 and 2.5 storey detached and semi-detached houses with reasonable gardens. As such it is difficult to understand how such high densities can be claimed to be found in the surrounding area. It is more likely that these are closer to 30dph.

Taking the analysis across both sites, there is no figure given in the addendum for the total population. Extrapolating from the data provided it suggests that a population per dwelling is about 2.2 per dwelling.
This combined site is 1.99ha. Taking off the 0.1ha for the traveller sites, the 0.37ha for areas with trees that contribute to the surrounding Green Belt character, the 0.11ha flood risk zone this leaves an area of 1.41ha. At a density of 30dph this would give 42 dwellings, even allowing for the play space to be entirely within the tree areas. Even if there were some more flatted development, given the previously developed nature of the site and the large footprint of the existing buildings, this might increase to 40 dph which would give 56 units which might be reduced once detailed analysis of the play space was carried out.

Site 257 – Thorpe Lea Road West

The site area stated within the Final site capacity addendum and draft 2 of the local plan suggest the site is 6.6ha and 6.58ha respectively. Looking at the registered land ownership, taking account of the land in the ownership of Highways England and Surrey County Council, measurements suggest that 6.19ha is closer to the reality. It would appear from the documents submitted that this variation may lie to the land on the northern edge of the site and the buffer along the eastern edge.
The site lies within the Green belt. The M25 does help limit the sprawl to the west. The Fishery lake to the south will limit the extent of development in this direction and as such could be seen as a well contained site. The overall site is characterised by two large pockets of industrial use, with three residential plots along the B388 and a further plot on the southern corner of the site. In between these are mature trees that fill in between these plots.

The AQMA on this site covers an area identified to need to be 1.2ha. The mature trees along the M25, on land owned by Highways England, are not continuous and the gaps that existing will need further strengthening to help with the noise and air quality issues. There is no obvious bund and limited fencing along the side of the motorway. Of equal concern however is the impact of noise. Not only the engine noise, but the sound of tyres. This latter point remains of higher importance in these high-speed locations and the increase of electric cars will not reduce this issue. While this technology may be able to improve the AQMA, it is unlikely that this is going to happen within the timeframes of this plan and as such it is not believed that this could be mitigated. When coupled with the need for noise attenuation this buffer may need to work harder than currently covered in the AQMA zone.

The public right of way that runs alongside this edge could then be easily linked into the scheme through careful landscape design and make more of a feature of this screening zone.

Houses in lee of rising land to the New Wickham Lane bridge will have issues of design especially with regards to overlooking, amenity and light. Many of the trees that line this bank are outside the site boundary, and with the rising land, is under the control of Highways England. There are a number of mature deciduous trees along this edge up to the roundabout which have an important role on the character of this site, provide useful screening to the traffic along the road, and should be maintained as part of future development. The set back of the rear boundary treatments along this edge will need careful consideration, whether it be areas of parking or rear gardens to mitigate the impact of the rise in levels and trees rising from these elevated levels.

B388 has line of some mature trees along the edge including a number of large oak trees. Whilst it is unlikely that these would completely limit development, they should in large part be retained and careful consideration will need to be made as to where the least harmful location for the entrance will be. It is noted that many of these trees lie in a strip of land to the west side of the B388 that is in the control of Surrey County Council.

There is a cluster of trees to the centre that are covered by a TPO. With careful design this could be integrated into the development.

It has been indicated that there is a chance that this site will not come forward in this complete form. There are two hatched areas that might not come forward at the same time. The north hatched area has an area of 0.66ha. The southern plot has an area of 0.48ha. The southern area would be easier to not bring forward at the same time, though from a design perspective its location is perhaps more important in terms of the way the developed design integrates into the local area. The northern of these two sites would have an impact on the efficiency of the development on this site.

In one part of the documents it claims that surrounding development is at 54dph and later on it states in the addendum it varies from 24-54dph. Looking at the land on the east side of the B388 it would strongly suggest that this is an area with a density of nearer 24dph. That said, the proximity and character of this site might well support higher density, flatted development that would be around the suggested density of 40-45dph. That said, if the finer grain analysis was to be carried out it is unlikely that the southern hatched area would be at such density, given the transition and relationship it would have with the existing surrounding development. It is suggested that a density of 30dph might be possible for this site, if it was brought forward on its own.

Therefore, taking the site area at the revised 6.19ha, removing the 1.2ha for the AQMA, 3 travellers’ pitches at 0.15ha, 0.41ha for play space (as advise in the addendum for this density), it is possible to achieve on the remaining 4.43ha, at a
flat rate of 45dph across the site, 199 units. This number would reduce the amount of play space and so could be increased by 2 further units to 201 units, as well as the 3 pitches. If the two hatched sites were to come forward, it is expected that the northern site could contribute 30 units at 45dph, and the southern site 15 units at 30dph.

