

<b>LOCATION:</b>	Westcroft Park Farm , Windlesham Road, Chobham, Woking, Surrey, GU24 8SN
<b>PROPOSAL:</b>	Construction of 20 dwellings with associated parking, access and landscaping following demolition of existing buildings (except Post Box Cottage)
<b>TYPE:</b>	Full Planning Application
<b>APPLICANT:</b>	Searchfield Ascot Park Ltd
<b>OFFICER:</b>	Navil Rahman

This application has been reported to the Planning Applications Committee because it is a major development (a development of ten dwellings or over).

## **RECOMMENDATION: REFUSE**

### **1.0 SUMMARY**

- 1.1 The application relates to the redevelopment of an existing private equestrian site, for the construction of twenty residential units together with associated parking and landscaping.
- 1.2 The site is located within the Green Belt and the development is considered to result in substantial harm upon the openness of the Green Belt representing inappropriate development in the Green Belt. By association, the development would conflict with the purposes of the Green Belt by reason of countryside encroachment.
- 1.3 No very special circumstances have been identified that would outweigh the harm to the Green Belt and the other harm identified. Other harm includes the development being contrary to the Council's spatial strategy, resulting in major development to an unsustainable and unsuitable location.
- 1.4 In addition, the proposed layout and quantum of development would be considered uncharacteristic of the low-density rural setting. In the absence of a legal agreement to secure affordable housing and SANG monies the proposal would also conflict with the Thames Basin Heath SPA.
- 1.5 The application is therefore recommended for refusal.

### **2.0 SITE DESCRIPTION**

- 2.1 The application site relates to an irregular shaped plot of land situated on the northern side of Windlesham Road between the settlements of Windlesham and Chobham, within the Green Belt. The site measures approximately 1.83 hectares and forms Westcroft Park Farm, previously known as the Ascot Polo Club. The site is primarily accessed via Windlesham Road, with vehicular access found to the centre of the boundary of the site, whilst a secondary access is found to the western part of the site fronting Windlesham Road as well as a disused access via Woodcock Lane which

adjoins the eastern boundary of the site. Windlesham Road does not benefit from any pedestrian footpath to the area surrounding the application site.

- 2.2 The site comprises a number of buildings on site: a two-storey dwelling (Post Box Cottage) to the southeast corner of the site; a dated stable block and storage building to the southwest corner of the site; and large steel barns situated towards the centre of the site comprising stabling, tack rooms, storage, groom accommodation, office, and ancillary facilities. The buildings on site measure approximately 2,937 sqm in footprint with a range of building heights standing at a maximum height of approximately 7.55m. The northern part of the site is open, with areas of hardstanding and is used for informal parking.
- 2.3 The site and its surroundings are predominantly rural in character with a number of agricultural and equestrian use whilst there is a limited number of low-density residential development. Immediately north and northwest of the site is open grazing land and, to the east a horticultural nursery which includes various buildings and structures spanning to the northeast of the application site. To the west is Westcroft Park House, a large mansion house and its ancillary buildings, and Graylands, a residential chalet style bungalow which sits to adjacent to the southwestern corner of the site. Further east is a small number of single-family residential dwellings fronting Windlesham Road. To the south of the site to the other side of Windlesham Road is Windlecroft Farm. The site benefits from extensive mature planting predominantly to the southern, eastern, and western boundaries of the site.

### **3.0 RELEVANT PLANNING HISTORY**

- 3.1 14/0590 Erection of a two-storey dwelling with accommodation in the roof and an attached garage building with accommodation above following the demolition of existing buildings. *Granted 27/10/2014.*
- 3.2 15/0110 Erection of a two-storey detached dwelling with accommodation in the roof and a basement with linked two storey covered swimming pool block, access drive, balancing pond, and landscaping with retention of Post Box Cottage following the demolition of all other existing buildings. *Granted 20/05/2015.*
- 3.3 19/0308 Certificate of Lawful Proposed Development to confirm the commencement of the construction of the development, under planning permission SU/15/0110 (relating to the erection of a two-storey detached dwelling with accommodation in the roof and a basement with linked two storey covered swimming pool block, access drive, balancing pond, and landscaping with retention of Post Box Cottage following the demolition of all other existing buildings). *Certificate of Lawfulness Granted 17/10/2019*

### **4.0 PROPOSAL**

- 4.1 Planning permission is sought for the demolition of the existing buildings on site (aside from Post Box Cottage), and the construction of twenty residential units, in the form of 9x4 bedroom, 7x3 bedroom, 3x2 bedroom and 1x1 bedroom units, together with ancillary parking and landscaping. The central vehicular access would be retained and enhanced to service the development.
- 4.2 The dwellings would have a mixed form, comprising of chalet bungalows, two-storey dwellings, and two-storey properties with accommodation in the roof space. Units 7-11 would form part of a flatted block, with Units 7, 8 and 11 having private entrances, with Units 9 and 10 sharing an access lobby. All residential units would have private

amenity spaces apart from Units 8-10 which would have access to the proposed shared communal space.

Unit No (type)	RDG Guidance	Proposed private amenity space
1 (3b6p)	55	372.5
2 (3b6p)	55	230.75
3 (3b6p)	55	85.6
4 (4b7p)	70	127.9
5 (4b7p)	70	119.4
6 (4b8p)	70	83
7 (2b4p)	55	81.75
8 (2b4p flat)	N/A	0
9 (1b2p flat)	N/A	0
10 (2b4p flat)	N/A	0
11 (3b5p)	55	63.7
12 (4b8p)	70	115.7
13 (4b8p)	70	86.1
14 (3b6p)	55	66.8
15 (3b6p)	55	67.25
16 (4b8p)	70	68.05
17 (4b8p)	70	108.2
18 (4b7p)	70	178.4
19 (4b7p)	70	170.3
20 (3b6p)	55	109.7

Table 1 – Private amenity provision

4.3 The proposed housing mix are outlined in table 2 below:

Unit Type	Number of Units	Unit Percentage
1-bedroom	1 (1 flat)	5%
2-bedroom	3 (2 flats + 1 dwelling)	15%
3-bedroom	7 (7 dwellings)	35%
4-bedroom	9 (9 dwellings)	45%

Table 2 – Housing Mix

4.4 Table 3 below provides a comparison between the existing and proposed development. The heights of the existing buildings range, with a maximum height of approximately 7.55m and 1.1m (lowest) whilst the proposed heights of the buildings would range between maximum heights of 7.45m to 9.7m to the ridge.

