

<b>LOCATION:</b>	Sewage Disposal Works, 30 Doman Road, Camberley, GU15 3DF
<b>PROPOSAL:</b>	Erection of a headquarters and distribution facility totalling 15,985sqm consisting of warehouse (B8), office (B1a) (including product display area and canteen), training and workshop facilities (B1c), car parking and service yard, ground remodelling and landscaping (including flood attenuation areas), and the construction of a new left in left out access from the A331.
<b>TYPE:</b>	Full Planning Application
<b>APPLICANT:</b>	Andreas Stihl Ltd And Thames Water Utilities Ltd
<b>OFFICER:</b>	Sarita Bishop

## **RECOMMENDATION: REFUSE**

### **1.0 SUMMARY**

- 1.1 This application seeks planning permission for the erection of a headquarters and distribution facility totalling 15,985sqm (Gross Internal Area) consisting of warehouse (B8), office (B1a) (including product display area and canteen), training and workshop facilities (B1c), car parking and service yard, ground remodelling and landscaping (including flood attenuation areas), and the construction of a new left in left out access from the A331. The new facility would be the UK headquarters for the Stihl Group. The submission details that 95 local jobs would be retained and that the site would accommodate the company's future growth plans.
- 1.2 The principle of the proposed development in this location is acceptable, given the employment retention/generation associated with the proposal and as it would clearly benefit from the proximity of access to the A331/A30/M3. It is also considered that no adverse harm upon the character of the surrounding area would arise, including the setting of the Blackwater River nor the coalescence of Camberley and Blackwater. Appropriate measures may be secured to ensure any potential impacts on adjoining or future occupiers may be mitigated. The proposal has the support of the County Highway Authority, the Lead Local Flood Authority and the Council's Scientific, Drainage and Arboricultural Officers. Natural England also raises no objection and subject to a legal agreement to secure biodiversity offsetting Surrey Wildlife support the proposal.
- 1.3 Whilst the Environment Agency is satisfied with the submitted Flood Risk Assessment it raises an in principle objection to the development as it would be located within the functional floodplain (Flood Zone 3b). In the officer's opinion this is fatal to the application and therefore the application has to be recommended for refusal consistent with government advice. In the event that Members do not support this recommendation, and resolve to grant the application, then it is a requirement that the application be referred to the Secretary of State before granting planning permission.

### **2.0 SITE DESCRIPTION**

- 2.1 The site, of 4.13 hectares in area, is located on the east side of the Blackwater Valley Road, A331. It lies to the west of, and is currently part of, the long established Thames Water

sewage treatment works (STW) which comprises various buildings and processing tanks. This has its main vehicular access off Riverside Way to the south east. Whilst the site has been identified as surplus to Thames Water's requirements, there are a number of structures and pieces of infrastructure that are proposed to remain within the site including outfall channels and operational pipes.

- 2.2 The site comprises an area of largely undeveloped land which, over time, has become overgrown by dense vegetation. It is characterised by a broadleaved semi natural woodland with small areas of semi improved grassland, mounds of various heights and a bund covered with ruderal vegetation. Trees within the site are not subject to a tree preservation order.
- 2.3 The north eastern corner of the site comprises an area of hard standing. This part of the site was formerly occupied by Viridor for the processing of waste – separate to the operational processes of Thames Water. This use ceased in 2018. There are various site levels across the site. The northern part of the site contains a large mound of stockpiled material arising from historic building works associated with the STW which rises to a peak of circa 3.5m – 4m above the surrounding level. There is also a difference in site level in proximity to the western boundary with the A331 with the pavement being about two metres higher than the site. The site level also gradually raises across the site west to east. Lastly, there are electric pylons running along the southern part of the site. These will remain in place as part of any proposal for the site.
- 2.4 The A331 bounds the western edge of the site and is a dual carriageway with a footway/cycleway on its eastern side. The A331 connects into the London Road A30 to the north via the Meadows gyratory which in turn provides links to the wider Camberley area to the east, Sandhurst and Crowthorne to the north and Blackwater to the west. The A331 also provides a connection to the south of the site to junction 4 of the M3. This provides links to the M25 and London to the north and Basingstoke, Winchester and Southampton to the southwest.
- 2.5 The Environment Agency (EA) Flood Zone map shows that the main developable area of the site lies within the functional floodplain (Flood Zone 3b “High Probability” of the River Blackwater) with most of the remaining land being within Flood Zone 2. A small part of the site is within Flood Zone 1
- 2.6 The Blackwater Valley Site of Special Scientific Interest lies to the north of the Meadows roundabout to the east of A331. This includes Shepherds Meadows which is designated as a Suitable Alternative Green Space (SANG). The River Blackwater and the Hawley Meadows/Blackwater Park SANG are to the west of the application site and are separated from the site by the A331.
- 2.7 Watchmoor Park lies to the south. This comprises an office development, with buildings varying between two and four storeys in height. The Yorktown Industrial Estate lies to the north and comprises a variety of buildings and industrial/warehouse uses. The site also lies within the flat low lying flood plain of the Blackwater Valley.

### **3.0 RELEVANT HISTORY**

- 3.1 The planning history on this site predominantly relates to its use as a sewage treatment works. The most relevant application to the current proposal is as follows:

01/0291            Telecommunications determination for the erection of a 15 metre high lattice mast with two 600mm dishes and 3 dual antennas with the siting of an electric meter cabinet and creation of a compound.

