

LOCATION:	Land East Of Penny Cottage, Bagshot Road, Chobham, Woking, Surrey, GU24 8SJ,
PROPOSAL:	Creation of a 2 pitch Gypsy/Traveller site comprising the siting of 1 mobile home and 1 touring caravan per pitch and associated works and access.
TYPE:	Full Planning Application
APPLICANT:	Mr. J Robb
OFFICER:	Mr Duncan Carty

The application would normally be determined under delegated authority. However, the application has been called-in by Councillor Graham Alleway.

RECOMMENDATION: REFUSE

1.0 SUMMARY

- 1.1 This planning application relates to the retrospective provision of a two pitch gypsy/traveller site comprising the siting of 1 no mobile home and 1 no touring caravan on each pitch. Two accesses onto Bagshot Road and the provision of associated hardstanding for these accesses and use of land are also proposed. The application site is a former field, located in the Green Belt, and lies between Penny Cottage and Maltmans, fronting onto Bagshot Road.
- 1.2 The proposal is considered to be inappropriate development in the Green Belt, by definition, with an adverse impact on openness. The proposal would also have an adverse visual impact on rural character and streetscene; and would harm the setting of nearby listed buildings. It is not considered the matters presented amount to very special circumstances which clearly outweigh the identified harm. In addition, the provision of a contribution towards SAMM measures has not been secured and the proposal would therefore have an adverse impact on the SPA. The application is recommended for refusal.

2.0 SITE DESCRIPTION

- 2.1 The application site is a former field fronting onto Bagshot Road and located in the Green Belt. The site lies between Penny Cottage and Maltmans and opposite Brook Place. The land is open to the rear. The site is screened by trees to the flank boundaries and previously screened to the road by a series of Cypress trees to the front boundary (now removed). Penny Cottage and Maltmans are Grade II listed properties; and Brook Place is a Grade II* listed property.

3.0 RELEVANT HISTORY

The relevant planning site history includes the following:

- 3.1 SU/18/0504 – Erection of a four bedroom, two storey dwelling with associated landscaping and vehicle parking.

Refused permission in September 2018.

- 3.2 SU/18/1094 – Erection of a five bedroom, two storey dwelling, detached garage, provision of access and landscaping.

Refused permission in March 2019 and the subsequent appeal was dismissed in February 2020.

- 3.3 ENF/20/0069 – Unauthorised provision of a two pitch gypsy/traveller site.

This relates to the current proposal and has been the subject of Court proceedings (currently adjourned).

Other relevant planning history includes the following:

- 3.4 19/2074/FFU – Proposed gypsy/traveller site (two pitches) comprising the siting of two mobile homes, two touring caravans, the erection of two dayrooms, hardstanding and landscaping (part retrospective) on land south of M3, Guildford Road, Lightwater.

This application is also for the benefit of some of those who would benefit from this application proposal and is being reported elsewhere on this agenda.

4.0 THE PROPOSAL

- 4.1 The application proposal is to seek retrospective permission for the provision of a two pitch gypsy/traveller site comprising the siting of 1 no mobile home and 1 no touring caravan on each pitch. Two accesses onto Bagshot Road and the provision of associated hardstanding for these accesses and use of land are also proposed to be retained. As indicated above, a row of Cypress trees to the front boundary have been removed with five-bar gates and three-bar fencing provided to the front boundary of the site. Security lighting has also been provided.

- 4.2 The current proposal is to be provided for Mr J. Robb and four children (including one grown-up daughter) in one pitch and Mr T. Robb (son of Mr J Robb) and Mrs K. Robb with Ms S. Rooney (cousin of Mr T. Robb) with four children in the second pitch who are currently located at this site. This provision is for an extended family beyond the gypsy pitch proposal under application 19/2074/FFU which is proposed to provide two pitches for Mr T. Robb (son of Mr J Robb) and Mrs K. Robb with Ms S. Rooney (cousin of Mr T. Robb) and four children.

- 4.3 It has been confirmed that Mr J. Robb and Mr T. Robb undertake landscaping work around the South East and the Midlands obtaining work by word of mouth or by door knocking. They occasionally work together. When travelling, they lead a roadside existence or, when they can, stopping at relatives' sites. In a typical year they are away travelling for four to six months.

