LOCATION: 141 Park Road, Camberley, Surrey, GU15 2LL,

PROPOSAL: Consultation application from Surrey County Council for the

outline application for the erection of part 1, 2, 3 and 4 storey building for extra care accommodation comprising self-contained apartments, staff and communal facilities and associated parking

Town

(landscaping and appearance reserved)

TYPE: Consultation (County Matters)

APPLICANT: Surrey County Council

OFFICER: Duncan Carty

The Borough Council is only a consultee on this application and the determining authority is Surrey County Council. This application outline application has been reported to the Planning Applications Committee because it relates to major development (providing over 10 dwellings and over 1,000 square metres of floorspace).

RECOMMENDATION: RAISE AN OBJECTION

1.0 SUMMARY

- 1.1 This is a consultation application to be determined by the County Planning Authority, Surrey County Council (SCC Ref: 2023-0029). This is an outline application for which details of access, layout and scale only are to be determined. This is a Regulation 3 application for which the applicant and determining authority is Surrey County Council.
- 1.2 The outline planning proposal relates to the erection of a part 1, 2, 3 and 4 storey extra care development, with basement accommodation, in the form of 2 no (up to) four storey wings (to the flanks) with a single storey link (to the front). The development would include 60 apartments of extra care accommodation (Class C2), for affordable rent, with associated development with car parking and a new access onto Park Street. The site's existing access from Park Road would be converted into a pedestrian and cycle route.
- 1.3 The application proposal is considered to be out of scale and incongruous with the surrounding character of the area with an adverse impact on trees. The proposal would also be harmful to the occupiers of residential amenities of neighbouring properties. However, no objections are raised on highway safety and parking capacity, ecology, Thames Basin Heaths Special Protection Area and flood risk/drainage. As this application is to be determined by Surrey County Council, it is recommended that Surrey Heath raises an objection to this proposal.

2.0 SITE DESCRIPTION

2.1 The application site comprising approximately 0.82 hectares relates to the siting of a former 50 bed care home, Pinehurst, which is now demolished. The site lies in the settlement of Camberley. The application site falls with the Victorian/Edwardian Subdivisions Character Area of the Western Urban Area Character SPD 2012, in a predominantly residential area, located a minimum of about 140 metres south of the defined Camberley Town Centre.

- 2.2 The north west boundary bounds residential properties in Middle Gordon Road (including Roxborough House a recently built flatted development on the north west corner of the site) and flatted development (Buckingham Court and Court Gardens) to the east boundary and detached residential dwellings (accessed from Park Road and Park Street) to the south boundary. Park Road Doctors' Surgery lies to the south east. The Telephone Exchange is located on the west side of Park Road, opposite the application site.
- 2.3 The application site was cleared in 2021, with the care home vacated in 2016. There are some trees around, or close to, all site boundaries but none are protected under a Tree Protection Order. The site lies a minimum of about 1.5 kilometres from the Thames Basin Heaths Special Protection Area (TBHSPA).

3.0 RELEVANT HISTORY

3.1 88/0769

Consultation application by Surrey County Council in respect of the demolition of existing buildings and erection of a single storey 50 (bedroom) place home for the elderly with improved access from Park Road.

No objections raised in October 1988. The development was subsequently approved by Surrey County Council and implemented.

3.2 21/0023/PCA

Consultation application from Surrey County Council for the prior approval for demolition of all existing buildings on the site.

An objection was raised in January 2021 on potential impact on trees (insufficient details provided). The development was subsequently approved by Surrey County Council in April 2021 under permission 2020-0164 and implemented.