**Site 258 – Virginia Water (north)**

The site area stated within the final site capacity addendum and the 2nd draft of the local plan suggest the site is 19.5ha. Looking at the registered land ownership it is questioned whether this red line is accurate as it would appear that in three cases the red line cuts through the middle of gardens associated with properties outside of the red line. For the purpose of this analysis it has been presumed that this red line is correct, however if it were to be amended to the ownership boundaries seen on the land registry, this would reduce the site area by 1.32ha. It is noted that only 2 houses would be available on these 'further areas' and so it is easy enough to amend any capacity figures if this is not possible.

Of these, the existing trees that lie in the 1.14ha pocket would suggest that this is not available for development in any event.

The site lies in the Green Belt and the exceptional circumstances addendum suggests that this area does have a character of openness and is not connected to a larger developed area, that its acceptability to be removed lies in large part as a result of the surrounding settlement. If this is the case then it would necessitate a similar density for it not to appear out of context or challenge the Surrey Landscape character that covers this area. The topography on the site would also exacerbate any effort to increase the density on the site, though some larger properties could be designed as flatted apartments, using the fall in levels to minimise overall height. This could keep some density higher than the 4dph that surrounds the denser southern boundary of the site.

A considerable portion of this site is covered by high priority woodland priority habitat. This covers areas all the areas that are covered in trees on the site. Other areas are identified for woodland improvement which would suggest that a careful landscape strategy would be required for this site, as well as a woodland management plan to support and improve the existing stock on site. The larger stands of trees are identified as part of the priority inventory of deciduous woodland and part of the national forest inventory of broadleafed trees. The Dell Ancient Woodland referred to in the Draft Local Plan lies to the north of the site and care would need to be taken with mitigation measures for this development but it is not felt, with the other constraints more locally to the site, that this would be a major point of concern.

The site currently is indicated as a Farm Wildlife Packaged Area and a sediment Issues Priority. As such discussions with the Countryside Stewardship and Natural England would likely be needed at an early stage to understand the constraints that may be necessary, if this area can be removed from this coverage and if there are any mitigations that might have an impact on development. These may not limit development but will require further analysis to properly understand if there will be an impact to development capability.
The analysis of this site has been split into four sites. The Merlewood site has the locally listed care home at the core. It is proposed that this would be retained. Given the arrangement of the building on the site, the topography and the natural boundary formed by the trees, it is suggested that in the interests of the amenity required for the care home and the constraints of the setting to the locally listed building, this should in fact remove 1.68ha from this part of the land available.

In addition to this there are a number of large stands of trees that should be preserved. Some of these could be used for open space but it is unlikely that these would be integrated into development and residential plots due to the issues of ensuring their long term future. There is a large pond in the centre of the southern section of the site that is surrounded by trees. There are also trees along the boundaries with surrounding properties that would need to be maintained. It is therefore felt that a further 2.83ha should be removed from this pocket of development. The site analysis in the addendum suggests that this parcel of land is 9.5ha however on further measurement it would appear to be closer to 10ha. The addendum suggests that 3ha should be removed to allow for the setting of the locally listed building, topography, and trees to be retained. As can be seen from the above the estimates is in fact closer to 4.51ha which leaves an area of 5.49ha to be developed. From this the play space of 0.185ha should be taken leaving 5.31ha. The addendum suggests development is possible at the upper end of the higher surrounding density. It is not clear where exactly this is but it is likely to be in the converted larger buildings rather than the plots that surround. As seen the highest density of this is along the southern edge where 4dph is achieved. If there were some limited flatted development to meet the requirements for 10% of 1 and 2 beds, this might increase to 8dph. As such it is felt this parcel of land could have a capacity of up to 42 units in addition to those retained in the care home.

The Kenwolde site is stated to have an area of 2.8ha however it is hard to see how this is possible given the amount of trees on the site. Even allowing for some clearing of the understorey of Rhododendrons and scrub vegetation, there are still a large number of mature trees that cover the site. As such it is felt that a more realistic development for this site is 1.36ha. As acknowledged in the addendum the existing residential units retention reduces this figure by 0.8ha leaving just 0.56ha to be developed. If the existing units could be converted into circa 15 units, which does not seem unreasonable, this would allow, at 5dph, 3 units in these grounds. As a whole site it would allow 7 units. Given the apparent quality of the house, and these figures, and the costs of the removal, it would suggest that it is likely this parcel could accommodate 18 units at the most.

