22/0958/FFU

Reg. Date 8

8 December 2022

Old Dean

LOCATION:	61 London Road, Camberley, Surrey, GU15 3UG
PROPOSAL:	Erection of a three storey building with basement to provide a 61 bedroom care home and associated accommodation, parking, landscaping and access
TYPE:	Full Planning Application
APPLICANT:	Pathway Healthcare Ltd
OFFICER:	Duncan Carty

This application has been reported to the Planning Applications Committee because it relates to major development (providing over 1,000 square metres of floorspace).

#### **RECOMMENDATION: REFUSE**

#### 1.0 SUMMARY

- 1.1 This planning application is for the erection of a two storey building with basement and roof level accommodation to provide a 61 bedroom care home. The 0.24 hectare site is within the settlement of Camberley and lies approximately 565 metres from the Thames Basin Heaths Special Protection Area (SPA). The site is vacant and there are trees on the site frontage, within the application site, which are protected under Tree Preservation Order TPO/7/71.
- 1.2 The proposal is unacceptable because of its impact on local character, design and trees, and amenity for future occupiers. It is not considered that any community/health benefits from the proposal would outweigh this harm. However, no adverse impact on considered to be acceptable in terms of its impact on highway safety and parking capacity, ecology, Thames Basin Heaths Special Protection Area and flood risk/drainage.
- 1.3 As such, the proposal is recommended for refusal.

## 2.0 SITE DESCRIPTION

- 2.1 The application site is an irregular shaped site within the settlement of Camberley. The 0.24 hectare site on the south side of London Road, facing Diamond Ridge Woods, within the Historic Route Main Thoroughfares character area as defined within the Western Urban Area Character SPD 2012. The site lies approximately 565 metres from the Thames Basin Heaths Special Protection Area (TBHSPA). It is also located about 1 kilometre east of Camberley Town Centre.
- 2.2 The application relates to a vacant site, formerly occupied by two dwellings, 61 and 63 London Road, with residential properties in larger plots in a suburban location. The existing access, to the former dwelling 61 London Road, is from a private access road to the east flank boundary (shared with 55 and 57 London Road which lie on the opposite side of this access road, 59 London Road which lies partly to the rear of the plot and partly faces towards the rear of the application site, and 57a London Road) with the former access to 63 London Road directly from London Road. No. 65 London Road lies to the west flank with Luccombe Dell, off Knightsbridge Road, to the rear. The land falls to the rear with major

trees on the frontage, some within the highway verge. The trees on the site frontage, within the application site, are protected under Tree Preservation Order TPO/7/71.

2.3 Diamond Ridge Woods lies to the north of London Road, in this location, and forms a part of the Countryside (beyond the Green Belt). The woodland extends northwards into a Site of Nature Conservation Interest (SNCI) and further into a Site of Specific Scientific Interest (SSSI) within the Thames Basin Heaths Special Protection Area (SPA).

## 3.0 RELEVANT HISTORY

The application site has an extensive planning history of which the most relevant is:

3.1 04/0511 Outline application for the erection of 2 two storey buildings with accommodation in the roof to comprise a total of 20 flats with associated parking and access from London Road following the demolition of existing buildings (siting and means of access to be considered).

Non-determination appeal withdrawn in January 2005. The proposal was considered unacceptable on tree grounds.

3.2 06/0998 Outline application for the erection of 2 two storey buildings with accommodation in the roof to comprise a total of 20 flats with associated parking and access from London Road following the demolition of existing buildings (siting and means of access to be considered.

Non-determination appeal withdrawn in May 2008. The proposal was considered unacceptable on SPA grounds.

3.3 07/0101 Outline application for the erection of a part single storey/part two storey building with accommodation in the roof comprising a 72 unit residential care home (Class C2) following the demolition of 61 and 63 London Road with parking and access.

Refused in April 2007 on SPA grounds and it has not been demonstrated that the accommodation could be provided with sufficient communal accommodation. Appeal was withdrawn in February 2008.

3.4 07/0988 Outline application for the erection of a part single storey/part two storey building with accommodation in the roof and basement comprising a 58 unit residential care home (Class C2) following the demolition of 61 and 63 London Road with parking and access (layout, scale and means of access to be considered).

Approved in April 2008.

3.5 08/0912 Reserved matters pursuant to outline planning permission 07/0988 (appearance and landscaping to be considered).

Approved in January 2009. This development would have been provided with a two storey form with accommodation in the roof but with a single storey link and no rear wing. This would have provided a reduced scheme, when compared with the current proposal.

3.6 10/0901 Application for an extension to the time limit of outline planning permission 07/0988.

Approved in May 2011.

