

LOCATION: LITTLE HEATH NURSERY, LITTLE HEATH ROAD,
CHOBHAM, WOKING, GU24 8RJ

PROPOSAL: Redevelopment of a commercial nursery for residential use - 35 affordable dwellings with associated works with access from Burr Hill Lane; and provision of suitable alternative natural green space (SANGS) with associated works. (Amended plans & info rec'd 23/03/15), (Additional info rec'd 27/05/15), (Amended/additional info rec'd 28/07/15), (Amended plan rec'd 20/08/15).

TYPE: Full Planning Application

APPLICANT: Sentinel Housing Association

OFFICER: Michelle Fielder

RECOMMENDATION: **GRANT subject to conditions and completion of a legal agreement.**

1.0 SUMMARY

- 1.1 The application proposes 35 affordable housing units split between 19 social rented and 16 shared-ownership units. The application site lies outside of the settlement boundary of Chobham and is presented as a rural exception site within the Green Belt. The assessment of whether there is a local need for this scale of development under the criteria of Policy DM5 of the Core Strategy and Development Management Policies 2012 is finely balanced; however, in the officer's opinion it is considered the balance is tipped in favour of a grant of planning permission.
- 1.2 No objection is raised on highway or character grounds and it is considered the proposal would not be harmful to residential amenity. Subject to the completion of a legal agreement to secure SAMM and the delivery of a bespoke SANGS solution the proposal would not impact on the integrity of the SPA. In respect of the latter point, the application includes the creation of 6.7ha of SANGS to the north of the application site and comprises 2.2ha of land at Little Heath Meadows and 4.51ha of land at Little Heath Common.
- 1.3 The application site lies in Flood Zone 1 and predates the requirement (in place from April 2015) for proposals to demonstrate that a sustainable drainage scheme can be developed for the proposal prior to planning permission being granted. The Environment Agency (EA) has not raised objection to the proposal on flooding grounds; however, it is noted that the site has a high water table and that there is strong local objection to the proposal on the basis of groundwater flooding. For this reason in addition to the Drainage Officer's comments being awaited, officers have also consulted with Surrey County Council as the Lead Local Flood Authority (LLFA). Comments from both technical experts are awaited and will be provided as an update to the Committee. In the event that either the Drainage Officer or the LLFA raise concern with the technical details of the drainage strategy the recommendation is likely to change to refuse.

2.0 SITE DESCRIPTION

- 2.1 The 3.47ha site lies approximately 1.1km north east of Chobham village centre with an existing access off Burr Hill Lane. The site abuts the defined settlement policy boundary.
- 2.2 The site is divided into two parts by an existing ditch. The 1.28ha area to the south of the ditch is where the disused buildings associated with the former plant nursery are located (these are to the western tip of this area). This southern part of the wider red line site is where the proposed residential development will take place.
- 2.3 Levels across the site fall in a north west to south west direction. The remainder of the site is open pasture land bounded by trees, ditches and secondary woodland.
- 2.4 The application site is bounded on three sides by mixed character residential development and by open countryside on the northern boundary.
- 2.5 The groundwater table is high and the land has a waterlogged appearance and is heavy underfoot.

3.0 RELEVANT HISTORY

- 3.1 None relevant to this application. It is noted that objectors make reference to the planning history of the site and to a need to continue to refuse development proposals for the land. However, a planning history search reveals that there have been no recent planning applications to develop the land for residential purposes.

4.0 THE PROPOSAL

- 4.1 The proposal seeks to redevelop the existing site to provide 35 units of affordable housing. This will comprise 19 units for social rental and 16 to be made available as intermediate ownership (shared ownership). The proposed mix is set out below:
 - 4 x 1 bed flats
 - 18 x 2 bed houses
 - 9 x 3 bed houses
 - 4 x 2 bed bungalows
- 4.2 The built form proposed is predominately two storey semi-detached with a scattering of short terraces and four bungalows (2 semi-detached pairs). In general terms the proposed dwellings stand at between 8 and 8.5m high and feature decorative details such as soldier courses and canopy porches of either pitched or flat roof design. While materials would be controlled by condition the submitted information shows a mix of render and brick / render finishes. The proposed bungalows would feature rear and front gable projections and will stand 5.5m to the main ridge and 4m to the ridge of the gable projections.
- 4.3 The proposed works would require the demolition of all existing nursery buildings and an existing access off Burr Hill Lane is to be utilised. An average of 2 off road parking spaces are to be provided for each of the dwellings (less to the flats) proposed, accordingly a total of 68 parking spaces are to be provided, in addition to cycle parking.

- 4.4 The proposed layout indicates an area of community land to be retained as a 'community orchard' and the supporting information details a play area is to be provided, although no formal children's play area equipment is proposed.
- 4.5 The application also seeks to avoid harm to the Thames Basin Heaths SPA by providing SANGS of 6.7ha. This is located to the north of the application site and comprises 2.2ha of land at Little Heath Meadows and 4.51ha of land at Little Heath Common. The following works are to be undertaken to the proposed SANGS land in order that it is of suitable standard:
- Replacement and provision of pedestrian bridges;
 - The creation of an attenuation feature;
 - Re-grading of an existing pond;
 - The creation of a circular walk measuring 2.37km; and,
 - The erection of visitor information board and directional signs.
- 4.6 The application is supported by the following documents and regard will be had to these as appropriate in the assessments made in this report.
- Planning statement incorporating a statement of community engagement
 - Management Plan
 - Design and Access Statement
 - Archaeological Desktop Assessment
 - Phase II Ecological Surveys
 - Bat Survey
 - Transport Statement
 - Site investigation report and Phase 2 letter
 - Utilities statement
 - Additional background biodiversity data
 - Flood Risk Assessment
 - Tree Survey (BS compliant)
 - Daylight and Sunlight study.

5.0 CONSULTATION RESPONSES

- 5.1 Surrey County Council No objection.
Highway Authority
- 5.2 Natural England No objection (previous objection withdrawn).

5.3	Environment Agency	No objection subject to condition.
5.4	Chobham Parish Council	Objection on grounds of limited access, too close to SSSI, too dense, no proven need in Chobham for the number of affordable homes proposed.
5.5	Surrey Wildlife Trust	No objection.
5.6	SHBC Drainage Engineer	Comments awaited.
5.7	SHBC Tree Officer	No objection subject to conditions.
5.8	SHBC Housing	Supports proposal.
5.9	Crime Prevention Officer	No objection.
5.10	SCC LLFA	Comments awaited (please note - it is not a statutory requirement to have consulted with this body on this application).

