Item 7

SURREY COUNTY COUNCIL

To: Planning & Regulatory Committee

Date: 25 October 2023

By: Planning Development Manager

District: SURREY HEATH BOROUGH COUNCIL

Electoral Division(s):

Camberley East

Mr Hogg

Camberley West

Mr Lewis

Case Officer:

Charlotte Parker

Purpose: For Decision

Grid Ref: 487464 160177

Title: SURREY COUNTY COUNCIL PROPOSAL SU/23/0326/PCM

SUMMARY REPORT

Former Pinehurst Care Home, 141 Park Road, Camberley, Surrey GU15 2LL

Outline application for erection of part 1,2,3 and 4-storey building for extra care accommodation, comprising self-contained apartments, staff and communal facilities, and associated parking. Appearance and Landscaping reserved.

The application site is located in north-west Surrey, south of Camberley town centre, on land owned by Surrey County Council. The site, with frontages to Park Street and Park Road, was previously occupied by the former Pinehurst care home. This building was demolished in 2021 and hoarding now encloses the site.

The site is in a predominantly residential part of Camberley and is bounded on all sides by residential properties (a mix of houses and flats). A GP surgery adjoins the site to the south-east, and a single commercial building is located to its west side (on the opposite side of Park Street).

This is an outline application seeking self-contained extra care accommodation with associated facilities (indicatively 60 units). The application has been submitted by Surrey County Council under Regulation 3 of the Town and Country Planning General Regulations (1992). At this outline stage the planning considerations relate only to the principle of the development, including the layout, scale and means of access. The detailed design (appearance) and site landscaping are reserved matters which would be submitted at a later stage.

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Since submission of the application, negotiations have taken place regarding mitigation measures for the Thames Basin Heaths Special Protection Area (SPA) and these would be secured as part of any permission.

Eleven letters of representation have been received (one being on behalf of six residents). Comments made in these representations are summarised in the report, but relate primarily to the scale, massing and design of the building, and its impact on neighbour amenity.

Surrey Heath Borough Council objects to the proposal on the grounds of the scale, height, massing and design of the building, and resulting harm to the character of the area. Objection is also raised in relation to neighbour amenity and impact on trees.

Other statutory and technical consultees have provided advice on a range of issues, and this has either been reflected in additional information submitted during the course of the application or in proposed conditions.

Officers are satisfied that development of this scale and nature could be satisfactorily accommodated on the site, subject to details which would be submitted at the reserved matters stage or required by condition.

The recommendation is pursuant to Regulation 3 of The Town and Country Planning General Regulations 1992, outline planning application ref: **SU/23/0326/PCM** be granted **subject to the completion of legal agreements to secure payments (SANG and SAMM) to mitigate the impact of the development of the Thames Basin Heaths Special Protection Area (SPA).**

Application Details

Applicant

SCC Property

Date application valid

23 March 2023

Period for Determination

22 June 2023 (EoT date TBC)

Amending Documents

- Design and Access Addendum dated June 2023
- Transport Statement Technical Addendum dated 7 June 2023
- Updated Biodiversity Net Gain (BNG) Letter dated 9 June 2023
- Updated Hibernation Survey Report dated 28 October 2021 (received July 2023)
- Updated Preliminary Ecological Appraisal (PEA) and Biodiversity Net Gain Assessment Rev 2.0 dated 28 July 2022 (received July 2023)

- Planning Statement Addendum – Contributions Towards Special Protection Area dated September 2023
- Transport Statement Technical Addendum Part 2 dated 4 September 2023
- Drawing Number PR-289-ATK- 00-DR-L-40101 Landscape Illustrative Masterplan dated 2 October 2023
- Transport Statement Technical Addendum Rev A dated 3 October 2023
- Drawing number PR-289-ATK-XX-00-DR-A-90117 REvP03 dated 3 October 2023

Summary of Planning Issues

This section identifies and summarises the main planning issues in the report. The full text should be considered before the meeting.

	Is this aspect of the proposal in accordance with the development plan?	**Paragraphs in the report where this has been discussed**
Principle and Need	Yes	34-45
Layout, Design and Character	Yes	46-70
Residential Amenity	Yes	71-96
Highways, Access and Parking	Yes	97-108
Trees and Landscaping	Yes	109-121
Sustainable Design	Yes	122-128
Flood Risk and Drainage	Yes	129-134
Ecology and Biodiversity Net Gain	Yes	135-147

Thames Basin Heaths Special Protection Area	Yes	148-160
Air Quality	Yes	161-166
Heritage Assets	Yes	167-173

Illustrative material

Site Plan

Plan 1 – Showing the site location and layout

Aerial Photographs

Aerial Photograph 1

Aerial Photograph 2

Site Photographs

Photograph 1 – Existing Park Road entrance and No. 139 Park Road

Photograph 2 – Park Street frontage looking south

Photograph 3 – Park Street frontage looking north in vicinity of new access #

Photograph 4 – View north from existing access road towards Middle Gordon Road

Photograph 5 – View across site to south and south-west – towards Park Street

Photograph 6 – View south towards rear of properties in Park Road

Photograph 7 – View south-east along access road towards Park Road

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BACKGROUND

Site Description

1. The application site is located in the settlement of Camberley, approximately 140m south of the defined Camberley Town Centre. It falls within the Victorian/Edwardian Subdivisions Character Area of the Western Urban Area Character SPD 2012. The 0.82ha site was formerly occupied by a 50 bed elderly persons care home

(Pinehurst) which was demolished in 2021. The existing site access is to the south-east corner of the site (Park Road). The vacant site is currently secured, with hoardings to the two road frontages.

2. To its south side the site is set back from the road behind a group of detached dwellings (with accesses from Park Road and Park Street). To the north the site adjoins the rear of properties in Middle Gordon Road, including newly constructed flatted development (Roxborough House) which is located beyond the north-west corner of the site. To the east is flatted development at Buckingham Court and Court Gardens, and the Park Road Doctors Surgery (No. 143). To the west the site adjoins Park Street, with the Telephone Exchange and the detached house Witwood (Grade II listed) on the opposite side of the road facing the site boundary. The site is bounded on all sides by trees (a mix of deciduous and evergreen), with trees also lining the access road to Park Road.

3. The former buildings on the site have been demolished, leaving a central levelled platform of loose earth, fine rubble and gravel with some low brick retaining walls beyond which are grassed areas. This platform sits below ground level to adjoining land to the north, south and east. At the southern end of the site the levelled platform sits approximately 2m and 1.5m below the ground level of the adjoining properties, 139A Park Road and 111 Park Street respectively. To the north side of the site, there is a change in ground level of just under 2m.

Planning History

4. The original Pinehurst care home (50 place care home for the elderly) was constructed in the late 1980s, under permission SH/88/0769 dated 7 October 1988. The building replaced the original early 20th century house 'Pinehurst', originally a dwelling and latterly used as a children's home.

5. Prior approval was granted on 14 April 2021 under reference SU/21/0023/PCA for the demolition of all buildings on site (deemed consent confirmed).

THE PROPOSAL

6. Outline planning permission is sought for the erection of a building of between one and four storeys (with basement accommodation), to provide specialist affordable housing designed for older people (Class C2). The building would contain approximately 60 self-contained apartments (shown at this stage as 57 x 1 bed (one adapted) and 3 x 2 bed), with communal and staff areas.

7. The housing would be for the affordable rental sector, managed by a registered social housing provider with nomination rights from the local authority (Surrey Heath Borough Council).

8. The proposed building would comprise two principal wings on a broadly north-south axis linked by a single central section at their northern end. As this is an outline application the precise design is not for consideration at this stage, however the illustrative plans indicate that the two wings would provide accommodation over four

storeys reducing to three at their southern end (with plant and equipment on one four storey section). A small basement section would be provided (to the north-east corner of the building). The height at the southern end has been reduced (one storey omitted) following advice given at the pre application stage.

9. The proposed west wing would measure 40m by 18.3m, to a maximum height of 17.3m. The proposed east wing would measure 56.7m by 18.3m to a maximum height of 16.6m. The single storey link would have a maximum height of 4.3m, shown indicatively at this stage to be finished with a green roof. The remainder of the building would be flat roofed. Ground floor apartments would have small private gardens, with balconies indicated to serve each of the upper floor units.

10. In addition to the self-contained apartments, the building shown illustratively would contain an entrance/reception area, kitchen, dining room, communal lounge, hairdressing/therapy room, activity room, staff facilities, refuse and mobility scooter/cycle stores (all at ground floor level). Further ancillary facilities and plant would be provided at basement level. Additional "breakout" communal living rooms would also be provided within each wing of accommodation.

11. The new building would be central to the site, broadly in the location of the previous building, with the majority of trees and the existing boundary treatment retained. Hard and soft landscaping would be provided including a paved seating area/courtyard behind the single storey element (leading off from the communal lounge). Illustrative drawings show a network of paths and grassed areas to the wider site.

12. Access to the site would be from Park Street, a new access being formed to replace the existing site access onto Park Road. The Park Road access would be closed to vehicles and converted to a pedestrian and cycle route to and from the site. A total of 30 parking spaces would be provided of which 22 spaces would be for residents (including two disabled spaces and one car club space), five would be for staff, with two bookable visitor spaces and one drop off bay.

13. This application is an **Outline Application,** seeking permission for means of access, layout, and scale. Appearance and landscaping are Reserved Matters which would be submitted for approval at a later date, should outline planning permission be granted.

Consultations and Publicity

District Council

14. Surrey Heath Borough Council – Objection raised for the following reasons:

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

Principles VS1 and VS3 of the Western Urban Area Character SPD 2012 and Principles 6.4, 6.6, 6.9 and 6.10 of the Residential Design Guide SPD 2017.

(2) The proposed development by reason of its height, mass, significant increase in floorspace and spread of development and could result in the loss of trees (and other vegetation) which would give rise to an unneighbourly form of development resulting in an overbearing impact and loss of privacy on the amenities of the occupiers of adjoining residential properties, 111 Park Street and 139a Park Road and loss of privacy due to overlooking from the parking area over gardens at 83 and 85 Middle Gordon Road and Roxborough House. The development would therefore fail to respect the amenities of the occupiers of adjoining residential properties, contrary to Policy DM9 of the Surrey Heath Core Strategy and Development Management Policies 2012 and Principles 6.4 and 8.1 of the Residential Design Guide SPD 2017.

(3) It has not been demonstrated that the development could be constructed without harm to significant trees failing to comply with Policy DM9 of the Surrey Heath Core Strategy and Development Management Policies 2012.

Consultees (Statutory and Non-Statutory)

15. Surrey Heath Borough Council Environmental Health Officer – No objection. Comments received in relation to (1) Land Quality (2) Air Quality (3) Noise (4) Construction Environment Transport Plan (CTMP), and a number of conditions suggested accordingly.

16. Archaeological Officer – No objection.

17. Transport Development Planning - No objection on safety, capacity and policy grounds, subject to the imposition of conditions.

18. Surrey Wildlife Trust/SCC County Ecologist – No objection subject to the imposition of conditions.

19. Historic Buildings Officer – No objection.

20. LLFA SuDS & Consenting Team – No objection, subject to conditions.

21. RPS Planning & Dev Ltd - Air Quality - No objection (clarification from agent sought regarding queries raised in response from RPS)

22. Thames Water – No objection raised in relation to waste water capacity.

23. Natural England – No comments received.

24. Arboriculturist – No objection, subject to conditions.

Summary of publicity undertaken and key issues raised by public

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25. The application was publicised by the posting of 3 site notices and an advert was placed in the local newspaper. A total of 190 owner/occupiers of neighbouring properties were directly notified by letter.