3.7 11/0021 Application for the prior approval for the proposed demolition of two dwellings.

Approved in February 2011 and implemented.

## 4.0 THE PROPOSAL

- 4.1 The current proposal relates to the erection of a care home in the form of a two storey block of development with accommodation in the roof and basement, partly cut away at the rear, providing 61 bedroom/en-suites of care accommodation. The proposal would be provided for residents needing dementia care.
- 4.2 The proposed development would be T-shaped, with west and east flank and rear wings. The west and east wings of the proposed building would be provided centrally to the site, with the rear wing extending towards the rear boundary of the site.
- 4.3 The proposal would measure a maximum width of 43 metres and depth of 36 metres, with a maximum height of 13.1 metres, when viewed from the front of the site (17.1 metres from general ground level at the rear and 18 metres from basement level). This building would be set back about 15 metres from the front boundary (with London Road) and about 14 metres to the nearest point of the dwelling, 59 London Road, to the rear. The proposed building would set-in 4 and 4.5 metres from the west and east flanks, respectively.
- 4.4 The proposed building would provide a traditional design with a series of forward projecting gables against a hipped roof to the flank edges. These gables would provide relief in the front elevation, with the side and rear elevations providing less relief. A number of materials are to be provided with two brick colours, render, stone (for window surrounds) and grey window frames and rainwater goods. The proportion of the proposed building would be flatted roofed with a crown/recessed flat roof provided behind the gables/pitched roof to span the width of the proposed building wings.
- 4.5 The proposal would provide extended parking facilities to provide a total of 16 car parking spaces for the development which would be located to the front of the proposed building, using a new access onto London Road. This access would be provided across a ditch in the highway verge at the front of the site. The site would be expected to provide 18 staff at any given time.
- 4.6 The proposal would provide 66 bedrooms with accommodation including dining/day rooms and hair salon. Each bedroom would be provided with an en-suite bathroom, with further assisted bathrooms, WCs, storage, sluice room and a lift, nurse and treatment rooms, manager's office and administration office to be provided. Nine bedrooms would be provided at basement level, 15 at ground floor level and 42 on the upper floors.
- 4.7 The energy statement has indicated that there would be a fabric first approach to provide energy efficiencies from the building, including ventilation and insulation measures, but with the use of hybrid Variable Refrigerant Flow heat pumps to provide a low carbon energy solution for the development.
- 4.8 This planning application has been supported by the following:
  - Planning, Design and Access Statement;
  - Flood Risk Assessment and Drainage Report;
  - Noise Assessment;
  - Transport Statement;
  - Arboricultural Method Statement and Tree Survey; and
  - Energy statement.

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

# 5.0 CONSULTATION RESPONSES

5.1 County Highway Authority No objections subject to conditions [*These comments are* 

#### added at Annex A].

- 5.2 Local Lead Flood Authority No objections, subject to conditions in relation to the agreement of the detailed drainage design and its verification.
- 5.3 Archaeology Officer No objections.
- 5.4 Arboricultural Officer An objection is raised on impact on trees from the access/car park arrangements and built form (particularly the basement accommodation) and trees previously lost at the site frontage will need to be replaced which could also impact on the proposal [*These comments are added at Annex B*].
- 5.5 Surrey Wildlife Trust Comments awaited.
  - Natural England No objections, subject to conditions to mitigate impact on the SPA including limitations on occupancy/use.
- 5.7 Surrey Police No objections, suggest condition so that development could achieve a Secure by Design Gold or Silver accreditation [Officer comment: Such a condition would not meet the tests for imposing conditions in the NPPF]
- 5.8 Urban Design Consultant Raises an objection to the scale of the built form [*These comments are added at Annex C*].
- 5.9 NHS Frimley Integrated Care Board (ICB) An objection is raised on the basis that there is no demonstrated need for this development in the local area and that the proposal could result in an increase of care needs in the local area.
- 5.10 SCC Adult Social Care Group (ASC) An objection is raised on the impact on local health infrastructure and the need, to meet complex levels of mental health need and physical frailty, has not been demonstrated.