6.0 REPRESENTATION

6.1 At the time of writing 77 letters of objection and 3 letters of support have been received. In summary these raise the following concerns:

Impact on amenity of adjoining residential properties [see para section 7.5]

- Loss of light
- Loss of privacy
- Overlooking
- Development would be visually overbearing
- Light pollution
- Increase in noise / The proposal will be contrary to HRA, para 123 NPPF
- Loss of a view [officer comment: in planning terms there is no right to a view *per se*]
- The proposal does not provide a play area for children

Principle of the proposal [see section 7.3]

- There are better sites
- The proposal does not comply with Policy DM5 and is not a rural exception / inappropriate development in the Green Belt
- The proposed development would not meet a local need / the proposal should not be used to meet a wider borough need
- The application site should be retained in agricultural use
- Inappropriate development in the Green Belt

- Chobham has already met its local housing need
- There is no need for the development, however there is a need for housing for older persons
- There is insufficient infrastructure / local services in the borough to meet the needs of future residents of the development
- Proposal fails to have regard to cumulative impact of developments in the area

Highways and parking [see section 7.6]

- Parking provision is insufficient
- Roads and highway capacity is insufficient
- Emergency vehicles will not be able to access the proposed development
- Proposed access is insufficient /unsuitable / unsafe
- Traffic impact assessment is inadequate as it fails to consider the proposal's impact on other roads/junctions – i.e. where Delta Road meets Burr Hill and Windsor Court
- Inadequate sight lines/ poor visibility / on road parking/ school children make navigation of local road network and site access dangerous
- Local roads being used as a rat run have been underestimated
- Public transport links are poor
- Baseline and proposed TRICS data are questionable
- Lack of any detailed risk assessment in the traffic report
- Consideration should be given to making Burr Hill Lane/ Windsor Court / Delta Road oneway

Character and appearance [see section 7.4]

- The proposed development is of too high density / overdevelopment
- Impact on trees / trees have already been felled
- Site badly laid out

SANGS and ecological matters [see section 7.7]

- The proposal should not rely on land which is already in public use for SPA avoidance measures
- SANG land is too close to SPA
- Site supports a number of moth species many of which are Red Data Book and priority BAP species
- Impact on SSSI /NNNR
- Owl activity on site & bats should be looked at again

- Horse riders have a right to access the common – the submitted information does not make this clear

Drainage and flooding [see section 7.10]

- Objections to the principle of developing the site given highground water table
- Objections to the adequacy of the submitted surface water drainage strategy
- Area has the highest risk of flooding from surface water flooding (rating G)
- It will be difficult for occupiers / owners to obtain insurance_
- Levels should not be raised
- Development's solution to on-site flooding will increase flood risk elsewhere
- Council will be liable to being sued for passing these plans
- The proposed built form will prevent the stream from being dredged

Other matters

- Planning history of the site needs to be taken into account / previous schemes have been refused [*Officer comment: the current application must be determined on its own merits – also see 3.1*]
- The pre-application consultation undertaken by the applicant was inaccurate / insufficient [*Officer comment: this is not a material consideration in the determination of this application*]
- Consultation periods given by Council are too short [*Officer comment: the consultation periods meet the statutory requirements*]
- Insufficient infrastructure to support the proposal [*see section 7.8*]
- Agricultural tie should not have been lifted [*Officer comment: this is not material to the consideration of this application*]
- Site allocations work must be completed [*Officer comment: this is not material to the consideration of this application*].

In support:

- Affordable housing is desperately needed
- Site is suitable.

7.0 PLANNING CONSIDERATION

- 7.1 The National Planning Policy Framework; Policies CP1, CP2, CP3, CP5, CP6, CP8, CP11, CP12, CP14, DM5, DM9, DM10, DM11, of the Surrey Heath Core Strategy and Development Management Policies 2012; and, Policy NRM6 of the South East Plan are material considerations in this case. In addition, the Thames Basin Heaths Special Protection Area Avoidance Strategy Supplementary Planning Document (2012) is relevant.

7.2 The main considerations in the determination of this application are therefore:

- The principle of the development (Policy DM5, Green Belt and loss of employment);
- The proposal's impact on local character (including its scale and design response);
- The proposal's impact on amenity (including the level of amenity to be afforded to future residents);
- Highways and parking considerations;
- The proposal's impact on the Thames Basin Heaths SPA and other ecological matters;
- The proposal's impact on the Borough's infrastructure;
- Whether the proposed housing mix is acceptable; and,
- Flooding and drainage

7.3. The principle of the development

7.3.1 The application site lies in the Green Belt and abuts the settlement boundary of Chobham. There is a small amount of built form on the land, however, given the site's former use as an agricultural nursery the land is not considered to be previously developed land as defined by the NPPF.

7.3.2 The application site abuts the settlement boundary but is outside of it. The site is therefore considered to be within the countryside (in addition to being in the Green Belt – see below). Paragraph 54 of the NPPF advises LPA's to consider whether allowing some element of private or market housing would facilitate the delivery of significant affordable housing. While it is noted that term 'significant' is not quantified; this statement does provide a strong indication that market housing can provide an important tool in 'enabling' the delivery of affordable housing on rural exception sites.

7.3.3 The site is located on Green Belt land outside of the defined settlement, however, the provision of limited affordable housing for local community needs under policies of a local plan is cited at para 89 of the NPPF as an exception to development in the Green Belt being resisted because it is inappropriate. As the proposal seeks to deliver 100% affordable housing (as defined by Annex 2 of the NPPF) its in principle acceptability is dependent on whether it complies with the rural exception policy (Policy DM5) of the Surrey Heath Core Strategy and Development Management Policies 2012.