	Building Footprint (m <sup>2</sup> )	Hardstanding (m <sup>2</sup> )	Volume (m <sup>3</sup> )
Existing	2,937.0	6,769.0	13,001.0
Proposed	1,896.6	3,726.6	12,313.5
Difference (%)	-35%	-44.94%	-5%

Table 3 – Existing and proposed comparison

- 4.5 Units 8, 9 and 10 (2x2 bedroom flat and 1x1 bedroom flat) would be shared ownership units i.e., a 15% affordable housing provision.
- 4.6 Units 1 and 2, would be sited to the southwest corner of the site, designed in a chalet bungalow form. The remaining units would be spread across the centre and rear of the site contained in a rectangular plot, surrounded by soft landscaping with vehicular access running down towards the western boundary of the site to the rear. Soft landscaping would be retained and enhanced to the boundaries of the site.
- 4.7 Forty-six car parking spaces, including six visitor spaces and two blue badge spaces would be provided. Each dwelling would have two allocated parking spaces whilst dwelling 7 (2-bedroom) and flats 8-10 would have one allocated space. Each unit would have access to an EV charging point. 12 PV panels would be installed to the roof of the flatted development, whilst each unit would benefit from air source heat pumps and air source hot water cylinders. The fabric insulation is proposed to be above the minimum standards required by the Building Regulations.
- 4.8 The proposed material palette seeks a traditional aesthetic with a mix of red brick work, render, clay, and slate roof tiles.
- 4.9 The application has been supported by the following documents:
- Design and Access Statement
  - Planning Statement
  - Transport Statement
  - Travel Plan
  - Landscape & Visual Impact Appraisal
  - Landscape Master Plan
  - Arboricultural Impact Assessment (AIA) and Method Statement (AMS)
  - Ecological Impact Assessment (including Biodiversity Net Gain measure)
  - Historic Environment Desk-based Assessment
  - Sustainability and Energy Statement
  - Flood Risk Assessment and Drainage Strategy
  - Affordable Housing Viability Appraisal

## **5.0 CONSULTATION RESPONSES**

5.1	Surrey County Highway Authority	<p>Raise objection on the following grounds:</p> <p>The development would not provide safe and suitable access for all users and therefore fall contrary to the objectives of supporting sustainable modes of transport.</p> <p>See Annex A for a copy of the response.</p>
5.2	Climate Change Officer	No representation received.
5.3	Lead Local Flood Authority	Raise no objection subject to condition relating to sustainable urban drainage (SuDs).
5.4	Council's Drainage Engineer	No representation received.
5.5	Council's Housing Manager	Raise no objection, however, recommends delivery of affordable housing to be in the form of socially rented units.
5.6	Arboricultural Officer	Raises no objection, however, recommends pre-commencement condition in relation to tree protection measures and soft landscaping.
5.7	Environmental Health Officer	Raise no objection subject to contaminated land condition and a Construction Environment Management Plan (CEMP).
5.8	Surrey Wildlife Trust	Raise no objection and recommend the submission of a Construction Environment Management Plan (CEMP) at condition stage.
5.9	Surrey Fire and Rescue	Raise no objection to the proposal on fire safety grounds.
5.10	Joint Waste Solutions	Raise no objection.
5.11	Thames Water	Raise no objection subject to conditions relating to foul water and surface water drainage.
5.12	Chobham Parish Council	<p>Raise objection on the following grounds:</p> <ul style="list-style-type: none"> <li>• Inappropriate development within the Green Belt</li> <li>• Permissive pedestrian route should be given</li> </ul>

no weight and does not overcome sustainable transport concerns.

- Harm of the cycle stores upon the openness
- Potential overlooking of Plot 1 to the Graylands
- Supports SCC Highways objection.

5.13 Council's Viability Consultant

Raises no objection. The submitted evidence demonstrates that the developer profit level would be towards the lower range, and subsequently the offer of three shared ownership units is considered reasonable.

## 6.0 REPRESENTATION

6.1 A total of fourteen letters of consultation were sent on the 05/10/2022 to neighbouring residents, together with a site notice dated 10/10/2022 and press notice on the 21/10/2023. Six letters (from five households), three of support and three raising objections were received as part of the public consultation exercise. The concerns are summarised and responded to below.

- Amenity Impact - harm to privacy, increased noise pollution. *[Officer response: The proposed development would not be considered to result in any significant amenity harm over and above the existing development. The amenity impact of the development is further considered in section 7.5 of the report].*
- Concerns regarding the height, orientation, and position of the development relative to neighbouring properties. *[Officer comment: The proposed height, layout and quantum of development raises concerns. This is considered further in section 7.4 of the report.]*
- Against fundamental aim of Green Belt to prevent urban sprawl. *[Officer comment: The development would be considered inappropriate development within the Green Belt. This is considered further in section 3 of the report].*
- Demand does not exist. *[Officer comment: The Council can demonstrate a 5-year housing supply and therefore the provision of additional housing is not given significant weight.]*
- Unsustainable location without car use, no footpath or public transport. Increased traffic to busy road. *[Officer comment: The development is considered an unsustainable location. This is considered further in section 7.6 of the report.]*

## 7.0 PLANNING CONSIDERATIONS

7.1 In considering this development regard is given to Policies CP1, CP2, CP5, CP6, CP8, CP11, CP12, CP14, DM1, DM3, DM7, DM9, DM10, DM11, and DM13 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); Thames Basin Heaths Special Protection Area Avoidance Strategy SPD 2019 (AAS); Development Contributions SPD (2011); the Infrastructure

Delivery SPD (2014); the Planning Practice Guidance (PPG); the Written Ministerial Statement 24.05.21 (WMS); the Council's First Homes Policy Guidance Note 2021 (FHP); and the National Design Guide.

