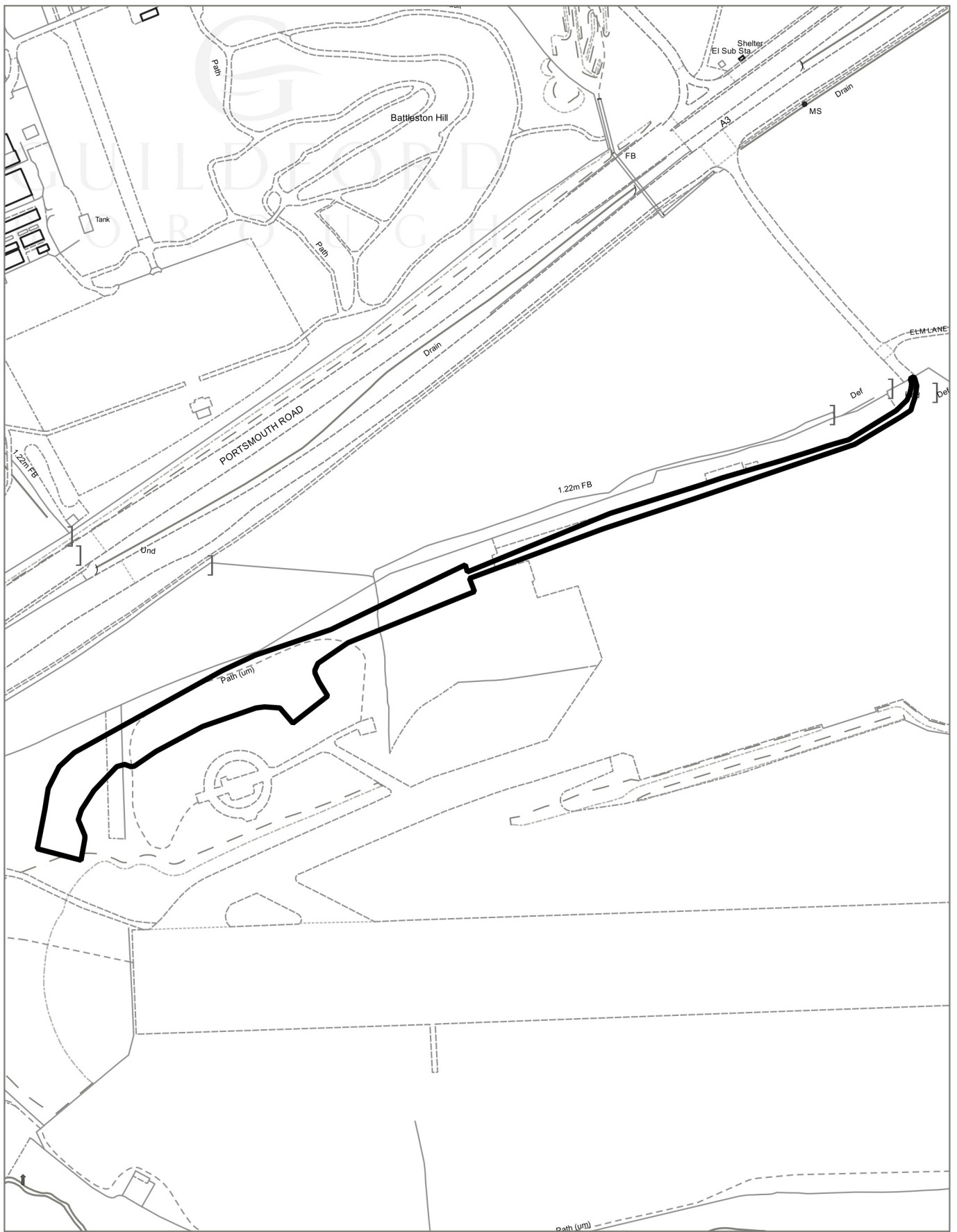


20/P/01708 - Land At Wisley Airfield, Hatch Lane, Ockham



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This map is for identification purposes only and should
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Print Date: 17/11/2021