26. Eleven letters of representation have been received by the CPA in relation to this application. Two of those letters were sent on behalf of six residents (Roxborough House). The letters raise objections on the following matters including:

- Concern raised over impact of HGV movements during construction
- Height of building too great – should be the same as previous building on site
- Access onto Park Street will cause traffic issues including hazard for pedestrians. Existing access should be retained.
- Excessive speeds on Park Road will cause risk when accessing bus stop on opposite side of road
- Insufficient parking provision will result in increased on street parking (including by visitors) on Park Road causing hazardous conditions. Doctors surgery already results in on street parking.
- Already a significant number of care homes in the area
- Would result in overdevelopment and urban creep
- Style and scope at four storeys high unsuitable in residential area and out of place within surrounding properties
- Windows and balconies will overlook existing residential properties
- New access road will cause noise and light pollution for residents to north (including use by staff)
- Concern at inclusion of storage tank for waste fluids
- Impact on air quality
- Site may contain Japanese Knotwood
- Removal of trees from northern boundary (G4 and G5) will result in loss of privacy and overlooking into gardens(including from balconies)
- Height shown as three storey at pre application/local engagement stage
- Will increase pressure on local doctors' surgeries (Park Road surgery at capacity), and other local services
- Possible damage to tree roots during construction, also to neighbouring properties (through piling)
- Apparent discrepancies in application documentation regarding height of building and number of storeys (ie. does the height include plant/PV panels)
- Suggested restriction on future extension (ie. additional storeys)

27. Support has been expressed for the provision of elderly persons' social housing on the site.

PLANNING CONSIDERATIONS

28. The guidance on the determination of planning applications contained in the Preamble/Agenda frontsheet is expressly incorporated into this Report and must be read in conjunction with the following paragraphs.

29. In this case the statutory development plan for consideration of the application consists of the Surrey Waste Local Plan Part 1 – Policies and Part 2 – Sites, which together form the Surrey Waste Local Plan 2019-2033 (**SWLP**), the South East Plan 2009 (retained Policy NRM6 only) (**SEP**), Surrey Heath Core Strategy and Development Management Policies 2012 (**SHCSDMP2012**), the Western Urban Area Character Supplementary Planning Guidance 2012 (**WUAC**) , the Surrey Heath Residential Design Guide Supplementary Planning Guidance 2017 (**SHRDG**) and the Thames Basin Heaths Special Protection Area Avoidance Strategy Supplementary Planning Guidance 2019 (**TBHSPAAS**).

30. The SWLP sets out how and where different types of waste will be managed within Surrey in the future, sets out the planning framework for the development of waste management facilities, and is used in the determination of planning applications.

31. The SHCSDMP2012 is a two part plan. The first part (Core Strategy) sets out the spatial strategy for Surrey Heath, outlining key strategic issues and policies which aim to deliver the Council's vision and objectives. The second part sets out a series of detailed policies aimed at delivering Core Strategy decisions and guiding decision making on planning applications.

32. In considering this application the acceptability of the proposed development will be assessed against relevant development plan policies and material considerations.

33. In assessing the application against development plan policy it will be necessary to determine whether the proposed measures for mitigating any environmental impact of the development are satisfactory. In this case the main planning considerations are: considered to be the principle of the development and its impact on character of the area with particular reference to height, massing and design, impact on residential amenity, and the impact on the Thames Basin Heaths Special Protection Area (SPA).

PRINCIPLE AND NEED

Surrey Heath Core Strategy and Development Management Policies 2012 (SHCSDMP)
Policy CP1: Spatial Strategy
Policy CP3: Scale and Distribution of New Housing
Policy CP5: Affordable Housing
Policy CP6: Dwelling Size and Type
Policy CP12: Infrastructure Delivery and Implementation

34. Paragraph 60 of the National Planning Policy Framework (2023) states:

    'To support the government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay'.

35. It goes on to state in Paragraph 62:

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'Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).'

36. SHCSDMP Policy CP5 seeks the delivery of affordable housing as a proportion (35%) of all housing delivered over the Plan period (2011-2028), split evenly between social rented and intermediate. Policy CP6 states that the Council will promote a range of housing types and tenures which reflect the demand for market housing and need for affordable housing, including accommodation for specialised needs. Policy CP12 (Infrastructure Delivery and Implementation) seeks to deliver physical, social and community infrastructure, which includes affordable housing.

37. These policies sit within the wider framework set out in the Core Strategy, which seeks in Policy SP1 to deliver new development sustainably and largely through the redevelopment of previously developed land in the western part of the borough. Camberley is identified as having scope for residential development. Policy CP3 seeks to make provision for minimum of 3240 net additional dwellings over the plan period, 31% of which would be in Camberley.

38. The emerging local plan identifies the site for extra care housing (44 units) (HA1/14). Although limited weight can be afforded in this regard, as the plan remains subject to consultation and examination, it is noted that the application aligns with the Surrey Heath's 'direction of travel' in terms of site allocations and its overall strategy for delivering extra care housing.

39. Under the NPPF, there is a presumption in favour of sustainable development. Policy CP1 of the CSDMP sets out the spatial strategy for the Borough and new development is expected to come forward largely through the redevelopment of previously developed land in the west of the Borough. Camberley, as the principal settlement within the Borough, has scope for residential development. The application site is previously developed and is located close to the Camberley Town Centre. It is currently vacant but was last used as a care home (Class C2) and the proposal would not result in a material change of use of the land. It would also accord with emerging local plan policy. As such, the principle for the development is therefore established subject to the assessment below.

40. Surrey County Council's (SCC) Cabinet approved an Accommodation with Care and Support (AwCS) Strategy on 16 July 2019. Underlying this Strategy is the significant strain being experienced by the care and support system, and the challenges being faced due to Surrey's ageing population and the lack of specialist accommodation which enables older people to remain and be cared for in their communities as their needs increase.

41. 'Extra Care' is a term applied to housing for older people, often (but not exclusively) in the social rented sector, provided in self-contained units with access to care, support, domestic, social, community and other services. SCC has identified that of the various types of specialist housing, extra care accommodation has the greatest shortfall between demand and provision, particularly in terms of affordable rented provision.

42. The AwCS Strategy seeks to address this shortfall and expand the availability of extra care accommodation on suitable sites across the County. In doing so older people would be given the opportunity to live in settings where their needs can be met as they change over time, lessening the need for people to move directly into higher dependency residential care.

43. As part of its AwCS Strategy, SCC seeks to achieve a minimum of 25 extra care units per 1000 of Surrey's population of over 75s by 2030. This site has been identified along with a number of others in Surrey as being suitable for extra care housing. If approved, the delivery of around 60 extra care units as proposed would meet an identified need in Surrey Heath and deliver against the target set in the Strategy.

44. As outlined in the Statement of Need accompanying this application (paragraphs 3.01-3.07), extra care housing is being provided in Surrey Heath. However, the tenure of these units is either leasehold or private rental 'leaving a significant demand gap to be filled by SCC and partner organisations in the delivery of affordable extra care units'.

45. The development of this site for extra care housing would be in accordance with national and development plan policy which seeks to boost the supply of housing generally, and specialist housing for different groups in the community in particular – in this case older people. The proposal would also align with the aims of the AwCS Strategy and make a contribution to closing the identified gap in the supply of affordable extra care housing across the County.

LAYOUT, DESIGN AND CHARACTER

Surrey Heath Core Strategy and Development Management Policies 2012 (SHCSDMP)
Policy CP2 – Sustainable Development and Design
Policy DM9 – Design Principles
Western Urban Area Character SPD – 2012
Residential Design Guide – SPD 2017

46. Paragraphs 126-136 of the National Planning Policy Framework (2023) seek to promote the creation of well-designed places. Paragraph 130 states that:

    'Planning policies and decisions should ensure that developments:

    (a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

    (b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

    (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

(d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

(e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

(f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'

47. Further detailed guidance is set out in the National Design Guide (2019). This sets out the Government's priorities for design in the form of ten characteristics, stating that the underlying purpose for design quality and the quality of new development at all scales is to create well-designed and well-built places that benefit people at all stages of life (including the elderly) and communities.

48. SHCSDMP Policy DM9 states that development will be acceptable where it incorporates high quality design with layouts that maximise opportunities for linkages to the surrounding area and local services. It should also respect and enhance the local, natural or historic character of the environment paying particular regard to scale, materials, massing, bulk and density. Development will be expected to incorporate and reflect design and character measures as set out in either general or area specific SPD.

49. The Western Urban Area Character SPD (2012) (WUAC SPD) covers parts of Camberley, Frimley and Mytchett, and sets out detailed guidance for development based on its 'patchwork' of different character areas. The application site is located within the Victorian/Edwardian Sub-Divisions (Historic Routes) character area which is centred on the older road network, most of the defined areas being close to Camberley Town Centre. A number of features are identified as contributing to the area's character including age and type of buildings, their height, architectural detailing and boundary treatments.

50. The SPD contains five guiding principles (VS1-VS5) for this character area, VS1 and VS3 being particularly relevant to this proposal. VS1 states that new development should; reflect historic plot dimensions, architectural detailing, scale and massing; result in high quality detailing for publicly visible elevations; contain traditional architectural elements and high quality materials, which should principally include red brick with occasional use of render, stone, and boarding, with slate and tiled roofs; incorporate front boundary treatments of brick walls and/or hedging and; strongly address the road frontage. VS3 states that buildings with large footprints and large areas of flat roof spanning the building depth should be resisted, and that the massing of building and roof elevations should be broken down accordingly.

51. The Surrey Heath Residential Design Guide (SHRDG SPD) sets out a number of principles to guide new residential development, under the overarching Principle 4.1 which states that designers will be expected to demonstrate how their residential design has addressed the Council's 4 strategic themes of; putting people first;

developing a sense of place; creating sustainable places and; improving quality. These include principles relating to density, layouts, height, connectivity within and around sites, parking and architectural detailing/materials.

52. This proposal is in outline, with layout, scale and access for consideration at this stage, and appearance and landscaping as 'reserved matters' for future consideration.

53. 'Layout' is defined in the National Planning Practice Guidance (NPPG) as 'the way in which buildings, routes and open spaces within the development are provided, situated and orientated in relation to each other and to buildings and spaces outside the development'. 'Scale' is defined as the 'height, width and length of each building proposed within the development in relation to its surroundings'.

54. As such, whilst the layout and overall scale of the development can be considered, the building's external appearance including - for example, the position of window openings and balconies, materials and other detailing - is not for consideration at this stage. Similarly, details of hard and soft landscaping would be reserved for future consideration, though the spaces they would occupy form part of the 'layout' and can be assessed accordingly.

55. 'Access', defined as 'the accessibility to and within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network', is also for consideration at this stage and would include the access routes (vehicular and pedestrian) and car parking area.

56. In terms of layout, the proposed building would have a broadly U shaped footprint, with a small projection to the north-east corner. Although different in form from the previous building, it would occupy a similar footprint albeit with slightly increased separation from the Park Street frontage, and some reduction in separation from the southern site boundary (this will be considered further in relation to residential amenity (see paragraphs 71-96). The parking and turning area would be located to the north side of the building, with the remainder of the site landscaped with a mix of planted, grassed and hard surfaced areas, and provision of ancillary structures including seating.

57. In terms of scale, the majority of the building would be four storeys in height, with three storey sections to the southern end of each wing. The link section of the building would be single storey. Plant and equipment would be installed on sections of roof, but this would be within the overall height parameters of any outline consent. The building would be flat roofed, and there would be a small basement section to the north-east corner.

58. It should be noted that whilst illustrative details have been submitted with the application, to show how the development might look on completion, they are not for consideration at this stage and are subject to change. The assessment below will be carried on this basis.