7.3.4 Policy DM5 states:

Development consisting of 100% affordable housing within the countryside or Green Belt will be permitted where:

- (i) There is a proven local need for affordable housing for people with a local connection to the area; and
- (ii) The need cannot be met within the settlement boundary; and
- (iii) The development will provide affordable housing for local people in perpetuity; and

(iv) The development site immediately adjoins an existing settlement and is accessible to public transport, walking or cycling and services sufficient to support the daily needs of new residents

7.3.5 The subtext to this policy (para 6.32) advises that the intention of the policy is to help provide accommodation for local people, who often have a local connection through employment or from growing up in the area and still have family who reside in the locality. Para 6.33 adds that the Council recognises there is limited opportunities to provide housing within these settlements at a scale which will deliver significant levels of affordable housing. Support for the provision of rural exception sites is also enshrined in Policy CP3 at point iv, where it advises that small scale affordable housing schemes as rural exceptions sites outside of village settlement boundaries will be acceptable. Para 5.11 explains that the purpose of this element of the policy is to allow villages to continue to develop as mixed and inclusive communities by providing accommodation for households who are either current residents or have an existing family or employment connection.

7.3.6 Local objection to the proposal cites a lack of need for affordable housing in Chobham and in doing so reference is made to the a recent High Court challenge (*Old Huntstaton Parish Council v Secretary for the Communities and Local Government and others*) wherein the Secretary of State's decision to grant planning permission for a development of 15 homes as a rural exception site was quashed. The crux of the decision appears to centre on the definition of what is a 'local need'. In quashing the decision it was held that a wider need for affordable housing in an area could not be considered as a local need, in short that a rural exception policy did not permit towns to push their affordable housing to rural sites.

7.3.7 The local plan policies and sub text cited above provide a clear indication of how 'local' is to be defined. In assessing whether the proposal would meet a truly local need the Council's Housing Manager provides the following comments (a full copy of the detailed comments provided are held as Annex 1 to this report):

- The Council has a responsibility to have systems in place to prioritise households seeking a social housing tenancy
- The Council operates a housing register which is register of everyone who qualifies to be considered for social housing
- There are always more applicants than available properties
- Applicants are prioritised in accordance with the Council's allocation policy
- There are 179 social homes in Chobham (5.4% of the total stock in the Borough)

The demand for properties, by bedroom number is listed below:

Bed No	Chobham as a preference	Total applicants	Camberley as a preference
1 bed	117	261	212
2 bed	78	236	196
3 bed	32	113	86

4 bed	9	23	19
5 bed	2	2	2
Total	238	635	515

- The Housing Manager accepts that while there will be people who will choose all areas as they do not mind where they are housed and others who simply like the idea of moving to Chobham; there is also within these figures people who currently live in Chobham and others with an association to the village. Moreover, that association may well match the 'local connection' criteria set out in the subtext to the local plan policies already mentioned. It is also noted that the housing register currently contains 13 applicants who already reside in Chobam.
- During April 2010 and Jan 2015 there were 696 social housing homes let in Surrey Heath and a further 148 sheltered housing vacancies. Of these 23 (3%) vacancies were in Chobham.
- During the same period 16 households moved out of the village to meet their housing need (it is accepted that there is no guarantee that at least some of these may simply have chosen to move away from the village)
- Considering the price of properties in the village it is likely that low cost home ownership will attract local need.

7.3.8 In light of the above considerations it is considered that there is a small, but persistent need, for affordable housing in Chobham and that the proposal will go some way to meeting this need.

7.3.9 A review of the Council's Annual Monitoring Report and the Council's most recent Five Year Housing Land Supply Paper does not indicate that there any other sites which are available and or deliverable to meet this need. The other policies requirements can be met by a s106 agreement retaining the affordable housing in perpetuity, the social rented properties only be made available to persons with a connection to Chobham (to be secured via a Local Lettings Agreement), and a cap of 80% being the maximum amount any owner can purchase of any shared ownership property.

7.3.10 The proposal is therefore considered not be inappropriate development in the Green Belt, and acceptable in terms of para 89 of the NPPF and Policies CP3 and DM5 of the Core Strategy and Development Management Polices 2015. However, due to the Green Belt location and the fact the proposal is only acceptable in Green Belt terms because it is considered to be a rural exception site, it is considered further development should be strictly controlled, as such any approval would be subject to a condition removing permitted development rights.

7.3.11 The proposal would result in the loss of a site previously used for commercial purposes. However, it is noted that site was not used for employment, i.e. not in B class use. The site is also vacant and the buildings that were on site did not readily lend themselves to being converted to an alternative use. No objection is therefore raised to the loss of the commercial use.

7.3.12 The principle of the development proposal is therefore acceptable subject to the considerations in the remainder of this report.

7.4 The proposal's impact on local character

- 7.4.1 The NPPF has a presumption in favour of sustainable development and to secure high quality design, as well as taking account of the character of different areas. However, the NPPF rejects poor design that fails to take the opportunity to improve the character and quality of an area. Paragraph 59 of the NPPF requires design policies to concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area generally.
- 7.4.2 Policy CP2 (Sustainable Development and Design) of CSDMP 2012 is reflective of the NPPF as it requires development to ensure that all land is used effectively within the context of its surroundings and to respect and enhance the quality of the urban, rural, natural and historic environments. Policy DM9 (Design Principles) of CSDMP 2012 also promotes high quality design that respects and enhances the local environment, paying particular regard to scale, materials, massing, bulk and density.
- 7.4.3 The application site itself has a mixed character with the existing development appearing in poor condition and, this being set against the backdrop of the remainder of the wider open site. The southern boundary of the site is formed by Burr Hill Lane and this is predominately a mix of housing built during the 1950's to 1970's. The built form comprises bungalows, chalet bungalows and short terraces with the south side of this road comprising a number of detached bungalows. The eastern boundary of the site is formed by dwellings in Medhurst Close. This development is a higher density, two storey terraced development. To the west, the boundary is formed by the shared private drive (Little Heath Road) and this serves a mix of house types.
- 7.4.4 Taken as a whole the mixed built form of the area is readily evident, however this does not result in a disjointed or inharmonious character. Indeed the area is unified by the setback of the existing properties from the road frontage and the spacing between them. Those areas where the form of adjoining properties are different to one another have a more organic feel and the age of the properties gives rise to an established and mature character. Higher density developments, such as Medhurst are relatively self-contained and do not, significantly, undermine the spacious, open and established urban grain of the wider area.
- 7.4.5 The development proposal responds to this by seeking to deliver a 35 unit scheme off a cul de sac. The scheme is relatively low density at 28dph (although it is noted that a dph assessment is a blunt tool for assessing how a proposal will integrate with its surroundings) and this takes account of the site's constraints. Dwellings are to be setback from the new road frontage and the presence of most will be softened (from the front) by small front gardens enclosed by low level planting. Properties form semi-detached pairs or short runs of terraces (plots 11-16 and 17-19 (15 and 17 being 2no. 1 flats) and as a consequence the footprint of the proposed built form does not appear to be at odds with that of the surrounding area.
- 7.4.6 The proposed 2 storey dwellings and buildings containing flats will stand to a height of approximately 8 and 8.5m. In addition to this height, the land levels across the site would be raised as part of the sustainable drainage strategy. The levels raises would mean the finished floor level of the dwellings would, in the main, be between 0.5 and 1.5m higher than the existing ground levels. This is considered acceptable against the backdrop of the surrounding two storey development.