7.2 The key issues to be considered are:

- Principle of development, affordable housing provision, need and Green Belt assessment.
- Impact on the character, appearance, and trees of the surrounding area.
- Impact on residential amenity.
- Impact on sustainability, highways safety and parking capacity.
- Impact on flood risk and drainage.
- Impact on the Thames Basin Heaths Special Protection Area
- Impact on biodiversity and ecology; and
- Other matters.

### **7.3 Principle of development, affordable housing provision, need and Green Belt assessment.**

7.3.1 Section 13 of the NPPF contains specific policies relating to development within the Green Belt. Paragraph 147 of the National Planning Policy Framework (NPPF), states that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

7.3.2 Paragraphs 147 and 148 of the NPPF further state that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt.

7.3.3 The NPPF has a presumption in favour of sustainable development. Policy CP1 (Spatial Strategy) of the Surrey Heath Core Strategy and Development Management Policies Document 2012 (CSDMP) states that new development will largely come forward through redevelopment of previously developed land and sustainable locations in the west of the borough. The site is contrary to this strategy being within an unsustainable location (see section 7.6 below) not located in the west of the borough. Additionally, paragraph 74 of the NPPF requires plan-making authorities to identify a five-year supply of deliverable housing sites. The Council's Five-Year Housing Land Supply Paper 2021-2026 (1 April 2021) indicates that there is currently about a 7.2-year supply of housing available within the Borough.

7.3.4 These factors weigh against delivering development within this Green Belt location. The construction of new buildings is to be regarded as inappropriate in the Green Belt subject to a limited number of specific exceptions. Relevant in this instance is the exception at paragraph 149 g) of the NPPF that permits limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

- not have a greater impact on the openness of the Green Belt than the existing development; or
- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously development land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

- 7.3.5 The land is occupied by permanent structures in the form of barns, brick buildings, and other structures in occupation for equestrian uses. It is therefore considered to meet the definitions of previously developed land as described in the NPPF. In addition, the site benefits from residential development previously approved on site (see application ref.15/0110) in the form of a single manor house. Ground works had commenced on site (now paused) in relation to this development whilst the existing equestrian buildings remain. The acceptability of the loss of the private equestrian facility and employment has therefore been established.
- 7.3.6 The proposed development therefore has potential to being an exception to inappropriate development in the Green Belt. The following assessment of whether the development would not have a greater impact on the openness of the Green Belt than the existing development; or not cause substantial harm to the openness of Green Belt, subject to meeting an identified affordable housing need, will determine this.

#### Affordable Housing Provision & Housing Mix

- 7.3.7 National Policy seeks new development to deliver sustainable, inclusive, and mixed communities in accessible locations. Policy CP6 of the CSDMP requires the provision of a range of housing sizes across the Borough. The policy does not, however, specify a precise mix of housing types. The policy also sets out that the Council will consider site characteristics and viability.
- 7.3.8 The proposed development provides a mix of predominantly larger family homes, with 80% of the development representing 3+ bedroom units. Whilst the range of housing mix on offer could be improved it nonetheless provides a mix of housing types which would contribute towards a mixed and inclusive community by enabling a variety of housing types to meet the identified local needs. The proposed development would not unduly harm the existing balance in the locality. It is therefore considered an acceptable mix.
- 7.3.9 Policy CP5 of the CSDMP requires the provision of 40% of the proposed housing to be affordable (or eight units). This is normally split between socially rented and intermediate (shared ownership). The definition of affordable housing, as set out in Annex 2 of the NPPF, has widened the options for affordable housing. This proposal is for three units or 15% affordable so equating to a shortfall of five units.
- 7.3.10 The Council's Affordable Housing Guidance note sets out that where it is considered that the delivery of affordable housing in accordance with the policy is unviable, this must be demonstrated through the submission of a financial appraisal. If, following the review, the Council concludes that it is in fact economically viable to provide for the affordable housing requirement in accordance with Policy CP5, this could lead to the application being refused. However, if the Council is satisfied that affordable housing cannot be provided in accordance with the policy, it will seek to negotiate alternative provision.
- 7.3.11 The proposal originally did not support any provision of affordable housing on site. The applicant's financial appraisal sets out the proposed development is in deficit of -£1,596,238 (adjusted profit of 9%), having a Residual Land Value (RLV) (*definition: sale income minus expenditure*) of £4,198,019 with a Benchmark Land Value (BLV) (*definition: existing or alternative use value + incentive/premium to landowner to bring forward the development*) of £5,794,257. On this basis no affordable housing can be provided. In accordance with PPG best guidance, the proposal appears to be marginally viable prior to considering inclusion for affordable housing.



7.3.12 The BLV is based on the Alternative Use Value (AUV) of the extant permission on site relating to the development of a manor house. The PPG advises that consideration to the following should be given as to whether an AUV can be considered to inform the BLV.

1. if there is evidence that the alternative use would fully comply with up-to-date development plan policies,
2. if it can be demonstrated that the alternative use could be implemented on the site in question,
3. if it can be demonstrated there is market demand for that use
4. if there is an explanation as to why the alternative use has not been pursued.

7.3.13 The alternative use would satisfy points 1-3 with the development considered under current adopted local plan policies. Why the alternative use has not been pursued, the applicant has suggested that they are not a developer of manor houses and identified the subject site as one that would be a suitable location for their product.

7.3.14 On this basis, if the AUV is not accepted, the scheme would be considered unviable. However, given the guidance set out in the PPG as identified above, the acceptance of the AUV appears reasonable. The developer profit level is towards the lower range even taking this into account and therefore the offer of three shared ownership units raises doubts regarding the viability of the development. If the development was unable to provide any affordable housing due to viability, or any other reason, then the test determining the acceptability of the development within the Green Belt would revert to having to satisfy the first sub paragraph of paragraph 149(g) which states that development in this case would not have a greater impact on the openness of the Green Belt than the existing development.

7.3.15 It is noted that the developer is associated with providing high end housing and taking this into account together with the incompliant affordable housing provision, it is considered reasonable that any grant of permission is subject to a review mechanism with updated predictions of sales values and build costs to be compared against the assumptions made in the viability assessment to demonstrate whether the scheme's viability has improved. Any surplus identified by the review would be liable for S106 contributions. Subject to the review mechanism, the proposal would be considered acceptable in line with Policy CP5 of the CSDMP and the NPPF.