*Prior approval not required 25 May 2001. This was implemented. The applicant has advised that this has subsequently been removed from the site (see 18/0384 below).*

3.2 In January 2019 the Council issued a screening opinion pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA) for development comprising 19,000 square metres of B1a (offices), B1(c) (light industrial) and B8 (warehouse) uses with ancillary retail/display areas. This opinion concluded that the submitted development was not considered to be EIA development for the purposes of the regulations and as such an EIA was not required.

3.3 Although not on the application site, the following application is also considered relevant to the consideration of the current application:

18/0384                      Erection of a 5 metre extension to existing communications mast, erection of 3 antennas, 2 dishes and ancillary development on land between 6 and 8 Doman Road. *Approved 30 November 2018.*

*The application confirmed that the development was required by Vodafone who operated the telecommunications mast at the sewage treatment works as this mast was due to be decommissioned and removed.*

**4.0 THE PROPOSAL**

4.1 Planning permission is sought for the erection of a headquarters and distribution facility totalling 16,456 square metres (Gross External Area) consisting of warehouse (B8), office (B1a) (including product display area and canteen), training and workshop facilities (B1c), car parking and service yard, ground remodelling and landscaping (including flood attenuation areas), and the construction of a new left in left out access from the A331.

4.2 The proposed development is to be occupied by the Stihl group as its UK headquarters and is needed to address shortfalls in the existing site in Stanhope Road and to accommodate future growth. Stihl currently predicts that Phase 1 will meet their requirements for some 10 years upon their projected growth rate and will allow them to consolidate their business onto one site. It has 95 employees in Camberley.

4.3 The development is proposed in two phases. The first phase would provide all of the office floorspace and the majority of the warehouse floorspace. The second phase would provide the remaining warehouse floorspace. The phasing of development is as set out below:

Accommodation	Floor area square metres
Phase 1	
Office ground floor	1,174
Office first floor	874
Office second floor	796
Warehouse	9,140
	11,984
Phase 2	
Warehouse	4,472
Total floor space	16,456

4.5 The building is generally rectangular in shape with total dimensions of 108 metres by 102 metres (Phase 1) and 154 metres by 102 square metres (Phase 2). The warehouse has a height of 18.65 metres (top of parapet) reducing to 12.6 metres for the offices. The building has a simple palette of materials in various shades of grey. Aluminium curtain walling is proposed for the offices with trapezoidal profile and composite cladding panels proposed for both the offices and warehouse.

- 4.6 Phase 1 would also include the provision of a proposed “left in, left out” access onto the A331 and 102 car parking spaces including 7 for disabled users at the northern end of the site. A further 20 spaces would be provided as part of the Phase 2 works. Of the available parking spaces 13 would be provided with charging points for electric vehicles with capacity provided capable of meeting future demand; and, 48 cycle spaces would also be provided across the site. The service yard is located to the rear of the building providing access to 13 loading bays of which 10 will be provided as docked loading bays. The proposed future use is for a distribution warehouse on the site. It is understood that there is an anticipated total of up to 22 HGV movements throughout the day, with up to 4 two-way movements during the AM peak and 2 two-way movements during the PM peak.
- 4.7 Lighting is proposed along the main internal access road comprising lighting columns up to 6 metres in height. Similarly sized lighting columns are proposed within the car parking areas. The perimeter of the building and its landscaped frontage would utilise low level lighting with the predominant use of bollards in key locations such as path junctions.
- 4.8 The site has a number of mounds of earth which would need to be levelled/ removed to facilitate the development. Given that the main mound is between three and four metres in height above the general site level, and having regard to the proposed required building slab levels, external ground levels and flood compensation areas to comply with the mitigation measures outlined in the Flood Risk Assessment, an extensive cut and fill / remodelling exercise is proposed.
- 4.9 There are 13 individual trees, nine groups of trees and one area categorised as woodland on the site. Of these only one group would be retained as a result of the proposed development. A structured avenue of planting is proposed into the site. The approach to the building’s entrance would have a number of landscaped areas which is proposed to incorporate native species as part of the site wide landscaping approach. A landscape buffer strip would be provided between the building and the A331 which would also incorporate native specimen tree planting, including evergreen species. The planting of a shrub understorey made up of native species which would combine to create varied structure of vegetation with year round cover is also proposed. The flood relief area at the southern end of the site has been designed to create an area for wildlife and habitat creation. The proposed landscaping would be fully implemented as part of Phase 1.
- 4.10 The application is supported by the following documents. Regard will be had of them in section 7 of this report:
- Planning Statement
  - Design and Access Statement
  - Employment Land Assessment
  - Transport Statement and Travel Plan
  - Flood Risk Assessment
  - Drainage Impact Assessment
  - Ground Investigation Report
  - Noise Impact Assessment
  - Arboricultural Planning Statement
  - Landscape Visual Impact Assessment
  - Landscape Strategy
  - Ecological Impact Assessment
  - Bat Survey
  - BREEAM pre-assessment
  - Energy report
  - Utilities assessment
  - Archaeological Desk Based Assessment
  - External Lighting Assessment
  - Statement of Community Involvement
  - Construction Management Plan

A flood map challenge was originally submitted as part of the application. However, this was withdrawn. It is noted that the Environment Agency has stated that it is within its remit to consider such challenges rather than the Borough Council as it controls the Flood Zone map data.