- 7.4.7 All the proposed bungalows (plots 22 to 25) are of an uncomplicated design with gable fronted projections to the rear and front elevations and are to be constructed in brick. All other dwellings feature some detailing which will serve to add visual interest. Such detailing takes the form of soldier courses, the use of render, window detailing and the provision of front porches. These features appear to be integral to the design response as opposed to simply being add-on's and each of the proposed units will benefit from at least one of these features. These will serve to unify the proposed development and create a sense of place, while the scale, massing and spacing of the properties, along with the simple palette of materials will serve to integrate the proposal in the wider setting.
- 7.4.8 The applicant has submitted hard and soft landscaping plans for consideration at this stage. The Arboricultural Officer has considered these, along with details of the proposals impact on trees, and no objection is raised. The landscaping information submitted is relatively detailed and some concern is raised in respect of the species selection. A revised landscaping plan would therefore be required and this could be secured by condition.
- 7.4.9 The submitted hard landscaping plan is generally considered to be acceptable; however, the front boundary of a large number of properties is shown to be demarked by a 1m high picket fence. Such a boundary treatment is not readily apparent in the wider area and it is considered this would give rise to a 'twee' and cluttered appearance. This detail is not considered acceptable and in a similar way to the soft landscaping would need to be revisited if planning permission were granted.
- 7.4.10 The proposed layout is considered to legible with clear demarcations between public and private areas. Footpath links to the community amenity area (the orchard) and the SANGS land will be provided in convenient locations. Car parking is, in the main, provided on plot, where it is not the communal areas are small and broken up by low level planting. Soft landscaping and areas of greenery are to be retained within the body of the site and to the northern boundary. This will prevent the site from appearing overdeveloped and also provide a soft edge between the development and the proposed SANGS / open countryside to the North.
- 7.4.11 In light of the assessment above the application is considered acceptable in context of the NPPF and Policy DM9.

7.5 The proposal's impact on amenity

- 7.5.1 The NPPF seeks a good standard of amenity for all existing and future occupants of land and buildings. Policy DM9 (Design Principles) ensures that the amenities of the occupiers of the neighbouring properties and uses are respected.
- 7.5.2 This section seeks to consider the impact of the proposal on those properties sharing a boundary with the proposed dwellings. This is because those properties, being closest to the proposed development are likely to be the most affected by it. It stands to reason therefore that if the development is acceptable (or can be made acceptable by the imposition of conditions) to these properties it will be acceptable to those properties set a greater distance away.
- 7.5.3 Proposed plots 24 and 25 would share a rear boundary with no's 29 and 37 Medhurst. At its closest a distance of 35m would be retained between proposed plot 25 and No36. Plots 24 and 25 are single storey bungalows with an eaves height of 2.4m. With no roof level accommodation proposed, the development is relatively low key and it is considered the distance and boundary treatments between the proposed and existing will be sufficient to

- prevent any loss of amenity arising.
- 7.5.4 Plot 25 will also share a side boundary with Brook House to the south. The proposed plot will be set 3.5m off this boundary and a distance of 20m is to be retained between the built form of the two properties. The proposed dwelling would have windows in the side elevation facing this boundary, however given their ground floor location any views would be restricted by the site boundary treatment.
- 7.5.5 Plots 26 and 35 (all 2 storey dwellings) would share a boundary with no's 26 to 32 Burr Hill Lane. The side elevation of plot 35 would face the rear boundary of no 26 Burr Hill Lane at a separation distance of 6m. The proposed dwelling (2 storey 3 bed house) would however be set forward of the existing neighbouring dwelling and a separation distance of 15m (approx) is to be retained between the built form. A first floor bedroom window is proposed in the side elevation of this property and this could provide views of the side amenity area of No.26. Given this window is a secondary window, a condition requiring it to be obscured glazed could be imposed. Subject to this condition (in addition to no other openings being formed), the limited eaves height of the proposed unit (at 4.7m) together with the orientation of the plot and separation distances are considered sufficient to prevent any material harm to residential amenity arising.
- 7.5.6 With the exception of plot 26, all other proposed plots backing onto 26-32 Burr Hill Lane have a rear garden depth of 10m+. Plot 26 has a minimum depth of 7m but this is mitigated (in terms of the provision of amenity space to the proposed plot) by its width of between 10 and 16m. In addition the distance between the elevations of the aforementioned proposed and existing properties exceeds 40m.
- 7.5.7 Proposed plots 1 to 4 are 2 storey houses and these would share a boundary with No.25 Burr Hill Lane. The rear elevation of plot 1 would be set approx 15m off the shared boundary, however the orientation of No.25 is such that an oblique relationship would result and there would be very limited, if any, direct overlooking of primary living space. There would be a degree of overlooking of the primary amenity area of No.25 from the two first floor bedroom windows of the proposed dwelling, however, this is not considered so harmful as to warrant the refusal of the scheme. It is also noted that first floor rear facing window of plots 2 and 3 will overlook the length of No's.25 garden, however the separation distance in excess of 15m is considered sufficient to prevent any significant harm arising.
- 7.5.8 Plot 4 (a 2 bed 2 storey dwelling) and plots 5 and 6 (3 bed 2 storey dwellings) would share a boundary with Burr Hill Cottage and Little Heath House. The proposed dwellings would not directly face these neighbours and plot 6 would be set 18m approximately from the closest point of Little Heath House and in excess of 25m from Burr Hill Cottage. In light of the oblique relationship which would result and the level of separation it is considered the proposal would not be unduly harmful to the occupiers of these neighbouring properties.
- 7.5.9 Plot 6 would site side elevation on to Burwood, however a distance of approx 40m would be retained between the respective properties and this is considered to be acceptable to prevent any overlooking or other amenity harm. The level of separation between this neighbour and proposed plots 7 and 8 (2 x 1 bed flats) increases to 45m+ which is also considered to be acceptable.
- 7.5.10 Letters of objection have been received from properties in Delta Road (and other nearby neighbours) who share a boundary with the application site. While these properties will experience a change in outlook (which is not a material a planning consideration) it is not

considered they will experience a material loss of privacy or other amenity harm from the proposal.