59. Historically the site was occupied by a large house (later Pinehurst Children's Home), dating from the early 20th century and set in large, landscaped grounds. It formed

part of the low density, suburban development of Camberley in the late 19th and early 20th centuries, which was characterised by large single houses in spacious, well treed plots. This is a key component part of the area's character, and one which the WUAC SPD seeks to retain.

60. When this building was replaced in the late 1980s with a single storey, multi winged building (elderly persons' accommodation), it would appear that much of the boundary screening (including trees) was retained, and this remains in situ. Therefore whilst the previous (1980s) building was not itself characteristic of the area, its position on the site, low height and its wider setting enabled it to be largely screened from the public realm. From outside the site, and from its Park Street frontage in particular, the dominant feature of the site remains its boundary tree screen. Street scene images of the previous care home in situ show that it could be glimpsed through gaps in the vegetation, but was not generally visible or prominent from outside the site.

61. A building of this proposed scale and general massing would be considerably larger than its predecessor, particularly in height. Unlike its predecessor, the proposed building would be visible from outside the site and from Park Street in particular. The formation of a new access to this frontage would also open up views of the site which currently do not exist.

62. As set out above, the WUAC SPD sets out four 'guiding principles' for new development in the Victorian/Edwardian Sub-Divisions (Historic Routes) character area. Key and defining characteristics of the area are set out as being the retained Victorian and Edwardian housing, the rhythm of original plots and the existence of mature vegetation including hedging; it is this character which the design principles seek to retain and enhance through new development. The key pressures on the area are identified as being the loss of these characteristics, including through incremental and unsympathetic alterations to dwellings.

63. Although the site was once occupied by an Edwardian house, this was demolished in the 1980s and its replacement (now also demolished) was a modern building of its time. Nothing therefore remains of the original house or its gardens, though its original plot and tree boundary screening remain. Apart from the changes to the access arrangements, the plot would be retained, in accordance with one of the overall aims of the WUAC SPD (VS1(a)). The building would also be positioned broadly central to the plot, allowing for the retention and augmentation of boundary planting.

64. Where the proposal diverges from the design guidance is in its massing, and overall design which includes flat roofs. Whilst red brick is likely to be the principal external material (and could be secured at the reserved matters stage) (VS1(e)), the design would otherwise not accord with the guidance which seeks the incorporation of traditional elements such as gables, pitched roofs of varied heights (of slate or tile), chimneys and a mix of decorative materials (VS1(d) and (e)). Principle VS3 discourages the use of large areas of flat roof.

65. Whilst the design guidance is not prescriptive on height, it is noted that buildings in the area (including some recently constructed flatted development) are generally a maximum of three full storeys in height, with any additional accommodation (ie. fourth

storey) located in the roofspace, and generally served by dormer windows. Scale and massing are referenced in VS1(a), the inference being that new development should aim to reflect that of large Victorian/Edwardian houses (typically a maximum of three storeys). Therefore whilst buildings with accommodation over four storeys are part of the prevailing character of the area, flatted development of this massing (ie. with four or more full storeys) is only present in other more densely developed parts of Camberley, and which are outside the defined character area.

66. It is acknowledged that the proposal does not accord with the specific design guidance for the area in relation to massing and architectural detailing. Subject to detail submitted at the reserved matters stage, the building is likely to be modern in form and articulation, with brick and glazed elements under flat roofed sections of varying heights.

67. However, as set out in national planning guidance and National Design Guide, design encapsulates also the function and connectivity of development, encouraging the provision of well-designed and well-built places that benefit people at all stages of life, including the elderly. The potential of sites should be optimised to accommodate and sustain an appropriate amount and mix of development, and should be safe, inclusive and accessible places which promote health and well-being.

68. As set out previously, this development seeks to meet an urgent need for modern, purpose-built affordable housing for the elderly. Extra care housing facilities need to include both self-contained living accommodation, and ancillary and communal facilities for residents and staff. This requires a critical mass of development, and a layout which functions for this use. Such development should also be well located in relation to local facilities and services, with good connectivity to them including on foot, and by bicycle and mobility scooter (SHCSDMP Policy DM9).

69. As set out above, this site is very well located in relation to central Camberley and its station, as well as being adjacent to a doctors' surgery. The provision of a new footpath link (reusing the existing vehicular access) would enhance the connectivity of the site, providing a safe route for pedestrians and scooter users. This accords with SHRDG Principle 6.1 which states that new residential development should connect into and complement the local existing network of routes and public open spaces, and ensures that connections for pedestrians, cyclists and public transport are given the highest priority. The new footpath link would also visually enhance the development, and its relationship with the public realm in Park Road. The building would also be positioned centrally within the site, allowing for landscaped open space to be provided around it, and for the treed boundary to be maintained and enhanced.

70. The residential amenity of future residents, including through the provision of shared and private amenity space, will be addressed in more detail below. However, inasmuch as this relates to design, it is considered that this would be a well-designed and well-built development which would be fit for purpose, providing also an appropriate balance between making efficient use of land and safeguarding the character of the area.

RESIDENTIAL AMENITY

Surrey Heath Core Strategy and Development Management Policies 2012 (SHCSDMP)
Policy CP2 – Sustainable Development and Design
Policy DM9 – Design Principles
Residential Design Guide – SPD 2017

71. Paragraph 185 of the National Planning Policy Framework (2023) states that:

'Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

(a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;

(b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and

(c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.'

72. SHCSDMP Policy DM9 states that development will be acceptable where it provides sufficient private and public amenity space and respects the amenities of occupiers of neighbouring property and uses.

73. The Surrey Heath Residential Design Guide (SHRDG) states in Principle 6.4 that housing development should seek to achieve the highest density possible without adversely impacting on the amenity of neighbours or residents, or compromising character. Principle 8.1 states that new residential development should be provided with a reasonable degree of privacy to habitable rooms and sensitive outdoor amenity spaces, and that development which would have a significant adverse effect on the privacy of neighbouring properties will be resisted. Paragraph 8.4 sets out a guideline minimum privacy distance of 20m between the rear of two storey buildings directly facing each other (i.e. a back to back relationship). For two storey rear to side relationships it states that it may be possible to reduce the separation distance to 15m. It states however that extra separation may be needed where there are significant changes in level between buildings, or where new development is greater than 2 storeys in height.

74. The application site has residential properties immediately adjoining it to the north, south and east. On its western side the site adjoins Park Street, the rear section of gardens to 87 and 89 Gordon Road, and a commercial building (Telephone Exchange).

75. To the north of the site, on the western end of Middle Gordon Road, is the recently constructed Roxborough House (No 87). This is a development of six flats, with accommodation over three floors. A number of windows at first and second floor levels to the rear of the building face towards the application site. These windows

serve bedrooms, a kitchen and a living room (this window has a Juliette balcony); the windows to the second floor are dormer windows within the roofspace.

76. This part of the building is approximately 10m from the boundary with the application site (there are no windows on the projecting wing to the west end of this elevation), and the proposed building would be positioned between 17m and 19m from the boundary at this point. As such, there would be a minimum separation distance of 27m between these two buildings. Notwithstanding the proposed height of the proposed building, this distance is considered sufficient to prevent significant harm through any overbearing or overshadowing effect (taking into account the form and massing of this part of the building).

77. Although the scheme is in outline, the building has been designed with its principal elevations facing east and west, where balconies would be located. The part of the building closest to Roxborough House is shown as having staff accommodation at ground floor, with residential units at first, second and third floors. Indicative drawings show eight windows (two per floor) to the north facing elevation (facing towards Roxborough House). Although the illustrative elevational drawings show these openings as internal balconies, the internal layouts indicate that in all cases these would be secondary windows to the main living areas.

78. Taking into account the guideline privacy distances set out in the SHRDG (paragraph 8.4) it is considered that privacy would be adequately safeguarded. Furthermore, the exact relationships would be considered further at the reserved matters stage to consider and if necessary, obscure glazing of these windows could be required. In addition, the detailed design of balconies would be assessed at that stage, and for measures to be taken to prevent harmful overlooking to Roxborough House. It is further noted that although trees on this boundary and within the application site would be removed, there are a number of trees within the garden to Roxborough House which would filter and screen views at this point.

79. Next to Roxborough House is a pair of two storey houses (Nos 83 and 85 Middle Gordon Road), positioned close to the road frontage with rear back gardens of approximately 21m in depth. Part of the proposed building immediately behind these properties would be single storey, set approximately 20m into the site from the boundary, from which no unacceptable loss of privacy or harmful overlooking would arise (taking into account the removal of trees – see below).

80. Flanking this single storey section would be the ends of the two wings, which would be three storeys at this end, and positioned at an oblique angle to the northern site boundary. As set out above, the principal elevations of the two wings face east and west, with the north facing elevations containing secondary windows to the main living spaces. Whilst the windows and balconies to the east and west facing elevations have the potential to provide some limited overlooking to the north, it is considered that the separation distances and lack of direct alignment, combined with detailed design as required (eg. to balcony screens) would be sufficient to safeguard mutual privacy.

81. Nos 79 and 81 Middle Gordon Road, a two storey house and bungalow respectively, are located at the northern apex of the site. The proposed building would be positioned approximately 20m from the boundary. Notwithstanding the relatively

close relationship between No 81 and its rear boundary (10m), it is considered that the relationship would be acceptable, due to the orientation and massing of the proposed building. No 79 is set back behind No 81, and has a longer rear garden (approximately 17m from the end of its conservatory). A tree screen would be retained to this boundary.

82. To the north east side of the site, No 73 Middle Gordon Road (Buckingham Court) is a development of 15 flats, accommodated over three storeys with the upper storey in the roofspace, served by dormer windows. The front elevation of this building faces towards the application site. This building is not in direct alignment with the proposed building, with oblique views only of the north and west facing elevations (at a minimum separation distance of approximately 30m).

83. Facing into the site from the east side are flats within Court Gardens, which have accommodation over three floors. These flats have windows serving main living areas on their west facing elevation, facing into the application site. These windows would be positioned approximately 40m from the east elevation, on which the indicative drawings also show there to be balconies, and a glazed stairwell. There would be some intervisibility between the upper storey windows of Court Gardens and the proposed units, however it is considered that there would be sufficient distance for privacy to be maintained. It would be necessary at reserved matters stage, however, to ensure that balconies were designed such that mutual privacy was maintained through their positioning and design, and that similarly the detailed design of the stairwell maintains privacy and limits light spill.

84. Adjoining the site to its south-east corner is the Park Road Doctors Surgery. This building faces towards the application site, with its northern end being approximately 25m from the proposed building. Most of the surgery's windows face towards the access road, over its car parking area. No harm to privacy is therefore identified in this regard.

85. The other residential properties adjoining the application site are to the south. No. 139a Park Road is a chalet-style bungalow with rooms in the roofspace, set back from the road and positioned close to the application site boundary. This property would appear to have its principal outlook to the south-east/south-west, where its main outside living space also appears to be positioned, but there are also ground floor windows and a series of rooflights facing north into the application site, and a small area of garden. The part of the proposed building closest to this property would be the south elevation of the east wing, which would be three storeys in height with a width of approximately 17m. Indicative drawings show six windows (two per floor), and the internal layouts indicate that in all cases these would be secondary windows to the main living areas. This elevation would be positioned approximately 13m from the boundary (against which part of No 139a is positioned). This would be closer than the previous building on site, which was also lower in height.

86. Although the proposed building would be three storeys in height (8.85m) at this point, its impact would be limited to some extent by the lower ground level of the site (approximately 2m). Whilst recognising that the proposed building would be more prominent in views from No.139a, it is considered that its height and massing would not result in an unacceptable level of harm due to any overbearing effect. Furthermore, there would be no overshadowing due to the proposed building's

position to the north of No 139a. In terms of privacy, this would be assessed in detail at the reserved matters stage, incorporating (if necessary) obscure glazing.