## 5.0 CONSULTATION RESPONSES

5.1	Surrey County Council County Highway Authority	No objection subject to conditions. The full comments of the County Highway Authority are provided as Annex A to this report.
5.2	Environmental Health	No objection subject to conditions
5.3	Scientific Officer	No objection subject to conditions
5.4	Arboricultural Officer	No objection subject to conditions
5.5	Environment Agency	The latest comments from the Environment Agency are provided as Annex B to this report.
5.6	Surrey County Council Lead Local Flood Authority	No objection subject to conditions
5.7	Drainage Officer	Objection
5.8	Surrey Wildlife Trust	Views awaited
5.9	Natural England	No objection subject to conditions
5.10	Surrey County Council Archaeologist	No objection
5.11	Hart District Council	No objection on the basis that necessary consultations have been undertaken with regard to access arrangements, transportation impacts, environmental impacts and any other material planning considerations that may have cross local authority border implications
5.12	Rushmoor Borough Council	No objection
5.13	Yorktown and Watchmoor Association	Business No views received
5.14	Surrey Police Architectural Liaison	No views received
5.15	National Grid	No views received
5.16	Thames Water Utilities	No objection
5.17	Fire Safety	No views received
5.18	Bracknell Forest Borough Council	No objection subject to matters relating to their response to the screening opinion (how significant adverse effects on the environment in relation to downstream flood risk, the biodiversity network and transport impacts), transportation implications particularly in relation to the A331 and the Meadows gyratory and drainage and flood risk and potential impacts within Bracknell Forest
5.19	Economic Development Officer	Positively supports this proposal as it will enable a quality employer to remain and grow within the Borough.
5.20	Blackwater Valley Recreation/Countryside Management	No views received
5.21	Southern Gas Networks	No views received
5.22	Scottish and Southern Energy	No views received
5.23	Highways England	No objections subject to condition

5.24 Surrey County Council Planning Minerals and No objection Waste

## 6.0 REPRESENTATION

6.1 At the time of the preparation of this report 31 representations have been received in support of the proposal which are summarised below:

- ☒ Desperately need a better headquarters;
- ☒ It is good to stay in the area;
- ☒ We have outgrown our current building;
- ☒ Stihl is a highly regard local employer and the Council should work with them to keep them in the Borough;
- ☒ Need more space to work;
- ☒ This looks like a wonderful building and will serve to regenerate the local area.

## 7.0 PLANNING CONSIDERATION

7.1 The application is located within both the settlement and countryside areas of Camberley as defined by the Surrey Heath Core Strategy and Development Management Policies 2012. A small part of the north west corner of the site is also within the Yorktown Core Employment Area. As such Policies CP1, CP2, CP8, CP11, CP12, CP13, CP14, DM1, DM7, DM9, DM10, DM11, DM13 and DM17 are relevant to the consideration of this proposal as are the provisions of the National Planning Policy Framework (NPPF), the associated technical guidance and the National Planning Practice Guidance (PPG). The Western Urban Area Character Supplementary Document 2012 (WUAC) defines the site as being within the Industrial Estate and Infrastructure Character Area. The site is also subject to the Yorktown Landscape Supplementary Planning Document 2008. The Vehicular and Cycle Parking Guidance 2018 published by Surrey County Council is also relevant.

7.2 The main determining issues are considered to be as follows:

- ☒ The principle of development;
- ☒ The impact on the character of the area;
- ☒ The impact on the landscape including trees;
- ☒ Highway matters;
- ☒ The impact on flood risk;
- ☒ The impact on adjoining and future occupiers of the development; and,
- ☒ The impact on ecology

### 7.3 The principle of development

7.3.1 The application site is located within both the settlement and countryside areas of Camberley. Whilst development within the settlement area of Camberley is considered to be a sustainable location for redevelopment, policy CP1 states amongst other matters that:

“...Development in Countryside beyond the Green Belt (as shown on the Proposals Map) which results in the coalescence of settlements will not be permitted”

Due to its location the site is not considered to fulfil a countryside role. The A331 forms the existing boundary between existing development in the area, such as the Yorktown Industrial Estate and Watchmoor Park, and the countryside, Hawley Meadows, to the west which separates Blackwater and Camberley. As the proposed development would not extend beyond the A331, the proposal is not considered to result in the coalescence of Blackwater and Camberley. As such no objection is raised to the proposal in countryside terms.

7.3.2 The application is accompanied by a sequential site assessment which sets out the

requirements for the development, including a minimum site area of 3.9 hectares and the provision of all activities on one site, and that there are no other suitable or available site for the proposal within the functional economic area (comprising Surrey Heath, Hart and Rushmoor). In addition, no sequentially preferable sites were identified within Bracknell Forest.