- 7.5.11 Objections on the basis of noise generation from the proposed development have been raised (in context of para 123 of The NPPF and the Human Rights Act). In this regard it is accepted that the development will change the noise profile of the area by introducing human activity where they is currently none, however, residential development is generally not considered to be harmful. Moreover development of this nature is prevalent in towns, villages and hamlets where dwellings are surrounded by other dwellings. Against this backdrop it is not considered that the provision of 35 residential units would give rise to significant noise impacts to the detriment of the health and quality of life of residents. Indeed in the absence of evidence to the contrary such an assertion cannot be sustained. Please see page 2 of the agenda papers for further information on Human Rights.
- 7.5.12 Concerns had been raised by the Arboricultural Officer regarding the amount of shading the proposed dwellinghouse would experience given the retained boundary trees. A daylight report has been submitted and the proposal revised in light of these comments with a reduction in the proposed dwelling numbers proposed. The additional information submitted and the revisions made to the scheme are considered acceptable and this concern has therefore been resolved.
- 7.5.13 All of the proposed dwellings and flats have access to private amenity space and their respective siting within the proposed site does not give rise to any material concerns. In light of the above it is considered the proposal complies with the aims and objectives of Policy DM9 of the Core Strategy and Development Management Policies 2012.

7.6 Highways and parking considerations

- 7.6.1 Policies DM11 and CP11 require developments to provide a safe means of access and not to prejudice the safe or free flow of traffic.
- 7.6.2 The application is supported by a Transport Statement which, amongst other things, explains how the site will be serviced by local shops and facilities and its connectivity to public transport. In this regard it is noted that the site access lies approximately 3 to 4 minutes (160 to 300m) walk from bus stops on Burr Hill Lane and that these provide services between Chobham and Woking, Chobham and Kingfield Green and Chobham and Farnborough College (para 3.6 of the transport statement). The statement adds that the site is well served by pedestrian routes and is sustainable.
- 7.6.3 The site is to be accessed via the existing access off Burr Hill Lane. Visibility splays at this junction of 2.4m by 43m are to be provided in both directions in accordance with the Manual for Streets Guidance.

The access road is to be provided with a bellmouth radii of 5.5m and the inner road width will permit two vehicles to pass one another. In addition, refuse vehicles can enter and leave the site in forward gear using the turning heads to manoeuvre.

- 7.6.4 The maximum parking requirement for a village or rural location for the mix of units proposed is 57 spaces, as the proposal makes provision for 68 spaces, this is acceptable and an objection on under provision could not be substantiated. Covered and secured cycle parking will be provided to each of the units in accordance with SCC Highway standards and this is considered acceptable.
- 7.6.5 The existing site is not in use and as such an examination of the proposed and existing traffic flow is perhaps moot. What is important, however, is whether the proposed development of 35 dwellings, would overburden the existing local highway network or whether the predicted traffic movements can be absorbed without material detriment to local highway network. The predicted traffic flows during peak hours are cited as being 10 two way trips between 0800 and 0900hrs and 14 two way trips between 1700 and 1800hrs. It is considered that this level of movement will be indiscernible in context of the local or wider road network.
- 7.6.6 Surrey County Council Highways has reviewed the information submitted and do not raise objection to the proposal, subject to various conditions being imposed. The conditions imposed would require the submission and implementation of, a construction transport management plan and the provision and the parking of turning areas on site in addition to connectivity improvements in the form of a public footpath to link the proposed footpaths in the body of the site to the footpath on Burr Hill Lane and raised access platforms to be constructed at the existing 2 bus stops on Delta Road (adjacent to the junction with Beta Road) and one on Windsor Court Road.
- 7.6.7 In light of this assessment and information and in the absence of any robust evidence to the contrary, the application is considered to comply with the aims and objectives of Policies CP11 and DM11 of the CSDMP 2012 and no highways related objection is raised.

7.7 The proposal's impact on the Thames Basin Heaths SPA and other ecological matters

- 7.7.1 The fact the whole of the Borough falls within the 5km zone of influence of the Thames Basin Heaths SPA is well rehearsed, as it the fact that new residential development within 400m of the boundary of the SPA is prohibited. The Council's Avoidance Strategy encapsulates these principles and requires development falling within the 400m to 5km range to mitigate its impact on the SPA by making a contribution to SANGS provision through the Councils CIL regime. However, subject to the applicant providing the necessary CIL forms, the proposal would be exempt from the CIL regime because it would deliver 100% affordable housing. In such instances the planning authority is still required to allocate SANGS capacity, however due to the site's location only 9 dwellings can be allocated capacity. For this reason, and to accord with Policy CP14 of the CSDMP 2012, the adopted SPD and Policy NRM6 of the South East Plan 2009, the proposal includes the creation of its own SANG.
- 7.7.2 The SANG land is to be formed from approximately 4ha of Little Heath Common. Little Heath Common is a designated Site of Nature Conservation Importance (SNCI) and is already used for informal recreational purposes, however visitor surveys demonstrate that this is underutilised. In addition, 2ha of land at Little Heath Meadows is also to be made available for inclusion into the proposed SANG. The proposed 6ha provision exceeds the

0.57ha actually required by the population increase v the 8ha standard per 1000 people's standard used. Objections to the use of land already available for public use have been received, however this is not prohibited by the adopted SPD and it is noted that section 6 of this document expressly states that such areas can be used in the formation of new SANGS. Concern has also been raised that the land to be used in the creation of the SANG is within the SPA, however, this is not the case. A carpark is not provided for the SANGS area, however as this is intended to serve the development proposed, which lies adjacent to it, this is in accordance with the adopted guidelines of this Council.