87. It is noted that the indicative plans show a scooter storage between the proposed building and the boundary. This should be relocated, to minimise disturbance to properties to the south, and an informative to this effect is recommended. It is also noted that there is scope to augment the boundary planting at this point, which would further screen the site and further any disturbance from and intervisibility with the site. This would be sought at the reserved matters stage.

88. The other residential property directly adjoining the site to the south is No. 111 Park Street, a two storey house with its north facing side elevation facing the application site. There are two windows to this elevation, apparently serving a kitchen at ground floor and a bathroom at first floor, and a ground floor door (to a utility room). This property has a rear garden, which extends along the southern site boundary, with a close boarded fence to this side. On the application site side of the boundary is vegetation/hedging and trees.

89. The part of the proposed building closest to this property would be the south elevation of the west wing, which would be positioned approximately 16m from its side elevation. This part of the proposed building would be three storeys in height with a width of approximately 17m, however it would be set back further into the site than No. 111 so would not be in direct alignment. Indicative drawings show six windows (two per floor), and the internal layouts indicate that in all cases these would be secondary windows to the main living areas. The relationship is similar to that which previously existed with the former building on site, the key difference being the increase in height (the previous building being single storey).

90. The separation distance, and relative positions of the two buildings, are considered such that there would be no unacceptable loss of amenity through any overbearing or overshadowing effect in relation to the house. It is recognised that the proposed building would extend for the length of the rear garden and its upper floors would be visible from it. However, the relationship is considered to be such that amenities would not be unacceptably harmed, taking into account the fact that the proposed building would be to the north (and therefore would not result in overshadowing). In terms of privacy, as set out previously, this would be addressed in detail at the reserved matters stage incorporating (if necessary) obscure glazing.

91. These conclusions relate similarly to No 113 Park Street, which adjoins No. 111 to the south, and has a garden in similar east/west alignment. Suitable controls over the positioning of windows/balconies and their detailed treatment would ensure that there would be no unacceptable loss of amenity.

92. The other property directing abutting the application site is No 139 Park Road, which fronts Park Road adjacent to the existing access to the site. This is an L shaped former lodge building with its principal aspect facing away from the site (to the south-west), but with windows facing the access and a section of its garden running alongside it.

93. On the basis that the existing access point will be closed, and altered to form a pedestrian access, it is considered that the proposal will result in some improvement to the amenities of this property.

94. The proposal seeks to position the majority of car parking (20 spaces) along the northern boundary of the site, to the rear of the gardens to properties fronting Upper Gordon Road. Although it would appear that some parking was accommodated in this part of the site previously, the proposed layout including the formation of the new access road would introduce a level of vehicular activity greater than that previously experienced (ie. when access was from Park Road). However, it is considered that with appropriate levels of boundary planting, and appropriate acoustic fencing there would be no unacceptable loss of amenity to neighbouring properties due to noise or other disturbance. As set out in the Transport Statement (assessed below) traffic levels are anticipated to be relatively low due to the nature of the use and the profile of future occupiers.

95. To conclude in relation to neighbour amenity, whilst the development would result in some impact on neighbouring properties (as set out above), it is considered that an acceptable degree of privacy between habitable rooms and on outdoor private amenity spaces would be maintained. No other significant harm to residential amenity has been identified, though as this scheme is currently in outline it would be necessary at the reserved matters stage to give careful consideration to the exact positioning of windows and balconies including through the use (as necessary) of obscure glazing or other design features. Landscaping details would also need to ensure that neighbour amenity is safeguarded. Conditions are also recommended to control/mitigate disturbance during construction (dust, Construction Transport Management Plan and lighting).

96. In terms of the amenity of future occupiers, it is considered that each unit has been designed such that living conditions would be acceptable. Each unit would have outside living amenity space in the form of a private garden (ground floor) or balcony (upper floor), all of which would be oriented to be each east or west facing. There would also be communal accommodation and amenity space.

HIGHWAYS, ACCESS AND PARKING

Surrey Heath Core Strategy and Development Management Policies 2012 (SHCSDMP)
Policy CP11 – Movement
Policy DM9 – Design Principles
Policy DM11 - Traffic Management and Highway Safety
Residential Design Guide – SPD 2017

97. Paragraph 110 of the National Planning Policy Framework (2023) states:

'In assessing.....specific applications for development, it should be ensured that:(a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

(b) safe and suitable access to the site can be achieved for all users;

(c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code ; and

(d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.'

98. It goes on the state in Paragraph 111 that:

'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'

99. And in Paragraph 112 that:

'Within this context, applications for development should:

(a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

(b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

(c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

(d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

(e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.'

100. SHCSDMP Policy CP11 is a strategic policy which seeks to promote and facilitate sustainable forms of transport, and development which reduces the need to travel. It also requires that all new development is appropriately located in relation to public transport and the highway network and complies with the Council's car parking standards.

101. SHCSDMP Policy DM9 states that development will be acceptable where it incorporates high quality design with layouts that maximise opportunities for linkages to the surrounding area and local services.

102. SHCSDMP Policy DM11 resists development which would adversely impact the safe and efficient flow of traffic movement on the highway network. 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. New development will be expected to protect existing footways, cycleways and bridleways and facilitate improvements to existing or provide new

connections to these routes, especially where such schemes have been identified in the Local Transport Plan.

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103. The current access to the site is from Park Road, to the south-east corner of the site, via a short driveway adjacent to the Park Road Doctors surgery. Due to its proximity to the access to the surgery, and its limited (single) width, which could not be increased to a 2-way access without the loss of trees and harm to neighbour amenity, the proposal seeks relocation of the access to the Park Street frontage. The existing access would be altered to provide a pedestrian route to and from the site. Both Park Street and Park Road have a speed limit of 30 mph.

104. The proposed new access would be located towards the northern end of the Park Street frontage. It would be 2-way access road with footways to either side leading into the site, and a continuous pavement/pedestrian-priority raised crossing (also referred to as a Copenhagen-style crossing). A single tree would be removed to form the access and provide visibility splays (see below). The access road would run for the length of the site along its northern end to a turning head, and serve 30 parking spaces (to include two disabled spaces, one car club space and a drop off zone).

105. As set out in the application details (Transport Statement Technical Addendum Rev A dated 3 October 2023), 22 spaces would be allocated to residents. However, it is stated that the parking demand would depend occupancy, which would vary depending on the number of residents and their respective carers and it is anticipated that at full occupancy there would be fewer than 22 residents owning cars freeing up more parking on site for visitors. It is stated that as a comparison, similar residential (retirement flats) sites have been reviewed using the TRICS database to understand typical parking accumulation, and that to consider maximum parking accumulation (the maximum number of vehicles parked at any one time within the hour), a worse-case scenario has been considered which assumes that vehicles arriving and leaving within the hour would be parked at the same time.

106. In terms of vehicle movements, as set out in the Transport Statement (dated January 2023) the proposed development would result in eight two-way vehicle trips in the AM peak and six vehicle trips in the PM peak, which it is considered would have a negligible impact on the local highway network.

107. For parking, the overall conclusion of the Transport Statement is that given the small scale of the proposed development, the anticipated low scale of vehicle trip generation, the sustainable location, close proximity of the public car parks, the proposed car club bay and the onsite parking, any increase in parking demand due to the development is considered likely to be minimal.

108. It has been confirmed by the Council's Transport Development Planning (TDP) Officer that subject to the imposition of a number of conditions, the application is acceptable on safety, capacity and policy grounds, and accords with relevant guidance (Surrey's Local Transport Plan 4, Healthy Streets guidance and Surrey Parking Standards). Further details of the pedestrian priority crossing would be required to be submitted as the Reserved Matters stage, however sufficient detail

has been provided to demonstrate that it could be provided to the satisfaction of TDP within the existing site constraints (including tree retention).

TREES AND LANDSCAPING

Surrey Heath Core Strategy and Development Management Policies 2012 (SHCSDMP)
Policy CP2 – Sustainable Development and Design
Policy DM9 – Design Principles
Western Urban Area Character SPD – 2012
Residential Design Guide – SPD 2017

109. Paragraphs 126-136 of the National Planning Policy Framework (2023) seek to promote the creation of well-designed places and highlight the importance of appropriate and effective landscaping as part of this wider objective.

110. With specific reference to trees, it states in Paragraph 131:

'Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.'

111. SHCSDMP Policy DM9 states that development will be acceptable where it protects trees and other vegetation worthy of retention and provides high quality hard and soft landscaping where appropriate.

112. The Western Urban Area Character SPD (2012) (WUAC SPD) covers parts of Camberley, Frimley and Mytchett, and sets out detailed guidance for development based on its 'patchwork' of different character areas. One of the five guiding principles, VS1, states that new development should incorporate front boundary treatments of brick walls and/or hedging and; strongly address the road frontage.

113. The SHRDG SPD states (Principle 9.1) that boundary treatments in residential will be expected to reflect the character of the development and surrounding context, and that long lengths of hard boundary treatments will be resisted where they would be visible from the public realm.

114. None of the trees on the application site are subject to a Tree Preservation Order, and none are identified as Veteran Trees (Preliminary Ecological Assessment and Biodiversity Net Gain Assessment (PEA) 2022 paragraph 5.2.3). However, as set out above (under Layout, Design and Character), the trees on the periphery of the site contribute to the character of the area, particularly those on the Park Street frontage and at the existing access point on Park Road. They are a mix of deciduous and evergreen trees, with 73 individual trees and six groups assessed in the arboricultural

appraisal and impact assessment (AAIA). Deciduous species include Lime, Sycamore, English Oak and Copper Beech, and evergreen species include Scots Pine, Norway Spruce, Douglas Fir and Yew. The groups are primarily of Lawson and Leyland Cypress, Laurel and Holly, mostly forming the understorey to the individual trees. They are a mix of mature, semi-mature and young trees, all graded at 'B' or 'C'.

115. Four individual trees (T40 Lime and Sycamores T43, T44 and T45) and two groups (G4 – Sycamore and G5 – Leyland Cypress) are proposed to be removed. One further tree (T39 – Douglas Fir) is included in the assessment, but is categorised as a 'failed tree' which is no longer standing. T40 is a B grade tree of moderate quality on the Park Street frontage which makes some contribution, as part of the treed frontage, to the public realm. The removal of this tree is necessitated by the formation of the new access point. T43-T45 are all C graded trees on the north-west facing site boundary (with Roxborough House), and groups G4 and G5 (C graded) are further along that boundary (with Roxborough House and Nos 83 and 85 Middle Gordon Road). All these trees would be removed to facilitate the formation of car parking spaces. The remainder of the trees assessed in the AAIA would be retained.

116. SHCSDMP Policy DM9 seeks to protect as part of development proposals trees and vegetation worthy of retention. None of the trees proposed for removal are identified as A (high) grade trees, with only one being identified as of 'moderate' (B grade). This tree has some prominence in the public realm, however it is considered that its value is as part of a group, rather than as an individual tree. Whilst its removal would punctuate the line of frontage trees, on the basis that that remainder of this group would be retained it is not considered that this would be so harmful as to render the scheme in conflict with development plan policy. Furthermore, its loss needs to assessed in the context of replacement planting and landscaping which will be addressed below.