5.0 CONSULTATION RESPONSES

- 5.1 County Highway Authority Details of access visibility and confirmation that the public footpath will not be affected are required. Each of the proposed dwellings should be provided with a fast-charge electric vehicle charging point.
- 5.2 Environmental Health No details of how water is to be supplied or waste/effluent is to be disposed of. There is a risk of land contamination from the laying of hardstanding. There is concern about commercial, industrial and trade use on the site, for which conditions would be necessary. No objections are raised, subject to conditions.

5.3	Waste & Recycling Service	If the site is permanent and residents paying council tax, then they are entitled to the use of household waste and recycling collection service. As such, each property will need to be provided with its own set of waste and recycling bins.
5.4	SCC Countryside Officer	No comments received to date.
5.5	Chobham Parish Council	An objection is raised. Development is inappropriate development for which no very special circumstances have been demonstrated. It conflicts with the purposes of the Green Belt, provides ineffective use of land outside settlements, has poor accessibility to public transport, pedestrian networks and facilities for day to day needs, unneighbourly development to local residents, it has not demonstrated that the it would not compromise traffic management and highway safety, impact on public footpath and harmful to setting of listed buildings.

6.0 REPRESENTATION

6.1 At the time of preparation of this report no letters of representation in support have been received and 24 representations, including a representation from Chobham Society, raising an objection have been received raising the following issues:

6.2 *Local Character, Green Belt and setting of listed buildings [See paragraphs 7.3, 7.4 and 7.5]*

- Out of keeping with the character of the area
- Impact on setting of listed buildings
- Such uses are not appropriate in the Green Belt or countryside
- Reduce the character of surrounding properties
- Development too high
- Over development
- Does not constitute limited infilling as the site is located outside of a defined village and would result in urban sprawl and merging of neighbouring towns and villages (which the NPPF seeks to prevent) - Inspector [for appeal for refusal SU/18/1094] indicated that there was a broken linear pattern of development between Chobham and West End
- Inappropriate development and harmful to the Green Belt
- Site is in clear view of Bagshot Road (contrary to indications in the application submission)
- Site obstructs views for the south (contrary to indications in the application submission)
- Trees shown on drawings have been cut down
- Impact from the raising of land by importation of hardcore/gravel [*Officer comment: It is not considered that there has been any significant land raising resulting from the laying of the hardstanding*]
- Impact from security lighting/posts
- Proposal does not enhance the historic environment
- Conflict with local plan
- Merging of settlements (West End and Chobham)
- Encroachment on the Green Belt
- An attempt to establish residential use on the site
- Degradation of the site from green to brown field

6.3 *Residential amenity [See paragraph 7.6]*

- Increase in pollution

6.4 Highway safety [See paragraph 7.7]

- Site accesses are on a bend in the road and very dangerous
- Inadequate access
- Traffic or highways impact
- Increase in traffic
- Increase in traffic since local housing developments have been built
- Limited visibility on highway in this area has caused several serious road accidents
- Impact on public footpath which runs across the site (not shown on drawings)
- Access to the site by motorcycles, vans, trucks, trailers and heavy goods vehicles
- Accesses to the site are not correctly shown on the [proposed] site plan [*Officer comment: The application is to be determined on the basis of the application submission*]
- Road traffic offences under the Road Traffic Act resulting in safety risk

6.5 Other issues

- Additional traveller site is not justified with other sites nearby [See paragraph 7.4]
- Retrospective nature of proposal [*Officer comment: This would not be a reason, in itself, to refuse this application*]
- General dislike of proposal [*Officer comment: There is no explanation as to this impact*]
- No enough information provided with the application [*Officer comment: There is explanation why they consider that insufficient information has been provided*]
- Anti-social behaviour (regarding disposal of rubbish/mess) [*Officer comment: This would not be a reason, in itself, to refuse this application*]
- Affecting local geology [*Officer comment: There is no explanation as to how the proposal results in this impact*]
- Application is illegal [*Officer comment: The retrospective nature of this proposal would make it, in itself, an illegal proposal*]
- Attempt to circumvent Green Belt legislation [*Officer comment: This would not be a reason, in itself, to warrant the refusal of this application*]
- Reduce the value of surrounding properties [*Officer comment: This is not a material consideration*]
- No previous permanent structures on the site [*Officer comment: This point is noted*]
- Speculative development made for profit [*Officer comment: This is not a material consideration*]
- Unlawful connections of water, electricity and sewage [*Officer comment: This is a matter for the utilities companies concerned*]
- Site cleared soon after appeal decision was issued [*Officer comment: This point is noted*]
- Land should be restored to paddock and the hardstanding removed [*Officer comment: This point relates to enforcement matters*]
- Dangerous precedent for other Green Belt land with road access onto Bagshot Road [*Officer comments: Each application is determined on its own merits*]
- Deed restrictions on the stationing of caravans [*Officer comment: This is not a material planning consideration*]