4.0 THE PROPOSAL

- 4.1 This is a consultation application under Regulation 3 of the Town and Country Planning General Regulations 1992 to be determined by Surrey County Council (Ref: 2023-0029) for which this Authority is a consultee. The applicant is Surrey County Council who are seeking to deliver social rent extra care apartments, due to a recognised local need, across a number of sites in Surrey, including the proposal at Lakeside School Playing Field site (23/0328/PCM) being reported elsewhere on this Agenda.
- 4.2 The current proposal is an outline application for the approval of access, layout and scale only with details of appearance and landscaping to be determined under a different (reserved matters) application(s).
- 4.3 The proposal is for the erection of a part one to four storey extra care development with a part basement in the form of 2 no (up to) four storey wings (to the west and east flanks) with a single storey link to the front (north), providing, in plan form, a U-shaped development. The development would provide a total of 60 apartments including 57 no one bedroom and 3 no two bedroom apartments of extra care and associated accommodation, for affordable rent, along with associated development and car parking and a new access onto Park Street. The former vehicular access onto Park Road would be provided as a pedestrian and cycle route only. A total of 30 parking spaces would be located for this development, located close to the north boundary of the site.
- 4.3 The proposed west wing of development would measure 40 metres in depth, 18.3 metres in width and a predominantly four storey height of up to 17.3 metres. The proposed east wing would measure 56.7 metres in depth, 18.3 metres in width and a predominantly four storey

height of up to 16.6 metres. The single storey link would have a maximum height of 4.3 metres and a maximum width of 58.3 metres for the development. Flat roofs are proposed over the development including a green roof over the single storey element.

- 4.4 Landscaping would be provided around the proposed building, including a "courtyard" behind the single storey element. Balconies would be provided to the upper floor flats in the flank elevations, and would extend beyond the flank walls of these wings.
- 4.5 The facilities provided within the building include an entrance/reception area, kitchen, dining room, communal lounge, mobility scooter and cycle store, hairdressing/therapy room, activity room, staff office, refuse stores, staff restroom, laundry and changing rooms to be provided at ground floor level, with kitchen AHU, sprinkler tank room, cold water storage tank and pump room, UPS battery room, telecom room and LV switchroom provided in the basement. Smaller "breakout" communal living rooms would also be provided to each wing and upper floor.
- 4.6 This planning application has been supported by the following:
 - Design and Access Statement;
 - Planning Statement;
 - Sustainable Drainage Report;
 - Preliminary Ecological & Net Biodiversity Gain Assessment Appraisal and Bat Survey and Hibernation Survey Report;
 - Air Quality Appraisal;
 - Sustainable Design and Construction Statement;
 - Daylight and Sunlight Report;
 - Transport Statement;
 - Utilities Assessment:
 - Heritage Assessment;
 - Energy Statement;
 - Arboricultural Appraisal and Impact Assessment;
 - Statement of Community Involvement; and
 - Archaeological Assessment.

The officer report below makes references to these documents, where applicable.

5.0 CONSULTATION RESPONSES

5.1 The consultations have been undertaken by Surrey County Council. However, the County Highway Authority has indicated that from their initial assessment it would be reasonable to expect that any highway impacts could be suitably mitigated. In terms of the consultations undertaken by this Authority, these include the following:

| 5.2 | Council's Arboricultural Officer | An objection is raised on the impact on trees. The car park and vehicular access would include level changes and incursions into the root protection of trees close to site boundaries, and the proposed building, including the basement, would be built too close to trees on the boundary [These comments are added at Annex A]. |
|-----|-------------------------------------|---|
| 5.3 | Environmental Health | No objections on noise, air quality, land quality/contamination and construction environmental management, subject to the provision of conditions. |

5.4 Urban Design Consultant Raises concerns about the size of the development on local

character. [These comments are added at Annex B].