The maximum coverage for the other two sites is covered by a covenant and there would appear to be sufficient, unconstrained land to achieve this. Therefore it would seem that across this site the following would be possible:

Kenwolde – 18 units (including the conversion)
Merlewood – 42 (in addition to the retained C2)
Gorse Hill House & Manor – 6 dwellings
Other – 2
Total – 68 units.
Site 261 – Virginia Water South

The Virginia Water South site is approximately 5.05ha, though the addendum states that this is slightly larger at 5.27ha. The area is bound by mature vegetation along the south/west and northern boundaries. These should be sought to be retained to provide a buffer to Trumps Green Road, the rail line and the Wentworth Estate and properties at Knowle Hill. The site lies fully within the Green Belt.

Although mitigation can likely be integrated through careful detailing, it is worth noting that there is a protection designation for Priority Species with Lapwings and Corn Bunting across the whole site.

Boundary and landscape planting along the developed northern and eastern edges of the site needs careful consideration and design input. It is suggested that a 10m buffer should be provided to allow for planting and maintenance of the space along the edge. The total area for this buffer is approximately 0.487ha and should be removed from the developable area. Likewise, woodland buffers along the western edge should be considered with the design allowing for the retention of quality trees to provide a buffer between the golf course and the site. Additionally, proper garden spacing and natural light needs to be considered with the design of buildings along the edge. An additional buffer of 0.02ha should be considered.

Again, the Site Capacity Analysis suggests this would reduce the developable site area by 0.18ha. However, upon review, an area of 0.5 ha is covered by a Tree Preservation Order (TPO no. 420). Whilst this could be utilised within any open space provision, it is likely to restrict the developable area beyond the 0.18ha identified. Upon further review open space requirements for play and allotments ranges from 0.4ha to 0.6ha depending on density calculations this area may be in the TPO area as a combined amount.

Additionally, a public right of way runs alongside the southern edge could then be easily linked into the scheme through careful landscape design and make more of a feature of the southern screening zone.

Following the guidance set out in the Governments ‘Designing Gypsy and Travellers Sites’ Good Practice Guide, 2 traveller pitches will need to allow for and include an amenity building, space for a large trailer, a touring caravan (or two trailers), parking for two vehicles and a small garden area. Following the examples that given in this document, the space required just for these sites is a total of 0.1ha. This area is also backed up by figures used by Runnymede in analysis of some of the other sites being put forward, including this site.

When considering the site and the constraints and sensitivities of the Green Belt, the sense of openness that will be of consideration, the surrounding densities, it is felt that an absolute maximum of 25dph could be achieved, and indeed...
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it may be lower. Indeed the addendum states that surrounding density is lower, between 7-24dph.

This combined site is 5.05ha. Taking off the 0.1ha for the traveller sites, 0.507 buffer zones for housing, and 0.5 for the TPO and open space, this leaves a developable area of approximately 3.943ha and at a density of 25dph this would give 98 dwellings, even allowing for the play space to be entirely within the tree areas.

Site analysis

The site lies in the Green Belt and is bounded by the M25 to the north west, Salesian School to the north east, and existing development wraps around the site to the south. These nature of these boundaries would suggest that this is an easily contained site in the Green Belt and that there is a logic for development on this site. The M25 provides a hard built barrier to stop further interconnection of settlements.

The position of the public rights of way should not limit development if considered at the start of the design process and tied into the movement networks that form the basis for the masterplan development.

Although mitigation can likely be integrated through careful detailing, it is worth noting that there are two protection designations for Priority Species with Lapwings across the whole site.

The site currently is indicated as a Farm Wildlife Packaged Area and a Sediment Issues Priority.

As such discussions with the Countryside Stewardship and Natural England would likely be needed at an early stage to understand the constraints that may be necessary, if this area can be removed from this coverage and if there are any mitigations that might have an impact on development. The site also lies in Natural England’s medium risk zone identified for buffers of the relative vulnerability of priority habitats based on established climate change adaptation principles. These may not limit development but will require further analysis to properly understand if there will be an impact to development capability.

Following the guidance set out in the Governments ‘Designing Gypsy and Travellers Sites’ Good Practice Guide, 5 traveller pitches will need to allow for and include an amenity building, space for a large trailer, a touring caravan (or two trailers), parking for two vehicles and a small garden area. Following the examples that given in this document, the space required just for these sites is in the order of 400-450sqm or a total of 0.25ha. This area is also backed up by figures used by Runnymede in analysis of some of the other sites being put forward, including this site. Some sites require a site managers office as well but it is felt that with good planning this could be incorporated into the above area.