#### Meeting an affordable housing need

7.3.16 The Council's Local Housing Needs Assessment (2020) identifies that there is a net need for seventy-two affordable rented units per annum and thirty shared ownership units in the rest of borough sub-area. It advises that the level of net housing need in the Borough is considerable, and the Council should seek the maximum affordable housing provision from development as viably possible.

7.3.17 As evidenced above, the development is unable to viably provide affordable housing in compliance with policy and the offer of three shared ownership units is considered reasonable. The proposed offer would contribute towards meeting part of the housing need identified in the rest of the borough sub-area and therefore no objection is raised to the tenure of housing provided.

7.3.18 The NPPF does not quantify the contribution of affordable housing necessary to trigger sub paragraph 2 of paragraph 149(g). As such, the proposed offer of three shared ownership units would contribute towards meeting an affordable housing need as identified above.

## Impact on the openness of the Green Belt

- 7.3.19 Caselaw has established that Green Belt openness is open-textured, and this includes spatial and visual impacts. 'Open' can mean the absence of development in spatial terms, and it follows that openness can be harmed even when development is not readily visible from the public realm.
- 7.3.20 Table 2 in this report and the supporting documents outline that the development relative to the existing buildings on site would result in a 35% reduction (1,040.4m<sup>2</sup>) in the overall building footprint, 5% reduction in building volume (687.5m<sup>3</sup>) and 44.94% (3,042.4m<sup>2</sup>) reduction in hardstanding. The heights of the existing buildings range, with a maximum height of approximately 7.55m and as low as 1.1m. The proposed buildings would overall represent significant increases to the overall height on the site, with a minimum ridge height of 7.45m to the one and a half storey dwellings and a 9.7m height to the two and a half-storey building.
- 7.3.21 The existing buildings on site are largely situated to the centre of the site allowing long distance views towards the rear of the site and the land beyond, providing an open visual link to the wider Green Belt. Although some of the existing buildings are large structures, they are not dispersed over the site and therefore their visual and spatial harm is lesser than if these buildings were plotted across the site. The proposed development would increase the spread of development over the site, at an overall greater height, standing at a maximum of 9.7m to the tallest buildings, which is considered to be significant. Where some of the proposed buildings would stand at one and half storey height, this still represents a height of 7.45m which is 0.1m lesser than the highest ridge of the existing buildings limited to a single building.
- 7.3.22 In addition, some of the existing buildings are open-sided and weathered whilst the areas of hardstanding particularly towards the rear and eastern boundary of the site have somewhat blended into the landscape. A quantitative assessment of the footprint and volume therefore does not truly reflect the impact of the development on the openness in this instance.
- 7.3.23 It is accepted that the proposed development would have a lesser footprint, volume (albeit very limited), and expanse of hardstanding relative to the existing structures to be removed and the visual impact of the development is therefore lessened. The secondary access to the southwest of the site would be closed, and replaced with soft landscaping, thereby reducing views into the site from Windlesham Road, with the proposed dwellings to this area set further back relative to the existing barn.
- 7.3.24 The proposed development whilst similar would not follow the same layout of built form as exists. Crucially, the development would extend into the northern area of the site as well as reducing the spaciousness towards the eastern boundary, where there is currently no development of permanent construction above ground level. The reduction to the overall volume of development on site is very limited (-5%) and does not represent a substantial improvement on the existing buildings. The proposal results in a greater number of buildings spread wider across the site than present, at an increased maximum height, reducing long views towards the land beyond the rear of the site.
- 7.3.25 Hardstanding by virtue of being at ground level, has a lesser impact on the openness of the Green Belt than development above ground level. The reduction of hardstanding therefore holds limited benefit when considered against the overall context of the spread of development, its height, and the subsequent harm to the openness.
- 7.3.26 Where the development would make use of areas covered by existing buildings it would also result in use of the areas of hardstanding that have a more rural appearance. This more rural appearance, in particular towards the rear plays an

important visual function in linking the site with the wider surrounding open context, where to the north are large expanses of fields, without development. The proposed buildings would therefore effectively encroach further into the surrounding countryside and would fail to maintain the integrity of the surrounding landscape character and the visual openness of the Green Belt.

- 7.3.27 The existing site is of a private equestrian use, common to rural areas such as this, and the proposed development would introduce residential paraphernalia and activities that markedly contrasts with the existing uses. The development would result in a more permeable form of development, resulting in an encroaching urbanising effect that would be markedly at odds with the rural character of the wider surrounding area. The proposed residential use would be apparent throughout the day and throughout the year, with increased vehicle movements within the site, lighting across the site, and use of domestic gardens and communal areas. Whilst residential development in the form of Post Box Cottage and Westcroft Park House is found in the surrounding area, these are isolated residential developments, common to rural settings such as this, and the level of activity associated with these dwellings would not be comparable to the introduction of potentially one-hundred and twenty-three residents on site.
- 7.3.28 In summary the overall volume and footprint of development would be less than that of the existing buildings on site. However, the spread of development results in buildings sited above areas of previously open land, at an overall increased height and together with the activity on site (including lighting, use of gardens and communal areas, coming and goings, deliveries etc), and the context of the open rural surroundings, the proposed development would result in substantial harm upon the openness of the Green Belt.
- 7.3.29 The NPPF sets out five purposes served by the Green Belt. Particularly relevant is purpose c) to assist in safeguarding the countryside from encroachment. Whilst the site is established as previously developed land, the substantial harm to openness would, by association, harm the rural and open characteristics of the area which sits within the surrounding context of open fields and horticultural uses. The development would therefore encroach into the countryside and subsequently be contrary to one of the purposes served by the Green Belt.
- 7.3.30 The proposed development would therefore fail to meet the exceptions set out in paragraph 149 of the NPPF and subsequently fall contrary to Part 13 of the NPPF. Very Special Circumstances would therefore be required to outweigh this harm.