## 6.0 **REPRESENTATIONS**

5.6

- 6.1 There were 7 notification letters originally sent to neighbouring properties on 9 December 2022, and notified in the press on 21 December 2022. No representations of support have been received. To date, 10 letters of objections have been received summarised below:
- 6.2 <u>Principle and need</u> [See section 7.2]
  - Overwhelming amount of care homes in the local area and beyond (unsure of need for this proposal)
  - Strain on existing community facilities
- 6.3 <u>Character and trees</u> [See section 7.3]
  - Too big/high/scale of development, towering over nearby properties
  - Out of keeping with character of area
  - Over development

- Oppressive, monolithic design
- Negative visual impact on landscape and locality predominantly tree lined and opposite Diamond Ridge Woods.
- Scale inappropriate for a residential area
- Industrial sized building, more akin to an industrial park or office site

# 6.4 <u>Residential Amenity</u> [See section 7.4]

- Close to adjoining properties
- Increase in pollution
- Noise pollution, and fumes, from cars, comings and goings, etc.
- Loss of privacy/overlooking
- Loss of light
- Impact on quiet amenity from increased traffic (to access road)
- 6.5 <u>Highway safety and parking capacity</u> [See section 7.5]
  - Inadequate public transport provisions no bus routes in the immediate vicinity
  - Inadequate parking provision for staff and visitors 16 when 31 would be required and accentuated during shift changeover
  - Level of parking provision would lead to significant overspill onto the A30, which has a 40/50mph speed limit, and local streets
  - Existing parking on A30/footway, which is hazardous to pedestrians and other road users, will be made worse
  - Loss of parking
  - Inadequate access
  - Increase in traffic
  - Access road (to east flank) is not suitable for commercial traffic (deliveries, commercial waste, build and maintenance) and would have increased usage
  - Go against policy to reduce accesses onto A30 for safety reasons (e.g. Knightsbridge Road and Middleton Road)
  - Construction access should be from new access point (and not access road)

# 6.6 Other matters

- General dislike of proposal [Officer comment: This is not further explained]
- Impact on foundations [Officer comment: This is a Building Control matter and would not be a reason to refuse this application]
- Block views [Officer comment: This is not a material planning consideration]
- Impact on drainage from hardstanding

## 7.0 PLANNING CONSIDERATION

7.1 The application site lies in the settlement of Camberley and within the Main Thoroughfare character area. 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. Reference to the NHS/SCC Joint Health and Social Care Dementia Strategy for Surrey 2022 to 2027 (DS) is also made. 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 The NPPF has a presumption is favour of sustainable development and identifies three overarching objectives to achieving sustainable development: namely economic, social and environment. The social objective seeks to support strong, vibrant and healthy communities by supporting a number and range of housing.
- 7.2.2 The optimum reuse of this site is for a residential use (Class C2). However, the proposal is for a Class C2 development and it is subject to the need as to whether the principle is accepted.
- 7.2.3 The need response from the applicant sets out the national need for care home accommodation, which is not disputed, but also indicates that the Surrey Heath Housing Market Assessment 2014 indicates a need for specialist housing accommodation, particularly for the elderly (including for persons with dementia). However, the Local Housing Needs Assessment 2020 provides more recent advice indicating that the number of residents over the age of 65 is forecasted to rise by a half by 2040 which is due to a growing older population and increasing life expectancy and there is a clear need to accommodate households to support such residents, but many could be accommodated with adaptations to properties to meet their changing needs.
- 7.2.4 The comments of the SCC Adult Social Care Group has raised an objection on the impact on the local health infrastructure and the need, to meet complex levels of mental health need and physical frailty, has not been demonstrated. The NHS Frimley Integrated Care Board (ICB), formerly the Care Commissioning Group (CCG), has indicated that there is no such need in the local area for this accommodation, and concerns raised about the impact on primary care.
- 7.2.5 It is a concern that the facility could increase demand for services to support care provision and that this would put a strain on these local facilities. In addition, receiving those from a wider catchment beyond the ICB area (and borough/county boundaries) would add to the strain on local services. Whilst, it is considered that the impact on local health services would not be a reason in itself to warrant the refusal of this application, it must be noted that the need for the development may not be so significantly weighing in favour of the scheme (against the harm of the development, as assessed below) taking into consideration the likely impact on existing local care facilities. 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 states 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 MT1 of the WUAC states that new development should consist principally of two storey buildings, maintain the open textured green character with visual gaps through to vegetation and maintain the existing rhythm of plot widths. Principle MT5 of the WUAC indicates that measures to minimise the impact of car parking on the streetscene would be encouraged providing that this does not facilitate the paving over of front garden areas.
- 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 screeens 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 The site is located within the settlement area, falling within the Historic Route character area. The site, noting that it is cleared of built form, remains with open, spacious and verdant characteristics to site boundaries. The site frontage is fairly open, with trees only to the east side of this frontage, but it is noted that some replacement trees (for lost TPO trees) are expected to this frontage. The site lies opposite woodland (within the defined countryside) and there are gaps between built development to the west and east flank of this site. The proposed development would provide a large block of development (two storey in height with accommodation in the roof) with limited gaps to the flanks which would provide a building much bigger than nearby buildings and would not maintain the rhythm of, and gaps between, development failing to comply with Principle MT1 of the WUAC. In addition, the rear wing extends further towards the rear boundary and includes a cut away basement level which would accentuate its height and mass, when viewed from the rear of the site.
- 7.3.5 It is noted that the proposal includes a series of front projecting gables and bays which would provide relief in the front elevation. However, the height, width and depth of the proposal would be out of scale with surrounding development, and appear much larger than surrounding development. The gaps to each flank do not sufficiently compensate for this impact. The proposal would provide a bank of car parking of 16 spaces to the front of the development, with access road and footways, which are not broken-up by soft landscaping failing to comply with Principles 6.9 and 6.10 of the RDG. This would provide a further urbanisation of the site, which could not be wholly hidden by vegetation to the site frontage (as viewed from London Road), due to the limited landscaped strip that would be provided between the car parking and front boundary of the site.
- 7.3.6 The Council's Urban Design Consultant (UDC) has advised that the overall scale of the development is out of character. The detailed design elements of the proposal with vertical elements, and different material finishes, would add interest but provide an over-busy design treatment and, along with its scale, a strong domineering appearance which would be out of character for the area and does not integrate well with the existing built context.
- 7.3.7 The Council's Arboricultural Officer considers that the proposal would provide hardstanding areas (for the parking to the front) which would include intrusions into the major trees at the front of the site, for which the Root Protection Area (RPA) is already compromised by the A30 highway and other hardstandings. The basement element would also impact in the RPAs where to construct would require greater excavations to provide working space. There is also very little space at the front to provide landscaping to effectively screen this development with any trees only likely to provide understorey planting. There is concern that the proposal would lead to the loss of major trees to the site frontage which form an important part of the local character. An objection is raised on this ground. Separate from this proposal, replacement trees for lost TPO trees to the