- 7.7.3 Details submitted in support of the SANG management plan indicate that Little Heath Common is already owned by SCC and that Little Heath Meadows will be transferred to that authorities ownership and that the combined area will be retained in perpetuity as SANG land under the responsibility of SCC. The SANG land will, however, be managed by SWT under contract to SCC. The applicant will also pay the required SAMM contribution.
- 7.7.4 Natural England advise that subject to conditions to ensure the delivery of the SANGS land prior to the first occupation of any residential unit the proposal would not give rise to harm to the integrity of the SPA or have a detrimental impact on the SNCI and therefore subject to a suitably worded legal agreement, no objection is raised on this ground.
- 7.7.5 The application is supported by a Phase II Ecological Survey and bat survey. The documents have been considered by Surrey Wildlife Trust and it is considered that subject to suitably worded conditions the proposal would not result in harm to ecological or biodiversity features of merit. Such condition(s) would need to protect existing ditches, hedges, mature trees and create new water features, provide mitigation measures to avoid harm to reptiles, schedule works outside of the bird nesting season, ensure any mature trees are soft felled, and provide follow up surveys for bats and badgers (prior to commencement of works). However, due to the length of time the application has been held in abeyance the report is now over one year old and as such rather than simply taking forward the recommendations outlined (and which were considered acceptable) it is considered that the survey work must be redone and all recommendations reviewed and updated prior to any works commencing on site.
- 7.7.6 A detailed objection has been received in respect of the proposal's impact on moths. In this regard it is noted that the proposed development in itself would not result in the loss of priority BAP habitats which are commonly associated with moths. Surrey Wildlife Trust have been asked to comment specifically on this matter and any comments provided will be reported by way of update.
- 7.7.7 Subject to these matters being taken forward in either conditions or as requirements within a legal agreement, it is considered the proposal is acceptable and would not conflict with Policy CP14 of the CSDMP 2012, the NPPF or saved Policy NRM6 of the SPA Avoidance Strategy. Such compliance would also ensure that the development did not conflict with the Natural Environment and Rural Communities Act 2006, the Wildlife and Countryside Act 1981 or The Conservation of Habitats and Species Regulations 2010.

7.8 The proposal's impact on the Borough's infrastructure

- 7.8.1 Since 1 December 2015 development proposals are required to mitigate their impact on

the infrastructure of the Borough by complying the Council's adopted Community Infrastructure Levy (CIL).

7.8.2 CIL is a non-negotiable charge on development and is calculated as pounds per square metre based on the net level of development proposed. In order to charge CIL the Borough Council was required to set CIL rates based on evidence of viability and produce a CIL charging schedule. This was subject to an independent examination and found to be sound by a Planning Inspector. The Council formally adopted the CIL Charging Schedule on 16 July 2014.

7.8.3 The CIL regulations state that the levy is only payable on development which creates net additional floor space, where the gross internal area of new build exceeds 100 square metres. While the proposed development is for C3 residential development it is exempt from CIL as it would deliver (100%) affordable housing which is not CIL liable (subject to the completion of the necessary CIL forms).

7.9 Whether the proposed housing mix is acceptable

7.9.1 Policy CP5 of the CSDMP 2012 seeks to ensure that 35% of all dwellings delivered in the borough over the plan period (to 2028) comprise affordable housing. The proposal will deliver 100% affordable housing therefore compliant with the terms of this Policy.

7.9.2 Policy CP6 takes this further by requiring a particular mix of unit sizes. The proposal's performance against this policy is set out in the table below (and indicated in brackets) :

	1 bed	2 bed	3 bed	4+ bed
Intermediate (shared ownership)	20 %	40% (11 or 69%)	40 % (5 or 31%)	-
Social rented	35 % (4 or 21%)	30 % (11 or 58%)	20% (4 or 21%)	15% (0%)

7.9.3 The proposed mix across the two tenures does not therefore comply in absolute terms with the policy. However, the provision of a mix of bungalows, flats and smaller dwellinghouses meets to the objective of meeting a range of housing needs and because of this, it is not considered necessary to raise objection to the proposed development.

7.10 Flooding and drainage

7.10.1 Policy DM10 requires developments to reduce the volume and rate of surface water run off through the use of SuDs. The application pre-dates the requirement for major developments to demonstrate, prior to a grant of planning permission that a sustainable drainage scheme could be implemented.

However, due to the size of the site (exceeding 1ha) a flood risk assessment has been submitted and given the number and detailed nature of the concerns raised officers have requested that the information submitted be as detailed as possible.

- 7.10.2 The submitted FRA agrees with local accounts of a high water table and notes that depressions in some areas of the site can experience a pooling of water during periods of long rainfall. The FRA concludes, however, that the proposal would not give rise to an increased risk of flooding to persons or property and will not result in the loss of floodplain storage.
- 7.10.3 The Environment Agency has assessed the submitted FRA and raises no objection to its findings. The Drainage Officer raised objection to the initial drainage strategy submitted and this (along with a number of other concerns) has been the reason for the determination period for the application being extended on four occasions. A revised drainage strategy has been submitted and the Drainage Officer comments, in addition to the LLFA, are awaited. In the event an objection is raised it is not considered appropriate to invite the applicant to again submit further revised details to address this matter and instead officers will seek to revise the recommendation to refusal.

8.0 ARTICLE 2(3) DEVELOPMENT MANAGEMENT PROCEDURE (AMENDMENT) ORDER 2012 WORKING IN A POSITIVE/PROACTIVE MANNER

- 8.1 In assessing this application, officers have worked with the applicant in a positive and proactive manner consistent with the requirements of paragraphs 186-187 of the NPPF. This included:
- a) Provided or made available pre application advice to seek to resolve problems before the application was submitted and to foster the delivery of sustainable development.
 - b) Provided feedback through the validation process including information on the website, to correct identified problems to ensure that the application was correct and could be registered.
 - c) Have suggested/accepted/negotiated amendments to the scheme to resolve identified problems with the proposal and to seek to foster sustainable development.
 - d) Have proactively communicated with the applicant through the process to advise progress, timescale or recommendation.

9.0 CONCLUSION

- 9.1 The proposal is presented as a rural exception site and it's considered there is, on balance, local need for affordable housing to justify the grant of planning permission for 35 dwellings. The proposal will deliver a bespoke SANGS solution and subject to conditions and the payment of SAMM there would be no impact on ecological features or the SPA.
- 9.2 The design response, layout, highway and parking arrangements are considered satisfactory as are the amenity relationships which would result.
- 9.3 However, the site is subject to a high groundwater table and detailed comments on the acceptability of the proposal on groundwater and surface water drainage are awaited. In the event that an objection is raised by either the Council's Drainage Officer or the LLFA it is highly likely that the recommendation would change from approval to refuse.