6.0 REPRESENTATIONS

- 6.1 The neighbour notification and publicity was undertaken by Surrey County Council. However, no representations have been received in support and 5 representations have been received raising an objection, raising the following objections:
- 6.2 <u>Character and trees</u> [See section 7.3]
 - Scope and style (four storeys high) would be unsuitable for residential area
 - Out of place/keeping with character of the area
 - Significant increase in building height (compared with former building on the site)
 - Development too high
 - Overdevelopment
 - Close to adjoining properties
 - Damage to tree roots in construction of car park
 - Removal of trees and shrubs
- 6.3 Residential Amenity [See section 7.4]
 - Loss of privacy
 - Loss of light
 - · Overlooking from windows/balconies
 - Noise nuisance
 - Noise from vehicles in car park (at rear of neighbouring garden), deliveries, refuse c9llection and visiting vehicles
- 6.4 Highway safety and parking capacity [See section 7.5]
 - Narrow, unsafe access onto Park Street lack of pedestrian visibility and road speeds
 - Traffic disruption during construction phase
 - Existing on-street parking (e.g. from doctors surgery on Park Road)
 - Existing on-street parking restrictions/regulations ignored
 - Size of vehicles (HGV) potentially on local residential roads
 - Inadequate access
 - Increase in traffic
 - Access to the development will accentuate existing traffic movement issues at the Park Street/Lower and Middle Gordon Road junction
 - Structural impact on neighbouring properties from piling
- 6.5 Other matters
 - Impact on view [Officer comment: This is not a material planning consideration]
 - Precedent for urban creep into residential areas

- Impact on doctors surgery (along with other large elderly homes (e.g. Kingsclear)
- Over capacity exists at local doctors (Park Road Surgery)
- Strain on existing community facilities
- General dislike of proposal
- Information missing from plans
- Higher than pre-app proposal (3 storeys)
- Increased danger of flooding

7.0 PLANNING CONSIDERATION

- 7.1 The application site falls within the settlement of Camberley. The application is considered against the relevant policies, which are Policies CP1, CP2, CP5, CP6, CP9, CP11, CP14, DM9, DM10, DM11, DM13, DM16 and DM17 of the Surrey Heath Core Strategy and Development Management Policies 2012 (CSDMP); Policy NRM6 of the South East Plan 2009 (as saved) (SEP); and the National Planning Policy Framework (NPPF); as well as advice within the Surrey Heath Residential Design Guide 2017 (RDG); Western Urban Area Character SPD 2012 (WUAC); Thames Basin Heaths Special Protection Area Avoidance Strategy SPD 2019 (AAS); and the National Design Guide. The main issues to be addressed in the consideration of this application are:
 - Principle and need for the development;
 - Impact on character and trees;
 - Impact on residential amenity;
 - Impact on highways safety and parking capacity;
 - Impact on the Thames Basin Heaths Special Protection Area
 - Impact on ecology; and
 - Impact on flood risk and drainage.

7.2 Principle and need for the development

- 7.2.1 Under the NPPF, there is a presumption in favour of sustainable development. Policy CP1 of the CSDMP sets out the spatial strategy for the Borough and new development is expected to come forward largely through the redevelopment of previously developed land in the west of the Borough. Camberley, as the principal settlement within the Borough has scope for residential development. The application site is previously developed and is located close to the Camberley Town Centre. It is currently vacant but was last used as a care home (Class C2) and the proposal would not result in a material change of use of the land. As such, the principle for the development is therefore established subject to the assessment below.
- 7.2.2 Policy DM14 of the CSDMP indicates that the Council would seek to identify opportunities to enhance and improve community facilities within the Borough, whether through the provision of co-located or new facilities. Paragraph 62 of the NPPF indicates that the type and tenure of housing needed for different groups, including older people and people with disabilities, should be assessed and reflected in policies. In terms of the need for this development, an assessment is required on what facilities the proposal would provide and any knock-on benefits and disbenefits this would have on the care provision in the local area.
- 7.2.3 The current proposal relates to the provision of extra care apartments (Class C2). The future residents would be expected to be mobile (and may drive a car) but with a care package tailored to their needs. The needs statement provided for this application indicates that of the various types of specialised housing, extra care accommodation has the greatest shortfall between provision and demand, particularly within the affordable rental provision. Whilst it is noted that there is a level of provision of care and nursing homes, for which there is currently no needs, extra care provision is more limited, as

indicated in the provided needs assessment from the applicant, and there remains a need for such accommodation. In addition, the provision of 100% socially rented accommodation is a significant benefit of the proposal.