7.0 PLANNING CONSIDERATION

7.1 The application site lies in the Green Belt. The proposal is to be assessed against the National Planning Policy Framework (NPPF) and its associated Planning Practice Guidance (PPG); as well as Policies CP1, CP2, CP11, CP14, DM6, DM9, DM11 and DM17 of the Surrey Heath Core Strategy and Development Management Policies 2012 (CSDMP); and Policy NRM6 of the South East Plan 2009 (as saved) (SEP); Circular 01/2006 Planning for

Gypsy and Traveller Sites; PPS on Green Belt Protection and Intentional Unauthorised Development 2015 (GBPUID); Planning Policy for Traveller Sites 2015 (PPTS); and the Surrey Heath Gypsy and Traveller Accommodation Assessment 2018 (GTAA). In addition, advice in the residential Design Guide SPD 2017 (RDG); and the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD 2019 (TBHSPD) are relevant.

7.2 The main issues in the consideration of this application are:

- Impact on the Green Belt;
- Very special circumstances to support the proposal;
- Impact on rural character and setting of listed buildings;
- The suitability of the site for Gypsy and Traveller accommodation;
- Impact on residential amenity;
- Impact on highway safety;
- Impact on the Thames Basin Heaths Special Protection Area; and
- Other matters.

7.3 Impact on the Green Belt

7.3.1 Paragraph 133 of the NPPF indicates that fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

7.3.2 Paragraph 146(g) of the NPPF indicates that certain other forms of development including material changes of use of land are not inappropriate where they preserve the openness of the Green Belt and do not conflict with the purposes of the green Belt. In this case, the proposal relates to a material change of use. Paragraph 16 of the PPTS also indicates that traveller sites (temporary or permanent) in the Green Belt are inappropriate development.

7.3.3 Paragraph 146(e) of the NPPF indicates that limited infilling in villages is also not inappropriate development in the Green Belt. Recent case law has also confirmed that village boundaries, in this context, are not necessarily as defined in local plans and can extend beyond such boundaries where there is continuous development. Whilst the site lies within a gap within a line of residential properties, it is considered that this line of development is not physically connected to the nearby defined village of West End and therefore the proposal does not represent infilling within a village. The Inspector in his appeal decision for SU/18/1094 for this site also came to this conclusion (a copy of this appeal decision is provided at Annex 1 to this report) that the development of this site does not represent infilling within a village and is therefore inappropriate development.

7.3.4 Case law has established that the concept of openness is open textured and has a spatial and visual aspect. Openness can, by definition, mean the absence of development, irrespective of the visibility of the appeal site from vantage points. When compared to the previous use and undeveloped appearance of this of land, the change that has occurred is very much appreciable. In spatial terms, the proposal has provided an increase in development, particularly in terms of volume and floorspace of the mobile homes, which are key indicators of an increase in impact on the openness of the Green Belt. In visual terms, the stationing of the mobile homes (and tourer caravans) and the provision of hardstanding has an adverse visual impact on the openness of the site.

7.3.5 It is therefore considered that the proposal would be inappropriate development, by definition, with an adverse spatial and visual impact on the openness of the Green Belt.

7.4 Very special circumstances to support the proposal

7.4.1 Paragraphs 143 and 144 of the NPPF indicate that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the potential harm to the Green Belt, by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

7.4.2 Paragraph 24 of the PPTS indicates that local planning authorities should consider the following issues amongst relevant matters when considering planning applications for traveller sites:

- (a) The existing level of provision and need for sites;
- (b) The availability (or lack) of alternative accommodation for the applicants;
- (c) Other personal circumstances of the applicant;
- (d) That the locally specified criteria used to guide allocation of sites in plans or which form the policy where there is no identified need for pitches/plots should be used to assess applications that may come forward on unallocated sites; and
- (e) That they should determine applications from sites from any travellers and not just those with a local connection.