#### Very Special Circumstances

- 7.3.31 Whilst very special circumstances (VSC) have not been explicitly stated, the supporting information outlines that the development would bring various benefits including:
- a) 35% reduction in building footprint, 5% reduction in building volume, 42% reduction in hardstanding
  - b) 75% reduction in vehicle movements associated with the site.
  - c) 37% reduction in CO2 emissions (excess of policy requirement of 10%)
  - d) 242% increase in biodiversity net gain (and 60% net gain in hedgerow units)
  - e) Provision of 3 x on-site affordable dwellings
  - f) Provision of twenty residential units
- 7.3.32 Benefit a) has been discussed in detail in the preceding assessment. In summary, the overall reduction to the footprint, volume and hardstanding is outweighed by the increased spread of development and the increased maximum height which, in combination with other factors, result in substantial harm upon the openness of the Green Belt.

- 7.3.33 Benefit b) details the reduction of vehicle movements associated with the site setting out that there would be -117 total arrival and departures at the site relative to the existing use on weekdays and -602 trips on weekends. The proposed development is not considered comparable with the existing use, with the proposal being a trip generator that would result in new trips onto the highway network particularly during peak times. As such, whilst there would be a benefit to the reduction of HGVs and horse related vehicles, limited weight is attached to this benefit.
- 7.3.34 Benefit c) has not been clearly demonstrated, with no conclusive information submitted to evidence this claim. It is therefore given no weight.
- 7.3.35 Benefit d) refers to a 242% increase in biodiversity net gain on site. This is of significant benefit. Whilst it is recognised that the existing site is of poor biodiversity quality, this does not impact the weight afforded to the benefit which is considered significant.
- 7.3.36 Benefit e) refers to the affordable housing level to be provided. The proposed offer of three on site affordable dwellings (15%) falls short of policy, which would seek a 40% provision of affordable housing on offer for a site of this scale. Any benefit would need go over and above policy compliance to demonstrate very special circumstances, and therefore this benefit holds no weight.
- 7.3.37 Benefit f) refers to the provision of housing. The Council can demonstrate a 7.2-year housing supply within the borough and therefore no significant weight is attached to this benefit.
- 7.3.38 The proposed development would result in some benefits towards reduction in traffic generation and biodiversity net gain which in combination hold moderate weight. However, these are not considered sufficient in outweighing the harm to the Green Belt, and any other harm identified below, to amount to VSC.

#### **7.4 Impact on the character, appearance, and trees of the surrounding area**

- 7.4.1 Part 12 of the NPPF sets out that good design is a key aspect of sustainable development, helping make development acceptable to communities. Developments should function well and add to the overall quality of the area and be visually attractive as a result of good architecture, layout and appropriate and effective landscaping whilst being sympathetic to local character. Policy CP2 states that new development should use the land efficiently within the context of its surroundings and respect and enhance the quality of the urban, rural, natural, and historic environments.
- 7.4.2 Policy DM9 of the Surrey Heath Core Strategy and Development Management Policies Document (CSDMP) 2012 promotes high quality design. Development should respect and enhance the character of the local environment and be appropriate in scale, materials, massing, bulk, and density. It also seeks to protect trees and vegetation worthy of retention and provide high quality hard and soft landscaping where appropriate. Principle 6.2 of the RDG requires residential developments to use trees, vegetation, gardens, and open spaces to create a strong, soft green character to streets.

#### Layout & Context

- 7.4.3 The proposed development would replace the existing equestrian buildings on site (aside from the Post Box Cottage). The general arrangement provides a permeable layout largely situated around the centre of the site, without the creation of any awkward unattractive spaces. The proposed vehicle path running down the west of the site provides convenient access to all dwellings without being convoluted and without obstruction. The layout whilst allowing for some spacing between the properties, is

more akin to that of an urban location, rather than that of the rural countryside. Where the site benefits from larger existing buildings, these are of a design and form typical of rural locations such as this. The proposed development owing to the quantum of development proposed, and the relatively tight layout, would represent an overdevelopment of this rural countryside site. The proposed development therefore fails to respond to the character of the surrounding area, resulting in an urbanising form of development that harmfully contrasts with the open low density rural surroundings.

#### Scale, Bulk and Massing

- 7.4.4 The proposed buildings when considered in isolation are of balanced proportions in floor levels, widths and depth and allow a good balance and relationship between the built form and garden amenity on their individual plots.
- 7.4.5 However, the proposed dwellings would stand relatively tall, measuring a minimum of 7.45m to a maximum of 9.7m to the ridge lines. Whilst in isolation they may appear of an acceptable scale, relative to surrounding context, the proposed dwellings would appear unnecessarily tall, whilst overall resulting in the height of development being increased across the height. This again harmfully contrasts with the rural open surroundings.

#### Detailing and Materials

- 7.4.6 Although the proposed development is unacceptable in other aspects, it however considered that the proposed elevational treatment, detailing and form of the development has taken cues from the wider surrounding area, as has the material palette, providing a traditional aesthetic acceptable within this context. The contrast between properties enhances the overall quality of the development as does the use of landscaping. In the event of a grant of permission, conditions would be secured relating to details of materials and cycle and refuse/recycling stores to ensure their quality.

#### Landscaping & Trees

- 7.4.7 The existing site, noting its existing use and layout, aside from the boundary treatment provides limited soft landscaping benefit. The supporting documents state that the development would result in a 242% increase in biodiversity net gain on site. The proposed design, which includes front and rear garden soft landscaped, together with tree planting to the gardens, and boundaries of the site, represents a significant uplift in overall soft landscaping provision. From a design perspective, the level of soft landscaping introduction on site is considered acceptable and appropriate in ensuring good placemaking and enhancing the visual quality of the development.
- 7.4.8 The Council's Arboricultural Officer has reviewed the proposal and the supporting AIA and AMS. It is recommended that the minor amendments are made to the layout of the footway relative to T44 – T49 as well as the car parking spaces north of T9 to ensure the RPA of these trees is protected. The alterations necessary are considered minor amendments and could be secured as part of revised plans. Revised drawings have not been requested in this instance as the application is recommended for refusal. Aside from the minor amendments, conditions relating to tree protection measures and soft landscaping management is requested and would have been imposed if planning permission were granted.

#### Summary

- 7.4.9 The proposed layout, quantum of development and increased maximum heights which results in twenty separate buildings of permanent construction plotted over the site,

standing at a minimum of 7.45m and up to 9.7m high, results in an overdevelopment of the site that would appear out of character with this rural location. As such, the proposed development would be considered unacceptable failing to satisfy the objectives of Policies CP2 and DM9 of the CSDMP and the NPPF.