- 7.3.3 The application is for an existing and established employer located within the Borough, the development is supported by the Council's Economic Development Officer and the sequential assessment sets out that there are no sequentially preferable locations for the proposed development. These are material considerations which weigh in favour of the development.
- 7.3.4 Policy DM13 states that development for B class uses outside of Core Employment Areas and Camberley town centre will generally be restricted to the extension, alteration or addition to an existing building in employment use, the redevelopment of existing sites in employment use or sites allocated in a Site Allocations supplementary planning document. Technically the proposed development does not satisfy the policy criteria and represents a departure from policy. However, the lack of any suitable alternative site for the expansion of an existing local business weighs in the application's favour with the specific location of the application site and relationship to the existing defined Core Employment Area it is concluded that there is no planning policy objection to the application on the basis of this policy.
- 7.3.5 A small part of the site is also located within a designated Core Employment Area as outlined in the CSDMP Proposals Map. Policy CP8 states that Core Employment Areas will be retained for employment use and along with Camberley Town Centre, will be the focus of economic regeneration and inward investment. This policy also seeks to make provision for up to 7,500 new jobs in the period up to 2027. It will do this by ensuring a flexible supply of high quality employment floorspace utilising existing employment areas and promoting a more intensive use of these site through the recycling, refurbishment and regeneration of existing older or vacant stock.
- 7.3.6 It is acknowledged that the STW is not located within the Core Employment Area. However, having regard to the lack of suitable alternative sites, as the proposed development would predominantly be B8 and B1c uses which would be appropriate in this location and given the site's proximity to the Yorktown Industrial Estate and the A331, no objection is raised to the principle of development in this location subject to the consideration of the following detailed matters.

#### **7.4 The impact on the character of the area**

- 7.4.1 Policy DM9 (Design Principles) promotes high quality design that respects and enhances the local environment, paying particular regard to scale, materials, massing, bulk and density. The NPPF also seeks to secure high quality design, that also takes account of the character of different areas. Development which fails to integrate into its context, promote or reinforce local distinctiveness and fails to take the opportunity to improve the character and quality of the area and the way it functions should be refused. Policies CP2 (iv) and DM9 (ii) reiterate this requirement.
- 7.4.2 Guiding Principle IE1 for the Industrial Estate and Infrastructure Character Area as outlined in the WUAC SPD states that new development should pay particular regard to the following criteria:
- (a) Contemporary industrial architectural design will be welcomed.
  - (b) Buildings principally 2 – 3 storeys
  - (c) Incorporation of green infrastructure and landscaping where possible, especially in car parking areas and along front boundaries in accordance with the York Town Landscape

## Strategy

(d) Provision of structured on-site parking

(e) Waste storage areas to be screened from roads and public areas

(f) Use of high quality boundary treatments.

Guiding Principle IE2 states that:

High quality and visually attractive buildings with formal landscaping will be expected for development adjacent to, or visible from either the A30 or the Blackwater Valley, including the A331, the Blackwater Valley path and other green spaces. Development will be expected to maintain the informal appearance of the River Blackwater and contribute towards maintaining and improving its ecological function.

- 7.4.3 Principle YK3 advises that development proposals along the A331 should have a set back from the highway of 8 metres for a 1 or 2 storey building or 10 metres for a 3-4 storey building.
- 7.4.4 In response to the pre-application submission the Design Review Panel raised issues concerning the size of the building, the adequacy of the landscape buffer adjacent to the A331 and the blank façade of the western elevation which fronts the A331.
- 7.4.5 The proposed building has been designed to meet the particular needs of Stihl's business model and requirements, for example, with clear internal heights and volumes within the warehouse to provide an efficient internal layout for racking, to facilitate the use of automation and the provision of additional loading docks which allow for greater operational efficiency. This has resulted in a building with a large rectangular footprint and form. It has been designed to combine contemporary materials with simple detailing primarily through the use of composite and trapezoidal cladding profiles and colours within a grey colour palette.
- 7.4.6 The upper part of the warehouse would be finished in a darker hue to minimise the visual impact of the height of this part of the scheme. To minimise the impact of the length of the western elevation it is proposed to divide this elevation up into sections through the use of varying colour finishes and materials. The office element is proposed to be subordinated to the warehouse element. The main office elevation (north) is characterised by a completely glazed facade glazing which brings variation and visual interest to the building. The functional areas of the site are located to the rear of the building and would be screened from general view by the proposed building.
- 7.4.7 The existing site has various changes in level. The proposal will introduce a more uniform level to the site to enable the development to be built. These works will have an impact on the character of the area particularly with the removal of the existing mounds and the elevated bank along the boundary with Watchmoor Park. However, subject to securing a detailed landscape strategy for the site, it is considered on balance that these works would be acceptable.
- 7.4.8 It is recognised that the proposed building, as proposed to be built under either Phase I or II, would have a significant impact on the character of the area by virtue of its footprint, depth and height in proximity to the A331 particularly when viewed from the south. This impact would be further reinforced by the need to site the building at a finished floor level of 59.6 AOD (above ordnance datum) as set out in the Flood Risk Assessment to address potential flooding impacts. However, subject to the imposition of conditions to secure appropriate external and surfacing materials and a landscape strategy as set out below it is considered that the development would not result in material harm to the character of the area.