7.2.4 As such, the assessment below has been made on this basis.

7.3 Impact on character and trees

- 7.3.1 Policy CP1 of the CSDMP indicates that new development will come forward largely from redevelopment of previously developed land in the western part of the Borough. Policy DM9 of the CSDMP indicates that indicates that development will be acceptable where it respects and enhances the local character of the environment and protects trees and vegetation worthy of retention and provide high quality hard and soft landscaping where appropriate.
- 7.3.2 Principle VS1 of the WUAC indicates that development would need to reflect the historic plot dimensions, architectural detailing and scale and massing; predominantly contain traditional elements and use a high quality of architectural materials; be principally redbrick with the occasional use of render, stone and boarding with slate or tiled roofs; and provision of opportunities to soften with vegetation. Principle VS3 indicates that buildings that include large areas of flat roof to span the building depth will be resisted and the massing of building and roof elevations should be broken down to avoid this problem.
- 7.3.3 Principle 6.4 of the RDG requires housing development to seek the highest density possible without compromising local character, the environment or the appearance of the area. Principle 6.6 of the RDG would require new residential development to respond to the size, shape and rhythm of the surrounding plot layouts. Principle 6.9 of the RDG would require car parking courts to be designed with active frontages and attractive places with high quality hard and soft landscaping. Where parking courts are provided to the front of development they should be enclosed with strong landscape screens and not be dominant elements in the streetscene. Principle 6.10 of the RDG indicates that where bays are provided, they should accommodate no more than a cluster of three cars. Soft landscaping should be provided between such clusters.
- 7.3.4 Whilst the site is located within the settlement, close to Camberley Town Centre, the location is more suburban with more spacious and verdant characteristics. The proposed built form would be provided in a large building footprint to a greater height than the previous building on the site. This more prominent built form and its overall (and maximum) height and mass would have a much greater impact on local character. Even though the main frontage of the site is treed, the new access would open up the site and the presence of this built form would be apparent form Park Road, particularly after leaf fall.
- 7.3.5 The proposed flat roof nature of the building would not reflect the prevailing character of pitched roof buildings around this site and, whilst appearance is a reserved matter, the modern detailing proposed for the development would be out of character with its surroundings. The proposal would provide balconies which protrude beyond the flank walls of this development which would provide a poor design response. In addition, it would not reflect the Victorian/Edwardian Subdivisions Character Area or Principles VS1 and VS3 of the WUAC.
- 7.3.6 The proposal's layout would provide a parking area with a bank of 20 spaces on its north side, six space opposite (in front of the main entrance) with a further 3 spaces provided to the east flank. The bank of spaces are broken up with soft landscaping with groups of 5 spaces. This arrangement would not comply with the RDG, which requires a maximum grouping of 3 spaces. This combined with the scale of the proposal would provide an urban form of development in this suburban setting.
- 7.3.7 The Council's Urban Design Consultant (UDC) has raised concerns about the urbanising impact of the development, due to the extensive footprint (and resulting scale and height) and loss of vegetation in a verdant setting. She opines that the scheme is characterised

by a simplistic, contemporary design in stark contrast to the existing built context and local distinctiveness.

- 7.3.8 The Council's Arboricultural Officer has raised an objection on the impact of the proposal on trees. Concern has been raised on level changes required for the proposed parking area and vehicular access which would be located close to boundary trees. In addition, the proposed building, particularly the basement accommodation, would be positioned close to retained trees. These works which would be within the root protection areas could be harmful to these trees and sufficient details to indicate how the development can be constructed without harm to these trees has not been provided.
- 7.3.9 As such, harm to the local character, and trees, would occur from this development. It is not considered that the need for this development is an overriding benefit to outweigh this harm. An objection on these grounds is raised with the proposal failing to comply with Policies CP1, CP2 and DM9 of the CSDMP and the NPPF and advice in the WUAC and RDG.