10.0 RECOMMENDATION

The Executive Head of Regulatory to be authorised to GRANT permission subject a legal agreement to secure the following:

- The retention of the following spilt in tenure and mix of affordable units as set in the site layout plan;
- All social rented units to be retained as such in perpetuity;
- All social rented units only to be let in accordance with a Local Lettings Policy to ensure the units are let to persons with a local connection to Chobham;
- A cap of 80% of the market value being the maximum any person can own or mortgage of any shared ownership property; and,
- Provision of a bespoke Suitable Alternative Natural Greenspace (SANG) as detailed in the SANG Management Plan dated June 2015 (GPM Ecology, Haslemere, Surrey).

and subject to the following conditions:

1. The development hereby permitted shall be begun within three years of the date of this permission.

Reason: To prevent an accumulation of unimplemented planning permissions and in accordance with Section 91 of the Town and Country Planning Act 1990 as amended by Section 51(1) of the Planning and Compulsory Purchase Act 2004.

2. No development shall take place until details and samples of the external materials to be used shall be submitted to and approved in writing by the Local Planning Authority. Materials to be agreed will include the proposed brick, tile, guttering and fenestration. Once approved, the development shall be carried out using only the agreed materials.

Reason: In the interests of visual amenities of the area and to accord with Policy DM9 of the Surrey Heath Core Strategy and Development Management Policies 2012.

3. A minimum of 7 working days before any development, including any works of demolition or site clearance, a pre-commencement meeting must be arranged with the Arboricultural Officer. The purpose of this meeting is to agree the extent of any facilitation or management tree works, tree and ground protection, demolition, storage of materials and the extent and frequency of Arboricultural site supervision. In all other regards the development shall proceed in accordance with the supplied **BS5837:2012 – Trees in Relation to Design, Demolition and Construction** compliant report prepared by MJC Tree Services and dated 14 July 2015.

In addition all facilitation pruning works must be carried out by a specialist and qualified contractor in accordance with BS3998:2010 and under the strict supervision of the retained Arboriculturist.

Reason: To preserve and enhance the visual amenities of the locality in

accordance with Policy DM9 of the Surrey Heath Core Strategy and Development Management Policies 2012.

4.
 1. No development shall take place until full details of both hard and soft landscaping works have been submitted to and approved in writing by the Local Planning Authority and these works shall be carried out as approved, and implemented prior to first occupation. The submitted details should also include an indication of all level alterations, hard surfaces, walls, fences, access features, the existing trees and hedges to be retained, together with the new planting to be carried out and shall build upon the aims and objectives of the supplied **BS5837:2012 – Trees in Relation to Design, Demolition and Construction** Arboricultural Method Statement [AMS].
 2. All hard and soft landscaping works shall be carried out in accordance with the approved details. All hard and soft landscaping works shall be carried out in accordance with the approved details. All plant material shall conform to **BS3936:1992 Parts 1 – 5: Specification for Nursery Stock**. Handling, planting and establishment of trees shall be in accordance with **BS 8545:2014 Trees: from nursery to independence in the landscape**. In addition the details to be submitted shall make provision for the four oaks trees proposed for amenity spaces to be supplied and planted as semi-mature specimens [girth at 1m 35-40cm, nominal diameter 11.9cm/4.7” with an overall planted height of 6-8m]. Minimum planted sizes of all other individual trees should be girth at 1m 18-20cm, nominal diameter 6.cm/2.4” with an overall planted height of 5m+. Please note that *Betula pubescens* and *Prunus avium* “Plena” are not considered acceptable species within this development.
 3. A landscape management plan including maintenance schedules for all landscape areas other than small, privately-owned domestic gardens, shall be submitted to and approved in writing by the Local Planning Authority before first occupation of the development or any phase of the development, whichever is the sooner, for its permitted use. The schedule shall include details of the arrangements for its implementation. The landscape areas shall be managed and maintained thereafter in accordance with the agreed landscape management plan for a minimum period of 10 years.

Reason: To preserve and enhance the visual amenities of the locality in accordance with Policy DM9 of the Surrey Heath Core Strategy and Development Management Policies 2012.

5. No development shall take place until a Construction Transport Management Plan, to include details of:
 - (a) parking for vehicles of site personnel, operatives and visitors
 - (b) loading and unloading of plant and materials
 - (c) storage of plant and materials

(d) No HGV movement to or from the site shall take place between the hours of 8.30 and 9.15 and 3.00 and 3.45pm nor shall the contractor permit any HGV's associated with the development at the site to be laid up, waiting, in Burr Hill Lane or Delta Road during these times

has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction period.

Reason: The condition above is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to accord with Policies CP11 and DM11 of the Surrey Heath Core Strategy and Development Management Policies 2012 and the National Planning Policy Framework.

6. The development hereby approved shall not be first occupied unless and until space has been laid out within the site in accordance with the approved plans for vehicles to be parked and for vehicles to turn so that they may enter and leave the site in forward gear. There after the parking / turning areas shall be retained and maintained for their designated purposes.

Reason: to ensure the development does not prejudice highway safety nor cause inconvenience to other highway users and to comply with Policies DM11 and CP11 of the Core Strategy and Development Management Policies 2012 and the NPPF.

7. The development hereby approved shall not be occupied until raised access platforms are constructed at the existing bus stops on Delta Road (two adjacent to junction with Beta Road), Windsor Court Road (one adjacent to junction with road also named Windsor Court Road) and Bowling Green Road (one at junction with Windsor Road), Chobham, in accordance with details to be submitted to and approved in writing by the Local Planning Authority.

Reason: to ensure the development does not prejudice highway safety nor cause inconvenience to other highway users and to comply with Policies DM11 and CP11 of the Core Strategy and Development Management Policies 2012 and the NPPF.

8. The development hereby approved shall not be occupied until a continuous footway is provided between the existing footway on Burr Hill Lane and the proposed footways within the application site, in accordance with details to be submitted to and approved in writing by the Local Planning Authority.