## **7.5 The impact on the landscape including trees**

- 7.5.1 Principle YK1 of the YLS SPD advises that development proposals on the London Road/ Blackwater Valley Road shall provide high quality landscape design. The precise highway layout shall be determined subject to consultation with the Highway Authority. Principle YK6 advises that development proposals on sites which include watercourses will be required to incorporate appropriate forms of landscape design around the watercourse in order to reduce the risk of flooding, enhance biodiversity and improve the amenity of the area. Where development sites are adjacent to watercourses, the Council will encourage applicants to improve landscaping between buildings and the watercourse as appropriate to meet these objectives.
- 7.5.2 The application is supported by a detailed landscape strategy which includes a landscape buffer strip of just under 10 metres in width between the building and the A331. This buffer is proposed to incorporate native specimen tree planting including evergreen species with a shrub understorey and is wider than that proposed at the pre-application stage. Landscaped areas are proposed around the building and within the flood compensation area which are considered to create an appropriate landscape setting for the proposed development.
- 7.5.3 The application is also supported by an arboricultural report which states that there are 13 individual trees, nine groups of trees and one area categorised as woodland on the site. The Council's Arboricultural Officer advises that whilst the tree loss appears significant the site has been unmanaged for many years and the overall quality of the trees present is not considered to be high. The proposed development of the site would present an opportunity to provide a landscape scheme comprising trees suitable for the long term of the site and ensure adequate and appropriate management. Subject to this which may be secured by condition in the event that planning permission were to be granted, no objection is raised to the proposal in respect of tree or landscape issues.

## **7.6 Highway matters**

- 7.6.1 Policy DM11 indicates that development which would adversely impact the safe and efficient flow of traffic movement on the highway network will not be permitted unless it can be demonstrated that measures to reduce and mitigate such impacts to acceptable levels can be implemented. Policy CP11 indicates that improvements will be sought to the efficient and safe operation of the highway network while seeking to reduce the need to travel, encourage the use of sustainable modes of transport and reduce the impact of traffic on residential areas and development should comply with parking standards.

### Means of access

- 7.6.2 The proposed access into the development would be directly from the A331 and will comprise a left in/left out arrangement with deceleration and merging lanes. A vehicle barrier system will be provided within the development to control access to staff and deliveries. Pedestrian access into the site would be via by the existing 2.5 m shared footway/cycleway along the A331 and will directly connect into the site. At the proposed site access the addition of two informal pedestrian crossings with dropped kerbs and tactile paving is proposed allowing for access across the proposed site access junction. The County Highways Authority raises no objection to the access.

### Parking provision

- 7.6.3 County's 'Vehicular and Cycle Parking Guidance 2018' has been used to calculate the required car parking standards for B1 Office use and B8 Warehouse (Distribution). The guidance requires a maximum range of 1 space per 30m<sub>2</sub> to 1 space per 100m<sub>2</sub> for a B1 use. The B8 Warehouse (Distribution) requires 1 car space per 70m<sub>2</sub>. The development is

therefore providing 52 spaces for the B1 office use and 70 for the B8 use. The total provision will be 122 spaces including 7 disabled spaces. A servicing yard will provide a total of 13 HGV bays of which 10 will be docks for articulated or large rigid vehicles. The guidance requires 1 cycle space per 125 square metres of B1 floorspace and 1 space per 500 square metres for B8 floorspace and the provision of 48 spaces which is in accordance with this standard. County raises no objection to the parking or cycling provisions and these can be secured by conditions.

#### Highway safety and capacity

- 7.6.4 To consider the potential impact of the development on the highway network a survey has been carried out of the trip generation at the existing STIHL GB site which has two site accessed one of Stanhope Road and the other on Glebeland Road. Link accounts were undertaken capturing two-way vehicle movements across a 12 hour period between 07.00 -19.00. The recorded arrival and departure traffic volumes that are currently generated by the existing site for both car/light goods vehicles (LGVs) and heavy goods vehicles (HGVs) during the am peak period (7.30 -8.30) are 64 two-way traffic movements in the am peak and 62 two-way traffic movements for the pm peak period 17.00-18.00)
- 7.6.5 An assessment of trip generation for the development site has been undertaken comparing the existing operation with the proposed. This shows that for cars/LGVs trips there would be 100 two-way movements in the am peak (07.30-08.30) and 101 two-way movements in the pm peak (17.00-18.00). The proposal would increase the overall number of HGV loading bays and decks from 6 at the existing site to 10 at the new facility. This uplift in the proposed HGV operations at the new site compared to the existing is estimated to be double the amount. The predicted HGV movements during the am peak period will be 8 two-way movements and in the pm peak 4 two-way movements.
- 7.6.6 Total predicted traffic (HGV/car/LGV) will therefore result in 108 two way movements in the am peak and 105 (HGV/car/LGV) two-way movements in the pm peak. This would equate to an additional 44 two-way movements in the am peak and 43 additional two-way movements in the pm peak.
- 7.6.7 All arrivals to the development will be via the A331 north and all development turning left out of the site and proceeding to head southbound along the A331. As a result of this arrangement a number of movements will be required to u-turn at the A331/M3 roundabout to the south of the site and the Meadows gyratory to the north. An assessment has been carried out of 5 junctions (A30/A331 Meadows Gyratory, A331 Admiralty Way/Stanhope Road, A331 Riverside Way, A331 Sainsburys and Northern junction of the M3 Junction 4) to determine the impact of the development traffic for a future growth year of 2023 with and without development. The impact has been shown as percentage increases in the volume of traffic at the various junctions. The greater impact as demonstrated by the analysis will be at The Meadows Gyratory on the A331 arm northbound approach which shows with development that there will be an increase of 75 vehicles in the am peak hour (6.5% increase) which equates to an additional 1.2 additional vehicles per minute. There would be an additional 98 vehicles southbound in the am peak hour (5.5% increase) which equates to an additional 1.6 vehicles per minute. The greatest impact is recorded at the A331 southbound approach to the Stanhope Road signalised junction during the am peak hour which would result in an additional 98 vehicles (8.6%) increase which would equate to less than 2 additional vehicles per minute.
- 7.6.8 In the immediate term the existing site will be vacant and so the analysis has been based on just the new site rather than additional trips, so the impact on the junctions is given as a worst case scenario. Subject to the imposition of conditions to secure the access arrangements onto the A331, the provision of car and cycle parking, electric charging facilities, the implementation of a travel plan and the submission of a more detailed construction transport management plan the County Highway Authority conclude that the impact of the development traffic would not be considered severe.