highway verge are expected, but this planting, along with retained trees, would not result in a substantial screen to the site frontage being provided.

- 7.3.8 Planning permission (under outline permission 07/0988 and reserved matters permission 08/0912) has been previously granted for a care home on this site. However, the approved scheme included a single storey link element to break up the front elevation and did not have a rear wing. The current proposal is materially larger than the approved scheme. This permission also predates current local policy and guidance within the RDG and WUAC.
- 7.3.9 As such, harm to the local character (and trees) would occur from the proposed development. It is considered that the need for this development (as indicated in section 7.2 above) is not an overriding benefit to outweigh this harm. An objection on these grounds is raised with the proposal failing to comply with Policies 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 8.2 of the RDG indicates that all habitable room rooms should maintain at least one main window with an adequate outlook to external spaces. Principle 8.7 of the RDG indicates that usable, high quality private amenity space will be required for all new residential care homes.
- 7.4.2 The nearest residential properties are on the either side of the application site and to the rear. The west side elevation of the proposed development would be set away approximately 18 metres from the flank wall of 65 London Road (with a garage for that property in between) and 16.5 metres from the east flank wall of the proposal with the front walls of 55 and 57 London Road, which face the application site. These levels of separation would not result in material harm in privacy, light, overbearing or overshadowing terms, to the residential amenity of the occupiers of these properties.
- 7.4.3 The corner of the rear wing of the proposed development would be set 14 metres from the nearest front corner of 59 London Road to the rear. Noting the more oblique arrangement, and with the east wing of the development set 32 metres forward of the front wall of this property, the proposal would not result in material harm to the residential amenity of the occupiers of this property.
- 7.4.4 The proposal would not have any significant impact on any overbearing impact or overshadowing or loss of light to any adjoining or nearby residential property.
- 7.4.5 The proposed development would provide about 1330 square metres of rear amenity space, to a maximum depth of 43 metres. This is considered to be sufficient outdoor private communal amenity space for the future occupiers of the development, exceeding the minimum requirements in Principle 8.6 of the RDG (3 metre deep rear garden space). However, the proposal would provide basement level bedroom/en-suite accommodation with a poor outlook for future residents, consisting predominantly of retaining wall and railings above, failing to comply with Principle 8.2 of the RDG.
- 7.4.4 As such, the proposal is considered to be unacceptable providing poor outlook for some of the future residents failing to comply with Policy DM9 of the CSDMP and Principle 8.2 of 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 CSDMP requires development to comply with parking standards.