7.4.3 Paragraph 26 of the PPTS indicates that when considering applications, local planning authorities should attach weight to the effective use of previously developed land (or untidy or derelict land), sites being well planned or soft landscaped in such a way to positively enhance the environment and increase its openness; promoting healthy lifestyles, such as adequate landscaping and play areas for children; and not enclosing a site that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community.

7.4.4 The applicant has put forward very special circumstances to support this proposal which relate to:

- The modest and low scale nature of the proposal, whose impact can be mitigated by landscaping;
- The need to provide a permanent site for the family group who had been forced into a roadside existence following the Injunction which prevented such occupation of an alternative site in Lightwater, which is now the subject of a planning application being reported elsewhere on this Agenda (see Paragraph 3.4 above); and
- The contribution that the site can make to assist the Council in meeting the unmet need for gypsy/traveller accommodation in the Borough.

The modest and low scale nature of the proposal

7.4.5 The proposal provides mobile homes and hardstanding and associated works/tourer caravans which has an urbanising impact, when compared to the previous use. The utilitarian appearance of the mobile homes and the extent of hardstanding, visible from Bagshot Road, has an adverse visual impact on the local, rural character and streetscene. This detracts from the setting of the listed buildings, particularly currently to Brook Place

which lies opposite the site from which there are clear views of the development. The more limited height and scale of the mobile homes/tourer caravans, when compared with nearby residential properties, would not outweigh the identified harm to the Green Belt (and other harm) outlined above.

- 7.4.6 The applicant has offered to provide soft landscaping to mitigate the impact of the proposal. However, conditions that could be imposed to mitigate any harm would only protect for a limited period (5 years) so that such landscaping would become established, but this would not protect this landscaping in the long term. Whilst significant landscaping is provided to the flank boundaries, this landscaping, in a similar manner, would also not provide visual mitigation in the long term. In addition, the proposed development results in by definition harm to the Green Belt and further harm to the openness, as identified above, which, in itself, could not be mitigated by landscaping. It is therefore considered that this benefit can only be afforded very limited weight.

The need to provide a permanent site for the family group

- 7.4.7 The applicant has indicated that there is a need for his family members to reside in mobile home accommodation and for the family to remain together. The provision on this pitch is interrelated to the provision at the Lightwater site (under application 19/2074/FFU being reported elsewhere on this Agenda). Following an injunction imposed at that site, the current occupiers of the application site had moved from this previous site to avoid roadside existence. The family have links to this area, with children schooled in local schools. There are two children who also have special needs and it would be in the best interests of the child for the family group to remain together in the local area. However, with support for the proposal at Lightwater (elsewhere on this Agenda), the current site would not be required for this family group. As such, it is considered that on this basis the proposal would not be required and can only be afforded more limited weight.

The unmet need for gypsy/traveller accommodation

- 7.4.8 Paragraph 16 of the PPTS indicates that, subject to the best interests of the child, personal circumstances and unmet need are unlikely to outweigh harm to the Green Belt and any other harm to establish very special circumstances. In addition, the GBPDIUD indicates that intentional unauthorised development is a material consideration in the assessment of developments.
- 7.4.9 The GTAA sets out the unmet need for gypsy and traveller provision within the Borough. It confirms the need for 12 additional pitches within the borough over the GTAA period (up to 2032); with a need for the provision of 9 pitches required by 2022. There have been no gypsy pitches approved or due to be provided to meet this need. The fact that this need is not being met would mean that the current proposal would provide a benefit in reducing this unmet need within the Borough. It is also known that there are no vacant pitches in the Borough and the existing sites are overcrowded.
- 7.4.10 Annex 1 of the PPTS indicates that for the purposes of that planning policy, gypsies and travellers are defined as persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' education or health needs or old age have ceased to travel temporarily. As indicated in Paragraph 4.3 above, members of the family group undertake work which requires typically between four and six months of a calendar year travelling. It is therefore considered that the family group have gypsy/traveller status under the PPTS.
- 7.4.11 The interrelationship of this proposal with the proposed traveller site in Lightwater is set out in Paragraph 7.4.7 above. With this site being supported elsewhere on this Agenda, the need to provide this accommodation at this application site is diminished. The unmet need for such sites should be afforded significant weight. However, in this case with alternative

accommodation proposed elsewhere, the weight that can be afforded is more limited. It is clear that for the reasons set out elsewhere in this report, that the application site is not a suitable location for such development.