## **7.5 Impact on residential amenity**

- 7.5.1 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 6.2 of the RDG sets out the requirements for residential developments. Principle 6.4 of the RDG indicates that housing development should seek to achieve the highest density possible without adversely impacting on the amenity of neighbours and residents. Policy DM16 of the CSDMP requires the provision of play space provision for residential developments on site. The policy does not set a site area or threshold as to when this is required.
- 7.5.2 The nearest residential properties sit immediately adjoining to the west of the site. The Graylands, a residential chalet style bungalow with various single-storey buildings within the curtilage sits adjacent to the southwestern corner of the site, with the main dwelling setback 24.7m from the Unit 1 with the ancillary outbuilding to the rear set 4.5m away from Unit 1. Westcroft Park House is a sizeable manor house that is situated approximately 80m from Unit 1. Post Box Cottage to the southeast, is situated some 35m from Unit 2. No other residential properties adjoin the site, with the nearest dwellings situated to the eastern side of Woodcock Nurseries, set 75m from the curtilage of the application site.
- 7.5.3 When assessing the proposed development against Graylands, the existing site benefits from a wide (35m) one and half storey barn structure which sits near the boundary. The proposed dwellings would be set a further 7m rearwards, whilst they maintain a similar separation of 4.6m from the shared boundary. The orientation of the proposed dwellings, together with the relative separation distances and noting they are designed in a chalet-form, ensures that there would be limited harm to the neighbouring occupier's amenity particularly in context of the existing building on site. The proposed residential use would not result in any significant noise, disturbance, or light impact over and above the existing use.
- 7.5.4 Due to the separation distances relative to all other residential development it is considered there would be no significant amenity harm to these neighbouring occupiers.
- 7.5.5 The Department for Communities and Local Government Technical Housing Standard – Nationally Described Space Standard sets the requirements for internal space within new dwellings and is suitable for application across all tenures. Principles 8.4 – 8.6 of the RDG set out garden size requirements for new dwellings. Principle 8.6 sets out that flatted developments will be expected to provide outdoor amenity space for each unit.
- 7.5.6 All units would exceed the minimum space standards set out within the NDSS document. In addition, the internal layouts are well designed, ensuring acceptable levels of outlook, privacy, and natural light for all units.
- 7.5.7 All dwellings are provided with generous private rear gardens that meet the garden size requirements set out in the RDG which requires 55m<sup>2</sup> (2 or 3 bedroom) and 70m<sup>2</sup> (4+ bedroom) for gardens predominantly facing south and 65m<sup>2</sup> (2 or 3 bedroom) and 85m<sup>2</sup> (4+ bedroom) for gardens predominantly facing north. The flatted units whilst having access to the communal amenity space, do not benefit from any private amenity provision contrary to Principle 8.6 of the RDG. The absence of private amenity space for all residents demonstrates the overdevelopment of the site, failing to provide an acceptable standard of accommodation for residents of the flats.

- 7.5.8 The proposed development provides an area of play space within the curtilage, accessible and convenient for users which is considered acceptable and appropriate.
- 7.5.9 Taking all matters on balance, no objections are raised to the overall quality of accommodation on offer.

## **7.6 Impact on sustainability, highway safety and parking capacity**

### Sustainability of the site

- 7.6.1 Paragraphs 105 and 110 of the NPPF promotes sustainable transport objectives. This includes safe and suitable access for all users and has the benefit of reducing emissions. Policies CP1 and CP11 of the CSDMP reflect these objectives by directing development to sustainable locations with good transport links, promoting sustainable modes of transport and reducing the need to travel. Policy DM11 of the CSDMP states that development which would adversely impact the safe and efficient flow of traffic movement on the highway network will not be supported by the Council, unless it can be demonstrated that measures to reduce 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. County Highways Authority (CHA) have raised an objection to the proposal on the grounds that the site does not represent a sustainable location that would provide safe and suitable access for all users, therefore not providing genuine choice of transport modes, contrary to sustainable transport objectives.
- 7.6.2 The application site is situated outside of the settlement boundaries, in a rural location away set 2.5km away from the nearest village (Chobham). Access to the site is via Windlesham Road, a 40mph rural road without a pedestrian footway, whilst having poor / little lighting making the roadway unsuitable for pedestrians and less desirable for cyclists, particularly in hours of darkness. Access to the site is therefore vehicle dependent, whilst there are no local amenities situated in a safe, walking distance from the site.
- 7.6.3 Due to its location, the proposal would conflict with the spatial strategy set out in the CSDMP. The Council can demonstrate a 5-year housing supply and therefore there is no requirement for significant weight to be afforded to the provision of housing in this instance. Occupiers of the proposed dwellings would be reliant on the use of private cars to access most everyday services even if some of these journeys may be relatively short in distance. Ninety-five percent of the development is 2+ bedroom units, and it is therefore likely that children will be present at the site requiring access to nurseries and schools. The CHA raises that owing to the lack of a 'Safe Route to School,' SCC would need to pay for the provision of taxis to get children to school from the development site.
- 7.6.4 It is recognised that rural areas generally have a greater reliance on private car ownership and there are residential properties situated in the wider surrounding area. Notwithstanding this, the development would be contrary to the aim of providing sustainable patterns of growth. The proposed development would also result in a considerable degree of social harm providing new homes in a location which does not provide suitably for the day-to-day needs of its residents, nor give ready access to them by sustainable means and so would encourage unsustainable patterns of travel.
- 7.6.5 The applicant argues that there is a permissive path and local bridleway. However, this public right of way could be removed at any time and therefore cannot be relied upon. Furthermore, this would not be considered an appropriate route, being unlit with no footway and having narrow verges.

7.6.6 The submitted transport statement sets out that the development would provide the following benefits:

- ☐ Seventy-five percent reduction in vehicular movements associated with the site.
- ☐ Reduction in HGV traffic
- ☐ Closure of two substandard accesses on Windlesham Road
- ☐ Removal of horse and ride movements
- ☐ Removal of tractor movements
- ☐ Provision of a permission path to existing bridleway
- ☐ Thirty-seven percent reduction in CO2 emissions
- ☐ Removal of recreational pedestrian movements within Woodcock Lane and Windlesham Road

7.6.7 In addition, a travel plan has been submitted with measures and initiatives to promote sustainable modes of transport and reduce the need to travel including, mobility credits framework, EV charging points and cycle parking facilities.