7.4 Impact on residential amenity

- 7.4.1 Policy DM9 of the CSDMP indicates that development will be acceptable where it respects the amenities of the occupiers of neighbouring properties and uses. Principle 6.7 of the RDG requires housing development to seek the highest density possible without impacting on residential amenities. Principle 8.6 of the RDG requires communal outdoor amenity space to be provided for flatted developments with Principle 6.8 of the RDG setting out the minimum space requirements. Principle 8.1 of the RDG states that development which have a significant effect on the privacy of neighbouring properties will be resisted.
- The nearest residential properties lie to the south side of the application site. No. 111 7.4.2 Park Road is a two storey dwelling with its north flank boundary shared with the application site, and the main side wall of this dwelling set 1.5 metres from the mutual boundary. The width of the west wing would lie opposite the length of the rear garden of this property. Whilst it is noted that there is some tree and other vegetation screening to this shared boundary, its three storey form and width in this location and separation distance of 10 metres to the boundary would provide a dominant built form leading to an overbearing impact, particularly after leaf fall. There is a similar arrangement with 139a Park Road, where the chalet bungalow is orientated so that its rear garden is angled towards this boundary. The main part of this dwelling is located a minimum of 2 metres from the mutual boundary. It is noted that there is cherry laurel at this boundary at round 5 metres in height, which while providing some screening would not provide a permanent screen. The three storey form and width of the east wing in this location and separation distance of 11 metres to the boundary in this location would provide a similar dominant built form also leading to an overbearing impact. There would also be the potential for overlooking from the proposed balconies which would provide a 180 degree view.
- 7.4.3 The proposed development would face the rear boundaries of properties 79-87 Middle Gordon Road with 87 Middle Gordon Road recently redeveloped as flats (known as Roxborough House) which is set further back on that site, with its rear wall closer to the mutual boundary with the application site. The minimum levels of separation (about 24.5 to 33 metres, for the west and east the wings of the development, respectively) would be acceptable, with tree and vegetation screening being provided to much of this boundary. Even with the potential loss of vegetation and trees to this boundary and 180 degree views form the proposed balconies, the loss of privacy would be more limited due to the level of separation. The flatted development to the east flank Buckingham Court and Court Gardens are set further from this development with parking areas provided, along with some tree and vegetation screening in between. The relationship of the proposed building with these properties is considered to be acceptable.
- 7.4.4 The proposed parking area would be located close to the north boundary of the site. Environmental Health have not raised an objection on the noise or disturbance from to these properties. However, the land falls to the north boundary and the parking area

would need to be built up close to this boundary. With the resulting reduction in vegetation and trees that would be provided at this boundary, overlooking of these gardens could occur and provide an unneighbourly relationship.

- 7.4.5 The proposed development would provide outdoor private amenity to the rear of the development between the two wings of approximately 970 square metres, to a depth of approximately 41 metres, which would be sufficient amenity space provision and compliance with Principle 8.6 of the RDG, requiring a minimum 3 metre depth to this amenity space. Additional space would be available to the flanks of the proposed development and the former vehicular access to the site. Taking all of this into consideration, it is considered that the level of amenity space for future residents would be acceptable.
- 7.4.5 As such with an adverse impact on an overbearing impact and loss of privacy from the balconies and parking area, the proposal is considered to be unacceptable, failing to comply with Policy DM9 of the CSDMP and the RDG.