Conclusion

- 7.4.12 The current proposal is considered to be inappropriate development in principle for which it is considered there are no very special circumstances sufficient to outweigh the resulting harm. As such, the proposal fails to comply with Policies CP1, DM3 and DM9 of the CSDMP; the PPTS; and the NPPF.

7.5 Impact on rural character and the setting of listed buildings

- 7.5.1 Policy DM9 of the CSDMP indicates that development will be acceptable where it respects and enhances the local, natural or historic character of the environment. Policy DM17 of the CSDMP indicates that development which affects any heritage asset should seek to promote the conservation and enhancement of the asset and its setting.

- 7.5.2 The stationing of the mobile homes (and tourer caravans), which are utilitarian in appearance, and the provision of hardstanding has an urbanising impact which is harmful to rural character and, being clearly visible from Bagshot Road, the streetscene.

- 7.5.3 The adjacent properties to each flank, and the property opposite the site, are listed buildings; including the Grade II listed building, Penny Cottage, to the west flank, the Grade II listed building, Maltmans, to the east flank and the Grade II* listed property, Brook Place on the south side of Bagshot Road opposite the site.

- 7.5.4 In considering the appeal at this site under refused application SU/18/1094, the Inspector considered the impact of a house on this site in relation to these listed buildings. The Inspector considered that the heavy screening to Penny Cottage (and a modern garage extension to this property) would reduce the impact on this listed building. It is considered that the current proposal would have no materially greater impact on this listed building. However, the Inspector considered that the appeal development would have an adverse impact on Maltmans due to the resulting urbanisation of the application site. In addition, the Inspector considered that the removal of trees to the (front) site boundary and the appeal development would erode the rural setting of Brook Place. The proposal, although materially different from the current proposal, would have similar effects. The proposal provides a form of development, with the mobile homes/tourer caravans and hardstanding, which is utilitarian in appearance and has an urbanising impact at odds with, and detracting from, the setting of these listed buildings.

- 7.5.5 It is therefore considered that the proposal would have an adverse visual impact on the rural character and the setting of listed buildings, failing to comply with Policies DM9 and DM17 of the CSDMP and the NPPF.

7.6 The suitability of the site for Gypsy and Traveller accommodation

- 7.6.1 Policy DM6 of the CSDMP advises that gypsy and traveller sites should be accessible to public transport, cycling and pedestrian networks and facilities for the day to day needs of the occupants including education, healthcare and shopping. This policy also indicates that very special circumstances, which clearly outweigh the identified harm, would need to be applied to such accommodation in the Green Belt. The site is located between the nearest settlements of West End and Chobham, but is located on the main road with bus services and local services nearby. Whilst this is acknowledged the site falls within the Green Belt (for which very special circumstances do not exist to outweigh the harm), as acknowledged in Paragraphs 7.4 and 7.5 above, and therefore does not comply with Policy DM6 of the CSDMP.

7.7 Impact on residential amenity

- 7.7.1 Policy DM9 of the CSDMP requires development to pay regard to the residential amenity of neighbouring property and uses. Principle 6.4 of the RDG indicates that housing development should seek to achieve the highest possible density possible without adversely impacting on the amenity of neighbours and residents.
- 7.7.2 The proposed pitches are set about 15 and about 37 metres from the dwellings Penny Cottage and Maltmans, respectively. Noting this level of separation and the mature vegetation to these flank boundaries, no material adverse impact on the amenity of the occupiers of these dwellings is envisaged. The proposal is set sufficient distance from any other residential property to have any significant impact.
- 7.7.3 The Environmental Health Officer has confirmed that the importation of hardcore/gravel to provide hardstanding may have introduced contamination to the site. However, these matters can be considered through conditions, if minded to approve this application. Adequate land is provided with the proposal to provide private amenity space for the residents.
- 7.7.4 As such, the proposal is considered to be acceptable in residential amenity terms, complying in this regard with Policy DM9 of the CSDMP and the RDG.