117. The majority of trees to be removed are on the north-western site boundary. Although individually these trees are not of high quality (all being graded C – low), their removal would result in a change in character to this part of the site, thinning the tree screen which currently exists on the boundary with Nos 85 and 87 Middle Gordon Road, opening it up and providing a level of intervisibility between the site and surroundings which does not currently exist. As set out above in relation to neighbour amenity (paragraphs 71-96) a number of trees on this boundary are within the garden to Roxborough House, and were retained as part of the recent development of that site. Hedging would be planted to this boundary, details of which would be subject to approval at the reserved matters stage.

118. As set out in the Arboricultural Appraisal and Impact Assessment (AAIA) submitted with the application, there would be some incursion into the root protection area of three of the retained trees (T19 English Oak, T21 Sycamore and T22 Scots Pine – all close to the southern site boundary) to facilitate the construction of footpaths. A number of mitigation methodologies are proposed in the AAIA including ground protection, arboricultural supervision and 'hand digging' within impacted RPA's, as well as tree friendly construction methods including above ground pathway installation or porous materials. It is noted further that as the paths would form part of the landscaping proposals (a reserved matter), the precise position of paths,

materials and details of any land level changes would be considered at that time to ensure maximum avoidance of disturbance to tree roots.

119. Although indicative only at this stage, the illustrative landscape masterplan submitted with the application shows the overall strategy which would be applied to the landscaping of the site. Hedging would be formed/supplemented to all boundaries, and existing trees would be augmented with woodland/native planting. Further into the site there would be a mix of wildflower meadow, grass (neutral grassland and amenity grass) and ornamental planting, all intersected by a network of paths. Each ground floor garden area would be laid partially to grass (with a patio area), and enclosed with hedges. Hard surfaced areas would be a mix of tarmac (access road and parking areas), and paving. Other features include a kitchen garden, pergola and seating. It is recommended that to compensate for the loss of mature trees, a greater number of trees is planted than removed and of at least 14-16cm heavy standard in size.

120. This landscape strategy is considered acceptable for the site, and that it strikes the appropriate balance between retaining trees and maximising biodiversity, and providing an appropriate environment for future occupiers of the site, including those with limited mobility.

121. SHBC's comments regarding the loss of trees are noted. However, it is considered that tree removal is at the minimum level necessary to facilitate the development, and that the overall treed character of the site would be maintained, noting also that individually none of the trees are identified as being of high quality. It is also considered that where there would be any incursion into the RPA of trees during construction, appropriate measures would be taken to ensure that root damage was minimised. New tree planting would also supplement the existing trees.

SUSTAINABLE DESIGN

Surrey Heath Core Strategy and Development Management Policies 2012 (SHCSDMP)
Policy CP2 – Sustainable Development and Design
Policy DM7 – Facilitating Zero Carbon Deign
Policy DM9 – Design Principles
Western Urban Area Character SPD – 2012
Residential Design Guide – SPD 2017

122. Paragraphs 152-158 of the National Planning Policy Framework (2023) sets out the role the planning system is expected to play in supporting the transition to a low carbon future in a changing climate. As part of this, it states in Paragraph 157 that:

'In determining planning applications, local planning authorities should expect new development to:

(a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and

(b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

123. SHCS Policy CP2 is an overarching policy which sets out a number of criteria aimed at achieving sustainable forms of development, including those which contribute to a reduction in the Borough's carbon dioxide emissions, secure water efficiency and climate change resilience, and create safe and sustainable communities with a strong sense of place.

124. SHCSDMP Policy DM7 seeks to encourage development which reduces carbon dioxide emissions.

125. A Sustainable Design and Construction Statement has been submitted with the application. This states how the various strands of national and local policy encompassing sustainability in all its forms are reflected in the proposals.

126. A number of key Surrey County Council documents forming part of its Organisation Strategy are cited, including its Community Vision for Surrey in 2030, which includes the desire for Surrey to be a great place to live, work and learn, and a place where communities feel supported and people are able to support each other. It also cites includes the Council's four key priorities - growing a sustainable economy so everyone can benefit; tackling health inequality; enabling a greener future; empowering communities, as well as the Council's Environmental Policy and Action Plan, its Climate Change Strategy and Action Plan, Local Transport Plan and Sustainable Construction Standing Advice Note.

127. In addition to the Surrey Heath Borough Council development plan policies set out above, the Surrey Heath Borough Council Climate Change Action Plan is also referenced. In particular, it highlights the following:

(1) Low carbon energy and building design. Through active and passive building design strategies the proposed building would be energy efficient, and through the minimisation of heat loss and use of low carbon energy systems reduce carbon emissions. Other efficiencies would be sought through the use of measures such as the installation of efficient fittings to reduce water consumption.

(2) Circular economy considerations. For the detailed design stage (reserved matters) it is recommended that embodied carbon reduction strategies and circular economy principles are explored and implemented to reduce overall waste generation, and that compliance with the waste hierarchy is also embedded (ie. through the provision of accessible waste storage with containers for different waste streams).

(3) Improved health and wellbeing. This is seen as being achieved through the project as a whole, as residents with extra needs would be able to better access support to enhance their quality of life, including through communal living and the social cohesion that would bring. The building has been designed such that it focuses on

indoor air quality, and the provision of sufficient daylight, together with the provision of shared and private outdoor amenity space.

(4) Enhancing biodiversity. This would be achieved through landscaping design, the planting for which would include a range of species with ecological value and measures to create habitats, such as the inclusion of bat and bird boxes, and insect houses (see also paragraphs 135-147).

(5) Consideration of flood risk. This would be through the incorporation of Sustainable Drainage System techniques (SuDS), which would build in climate change resilience (see also paragraphs 129-134).

(6) Sustainable transport. Various measures would be incorporated to encourage active travel, and reduce car use (the sit is close to local bus routes). Electric charging points would also be available.

128. It is considered that subject to the implementation of the range of measures set out above, the proposal meets national and local policy objectives in relation to sustainable construction. To ensure that the reserved matters include these details however it is recommended that a condition is imposed.

FLOOD RISK AND DRAINAGE

Surrey Heath Core Strategy and Development Management Policies 2012 (SHCSDMP)
Policy CP2 – Sustainable Development and Design
Policy DM10 – Development and Flood Risk

129. Paragraphs 159 - 161 of the National Planning Policy Framework (2023) set out the role the planning system is expected to play in minimising the risk of flooding and mitigating its effects. Development should be directed away from areas at highest risk, and in determining applications LPAs should ensure that flood risk is not increased elsewhere.

In order to minimise flood risk, including surface water flooding, Paragraph 169 states that:

'Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:(a) take account of advice from the lead local flood authority;

(b) have appropriate proposed minimum operational standards;

(c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and

(d) where possible, provide multifunctional benefits.'

130. SHCS Policy CP2 is an overarching policy which sets out a number of criteria aimed at achieving sustainable forms of development, including criterion (vii) which requires

development to be climate resilient, in particular by reducing the risk from all types of flooding and improving water quality.

131. SHCSDMP Policy DM10 seeks to take a sequential approach to the allocation of sites and determination of planning applications to minimise flood risk, seeking to direct development towards the areas at lowest risk of flooding. This policy also states that 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).

132. A Flood Risk Assessment (FRA) has been submitted with the application. This concludes that as the proposed development is located in EA Flood Zone 1, there is a very low risk of fluvial flooding (a 0.1% or 1 in 1,000 risk). It also concludes that there is a low risk of surface water flooding, apart from in the north-east corner of the site where a flowpath crosses the site. This would be managed through the detailed design (and is in a low vulnerability part of the site, ie. the turning head). The FRA concludes that he site is at low risk of groundwater flooding, due to the clay rich soil nature and flooding data.

133. The FRA cross refers to the Drainage Strategy which sets out how on-site risk would be mitigated and run-off managed, to include management strategies including a range of sustainable features (SuDS) - green roofing, porous pavements and attenuation storage tanks. These measures collectively would restrict run-off to greenfield rates.

134. These details have been reviewed by the LLFA who are satisfied that subject to the imposition of conditions the requirements of the NPPF, its accompanying PPG and the Non-Statutory Technical Standards for sustainable drainage systems are met. On that basis, the proposal is considered to meet the requirements if SHCS Policy CP2 and SHCSDMP Policy DM10.

ECOLOGY AND BIODIVERSITY NET GAIN

Surrey Heath Core Strategy and Development Management Policies 2012 (SHCSDMP) Policy CP14A – Biodiversity and Nature Conservation

135. Paragraphs 174-188 of the National Planning Policy Framework (2023) seek to ensure that planning policies and decision making contribute to and enhance the local and natural environment. In particular, they should seek to minimise impacts on and provide net gains for biodiversity, ensuring that any harm to biodiversity is adequately mitigated. If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused (Paragraph 180 (a)).

136. SHCS Policy CP14a states that the Borough Council will seek to conserve and enhance biodiversity within Surrey Heath. Development that results in harm to or loss of features of interest for biodiversity will not be permitted, and new development will

where appropriate be required to contribute to the protection, management and enhancement of biodiversity.

137. Although this is an outline application and landscaping is a reserved matter, to accord with policy an assessment needs to be made of the impact of the development on biodiversity including any protected species.

138. A Preliminary Ecological and Biodiversity Net Gain Assessment (PEA and BNG) has been submitted, together with supporting information in the form of species surveys/reports (for bats and badgers) and a hibernation survey report. The PEA sets out the ecological constraints of the site, whether any mitigation measures are likely to be required, any additional surveys which may be required, and opportunities for ecological enhancement. It also sets out the baseline BNG unit score for the area surveyed.

139. Two statutory and non-statutory designated sites were recorded within 2 km of the survey area, of which the closest is 1500 m north-east of the survey area. These are: the Thames Basin Heaths Special Protection Area (SPA) (1500m from the site) (see paragraphs 148-160) and the Blackwater Valley and Broadmoor to Bagshot Woods and Heaths SSSIs (2000m and 1500m from the site respectively). Twenty-three protected species were recorded within 1 km of the survey area, of which the closest is 100 m south-east of the survey area.

140. Five UK habitat classification types were recorded on site during the field survey (other neutral grassland, line of trees, built up areas and gardens, developed land, sealed surface and artificial unvegetated, unsealed surface). These habitats are likely to support the following protected species or species of conservation concern: invertebrates, reptiles, nesting birds, hedgehog and foraging bats.

141. The report concludes that there is a low likelihood of any impact on any protected sites (subject to any required mitigation for the SPA). In terms of protected species and species of conservation concern, as there are no waterbodies on or close to the site limits, no suitable habitat exists to support great crested newts or other amphibians, otters or water voles. As set out in the report, although the site contains some habitat which could support invertebrates and reptiles (slow worm), and mammals including badgers and dormice, the lack of connectivity with other suitable habitats and the generally suburban and urban nature of habitats around the site limits the potential for these species to be supported.

142. For badgers, although the open grassland could potentially be used for foraging these spaces are typically used in conjunction with wooded areas where they can form larger setts. Such wooded areas are generally absent from the area around the site. Furthermore, no evidence of badger activity (latrines, setts, push-throughs, foraging signs and hair) was recorded when the site was surveyed. A number of bat species were identified as part of the desk study (common pipistrelle, soprano pipistrelle, brown long-eared, serotine and whiskered), and two habitats suitable for use by bats were identified (other neutral grassland and line of trees).

143. A number of non-native and invasive plant species have been identified on the site (rhododendron, cotoneaster, broad-leaved bamboo and cherry laurel); Japanese Knotweed has not been identified as one of the species present.

144. As set out above, SHCS Policy CP14a requires that there is no net loss of biodiversity and new development will where appropriate be required to contribute to the protection, management and enhancement of biodiversity. . As set out in the application details (BNG Assessment Letter June 2023), an assessment has been carried out which evaluates the baseline biodiversity units and identifies possible scenarios for habitat enhancement and creation, and the potential net gain in biodiversity units that this would achieve (based on the submitted landscape plan). Biodiversity net gain, including assessment and habitat classification, is calculated and interpreted following eight accepted principles and rules and supported by good practice principles and code of practice that detail, among other things, how to implement biodiversity net gain good practice principles within each stage of a development project's life cycle.