7.6.9 Given the proximity of the development to junction 4 of the M3, Highways England has also been consulted on this application. Highways England raises no objection to the proposal subject to the imposition of condition securing an operational traffic management plan prior to occupation of the development.

## **7.7 The impact on flood risk**

7.7.1 Paragraphs 155-165 of the NPPF considers flood risk. This is supported by the technical guidance with the PPG. Policy DM10 is reflective of the NPPF and states that development within flood zones 2 and 3 will not be supported unless the sequential and exception tests have been applied and passed and is a form of development compatible with the level of risk. It is also necessary to demonstrate through a site flood risk assessment that the proposal would, where practicable, reduce risk both to and from the development or at least be risk neutral. Where risks are identified, flood resilient and resilient design and appropriate mitigation and adaptation can be implemented so that the level of risk is reduced to acceptable levels.

7.7.2 In 2015 the Council published its Strategic Flood Risk Assessment (SFRA) for the borough as part of the evidence base for the preparation of the emerging local plan. This assessment identified the site as being within Flood Zones 1, 2 and 3. Flood Zone 3 (including climate change) is further divided into two sub categories, 3a (high probability) and 3b (functional flood plain) with the majority of the site falling within 3b). Flood Zone 3b is defined as comprising land where water has to flow or be stored in times of flood. Local planning authorities should identify in their SFRAs areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency. The SFRA is based upon EA modelled 1 in 20 annual probability floodplain of the Blackwater River.

7.7.3 The technical guidance to the NPPF set out flood risk vulnerability and flood zone compatibility. Within Flood Zone 3b the only acceptable developments are identified as essential infrastructure (such as electricity generating power stations or water treatment works where the exception test has been passed) or water compatible development (such as marinas, flood control infrastructure, amenity open space and sand and gravel working). As the proposal does not fall within these categories of development the technical guidance is clear that development should not be permitted. Consequently the EA raises an 'in principle' objection to the proposal and in the officer's opinion this has to be fatal to the application.

### The applicant's Flood Risk Assessment

7.7.4 However, the applicant's contend that the flood level and extent over the site ignore the presence of the barriers to flow, including the A331 embankment and the raised sidewalls of the drainage channels. As such, in their view the site is not considered 'land where water has to flow or be stored in times of flood' and the submitted FRA considers that the site should be defined as Flood Zone 3a for planning purposes. This matter has been reconsidered by the EA on a number of occasions during the course of the application but the EA has always maintained an objection. In the event that the applicant could demonstrate the site to be FZ 3a, and overcome the EA's in principle objection, then the development would be appropriate subject to the development passing the sequential test and complying with criteria (a) – (e) of paragraph 163 of the NPPF.

### The Sequential Test

7.7.5 To inform the sequential test, the FRA set out the requirements for the development including a minimum site area of 3.9 hectares. The FRA concludes that there are no suitable or available sites for the proposal within the Functional Economic Area comprising Surrey Heath, Hart and Rushmoor nor within Bracknell Forest. It is also noted that no additional sites were identified by Surrey Heath or the other councils to accommodate this development. In the officer's opinion it is therefore considered that there are no reasonably

available sites appropriate for the proposed development in areas with lower risk of flooding and consequently the sequential test has been passed.

#### Floodplain compensation, risk management and safe access and escape routes

7.7.6 The flood risk mitigation strategy for the development consists of the following elements:

- ☑ Ground floor levels set at the design flood level of 59.60m AOD – i.e. at the 1 in 100 annual probability +25% climate change allowance flood level, and a suitable freeboard above external ground levels to protect against surface water flood risk.
- ☑ Floodplain compensation has been provided on a level for level basis, resulting in a net benefit of over 1,000m<sup>3</sup> of additional floodplain storage, up to at the 1 in 100 annual probability +35% climate change allowance flood level of 56.66m AOD (as specified by the EA)
- ☑ Continuous safe access arrangements will be provided. As commercial development, in the event of flooding the site will be vacated and secured.
- ☑ A surface water drainage strategy which demonstrates that there won't be an increase in runoff from the site.

7.7.7 The following floodplain compensation scheme has been proposed for the site:

- ☑ Ground levels around the proposed building have been remodelled to provide a floodplain storage function to varying degrees – landscaping to the south is at 58.6m AOD, with the parking/loading bays to the east at 58.4m AOD, and parking areas to the north at approximately 59.0m AOD;
- ☑ An 'Eastern Compensation Area' has been provided over the land on the southern side of the STW, running from the boundary with the STW outfall channel on its western end up to the access road at its eastern end. This is currently an undeveloped area used for site access and for materials storage, and is proposed to be lowered to a minimum level of between 58.7m AOD to provide floodplain storage.