The area of floodzone 3, and to a lesser concern 2, lies along the majority of the possible entry to this site. While this will not mitigate development, and indeed there is space without this constraint it will need to be taken into consideration as part of the development. The total area of these two zones of 0.37ha should be removed from the developable area.

The site area matches that set out in the addendum.

The draft local plan states that the proposals should take account of the TPO, site boundary vegetation (which aligns with a footpath), and that the landscape strategy needs to take proper consideration of the SS3, Settled and Wooded Sandy Farmland, landscape character of the site as set out in the Surrey Landscape Character Assessment. In terms of impact on development, the principal characteristics of this are the
gentle rolling topography, the openness of farmland and where there is development is it low density. Surrounding development would appear to reinforce that with the low levels of density achieved. That said it is agreed that higher density nearer the motorway may be appropriate and therefore a higher than average density might be possible.

There is an AQMA along the edge of the M25 that requires a buffer. The buffer allowed would appear to be reasonable. Of equal concern however is the impact of noise. Not only the engine noise, but the sound of tyres. This latter point remains of higher importance in these high speed locations and the increase of electric cars will not reduce this impact. While this technology may be able to improve the AQMA, it is unlikely that this is going to happen within the timeframes of this plan and as such it is not believed that this could be mitigated. When coupled with the need for noise attenuation and the use of this buffer as a landscaped buffer to limit the impact on the wider green belt it is felt that this zone of underveloped land serves a useful and long term purpose on this site.

Within the calculations of density, the Runneymede addendum states 0.33ha of play space is required but then only totals this at 0.32ha. Turning to the number of units, the 7ha site, minus the 0.25ha for traveller sites, the 0.37ha for flood zones, the 0.18ha for the TPO constraints and 1.8ha for the AQMA and 0.33ha for play space, this leaves a total of 4.4ha. At the lower net density of 35dph, allowing therefore for some higher density and the rest to following surrounding areas, this would suggest 154 units, plus 5 pitches. At 39dph suggested this would be 172 units, plus 5 pitches.

**Site 263 – Ottershaw East**

This site area is as stated at 13.2ha and lies entirely within the Green Belt. The site is recognised as being within the Wentworth to Sheerwater woodland sandy farmland according to the Surrey Landscape Character assessment. The site is bound by development along the entirety of the western edge and portions of the southern boundary. It is screened to the north by a belt of trees and the Brox Copse to the south.

Significant discrepancies exist between the site boundary shown in the document and the land registry areas and measures should be taken to show areas accurately.

The Brox Copse is recognised as a priority habitat inventory – deciduous woodland that surpasses the woodland edge and will need to be maintained and carefully managed. Ancient woodland runs through the centre of the copse to the western edge. An additional buffer of 15m should be accounted for along the edge and necessitates an additional removal of 0.173ha from the developable area, in that land identified not as SANGs provision.

Although mitigation can likely be integrated through careful detailing, it is worth noting that there is a protection designation for Priority Species with Lapwings across the whole site.

There is a hedged and fenced public right of way running north/south through the portion of the site of which provides an appropriately defined break for development to the western side and an appropriate location for SANGs to the east. This leaves a gross developable area of around 6.82ha overall which is consistent with the addendum.

Following the guidance set out in the Government’s ‘Designing Gypsy and Travellors Sites’ Good Practice Guide, 2 travellor pitches will need to allow for and include an amenity building, space for a large trailer, a touring caravan (or two trailers), parking for two vehicles and a small garden area. Following the examples that given in this document, the space required just for these sites is a total of 0.1ha. This area is also backed up by figures used by Runneymede in analysis of some of the other sites being put forward, including this site.

The site appraisal mentions TPO along the southern boundary with Southwood Avenue and an additional buffer should be provided along this edge of 10m min with a land take of around having an impact of 0.05Ha however it is felt that the necessity to maintain the boundary buffers to the west, north and east, and the need to maintain this remaining landscape feature on this largely
developed site, would necessitate nearer 0.05ha to be removed from the developable area. Some of this could be used for open space on the site.

Boundary and landscape planting along the developed western and southern edges of the site needs careful consideration and design input. Additionally, four existing houses are located either hard against the boundary or within 5 meters of the edge and additional buffers should be provided accordingly. Overall suggested 10m buffer should be provided to allow for planting and maintenance of the space along the edge. The total area for this buffer is approximately 0.49ha and should be removed from the developable area.

Looking at the above and all the considerations for the site constraints and additional uses it is considered the net developable area should be reduced to approximately 5.32ha. This area should also include areas for open space allocations 0.94ha reducing the available land to 4.39ha for dwellings. We agree with the analysis of SLR and suggest a net density of approximately 30-35 dph would be appropriate given the surrounding context. Therefore the total dwellings therefore should be around 153 dwellings.