145. The broad habitat types in the survey area have been set out in paragraph 140 above. Habitat retention, enhancement, and creation opportunities (as detailed in the landscape plan) comprise:

- Retention and enhancement of existing areas of other neutral grassland
- Retention and enhancement of tree lines around the survey area boundary
- Creation of other neutral grassland (wildflower meadow)
- Creation of modified grassland (amenity grassland)
- Creation of developed land; sealed surface (all hard-standing areas and buildings)
- Creation of artificial Unvegetated, Unsealed Surface (resin-bound surfaces)
- Creation of mixed scrub along the margins of the existing tree lines
- Creation of new tree planting (urban tree)
- Creation of native hedgerow (mixed species native hedge)

146. Applying the BNG metric (a habitat based approach used to assess an area's value to wildlife), it is calculated that the development would result in a 67% increase in habitat units and 277% increase in hedgerow units. On this basis it is considered that sufficient information has been submitted to conclude that the proposal would meet policy requirements in relation to ecology and BNG.

147. The County Ecologist has confirmed that the application is acceptable, including in relation to BNG, subject to the imposition of conditions.

THAMES BASIN HEATHS SPECIAL PROTECTION AREA (SPA)

South East Plan Policy NRM6 – Thames Basin Heaths Special Protection Area
Surrey Heath Core Strategy and Development Management Policies 2012 (SHCSDMP)
Policy CP13 – Green Infrastructure
Policy CP14B – European Sites

148. Paragraph 182 of the National Planning Policy Framework (2023) states that 'the presumption in favour of sustainable development' does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site. The application site is located within 5km of the Thames Basin Heaths Special Protection Area.

149. The South East Plan was formally abolished in 2013, except for Natural Resource Management Policy 6 – Thames Basin Heaths Special Protection Area. This policy requires that new residential development which is likely to have a significant effect on the ecological integrity of Thames Basin Heaths Special Protection Area (SPA) will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects.

150. SHCS Policy CS13 seeks to encourage and enhance the network of green infrastructure across the Borough. Green infrastructure of strategic importance will include those areas designated as European sites and Suitable Alternative Natural Greenspace (SANGs) required to avoid and mitigate impacts to the European sites.

151. SHCSDMP Policy CP14(B) states that the Council will only permit development where it is satisfied that it will not give rise to likely significant adverse effect on the integrity of the Thames Basin Heaths SPA. All new residential (net) development within 5km of the SPA is considered to give rise to the possibility of likely significant effect. Appropriate measures to avoid and mitigate potential adverse effects will need to be put in place. All net new residential development shall provide or contribute to the provision of Suitable Alternative Natural Greenspace (SANG), and also contribute to the Strategic Access Management and Monitoring (SAMM) at the SPA.

152. The Thames Basin Heaths Special Protection Area Avoidance Strategy SPD (2019) (TBHSPAAS) provides guidance on the implementation of the policy. Based on the principles established in the Delivery Framework adopted by the Thames Basin Heaths Joint Strategic Partnership in 2009 (Surrey Heath BC being one of the local authority partners), the SPD provides guidance to demonstrate how the adverse effects of development within Surrey Heath on the integrity of the Thames Basin Heaths SPA should be avoided and mitigated.

153. The Thames Basin Heaths account for around two-thirds (approximately 2,000 ha) of Surrey's remaining heathland and were designated on 9th March 2005 as a Special Protection Area (SPA) for internationally important birds; providing habitat for woodlark (Lullula arborea), nightjar (Caprimulgus europaeus) and Dartford warbler (Sylvia undata). These birds nest on or near the ground and as a result they are very susceptible to predation of adults, chicks and eggs (particularly by cats, rats and crows) and to disturbance from informal recreational use, especially walking, cycling and dog walking.

154. The policy and guidance (and mitigation measures they seek) are based on the vulnerability of the Thames Basin Heaths SPA (TBHSPA) and the impact of visitors, in particular those with dogs. It is for this reason that alternative recreational provision (including for dog walkers) is sought in the form of SANG (SAMM provision supporting monitoring and management within the SPA itself).

155. The SPD states that developments within Use Class C2 (Residential Institutions) may be considered to give rise to likely significant effect to the SPA and may be required to contribute towards avoidance measures. Applications will be considered on a case-by-case basis, taking into account how the development will be used and occupied. In the case of 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.

156. As set out in the application details, the provider for this development is yet to be determined, and precise details of residents' likely age and mobility profile are not available. However, by its very nature extra care accommodation is designed to provide for a range of ages, providing greater support to meet health and mobility needs as they develop over time. As set out in the application details, residents could be eligible for accommodation from the age of 55 (though it is more likely to be accessed from the age of 75), and car parking spaces and a car club facility will be available to them. A proportion of them are therefore likely to access the SPA by car. In addition, as the TBHSPA is a local open space to the site, there is a high probability that residents will be taken there by visitors. Some visitors may have dogs (one of the main risks to nesting birds).

157. The applicant has agreed to contribute to both SANG and SAMM, to meet legal requirements under the Habitat Regulations and in accordance with policy and guidance. Although Surrey Heath has SANG provision, it does not have spare capacity to mitigate the effects of this development. As set out in the SPD, in such circumstances mitigation can be provided in neighbouring authorities provided they are within a defined catchment area, and capacity exists.

158. The applicant has established that capacity exists at the Shepherd Meadows SANG which is located between Blackwater and Sandhurst, within Bracknell Forest district

(approximately 10 minutes by car from the application site). That Council operates a tariff mechanism (based on bedroom numbers) and calculates contributions accordingly. As it stands, the higher (gross) contribution would be £276,612 and the lower (net) figure would be £45,680. Discussions are ongoing to establish whether the contribution should be based on net or gross unit numbers (10 or 60 respectively), on the basis that until the closure of the previous Pinehurst residential facility there were residents on site and pressure on the SPA accordingly. Natural England are party to these discussions. However, the applicant has committed to make the higher contribution, should this be the outcome of these discussions. This would be secured by a legal agreement between the applicant and Bracknell Forest Council.

159. In addition, a contribution is required towards SAMM, which would be paid to Surrey Heath Borough Council. Based on current figures the SAMM payment would be £29,313.30 for the 60 unit scheme and £4,801,60 for the 10 unit "net increase option" (subject to discussions as set out above). A separate legal agreement would be entered into to secure this contribution.

160. The recommendation for this application is to resolve to grant outline consent, subject to these legal agreements being completed.

AIR QUALITY

Surrey Heath Core Strategy and Development Management Policies 2012 (SHCSDMP)
Policy CP2 – Sustainable Development and Design
Policy DM9 – Design Principles

161. Paragraph185 of the NPPF (2023) requires that planning policies and decisions ensure new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.

162. Paragraph 86 states that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

163. An Air Quality Appraisal has been submitted with the application. This identifies the pollutants of concern as nitrogen dioxide (NO_2), particulate matter (PM10, PM2.5) and dust. The key issues are identified as the impact of the development on the surrounding area and the suitability of the site for its proposed use as a care home. The Council's air quality advisers agree with these conclusions.

164. The application site is not in an Air Quality Management Area (AQMA), the nearest AQMA being approximately 1.0 km to the south-east of the site (close to the M3

motorway). The Air Quality Appraisal refers to NO_2 monitoring sites operated by SHBC, and concludes on the basis of this data that NO_2 concentrations at the application site are likely to be below the AQS objective of 40 µg.m-3. For particulate matter, PM_{10} is monitored at one continuous automatic monitoring; no monitoring of $PM_{2.5}$ is carried out, and as such DEFRA mapped concentration estimates have been used. In both cases concentrations are well below current Air Quality Strategy objectives of 40 µg.m-3 and the Air Quality Standard limit value of 20 µg.m-3 for $PM_{2.5}$.

165. In line with best practice, a number of mitigation measures and opportunities have been outlined for consideration at the detailed design stage to minimise exposure for occupants of the new building and existing residents to local ambient sources of air pollution. The report also recommends submission of a simple air quality statement to determine the scale of any potential impacts on existing or future new receptors due to the proposed development, and a risk assessment of dust impacts during construction work with recommendations for mitigation and controls consistent with the level of risk.

166. The Council's air quality advisers recommend that, subject to the submission of this information, the application is acceptable in relation to air quality. No objection has been raised in this regard by SHBC's EHO. As this application is in outline, a condition is recommended to require submission of control measures for dust. On the basis of the previous use of the site as a care home, and that the site is identified in the emerging local plan for extra care housing, it is not considered proportionate or necessary to require the submission of a further air quality statement.

HERITAGE ASSETS

Surrey Heath Core Strategy and Development Management Policies 2012 (SHCSDMP) Policy DM7 – Heritage

167. Paragraph 194 of the National Planning Policy Framework (2023) states that:

'In determining applications, Local Planning Authorities (LPAs) should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.'

168. It goes on to advise that in determining applications, LPAs should identify and assess the particular significance of any heritage asset that may be affected by the development, taking account of any available evidence and any necessary expertise. Paragraph 199 states:

'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.'

169. SHCSDMP Policy 17 seeks to promote the conservation of heritage assets and their setting, with regard to be had as to whether an asset is designated. It also states that for sites of over 0.4ha prior assessment of the possible archaeological significance of a site should be undertaken, with further evaluation secured where there is a likelihood of archaeological remains.

170. Located to the west of the site on the opposite side of Park Street, approximately 50m from the site boundary, is a Grade II listed Arts and Crafts house, Witwood, by the architect Sir Edwin Lutyens. As a listed building it is a designated heritage asset.

171. When built in 1898 Witwood was one of a number of houses in Camberley set in relatively spacious and well treed plots, creating a sylvan suburban character. As a result of development over time, including the sub-division of plots and the redevelopment of the late 19th century/early 20th century housing, some of this character has been lost and the setting of Witwood eroded. The trees along Park Street are now the only indication of this former character, and therefore contribute to the setting and understanding of the listed building.

172. On this basis, the County Council's Historic Buildings Officer advises that provided the tree screen is retained it will both continue to contribute to Witwood's setting and limit views of the site from it. For this reason it is concluded that there would be no material impact on the special interest of the listed building. There are no other heritage assets (designated or non-designated) in close proximity to the site, or otherwise impacted by the proposed development.

173. In line with the policy requirement, an Archaeological Desk Based Assessment was carried out. Further field evaluation was then undertaken, with five trial trenches excavated. This work demonstrated that past development impacts had severely reduced the archaeological potential of the site, any surviving assets likely to be fairly modern in age and of low significance. On the basis of these conclusions, the County Council's Archaeological Officer advises that no further archaeological mitigation works are required.

Human Rights Implications

174. The guidance on the determination of planning applications contained in the Preamble/Agenda frontsheet is expressly incorporated into this Report and must be read in conjunction with the following paragraph.

175. In this case, it is the Officers' view that the scale of such impacts is not considered sufficient to engage Article 6 or Article a of Protocol 1 and any impacts can be mitigated by condition. As such, this proposal is not considered to interfere with any Convention right.

Conclusion

176. This is an outline application, seeking approval for layout, scale and means of access (with appearance and means of access reserved for future consideration). It is considered that a building of this size, scale and massing could be accommodated on the site without significant harm to either the character of the area, or neighbour amenity.