In order to facilitate access for flow routes into this area, a section of the southern drainage channel sidewall would be removed to provide a new flow route. This area would be designed as a wetland/ecological amenity area, with appropriate natural planting of native species and landscaping enhancements. The 58.7m AOD minimum level provides a nominal freeboard above the channel level in order to ensure the minor watercourse at low flows is still contained within the channel.

#### Flood resilience

7.7.8 Flood resilient measures are incorporated where it is accepted that, in severe flood events, water may enter some parts of the building so it is necessary to ensure the building will remain useable after the floodwater has receded and the area has been cleaned. The scheme proposes the use of flood resilient measures including materials that retain their structural integrity and have good drying and cleaning properties (e.g. the use of suitable tiling over areas, with water resilient grout) and the location of services and sockets etc. above floor level.

7.7.9 With the use of the flood relief 'finger' the overall layout and levels of the building have been designed to allow the site surrounds to flood whilst keeping the buildings ground floor above any potential flood waters. With flood models and levels provided by the EA up to the 1 in 100 year annual probability, with an additional 20% allowance for the impact of climate change, the applicants have exceeded this with the calculated impact of climate change

shown to 35%.

- 7.7.10 The EA has considered the submitted Flood Risk Assessment. It confirms that from the information it has reviewed that it appears that the scheme will offer compensation for the risk of flooding. The EA is satisfied with the flood risk compensation for fluvial flood risk and raises no objection to the proposal in this regard.

#### Sustainable drainage

- 7.7.11 Surrey County Council as the Lead Local Flood Authority have reviewed the surface water drainage strategy for the proposed development and assessed it against the requirements of the NPPF, its accompanying PPG and the Non-Statutory Technical Standards for sustainable drainage systems. Subject to the imposition of conditions to secure the submission, implementation and maintenance of an appropriate surface water drainage scheme it is satisfied that that the proposed surface water drainage scheme would meet the requirements set out in the submitted documents and the development would not increase surface water flood risk.
- 7.7.12 The Council's Drainage Officer has considered the proposals in detail. He is satisfied with the conclusions and measures within the Flood Risk Assessment and the proposed Floodplain compensation. He is also satisfied with the surface water drainage scheme, in principle, subject to further detail and minor design changes which may be dealt with by way of condition linked to the requirements of the Lead Local Flood Authority above.
- 7.7.13 Thames Water has confirmed that the Sewage Treatment Works (STW) has storm water storage built into its design. All flow enters the STW via the inlet works where preliminary screening is undertaken. In the event that the STW cannot process the quantity of flow entering the works it is then stored in Storm Tanks until such time that the flow can be processed. Furthermore, Thames Water raises no objection in respect of sewerage infrastructure.

### **7.8 The impact on adjoining and future occupiers of the development**

- 7.8.1 Policy DM9 (Design Principles) states that the amenities of the occupiers of the neighbouring properties should be respected by proposed development. The thrust of one of the core planning principles within the NPPF is that planning should always seek to secure a good standard of amenity for all existing and future occupants of land and buildings.
- 7.8.2 The main impacts in relation to adjoining and future occupiers are considered to be from noise arising from the development and odour from the adjoining STW and waste refuse facility which is identified for expansion. The closest noise sensitive receptor has been identified as the residential dwellings to the west in Blackwater at approximately 350 metres distance and the east in Camberley at approximately 390 metres distance.
- 7.8.3 The application is supported by an acoustics assessment report. This report identifies that the main noise sources associated with the development would be from delivery and collection vehicle movements and fixed plant and concludes by proposing noise limits for plant installations associated with the development. Environmental Health is satisfied with this approach. Subject to these levels being secured by way of condition no objection is raised to the proposal in this regard.
- 7.8.4 The applicant has submitted two odour reports, one relating to the adjoining waste receiving site and the other in respect of the adjacent sewage works. With regard to the adjoining waste receiving site, the report concludes that the source odour potential of the waste facility was considered to be small taking account of the nature and quantities of the materials received, the operational procedures adopted and the on and offsite sniffing assessments.

Given that the risk of odour exposure is assessed as negligible the impact of emissions from the waste facility on the development is unlikely to pose any significant risk of odour impact on future occupiers of the site.

7.8.5 With regard to the Camberley Sewage Treatment Works (STW) the report found that the largest individual contributor to odour emissions from the site as a whole was the residual sediment which was retained in the base of the rectangular storm tank, which accounted for 37% of emissions. The report identifies potential mitigation for the storm tank specifically the installation and commissioning of an effective cleaning system within the rectangular storm tank to ensure that the accumulation of residual sediment on the base of the tank after emptying is prevented.

7.8.6 Environmental Health notes that the odour impact assessment confirms that the development site will be affected by odours above an acceptable level over most of the site from the adjacent sewage treatment works. It is considered that subject to mitigation measures as set out above, and also to prevent the opening of any windows and provision of an alternative filtered fresh air supply into the building which may be secured by way of condition, in the event that planning permission were to be granted, no objection is raised to the proposal in respect of adjoining or future occupiers.