7.5 Impact on highway safety and parking capacity

- 7.5.1 Policy DM11 of the CSDMP requires development which would adversely impact the safe and efficient flow of traffic movement on the highway network will not be permitted unless it can be demonstrated that measures to reduce and mitigate such impacts to acceptable levels can be implemented. All development should ensure safe and well-designed vehicular access and egress and layouts which consider the needs and accessibility of all highway users including cyclists and pedestrians. Policy CP11 of the CSDNMP requires development to comply with parking standards.
- 7.5.2 The provision is for 27 car spaces in total for this development which relates to 0.45 car space per unit. The maximum standard is for 0.5 car space per unit. The maximum standard is for one car space per unit. Due to the level of care expected for each resident, the level of parking would appear quite low, particularly noting its more sustainable location close to Camberley Town Centre. The traffic statement from the applicant has advised that 22 parking spaces would be provided for residents, 2 disabled spaces, 5 staff spaces and 1 car club space. A total of 5 staff would be expected to be at the site at any time. Provision for mobility scooter and cycle storage is also proposed.
- 7.5.3 The traffic statement indicates that the current proposal would result in an increase in two-way vehicle trips of 8 during the weekday morning peak and 8 during the weekday evening peak. The new access would be provided onto Park Street which is one of the key routes into the town centre. Whilst this access would be located close to the road junction with Middle Gordon Road and Gordon Road, this should not result in any potential traffic conflict between the proposed access and this road junction. Access arrangements would provide access to all vehicles (including refuse and emergency vehicles).
- 7.5.4 The County Highway Authority has advised that from their initial assessment it would be reasonable to expect that any highway impacts could be suitably mitigated. As such no objections are raised on highway grounds with the proposal complying with Policies CP11 and DM11 of the CSDMP and the NPPF.

7.6 Impact on the Thames Basin Heaths Special Protection Area

- 7.6.1 Policy CP14 of the CSDMP indicates that development will only be granted where the Council is satisfied that the proposal will not give rise to a likely significant adverse effect upon the integrity of the Thames Basin Heath Special Protection Area (TBHSPA). No (net) residential development will be permitted within 400 metres of the SPA. This proposal is 1.5 kilometres from the TBHSPA.
- 7.6.2 Paragraph 3.3 of the AAP indicates that development for residential institutions will be considered on a case-by-case basis and in reaching a decision how the development is occupied and used will be considered. The proposal would provide extra care

apartments which, with a level of care provision, would be a form of residential institution.

- 7.6.3 The proposed accommodation would provide self-contained accommodation for future residents. It is also expected that some residents would have a car, it is considered that the proposal would have an adverse effect on the integrity of the SPA, unless contributions towards SANG and SAMM measures were provided.
- 7.6.4 However, no objections would be raised if such contributions were secured and would, in terms of its impact on the SPA, comply with Policy CP14 of the CSDMP, Policy NRM6 of the SEP, the NPPF and advice in the AAS.

7.7 Impact on ecology

- 7.7.1 Policy CP14 of the CSDMP requires development to conserve and enhance biodiversity with new opportunities for habitat creation and protection will be explored in particular on biodiversity opportunity areas. Development that results in harm to or loss of features of interest for biodiversity will not be permitted.
- 7.7.2 The application site has been the subject of an ecological evaluation which concluded that there was some activity by bats (foraging and commuting around the edge of the site but no roosting in the building, which is now demolished) with a badger sett in the south west corner of the site with some limited badger activity. Works in close proximity to the sett would need to be undertaken under licence. The existing ground conditions and lack of connectivity would mean that there would be limited reptile activity/populations on the site. Mitigation measures have been indicated to ensure no harm to any protected species. Biodiversity Net Gain would be achieved through the provision of grassland and the provision of mixed scrub to site boundaries. However, it is not clear how these areas would be provided alongside rear amenity requirements for this development. In addition, the comments of Surrey Wildlife Trust are awaited.
- 7.7.3 As such and subject to the comments of Surrey Wildlife Trust and clarification on the provision of the proposed biodiversity net gain proposals, no objections are raised on ecology grounds with the proposal complying with Policies CP14 of the CSDMP and the NPPF.

7.8 Impact on flood risk and drainage

- 7.8.1 Policy DM10 of the CSDMP indicates that development within flood risk zones 2 and 3 (medium and high risk), or on sites of 1 hectare or more, will not be supported unless it can be demonstrated that, through a Flood Risk Assessment, that the proposal would, where practicable, reduce risk both to and from the development or at least be risk neutral and, where risks are identified flood resilient and resistant design and appropriate mitigation and adaptation can be implemented so that the level of risk is reduced to acceptable levels, and that the form of development is compatible with the level of risk. Development will be expected to reduce the volume and rate of surface water run-off through the incorporation of appropriately designed Sustainable Drainage Systems (SuDS) at an appropriate level to the scale and type of development.
- 7.8.2 The site lies within Zone 1 (low flood risk). The provided drainage strategy includes the use of porous paving in car parks, attenuation crates within car park areas (to hold back water during extreme weather events), but it is expected that some outflow will enter the sewer system due to poor infiltration rates on the site. These arrangements are to be assessed by the LLFA.
- 7.8.3 As such and subject to any comments from the LLFA, no objections are raised on drainage and flood risk grounds with the proposal complying with Policy DM10 of the CSDMP and the NPPF.