Reason: to ensure the development does not prejudice highway safety nor cause inconvenience to other highway users and to comply with Policies DM11 and CP11 of the Core Strategy and Development Management Policies 2012 and the NPPF

9. Prior to the commencement of any works (including demolition, site clearance or

site preparation) full ecological and biodiversity surveys, together with proposed mitigation and enhancements (updating and building upon the findings and recommendations of the submitted Summary of Phase 11 Ecological Survey's, the Bat Survey (both dated August 2014) and the MC Moth information (May 2015)) shall be submitted to and approved by the Local Planning Authority in writing. The approved details shall be implemented in full and retained in accordance with the approved details.

Reason: to comply with the aims and objectives of Policy CP14 of the Core Strategy and Development Management Policies 2012, the NPPF, NERC Act 2006, the Wildlife and Countryside Act 1981 and The Conservation of Habitat and Species Regulations 2010.

10. Prior to the commencement details of the future maintenance and management of all areas of amenity land (not contained within the private garden areas or to be handed over to Surrey County Council as part of the adopted highway) shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be retained in perpetuity unless otherwise agreed in writing.

Reason: To ensure a satisfactory form of development in accordance with the NPPF and Policy DM9 of the Core Strategy and Development Management Policies 2012.

11. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order) no extensions, garages, buildings or roof alterations (as defined by Schedule 2, Part 1, Classes A, B, D and E of that order) shall be erected / implemented without the prior approval in writing of the Local Planning Authority.

Reason: To proposal is only acceptable as a rural exception site as it lies in the Green Belt wherein development must be tightly controlled in the interest of preserving Green Belt openness, the unfettered extension or alteration of properties could undermine the openness of the Green Belt and accordingly the condition is required to ensure ongoing compliance with Policies DM9 and DM4 of the Surrey Heath Core Strategy and Development Management Policies 2012 and the NPPF.

12. Notwithstanding the detail shown on the submitted plans no fence or other means of enclosure shall be erected or installed to demark the front boundaries of the dwellings hereby approved which otherwise might be permissible pursuant

to the provisions Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order), as defined by Schedule 2, Part 2, Class A.

Reason: To ensure a satisfactory form of development in accordance with Policy DM9 of the Surrey Heath Core Strategy and Development Management Policies

2012 and the NPPF.

13. Before first occupation of the development hereby approved the first floor side window(s) in plot 35 facing the garden of 26 Burr Hill Lane shall be completed in obscure glazing and any opening shall be at high level only (greater than 1.7m above finished floor level) and retained as such at all times in accordance with details to be submitted to and approved by the Local Planning Authority in writing. No additional openings shall be created in this elevation without the prior approval in writing of the Local Planning Authority.

Reason: In the interests of the amenities enjoyed by neighbouring residents and to accord with Policy DM9 of the Surrey Heath Core Strategy and Development Management Policies 2012 and the NPPF.

14. No works (demolition; site preparation; investigation, building; construction, fitting out snagging) shall be carried out on Sundays, Public Holidays, or except between the hours of 8am and 6pm on weekdays and 9am and 1pm on Saturdays. For the avoidance of doubt 'Public Holidays' include New Years Day, Good Friday, Easter Monday, May Day, all Bank Holidays, Christmas Day and Boxing Day.

Reason: In the interests of the amenities enjoyed by neighbouring residents and to accord with the National Planning Policy Framework.

15. The proposed development shall be built in accordance with the following approved plans:

- P105 Rev B Site layout
- P226 Rev A (plots 1,2,3,4,28,29 30 and 31)
- P227 Rev A (plots 5,6,34 and 35)
- P228 (plots 7,8)
- P229 Rev A (plots 9,10)
- P230 Rev A (plots 11 – 16)
- P231 Rev A (plots 17,18,19)
- P232 Rev A (plots 20, 21)
- P23 Rev A (plots 22,23,24,25)
- P234 Rev A (plots 26,27, 23, 33)

unless the prior written approval has been obtained from the Local Planning Authority.

Reason: For the avoidance of doubt and in the interest of proper planning and as advised in ID.17a of the Planning Practice Guidance.

Informative(s)

1. The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders. (Highways Act 1980 Sections 131, 148, 149).
2. When access is required to be 'completed' before any other operations, the Highway Authority will normally agree that wearing course material and in some cases edge restraint may be deferred until construction of the development is virtually complete, provided all reasonable care is taken to protect public safety.
3. There would be no objection in principle, from the highway point of view, to the proposed development if the applicant were to gain control of sufficient land to enable the necessary access to be constructed and provided with visibility splays all to the Highway Authority's minimum standard.
4. The applicant is advised that an area of land within the curtilage of the application site may be required for future highway purposes, details of which may be obtained from the Transportation Development Control Division of Surrey County Council.
5. The permission hereby granted shall not be construed as authority to carry out works on the highway. The applicant is advised that a licence must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. In this instance the Highway Authority is Surrey Heath Borough Council and an application to modify the existing vehicular accesses shall be made to the Highway Division.

In the event that a satisfactory legal agreement has not been completed by 29 September 2015, the Executive Head of Regulatory be authorised to REFUSE for the following reasons:

1. The proposal fails to provide a satisfactory legal agreement to secure the dwellinghouses as affordable housing (19 social rented and 16 shared ownership units). The proposal would therefore constitute inappropriate development in the Green Belt which would undermine the purposes of including land in and would result in countryside encroachment, and would significantly harm its openness and otherwise undeveloped and rural character. The proposal does not satisfactorily address the requirements of Policy DM5 of the Surrey Heath Core Strategy and Development Management Policies 2012 and cannot be considered to be a rural exception site or as an exception to para 89 of the NPPF.
2. In the absence of a completed legal agreement under section 106 of the Town and Country Planning Act 1990, the applicant has failed to comply with Policy CP14B (vi) (European Sites) of the Surrey Heath Core Strategy and Development Management Policies Document 2012; and, Policy NRM6 (Thames Basin Heath Special Protection Area) of the South East Plan in relation to the provision of contribution towards strategic access management and monitoring (SAMM) measures, in addition failing to provide a bespoke SANGS (Suitable Alternative Natural Green Space) solution, in accordance with the requirements of the Surrey Heath Borough Council's Thames Basin Heaths Special Protection Area Avoidance Strategy Supplementary Planning Document (Adopted January 2012).