177. It is recognised that the design of the building (as shown illustratively) does not accord with all design principles as set out in the Western Urban Area Character Supplementary Planning Guidance 2012 (WUAC) and the Surrey Heath Residential Design Guide Supplementary Planning Guidance 2017 (SHRDG). However, it is considered that the development as a whole would accord with the wider objectives of SHBC's strategic themes, namely putting people first, developing a sense of place and creating sustainable places.

178. It also accords with national and local planning policy regarding the provision of housing for boosting the supply of housing generally, and specialist housing for different groups in the community in particular. The site is well located in relation to Camberley town centre, and the services and facilities located there, with good interconnectivity between the site and its surroundings.

180. The proposal is considered acceptable in relation to all other relevant policies, subject to the imposition of conditions.

181. It should be noted that a number of illustrative plans and material have been submitted to demonstrate accordance with development plan policy in relation to landscaping and biodiversity, however that illustrative material would not be approved as part of an outline permission and will require full submission as part of the reserved matters as appropriate. The approved plans therefore relate to layout, scale and means of access only.

Recommendation

That, subject to Regulation 3 of the Town and Country Planning Regulations 1992, the Committee resolves that:

(1) Outline planning permission is granted for application ref: SU/23/0326/PCM subject to the satisfactory completion of legal agreement(s) to secure mitigation to offset the impact of the development on the Thames Basin Heaths Special Protection Area (SPA) and subject to the conditions listed; and

(2) The application is returned to this Committee for further consideration if the necessary legal agreement(s) have not been reached to the satisfaction of officers within 6 months of the date of this resolution.

Conditions:

IMPORTANT - CONDITION NOS. 6, 11, 19, 20, 21, MUST BE DISCHARGED PRIOR TO THE COMMENCEMENT OF THE DEVELOPMENT.

Approved Plans

1. The means of access, siting, layout and scale of the development hereby approved is as shown on the following approve plans/drawings:

- PR-289-ATK-XX-RF-A92101-Rev P01 - Site Location Plan dated 20 January 2023
- PR-289-ATK-XX-RF-A92103-Rev P01 - Site Block Plan dated 20 January 2023
- PR-289-ATK-XX-00-A90112-Rev P01 - Proposed Ground Floor Plan dated 20 January 2023
- PR-289-ATK-XX-01-A90113-Rev P01 - Proposed First Floor Plan dated 20 January 2023
- PR-289-ATK-XX-02-A90114-Rev P01 - Proposed Second Floor Plan dated 20 January 2023
- PR-289-ATK-XX-03-A90115-Rev P01 - Proposed Third Floor Plan dated 20 January 2023
- PR-289-ATK-XX-RF-A90116-Rev P01 - Proposed Roof Plan dated 20 January 2023
- PR-289-ATK-XX-ZZ-A91200-Rev P01 - Proposed Elevations 1 of 2 dated 20 January 2023
- PR-289-ATK-XX-ZZ-A91201-Rev P01 - Proposed Elevations 2 of 2 dated 20 January 2023
- PR-289-ATK-XX-ZZ-A91310-Rev P01 - Proposed Sections dated 20 January 2023
- PR-289-ATK-XX-ZZ-A92301-Rev P01 - Proposed Site Sections dated 20 January 2023
- PR-289-ATK-XX-ZZ-A90117-Rev P03 - Road Layout Setting Out dated 3 October 2023

Reserved Matters

2. Approval of the details of the design and external appearance of the building, and the landscaping of the site (hereinafter called "the reserved matters") shall be obtained from the County Planning Authority in writing before any development is commenced and carried out as approved. Plans and particulars of the reserved matters referred to above, shall be submitted in writing to the County Planning Authority before the expiration of three years from the date of this permission.

Commencement

3. The development hereby permitted shall be begun either before the expiration of five years from the date of this permission, or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.

Drainage

4. Prior to the installation of the surface water drainage on this site details of the proposed surface water drainage scheme shall be submitted to and approved in writing by the County Planning Authority. The design must satisfy the SuDS Hierarchy and be compliance with the national Non-Statutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:

   a) The results of infiltration testing completed in accordance with BRE Digest: 365 and confirmation of groundwater levels.

   b) Evidence that the proposed final solution will effectively manage the 1 in 30 (+35% allowance for climate change) and 1 in 100 (+40% allowance for climate change) storm events and 10% allowance for urban creep during all stages of the development. If infiltration is deemed unfeasible, associated discharge rates and storage volumes shall be provided using a maximum discharge rate equivalent to the pre-development Greenfield run-off.

   c) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.). Confirmation is required of a 1m unsaturated zone from the base of any proposed soakaway to the seasonal high groundwater level and confirmation of half-drain times.

   d) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk.

   e) Details of drainage management responsibilities and maintenance regimes for the drainage system.

   f) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.

   The development shall be implemented in accordance with the approved details.

5. The development hereby permitted shall not be occupied unless and until a verification report carried out by a qualified drainage engineer has been submitted to and approved in writing by the County Planning Authority. This must demonstrate that the surface water drainage system has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls), and confirm any defects have been rectified.

   Highways, Traffic and Access

6. Prior to the commencement of the development hereby permitted a Construction Transport Management Plan shall be submitted to and approved in writing by the County Planning Authority, to include:

   a) Details of parking for vehicles of site personnel, operatives and visitors.

b) Details of loading and unloading of plant and materials.

c) Details of storage of plant and materials.

d) A programme of works (including measures for traffic management).

e) Details of boundary hoarding to be provided behind any visibility zones

f) Details of HGV deliveries and hours of operation.

g) Details of vehicle routing.

h) Measures to prevent the deposit of materials on the highway.

i) Details of turning for construction vehicles.

Only the approved details shall be implemented during the construction of the development hereby permitted.

7. The development hereby permitted shall not be occupied unless and until the proposed Electric Vehicle charging points have been provided for all parking spaces (current minimum requirements - 7 kW Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply) in accordance with a scheme to be submitted and approved in writing by the County Planning Authority.

8. The development hereby permitted shall not be occupied unless and until the proposed access junction with Park Street has been provided in accordance with a scheme to be submitted to and approved by the County Planning Authority.

9. The development hereby permitted shall not be occupied unless and until facilities for the secure, covered parking of bicycles including charging facilities for electric cycles and charging facilities for mobility scooters has been provided in accordance with a scheme to be submitted to and approved by the County Planning Authority, and thereafter the said approved facilities shall be provided, retained and maintained to the satisfaction of the Local Planning Authority

Limitations

10. The height and scale of the proposed building shall not exceed that shown on Drawing Nos. PR-289-ATK-XX-ZZ-A91200-Rev P01 - Proposed Elevations 1 of 2 dated 20 January 2023, PR-289-ATK-XX-ZZ-A91201-Rev P01 - Proposed Elevations 2 of 2 dated 20 January 2023, PR-289-ATK-XX-ZZ-A91310-Rev P01 - Proposed Sections dated 20 January 2023 and PR-289-ATK-XX-ZZ-A92301-Rev P01 - Proposed Site Sections dated 20 January 2023 hereby approved.

Dust Management

11. Prior to the commencement of the development hereby permitted, a Dust Management Plan for the construction phase of the development shall be submitted to and approved in writing by the County Planning Authority. The development shall be implemented in accordance with the approved details.

Hours of Operation

12. No construction activities shall take place on the site except between the hours of 8am and 6pm Mondays to Fridays and 8am to 1pm Saturdays.

Noise

13. Prior to the installation of any noise emitting plant or machinery on the site in connection with the development hereby permitted details shall be submitted to and approved in writing by the County Planning Authority to demonstrate that such installations would not adversely affect noise sensitive receptors and future residents. The development shall be implemented and maintained in accordance with the details as approved.

Lighting

14. There shall be no external lighting installed on the site, including any temporary lighting required during construction, in connection with the development hereby permitted unless and until details of the proposed lighting have been submitted to and approved in writing by the County Planning Authority. Details to be submitted shall include:

    • confirming the type of fittings to be mounted on the building façade

    • providing details of lighting controls

    • providing a complete lighting scheme with associated lux plots

    • submitting lighting design and calculations demonstrating that the scheme is in compliance with the International Commission on Illumination's Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations Second Edition (CIE 150:2017).

    • Consideration of the lighting impacts on the ecological interests on the site such as Bats

    Only the external lighting which has been approved in accordance with this condition shall be installed on the site.

Trees

15. The development hereby permitted shall be carried out strictly in accordance with the approved Arboricultural Method Statement as set out in the Arboricultural Appraisal and Impact Assessment by ACS (Trees) dated 24 January 2023 and appendices attached thereto.

16. No trees shall be removed except for those identified within the Arboricultural Appraisal and Impact Assessment by ACS (Trees) dated 24 January 2023. All trees identified for removal shall be removed in accordance with the approved Tree Removals Plan.

17. The development shall proceed in accordance with the details, including tree protection fencing and construction exclusion zone, contained within the approved drawing ref: the Arboricultural Appraisal and Impact Assessment by ACS (Trees) dated 24 January 2023 and appendices attached thereto and retained during the construction phase of the development.

18. No development including groundworks and demolition shall take place and no equipment, machinery, or materials or site facilities shall be brought onto the site for the purposes of the development until a pre-commencement meeting has been held on site and attended by a suitable qualified arboriculturist, representative from the County Planning Authority and the site manager/foreman. The site visit is required to ensure operatives are aware of the agreed working procedures and the precise position of the approved tree protection measures or/and that all tree protection measures have been installed in accordance with the approved tree protection plan. To arrange a pre-commencement meeting please email [ARB CONTACT DETAILS TBC] with the application reference and contact details.

Biodiversity and Habitat Management

19. Prior to the commencement of the development hereby permitted, a Construction Environment Management Plan (CEMP) shall be submitted to and approved in writing by the County Planning Authority. This Statement shall be prepared in accordance with the recommendations set out in Table 3 of the Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment Rev. 2.0.
The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details.

20. Prior to the Commencement of the Development hereby permitted a Habitat Creation, Management and Enhancement Plan shall be submitted to and approved in writing by the County Planning Authority. The Habitat Creation, Management and Enhancement Plan, which should account for planting, management and enhancement over a 30 year period, should be based on the proposed landscaping and the biodiversity net gain assessment specified in the Updated Preliminary Ecological Appraisal (PEA) and Biodiversity Net Gain Assessment Rev 2.0 dated 28 July 2022 (received July 2023)and should include, but not be limited to following:

a) Description and evaluation of features to be managed
b) Ecological trends and constraints on site that might influence management
c) Aims and objectives of management
d) Appropriate management options for achieving aims and objectives
e) Prescriptions for management actions, together with a plan of management compartments
f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period
g) Details of the body or organisation responsible for implementation of the plan
h) Ongoing monitoring and remedial measures
i) Legal and funding mechanisms by which the long-term implementation of the plan will be secured by the applicant with the management body(ies) responsible for its delivery.
j) Monitoring strategy, including details of how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme

The development shall be implemented in accordance with the approved details.

21. Prior to the commencement of the development hereby permitted details of measures to demonstrate the following shall be submitted to and approved in writing by the County Planning Authority:

a. That waste generated during the construction of development is limited to the minimum quantity necessary.

b. Opportunities for re-use and for the recycling of construction residues and waste on site are maximised.

c. On-site facilities to manage the waste arising during the operation of the development of an appropriate type and scale have been considered as part of the development.

d. Integrated storage to facilitate reuse and recycling of waste is incorporated in the development.

The development shall be implemented in accordance with the approved details.

22. The extra care accommodation hereby permitted shall remain within Use Class C2 Residential Institutions in accordance with The Town and Country Planning (Use Classes) Order 1987, or any subsequent Order amending or replacing this Order, and shall remain as affordable housing for rent in accordance with the definition within the National Planning Policy Framework 2023 Annex 2: Glossary, or any subsequent Government guidance.