- 7.5.2 The provision is for 16 car spaces in total for this development which equates to one car space per 3.8 bedrooms. This level of provision is lower than the recommended maximum standards of one per 2 bedrooms for such accommodation (providing 31 car parking spaces) unless an individual assessment has been undertaken. However, noting the expected staff levels (18 on site at any given time), the parking levels have been considered acceptable by the County Highway Authority on the basis that the site is in a sustainable location where trips other than be car are viable and could be supported and promoted through implementation of a Travel Plan, which would be conditioned, if minded to approve this proposal.
- 7.5.3 The traffic statement indicates that the current proposal would result in a level of parking below the maximum standard. Noting the sustainable location close to bus services and with a cycle lane in the footway to the site frontage. In addition, overspill parking would not be available on A30 London Road, due to its primary route and traffic speed. Adequate site visibility would be provided at the site access and a ghost right turn could be provided (by condition) to allow vehicles to wait to turn into the site, without disrupting traffic flows on this highway. These access arrangements are considered to be acceptable by the County Highway Authority.
- 7.5.4 As such, no objections are therefore raised on these grounds. As such, the proposal is considered to be acceptable on parking capacity and highway safety 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 states 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 (SPA). The site lies approximately 565 metres from the SPA. 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. Residential institutions with permanent residents, such as care/nursing homes, the likely activity levels of the residents will be taken into account in assessing whether the development is likely to give rise to a significant impact on the SPA.
- 7.6.2 The proposed accommodation would provide bedroom/en-suite accommodation only and a level of care is required for residents. With limitations on occupancy to be secured by legal agreement or conditions, it is considered that the proposal would not have an adverse effect on the integrity of the SPA. Natural England has raised no objections to the proposal.
- 7.6.3 As such, the proposal is considered to be acceptable in terms of its impact on the SPA complying with Policy CP14 of the CSDMP, Policy NRM6 of the SEP, the NPPF and advice in the AAS.

## 7.7 Impact on flood risk and drainage

- 7.7.1 Policy DM10 of the CSDMP states 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.
- 7.7.2 The site lies within Zone 1 (low flood risk). The provided drainage strategy includes the use of porous paving in car parks/hardstanding, water butts, green roofs (on the flat

roof/crown roof element), rain gardens, and geo-cellular storage. These arrangements are accepted by the LLFA.

7.7.3 No objections are raised on drainage and flood risk grounds with the proposal complying with Policy DM10 of the CSDMP and the NPPF.

#### 7.8 Other matters

- 7.8.1 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). No objections are therefore raised on these grounds.
- 7.8.2 Policy CP14 of the CSDMP indicates that development that results in harm to or loss of features of interest, i.e. habitats, for biodiversity will not be permitted. The site has been cleared and does not include habitats for protected species. It is therefore considered to be acceptable on these grounds.
- 7.8.3 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. However, the County Archaeological Officer has indicated that no objections be raised to the proposal on these grounds.

## 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 The current proposal is considered to be harmful to local character and design, its impact on trees and amenity of future residents. Under the planning balance under Paragraph 11 of the NPPF, any benefits to health/community would not be so sufficient to outweigh this harm. However, there are no adverse impacts from the proposal on land use, residential amenity for local residents, highway safety and parking capacity, ecology, Thames Basin Heaths Special Protection Area and flood risk/drainage grounds. The application is therefore recommended for refusal.

## 10.0 RECOMMENDATION

REFUSE for the following reasons:

1. The proposed development, by reason of its height, design, mass, significant increase in floorspace, and spread of development would give rise to a quantum of built form that would form poor relationships with neighbouring buildings and have an urbanising impact on the open and sylvan character of the area. The development would therefore fail to respect the character and quality of the area including the Historic Route - Main Thoroughfares Character Area, contrary to Policies CP2 and DM9 of the Surrey Heath Core Strategy and Development Management Policies 2012 and the National Planning Policy

Framework, Principle MT1 of the Western Urban Area Character SPD 2012 and Principles 6.4 and 6.6 of the Residential Design Guide SPD 2017.

- 2. The proposed development, by reason of its spread of development across the site, including hardstanding car park and access areas and basement level accommodation, would have an adverse visual impact on local character and the streetscene and would lead to conditions harmful to tree health resulting in the potential loss of major trees on the site, including tree protected under Tree Preservation Order TPO 07/71, without the space to replace them which would have an adverse impact on the spacious and sylvan character of the area failing to comply with Policy DM9 of the Surrey Heath Core Strategy and Development Management Policies 2012 and the National Planning Policy Framework and a Principles 6.9 and 6.10 of the Residential Design Guide SPD 2017.
- 3. The proposed development, by providing basement level living accommodation (bedrooms) for future residents, which would result in a poor outlook for such future residents, failing to comply with Policy DM9 of the Surrey Heath Core Strategy and Development Management Policies 2012 and Principle 8.2 of the Residential Design Guide SPD 2017.

# Informative(s)