7.9 Other matters

7.9.1 Policy CP2 of the CSDMP requires development to contribute towards carbon dioxide emission reductions increase capacity for renewable and low carbon energy methods.

The proposal would provide sustainability benefits including the provision of photovoltaic panels on the roof (to be provided by condition) and communal air source heat pumps. The reductions in carbon emissions is proposed to be 65%. No objections are therefore raised on these grounds.

- 7.9.2 Policy DM17 of the CSDMP requires development on sites of 0.4 hectares or over to undertake an assessment of the potential archaeological significance of the site. The applicant has provided an archaeology report which recommends that whilst the site is likely to have low archaeological potential, though further excavation is recommended (provided by condition). However, the comments of the County Archaeological Officer have not been received and, subject to their comments, no objections are be raised to the proposal on these grounds.
- 7.9.3 The current proposal relates to residential development with a care element falling within Class C2 (of the Use Classes Order). As such, the proposal is not CIL liable.

8.0 PUBLIC SECTOR EQUALITY DUTY

8.1 Under the Equalities Act 2010, the Council must have regard to the need to eliminate discrimination, harassment or victimisation of persons by reason of age, disability, pregnancy, race, religion, sex and sexual orientation. This planning application has been processed and assessed with regard to the Public Sector Equality Duty. The proposal is not considered to conflict with this Duty.

9.0 CONCLUSION

9.1 No objections are raised to the proposal on parking capacity, ecology, Thames Basin Heaths Special Protection Area and flood risk/drainage grounds. However, it is considered that the proposal would have an adverse impact on local character and concerns are raised on highway safety grounds from potential traffic conflict between the proposed access and a nearby road junction. Under the planning balance under Paragraph 11 of the NPPF, any benefits to health/community would not be so sufficient to outweigh this harm. An objection is therefore raised to the proposal.

10.0 RECOMMENDATION

RAISE AN OBJECTION for the following reasons:

1. The proposed layout including the footprint of the building and the parking area would form poor relationships with neighbouring plots. In addition, by reason of the height, massing and overall floorspace this would result in a quantum of built form and scale of development that would be incongruous and dominant in its setting. The indicative flat roof design and the loss of trees would exacerbate this harm. Consequently the development would cause a loss of spaciousness and verdant character and fail to respect local distinctiveness including the Victorian/Edwardian Subdivisions Character Area, contrary to Policies CP2 and DM9 of the Surrey Heath Core Strategy and Development Management Policies 2012, the National Planning Policy Framework, Principles VS1 and VS3 of the Western Urban Area Character SPD 2012 and Principles 6.4, 6.6, 6.9 and 6.10 of the Residential Design Guide SPD 2017.

- 2. The proposed development by reason of its height, mass, significant increase in floorspace and spread of development and could result in the loss of trees (and other vegetation) which would give rise to an unneighbourly form of development resulting in an overbearing impact and loss of privacy on the amenities of the occupiers of adjoining residential properties, 111 Park Street and 139a Park Road and loss of privacy due to overlooking from the parking area over gardens at 83 and 85 Middle Gordon Road and Roxborough House. The development would therefore fail to respect the amenities of the occupiers of adjoining residential properties, contrary to Policy DM9 of the Surrey Heath Core Strategy and Development Management Policies 2012 and Principles 6.4 and 8.1 of the Residential Design Guide SPD 2017.
- 3. It has not been demonstrated that the development could be constructed without harm to significant trees failing to comply with Policy DM9 of the Surrey Heath Core Strategy and Development Management Policies 2012.

Informative(s)