7.6.8 The CHA argues that the development is not comparable to the existing use in terms of trip generation with the existing use an end destination and a trip attractor, whilst being a use that would be expected in a rural location. The proposed development would be a trip generator and result in new trips onto the highway network particularly during the AM and peak times.

7.6.9 The alternative modes of transport available for future residents appears to have limited scope, owing to the quality of the highway infrastructure (unlit roads and pathways, no defined pedestrian footpaths) and given the distance to local facilities, the development would be considered poorly located to support these aspects.

7.6.10 Officers accept the benefit of the proposal in reusing an existing site as well as reducing the use of HGVs to the site and encouraging the use of electric vehicles through EV charging bays. It is unclear as to how the development would reduce CO2 emissions and the trip generation numbers do not provide conclusive evidence on the relative greenhouse gas emissions arising from each as this would depend on distance and type.

7.6.11 Notwithstanding, the site fails to demonstrate appropriately how the development would provide safe and appropriate access for all users. Given the percentage of family homes provided, there is particular concern regarding the appropriateness of the location for children and young adults in accessing local facilities and services. The development would fail to accord with the Council's spatial strategy and subsequently result in significant social harm for the future residents of the site. The proposal would therefore be considered contrary to policies CP1, CP11 and DM11 of the CSDMP and the NPPF.

#### Parking Capacity

7.6.12 The proposed development would provide a total of forty-six parking spaces including six visitor spaces resulting in a parking ratio of 2.2 spaces per unit. Each dwelling would have access to an EV charging point.

7.6.13 With respect to cycle parking, each unit would be provided a store within the curtilage of the dwelling or otherwise a communal store for the flatted units. The proposed vehicle and cycle parking provision sufficiently meets the requirements set out the SCC Highways parking guidance.

#### Access



- 7.6.14 The existing central access to the site would be retained and enhanced, providing a 6m wide vehicle path through the site allowing vehicles to simultaneously pass whilst meeting requirements for waste operatives and emergency vehicles to safely enter and access the site. The other accesses off Windlesham Road would be closed and relandscaped which is considered acceptable and appropriate.

### Summary

- 7.6.15 The proposed development is considered an unsustainable location for residential uses of this scale and fails to demonstrate safe and suitable access for all users. Whilst parking capacity, and access within the site is considered acceptable, the unacceptability of the site location remains. On this basis, the proposed development is considered unacceptable in highway terms and fails to comply with the objectives of Policies CP1, CP11 and DM11 of the CSMDP and the NPPF.

## **7.7 Impact on flood risk and drainage**

- 7.7.1 Policy DM10 of the CSDMP indicates that development within flood risk zones 2 and 3, or on sites of one hectare or more, will not be supported unless it can be demonstrated that the proposal would, where practicable, reduce risk both to and from the development. 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 application site lies in a Zone 1 (low risk) flood area however relates to a site of greater than one hectare in area. The proposal includes a surface water drainage scheme and no objections have been raised by SCC subject to a condition relating to SuDS. Similarly, Thames Water have raised no objection subject to a condition relative to foul water drainage. Subject to these conditions, the development would raise no objections on drainage and flood risk grounds and would comply with Policy DM10 of the CSDMP and the NPPF.

## **7.8 Impact on the Thames Basin Heaths Special Protection Area**

- 7.8.1 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 (SPA). All new (net) residential development within five kilometres of the SPA is considered to give rise to the possibility of likely significant effect. Policy NRM6 of the SEP reflects these requirements. Proposals will be required to provide appropriate measures in accordance with the AAP. This includes contributions towards SAMM measures. SANG requirements are provided through CIL.
- 7.8.2 The Council has sufficient capacity of SANG for the development in the event planning permission is granted for the proposed development. The applicant has confirmed that the SAMM contribution would be secured through a legal agreement prior to the determination of this application. Subject to the signing of the legal agreement the proposal satisfies the objectives of Policy CP14 of the CSDMP, Policy NRM6 of the SEP, the NPPF and advice in the AAP.

## **7.9 Impact on biodiversity and ecology**

- 7.9.1 Policy CP14 of the CSDMP indicates that development which would result in harm to or loss of features of interest for biodiversity will not be permitted whilst biodiversity gain is recommended.
- 7.9.2 The application is supported by an ecological impact assessment with Surrey Wildlife Trust (SWT) consulted as part of the application. SWT have recommended that a bat

roost survey is conducted in reference to T33 which has been identified as having moderate bat roosting suitability. The tree is proposed to be retained and given its siting to the eastern boundary of the site away from the development, it is not considered necessary to conduct a further survey.

- 7.9.3 Recommendations have been made by SWT for conditions to be attached to any grant of approval in relation to ecological enhancements and management plans. Subject to appropriate conditions the development would be acceptable in ecological terms and comply with Policy CP14 and the NPPF.

## **7.10 Other matters**

- 7.10.1 Policy CP2 of the CSDMP indicates that development will be required to provide measures to improve energy efficiencies and sustainability. The energy statement provided to support the application includes measures to include a fabric first approach, within the building fabric, insulation and double glazing, high-efficiency heating systems and low energy lighting. In addition, photovoltaic panels would be provided to the flatted development. An expected reduction of 37.36% reduction in emissions which is equivalent to Level 4 Code for Sustainable Homes.

- 7.10.2 Policy DM17 of the CSDMP indicates that on sites of 0.4 hectares or over, a prior assessment of the potential archaeological significance of the site must be undertaken. In this case, a desk-based assessment has been provided which indicates that the site has a low archaeological potential. In addition, due to the previous site history, the archaeological implications for this development are low, with no evidence indicated, and it is considered that a programme of archaeological work is not required in this instance.

- 7.10.3 Paragraph 183 of the NPPF indicates that planning decisions should ensure that a site is suitable for its proposed use considering ground conditions and any risks arising from land contamination. Noting the historic site use, it is considered prudent to seek agreement of an approach to any land contamination on this site. A condition in this respect would be required, an approach which is supported by the Senior Environmental Health Officer.