7.8 Impact on highway safety

- 7.8.1 Policy DM11 of the CSDMP 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 imposed and that all developments should ensure safe and well-designed vehicular access and egress are provided. Policy CP11 of the CSDP indicates that all new development should be appropriately located in relation to public transport and the highway network and comply with car parking standards.
- 7.8.2 The current proposal allocates two parking spaces per pitch but provides a greater area of hardstanding which could be utilised for vehicle parking and as such meets the car parking standards.
- 7.8.3 The County Highway Authority has raised concerns about the access arrangements at the site with minimum requirements for visibility at the access points onto the highway. The Authority has raised an objection that it has not been demonstrated that adequate site visibility can be achieved at the site accesses. The site lies on the inside of a bend in the road which has a maximum speed limit of 40mph. There is concern regarding the safety of traffic movements on and off this road, particularly where adequate site visibility has not been demonstrated.
- 7.8.4 It is considered that it has not been satisfactorily demonstrated that the proposal would not have an adverse impact on highway safety and the proposal fails to comply with Policies CP11 and DM11 of the CSDMP and the NPPF.

7.9 Impact on the Thames Basin Heaths Special Protection Area

- 7.9.1 Policy CP14 of the CSDMP indicates that the Council will only permit development where it is satisfied that this will not give rise to likely significant adverse effect upon the integrity of the Thames Basin Heaths Special Protection Area (SPA). This requirement is also reflected in Policy NRM6 of the SEP and the NPPF. New (net) development between 400 metres and 5 kilometres of the SPA, such as the application site, should provide contributions to mitigate any impact on the SPA.

7.9.2 This will need to be secured prior to determination of the application, based on the likely level of primary residential occupation. An addendum update will be provided. However, with these contributions not secured, the proposal would not comply with the requirements of Policy CP14 of the CSDMP, Policy NRM6 of the SEP, the NPPF and guidance within the TBHSPA.

7.10 Other matters

7.10.1 The proposal falls within an area of low flood risk (Zone 1 as defined by the Environment Agency), As such, the proposal is considered to be acceptable on flood risk grounds. The Environmental Health Officer has advised that although the site was unlikely to have any historic land contamination, the importation of material to provide hardstanding may have introduced contamination into the site. It is considered that such matters could be considered by condition, if minded to approve this proposal.

7.10.2 As such, no objections are raised on flood risk or land contamination grounds with the proposal complying with Policy DM10 of the CSDMP and the NPPF.

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 1 or more of 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 current proposal is considered to be inappropriate development, by definition, with an adverse impact on openness for which it is considered there are no very special circumstances which exist sufficient to clearly outweigh this harm, and the other identified harm including the harm to the rural character, the streetscene and the setting of listed buildings.

9.2 It has not been demonstrated that the proposal would not have an adverse impact on highway safety. Contributions towards SAMM have not been secured and the proposal has an adverse impact upon the integrity of the SPA. The application is recommended for refusal.

10.0 RECOMMENDATION

REFUSE for the following reasons:

1. The proposal, by reason of the proposed development and the size of the mobile homes stationed on the site and the hardstanding and associated visual impact, would be, by definition, inappropriate and harmful development which: a) fails to preserve the openness of the Green Belt; and, b) have a detrimental urbanising impact, harmful to the rural character of the area, the streetscene and the setting of listed buildings. There are no very special circumstances sufficient to outweigh this harm (and the harm identified in reasons 2 and 3 below) and the proposal would be contrary to Policies CP1, DM6, DM9 and DM17 of the Surrey Heath Core Strategy and Development Management Policies 2012; the Planning Policy for Traveller Sites 2015 and the National Planning Policy Framework.

2. The proposed development would lead to an intensification in vehicular movements to and from the proposed access to Bagshot Road where it has not been demonstrated that sufficient visibility can be achieved. This could lead to conditions prejudicial to highway safety contrary to Policies CP11 and DM11 of the Surrey Heath Core Strategy and Development Management policies 2012 and the National Planning Policy Framework.
3. In the absence of a payment or a completed legal agreement under section 106 of the Town and Country Planning Act 1990, the applicant has failed to comply with Policy CP14B (vi) (European Sites) of the Surrey Heath Core Strategy and Development Management Policies Document 2012 and Policy NRM6 (Thames Basin Heath Special Protection Area) of the South East Plan 2009 (as saved) in relation to the provision of contribution towards Strategic Access Management and Monitoring (SAMM) measures, in accordance with the requirements of the Surrey Heath Borough Council's Thames Basin Heaths Special Protection Area Avoidance Strategy Supplementary Planning Document 2019.