23. The development hereby permitted shall not be occupied until payment has been made in accordance with the relevant tariffs to mitigate the effect of the development on the Thames Basin Heaths Special Protection Area.

Reasons:

1. For the avoidance of doubt and in the interests of proper planning.

2. To comply with Article 5 of the Town and Country Planning (General Development Procedure) (England) Order 2015 (or any order revoking and re-enacting that Order) and Section 92(2) of the Town and Country Planning Act 1990 as amended by Section 51(1) of the Planning and Compulsory Purchase Act 2004.

3. To comply with Section 92(2) of the Town and Country Planning Act 1990 as amended by Section 51(1) of the Planning and Compulsory Purchase Act 2004.

4. To ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site in accordance with National Planning Policy Framework 2023 paragraphs 167, 169 and 174; Surrey Heath Core Strategy and Development Management Policies 2012 Policies CP2 and DM10.

5. To ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site in accordance with National Planning Policy Framework 2023 paragraphs 167, 169 and 174; Surrey Heath Core Strategy and Development Management Policies 2012 Policies CP2 and DM10.

6. Compliance with this Condition is required prior to the commencement of the development hereby permitted to ensure the public highway can continue to be used safely and without any unnecessary inconvenience during the construction phase of the development to ensure the development does not prejudice highway safety nor cause inconvenience to other highway users in accordance with National Planning Policy Framework 2023 paragraphs 104, 111, 112, 113 and 187; and Surrey Heath Core Strategy and Development Management Policies 2012 Policies CP11 and DM11.

7. To comply with the terms of the application, the Surrey County Council Local Transport Plan 4, Healthy Streets for Surrey design guidance, and Surrey County Council Parking Standards by ensuring that electric vehicle charging points are available to all users at the earliest opportunity in accordance with National Planning Policy Framework 2023 paragraphs 104, 110 and 112; and Surrey Heath Core Strategy and Development Management Policies 2012 Policies CP11 and DM11.

8. To comply with the terms of the Surrey County Council Local Transport Plan 4 and Healthy Streets for Surrey design guidance by ensuring that infrastructure provided properly prioritises pedestrian movements and that this is communicated to drivers accessing the proposed development through design in accordance with National Planning Policy Framework 2023 paragraphs 104, 110, 112 and 124; and Surrey Heath Core Strategy and Development Management Policies 2012 Policies CP11 and DM11.

9. To comply with the terms of the Surrey County Council Local Transport Plan 4, Healthy Streets for Surrey design guidance, and Surrey County Council Parking Standards by ensuring that safe and secure parking for sustainable transport modes, with appropriate charging facilities, is made available to all users at the earliest opportunity in accordance with National Planning Policy Framework 2023 paragraphs 104, 110, 112 and 124; and Surrey Heath Core Strategy and Development Management Policies 2012 Policies CP11 and DM11.

10. To ensure that the scale of the development respects the character and appearance of the area within which it is located, in accordance with Surrey Heath Core Strategy and Development Management Policies 2012 Policies CP2 and DM9.

11. Compliance with this Condition is required prior to the commencement of the development hereby permitted as the potential impact from dust arises during the construction of the development. In the interests of the residential amenity of neighbouring dwellings, suitable dust management measures need to be in place at that time to ensure that the proposed development accords with Surrey Heath Core Strategy and Development Management Policies 2012 Policies CP2 and DM9.

12. In the interests of the residential amenities of neighbouring dwellings, in accordance with Surrey Heath Core Strategy and Development Management Policies 2012 Policies CP2 and DM9.

13. In the interests of the residential amenities of neighbouring dwellings, in accordance with Surrey Heath Core Strategy and Development Management Policies 2012 Policies CP2 and DM9.

14. In the interests of the residential amenities of neighbouring dwellings and the ecological interest of the site, in accordance with Surrey Heath Core Strategy and Development Management Policies 2012 Policies CP2, CP14A and DM9.

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15. To safeguard existing trees and landscape features and to ensure their contribution to the character of development and the character of the local area in accordance with Surrey Heath Core Strategy and Development Management Policies 2012 Policies CP2 and DM9.

17. To safeguard existing trees and landscape features and to ensure their contribution to the character of development and the character of the local area in accordance with Surrey Heath Core Strategy and Development Management Policies 2012 Policies CP2 and DM9.

18. To safeguard existing trees and landscape features and to ensure their contribution to the character of development and the character of the local area in accordance with Surrey Heath Core Strategy and Development Management Policies 2012 Policies CP2 and DM9.

19. This condition is required prior to the commencement of the development as details the landscaping of the site is a reserved matter. The indicative landscaping information provided with the outline application has not been approved as it needs to be assessed in respect of the delivery of biodiversity requirements in connection with the development plan. This is to ensure that the proposal complies with Surrey Heath Core Strategy and Development Management Policies 2012 Policies CP2, CP14A and DM9.

20. This condition is required prior to the commencement of the development as details the landscaping of the site is a reserved matter. The indicative landscaping information provided with the outline application has not been approved as it needs to be assessed in respect of the delivery of biodiversity requirements in connection with the development plan. This is to ensure that the proposal complies with Surrey Heath Core Strategy and Development Management Policies 2012 Policies CP2, CP14A and DM9.

21. This condition is required prior to the commencement of the development as it relates to information required during the construction phase of the development and is required in accordance with Policy S4 of the Surrey Waste Local Plan 2020.

22. To ensure that the proposed development remains solely for the use intended and meets the definition of affordable housing in order to contribute to the Surrey Heath Borough affordable housing need in accordance with National Planning Policy Framework 2023 paragraphs 65 and 124; Surrey Heath Core Strategy and Development Management Policies 2012 Policy CP5.

23. To ensure that mitigation is secured in relation to the impact of the development on the Thames Basin Heaths SPA and to accord with the Habitat Regulations, South East Plan Policy NRM6 and Surrey Heath Core Strategy and Development Management Policies 2012 Policies CP13 and CP14B.

Informatives:

1. In determining this application the County Planning Authority has worked positively and proactively with the applicant by: entering into pre-application discussions; assessing the proposals against relevant Development Plan policies and the National Planning Policy Framework including its associated planning practice guidance and European Regulations, providing feedback to the applicant where appropriate. Further, the County Planning Authority has: identified all material considerations; forwarded consultation responses to the applicant; considered representations from

interested parties; liaised with consultees and the applicant to resolve identified issues and determined the application within the timeframe agreed with the applicant. Issues of concern have been raised with the applicant including impacts of the development on the Thames Basin Heath Special Protection Area and addressed through negotiation and acceptable amendments to the proposals. The applicant has also been given advance sight of the draft planning conditions and the County Planning Authority has also engaged positively in the preparation of draft legal agreements. This approach has been in accordance with the requirements of paragraph 38 of the National Planning Policy Framework 2023.

2. Attention is drawn to the requirements of Sections 7 and 8A of the Chronically Sick and Disabled Persons Act 1970 and to the Code of Practice for Access of the Disabled to Buildings (British Standards Institution Code of Practice BS 8300:2009) or any prescribed document replacing that code.

3. This approval relates only to the provisions of the Town and Country Planning Act 1990 and must not be taken to imply or be construed as an approval under the Building Regulations 2000 or for the purposes of any other statutory provision whatsoever.

4. The applicant is reminded that, under the Wildlife and Countryside Act 1981, as amended (Section 1), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or is being built. Planning consent for a development does not provide a defence against prosecution under this Act.

5. Trees and scrub are likely to contain nesting birds between 1 March and 31 August inclusive. Trees and scrub are present on the application site and are assumed to contain nesting birds between the above dates, unless a recent survey has been undertaken by a competent ecologist to assess the nesting bird activity during this period and shown it is absolutely certain that nesting birds are not present.

6. The applicants are advised that badgers may be present on site. Badgers and their setts are protected under the Protection of Badgers Act 1992. It is a criminal offence to kill, injure or take badgers or to interfere with a badger sett. Should a sett be found on site during construction, work should stop immediately and Natural England should be contacted. During site preparation works, all open trenches, pits and excavations shall be covered outside working hours so that any transiting fauna that falls into the earthworks can escape.

7. If proposed site works affect an Ordinary Watercourse, Surrey County Council as the Lead Local Flood Authority should be contacted to obtain prior written Consent. More details are available on our website.

8. If proposed works result in infiltration of surface water to ground within a Source Protection Zone the Environment Agency will require proof of surface water treatment to achieve water quality standards.

9. Sub ground structures should be designed so they do not have an adverse effect on groundwater.

10. All works involving excavation of soil, including foundations and the laying of services, within the root protection area of retained trees on the site will be supervised by the appointed arboricultural consultant and will be dug by hand and in

accordance with [the approved Arboricultural Method Statement and] the National Joint Utility Group Vol 4, 2007 Guidelines for the planning, installation and maintenance of utility apparatus in proximity to trees.

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11. The applicant is advised that careful consideration should be given to the location of ancillary storage structures to be considered as part of the reserved matters for landscaping. This is to ensure that these structures as positioned such that the residential amenity of adjoining occupiers is safeguarded.

12. It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. Electric Vehicle Charging Points shall be provided in accordance with the Surrey County Council Vehicular, Cycle and Electric Vehicle Parking Guidance for New Development 2023.

13. The permission hereby granted shall not be construed as authority to carry out any works on the highway. The applicant is advised that prior approval must be obtained from the Highway Authority before any works are carried out on any footway, footpath,carriageway, or verge to form a vehicle crossover to install dropped kerbs. www.surreycc.gov.uk/roads-and-transport/permits-and-licences/vehicle-crossovers-or-dropped-kerbs.

14. It is the responsibility of the developer to provide e-bike charging points with socket timers to prevent them constantly drawing a current over night or for longer than required. Signage should be considered regarding damaged or shock impacted batteries, indicating that these should not be used/charged. The design of communal bike areas should consider fire spread and there should be detection in areas where charging takes place. With regard to an e-bike socket in a domestic dwelling, the residence should have detection, and an official e-bike charger should be used.

    Guidance on detection can be found in BS 5839-6 for fire detection and fire alarm systems in both new and existing domestic premises and BS 5839-1 the code of practice for designing, installing, commissioning, and maintaining fire detection and alarm systems in non-domestic buildings.

Contact Charlotte Parker

Tel. no. 020 8541 9897

Background papers

The deposited application documents and plans, including those amending or clarifying the proposal, and responses to consultations and representations received, as referred to in the report and included in the application file.

For this application, the deposited application documents and plans, are available to view on our online register. The representations received are publicly available to view on the district/borough planning register.

The Surrey Heath Borough Council planning register entry for this application can be found under application reference SU/23/0326/PCM.

Other documents

The following were also referred to in the preparation of this report:

Government Guidance

National Planning Policy Framework

Planning Practice Guidance

The Development Plan

Surrey Waste Local Plan 2020

Surrey Minerals Plan Core Strategy Development Plan Document (DPD) 2011

Surrey Minerals Plan Primary Aggregates Development Plan Document (DPD) 2011

Surrey Minerals Plan Site Restoration Supplementary Planning Document (SPD) 2011

http://www.surreycc.gov.uk/environment-housing-and-planning/minerals-and-waste-policies-and-plans/aggregates-recycling-joint-development-plan-document

Surrey Heath Core Strategy and Development Management Policies 2012

South East Plan (saved Policy NRM6)

Other Documents

Surrey Heath BC - Western Urban Area Character SPD – 2012

Surrey Heath BC - Residential Design Guide – SPD 2017

Surrey Heath BC – Thames Basin Heaths Special Protection Area Avoidance Strategy – SPD January 2012

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