- 7.10.4 The site involves the creation of twenty new dwellings and would therefore be CIL liable.

## **8.0 PUBLIC SECTOR EQUALITY DUTY**

- 8.1 Under the Equalities Act 2010 the Council must have due 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 due regard to the Public Sector Equality Duty. The proposal is not considered to conflict with this duty.

## **9.0 CONCLUSION**

- 9.1 The proposed development is considered unacceptable in principle, representing inappropriate development within the Green Belt, by reason of substantial harm upon the openness whilst it would encroach upon the countryside thereby falling contrary to the purposes of the Green Belt. The proposed development relative to the existing site would comprise of buildings standing taller, of a more solid permanent construction and spread across a greater area resulting in an urbanising form of development that is out of character with the low density, spacious rural surroundings. The development site would also be considered an unsustainable location that fails to provide safe and suitable for all users, resulting in social harm and failing to demonstrate how the development would accord with sustainable transport principles. In the absence of a

completed legal agreement for SAMM and affordable housing the proposal is also contrary to policy.

## **10.0 RECOMMENDATION**

### **REFUSE for the following reasons:**

1. The proposed development by reason of its overall quantum, spread of development and overall height would represent inappropriate development within the Green Belt, resulting in substantial harm upon the openness and resulting in encroachment into the countryside, thereby conflicting with the purposes of the Green Belt. As such, the proposal meets none of the exceptions for development set out in paragraph 149 of the National Planning Policy Framework (NPPF) and there are no very special circumstances to outweigh this Green Belt harm and the harm identified in reasons 2-5. The proposal is contrary to part 13 of the NPPF and Policy DM3 of the adopted Surrey Heath Core Strategy and Development Management Policies Document 2012.
2. The proposed development by reason of its layout, quantum of development and overall height across the site would result in an overdevelopment of the site, creating an urbanising form of development that would be harmful to the low-density rural character of the surrounding area. This would be contrary to the NPPF and Policy DM9 of the adopted Surrey Heath Core Strategy and Development Management Policies 2012.
3. The proposed development fails to demonstrate that it would be an appropriate location for providing large scale housing, failing to demonstrate how the development would provide safe and appropriate access for all users whilst falling contrary to the Council's spatial strategy and subsequently result in significant social harm for the future residents of the site. The proposal would therefore be considered contrary to policies CP1, CP11 and DM11 of the Surrey Heath Core Strategy and Development Management Policies Document 2012 and the NPPF.
4. The proposed development by reason of inadequate private amenity space for Units 8, 9 and 10 would result in a poor standard of overall accommodation for the future occupiers, contrary to the objectives of DM9 of the Surrey Heath Core Strategy and Development Management Policies Document 2012 and Principle 8.6 of the Residential Design Guide 2017.
5. In the absence of a completed legal agreement under section 106 of the Town and Country Planning Act 1990, proposal fails to secure any provision for affordable housing. The application is therefore contrary to the aims and objectives of Policy CP5 of the Surrey Heath Core Strategy and Development Management Policies 2012, the National Planning Policy Framework, and advice within the Surrey Heath First Homes Policy Guidance Note 2021 and Written Ministerial Statement (24.05.21).
6. In the absence of a payment or a completed legal agreement under section 106 of the Town and Country Planning Act 1990, the applicant has failed to comply with Policy CP14B (vi) (European Sites) of the Surrey Heath Core Strategy and Development Management Policies Document 2012 and Policy NRM6 (Thames Basin Heath Special Protection Area) of the South East Plan in relation to the provision of contribution towards strategic access management and monitoring (SAMM) measures, in accordance with the requirements of the Surrey Heath

## Annex 1 – SCC Highways

1. The proposed development by reason of its overall quantum, spread of development and overall height would represent inappropriate development within the Green Belt, resulting in substantial harm upon the openness and resulting in encroachment into the countryside, thereby conflicting with the purposes of the Green Belt. As such, the proposal meets none of the exceptions for development set out in paragraph 149 of the National Planning Policy Framework (NPPF) and there are no very special circumstances to outweigh this Green Belt harm and the harm identified in reasons 2-5. The proposal is contrary to part 13 of the NPPF and Policy DM3 of the adopted Surrey Heath Core Strategy and Development Management Policies Document 2012.
2. The proposed development by reason of its layout, quantum of development and overall height across the site together with the provision of inadequate private amenity space for Units 8, 9 and 10, would result in an overdevelopment of the site, creating an urbanising form of development that would be harmful to the low-density rural character of the surrounding area. This would be contrary to the NPPF and Policy DM9 of the adopted Surrey Heath Core Strategy and Development Management Policies 2012.
3. The proposed development fails to demonstrate that it would be an appropriate location for providing large scale housing, failing to demonstrate how the development would provide safe and appropriate access for all users whilst falling contrary to the Council's spatial strategy and subsequently result in significant social harm for the future residents of the site. The proposal would therefore be considered contrary to policies CP1, CP11 and DM11 of the Surrey Heath Core Strategy and Development Management Policies Document 2012 and the NPPF.

4. In the absence of a completed legal agreement under section 106 of the Town and Country Planning Act 1990, proposal fails to secure any provision for affordable housing. The application is therefore contrary to the aims and objectives of Policy CP5 of the Surrey Heath Core Strategy and Development Management Policies 2012, the National Planning Policy Framework, and advice within the Surrey Heath First Homes Policy Guidance Note 2021 and Written Ministerial Statement (24.05.21).
5. In the absence of a payment or a completed legal agreement under section 106 of the Town and Country Planning Act 1990, the applicant has failed to comply with Policy CP14B (vi) (European Sites) of the Surrey Heath Core Strategy and Development Management Policies Document 2012 and Policy NRM6 (Thames Basin Heath Special Protection Area) of the South East Plan in relation to the provision of contribution towards strategic access management and monitoring (SAMM) measures, in accordance with the requirements of the Surrey Heath Borough Council's Thames Basin Heaths Special Protection Area Avoidance Strategy Supplementary Planning Document (2019).

**Informative(s)**