## **7.9 The impact on ecology**

7.9.1 The application is accompanied by an ecological impact assessment and bat surveys, the most recent of which was undertaken in October 2019. In respect of bats, badgers and birds appropriate mitigation is proposed. The assessment identifies that the main and residual impact of the proposed development would be the loss of broadleaved semi-natural woodland habitat on site. As set out above a landscape strategy is proposed for the site which includes wildlife friendly planting and the creation of wildlife refuges and logpiles. Subject to any further views received from Surrey Wildlife Trust on compensatory measures, this approach is considered to be acceptable and may be secured by way of condition.

7.9.5 Natural England has been consulted on this application, particularly in relation to the Blackwater Valley SSSI. No objection is raised subject to the imposition of conditions which secure a construction environmental management plan including in relation to runoff and sediment control, a SuDS Construction, Management and Monitoring Plan and the provision of oil interceptors within the car park and new access to the A331. Natural England also highlights that there may be opportunities, associated with the proposed drainage works, to deliver habitat enhancement on the site. These could be secured as part of a detailed enhancement strategy for the site by way of condition.

7.9.6 Surrey Wildlife Trust has been consulted in terms of general nature conservation issues. In the initial consultation response clarification was sought on the proposed compensatory landscaping and biodiversity gain specifically through the use of the DEFRA biodiversity matrix. This was submitted and identified a net loss of biodiversity on the site. To address this the applicants have agreed to provide off-site biodiversity offsetting. This could take the form of one of Thames Water's sites in the area or a financial contribution to a biodiversity offsetting organisation such as the Environment Bank. Surrey Wildlife Trust agree with this approach subject to such measures being appropriately secured by way of section 106 legal agreement. On this basis the scheme is acceptable in biodiversity terms.

## **7.10 Other matters**

7.10.1 The application site is part of a sewage treatment works. A ground investigation report has been submitted in support of the application. The Contaminated Land Officer has considered this submission and concludes that it is clear that there are contamination issues on the site and that management and remediation of the site is required. On this basis further investigation and characterisation is required to form a Remediation Action Plan and Material Management Plan to achieve an agreed remedial scheme followed by a

Verification of Remediation. These works may be achieved by way of condition and informative. Subject to this no objection is raised to the proposal in relation to contaminated land.

- 7.10.2 There was an existing telecommunications mast located within the site. The justification for the planning application for new telecommunications development at 6-8 Doman Road as set out above was that the development was required by Vodafone who operated the telecommunications mast at the sewage treatment works as this mast was due to be decommissioned and removed. The applicant has confirmed that the existing mast in the application has been decommissioned and removed from the site. On this basis no objection is raised to the proposal in respect of telecommunications infrastructure.
- 7.10.3 The Community Infrastructure Levy (CIL) Charging Schedule was adopted by Full Council on 16 July 2014. Given this, an assessment of CIL liability has been undertaken. Surrey Heath charges CIL on certain types of retail and/or residential development. As the proposal is for a B1/B8 use, it would not be CIL liable.
- 7.10.4 The application is supported by an archaeological desk based assessment and a Geo Technical report. The archaeological report concludes that there is a low risk that currently unknown buried archaeological remains will be physically impacted by the development. The technical report indicates that there are no extensive or thick deposits of peat surviving in situ within the alluvium layer across the site and notes that this layer has been disturbed over time with the introduction of modern pipes associated with the sewage treatment plant. The County Archaeologist is satisfied that it is unlikely that remains of archaeological interest will be impacted by this development and she raises no objection.
- 7.10.5 The application is supported by an energy strategy report which sets out the passive design and energy efficiency measures to be used in the development. The submitted BREEAM pre-assessment demonstrates that the development will achieve a BREEAM "Very Good" level. The submission of a verification report that confirms that this has been may be secured by way of condition.

## **8.0 POSITIVE/PROACTIVE WORKING**

- 8.1 In assessing this application, officers have worked with the applicant in a positive, creative and proactive manner consistent with the requirements of paragraphs 38-41 of the NPPF. This included the following:-
- 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 proactively communicated with the applicant through the process to advise progress, timescale or recommendation.

## **9.0 CONCLUSION**

- 9.1 The principle of the proposed development in this location is acceptable, given the employment retention/generation associated with the proposal and as it would clearly benefit from the proximity of access to the A331/A30/M3. It is also considered that no adverse harm upon the character of the surrounding area would arise, including the setting of the Blackwater River nor the coalescence of Camberley and Blackwater. Appropriate measures may be secured to ensure any potential impacts on adjoining or future occupiers may be mitigated. The proposal has the support of the County Highway Authority and Lead Local Flood Authority and the Council's Scientific, Drainage and Arboricultural Officers. The proposal also has the support of Natural England and the SWT subject to a legal agreement to secure biodiversity offsetting. Whilst the EA is satisfied with the submitted Flood Risk Assessment it raises an in principle objection to the development as it would be located within Flood Zone 3b. In the officer's opinion the development's siting within the functional

floodplain is fatal to the application and permitting development here would go against the government's advice. The application is therefore recommended for refusal.

## **10.0 RECOMMENDATION**

REFUSE for the following reason:

1. A significant part of the site lies within the functional floodplain (Flood Zone 3b) where development should not be permitted unless it is categorised as essential infrastructure or water compatible. The proposal's flood risk vulnerability category (i.e. less vulnerable development) is therefore not appropriate development being contrary to Policy DM10 of the Surrey Heath Core Strategy and Development Management Policies 2012, the National Planning Policy Framework and its associated planning practice guidance.