Site 157 (IE10) – Egham Gateway West, Station Road North, Egham

The site has a large expanse of parking to the rear with 2 and 3 storey buildings that front the High Street, and 2 storey buildings around Church Road. Other buildings in the surrounding context follow this scale as well.

There are a number of Grade II listed buildings that abut the development area on a number of sides. These include 8 Station Road North and 169 and 170 High Street. On the opposite site of the High Street is the Grade II Literary Institute and Red Lion Public House. Adjacent to this is the Locally Listed United Reform Church.

As such relationship to these buildings, found in future development, will need to be sensitive to the scale, appearance and massing.

In order to achieve the increased numbers of 120 units on a 0.8ha site (that includes a number of roads in this area totalling 0.12ha) would require a density of 150dph. On top of this approximately 100sqm of D class floorspace is required. This should be able possible along the 40m of High Street frontage this site has along with the ‘range of A class uses’. To achieve this density would require a height of development that would require 4 or 5 storeys which would likely have a significant harm to the setting of the listed and locally listed buildings. The lower target of 60 units, and the improvements to the public realm, presuming the existing urban grain is retained to do so, would require a density of 88dph which is still high for a site with this sort of context and sensitivities. At 75dph it would be possible to have 51 units, at 80dph it would allow 54 units.

As such it is felt that the initial assessment of the site is perhaps closer to the reality of what is achievable on this site and indeed it may be difficult to achieve even this level.
Site IE11 – Chertsey Sainsbury and car park

The site has a significant number of designated and non-designated assets along Guildford Street and Windsor Street, however to the rear of the site is the large and monolithic supermarket and expanse of hardstanding. The Sainsbury site description for the balance of uses is fairly loose and vague. It would appear that if there is sufficient space to accommodate the upper limit of the units but this would likely be more 1 and 2 beds at this end of the range and would result in a reduction in the amount of commercial use available to the site.

Site IE11 – High Street North, Egham

The premise of the regeneration of this site is in the improvements to the large area of hardstanding between the car parking for the supermarket and the buildings that line the High Street. There are a number of listed and locally listed buildings in this area, and there is the fact that the site lies within a flood risk zone 2. It is noted however that only about half of this specific area is covered by this risk, and that area is not immediately behind some of the listed buildings. As such it is possible that with careful, high quality design, it may be possible to achieve this allocation on this site, subject to more detailed flood risk assessments.

Site IE11 – Strodes College Lane

The site does lie within flood zone 2 however on review of the Officer’s Report for the now expired application, it is noted that Environment Agency did not raise any specific concerns. Given the recent nature of the application, it is felt that there is a good chance that this application would merit renewal.

Site IE11 – Egham Library

Egham Library is a building of very little architectural merit set in a large area of hardstanding car park, and in a context with limited value to the surrounding development. A large flatted development to provide 40 units should be able to be achieved on this site.

Site 253 (IE9) – Egham Gateway East, The Precinct

The buildings that form this site are of very low architectural significance and makes no positive contribution to the setting of the listed buildings opposite. There is a large amount of car parking to the rear which should be sufficient for the new residential units. It would seem that there should be no issue with the allocation and plans suggested for this site.

Site 264 (IE8) – Addlestone West, Station Road

There are five main buildings on this site with a significant amount of space in between that with the opportunity to reconsider this whole site, making considerably more efficient use of the space, and provide better relationship of buildings and Station Road. The existing buildings are mainly low-rise buildings. The AQMA that runs along Station Road will need to be considered as part of the design of this site but it is felt that there is sufficient space to accommodate this. There is sufficient space to have the improved community and/or health facilities using increased height to the buildings, in response to the Council offices on the other side of the road and the lack of listed or locally listed buildings. It is felt therefore that the capacity identified for this site is reasonable.

Site 318 (IE7) - Addlestone East, Station Road

The surrounding site is largely 2 storeys. There is a current application (ref RU.18/0743) for a development of 3-6 storeys, comprising 71 residential units (Use Class C3), 425sqm (GEA) of flexible retail floorspace (Use Class A1, A2, A3) and associated access, car and cycle parking, bins stores, plant, landscaping and amenity space. It is not clear what views have been expressed by the Council on this application but this submitted scheme demonstrates how this site might be brought forward. The proof of the acceptability of what is being proposed for this site will lie in how this site is determined by officers, however it is felt that the approach may suffer from one too many stories, given the surrounding context and precedent on height, and therefore this would suggest that up to 8 units might be lost from the scheme.