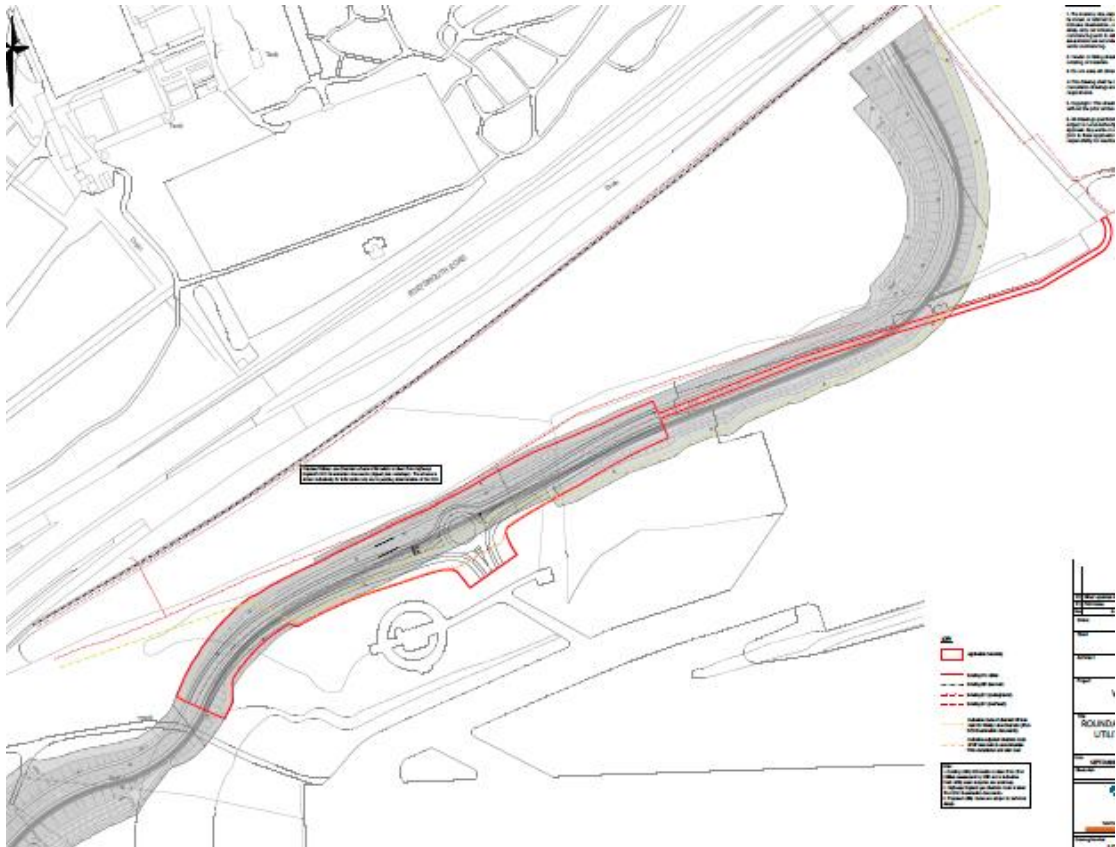


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GUILD FORD
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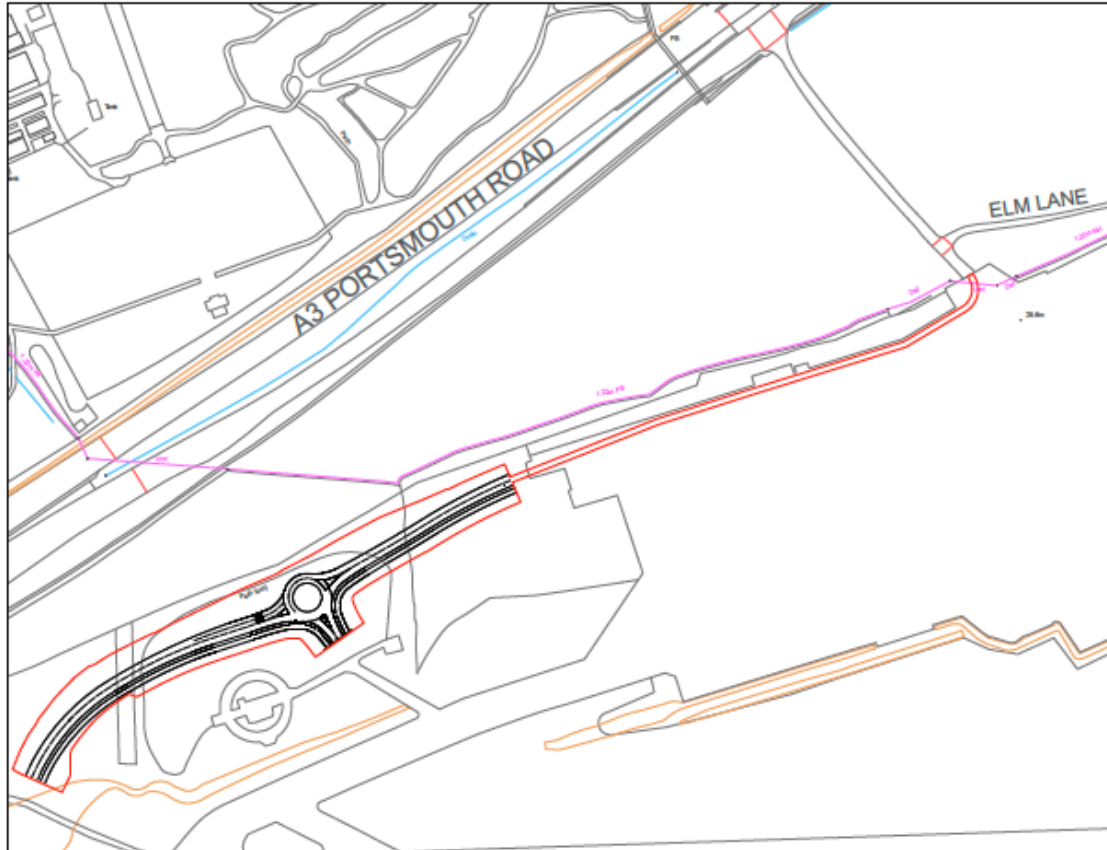
21P01708 Land at Wisley Airfield Hatch Lane GU23 6NU



Not to scale



20/P/01708 Land at Wisley Airfield Hatch Lane, Ockham GU23 6NU



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App No: 20/P/01708
Appn Type: Full Application
Case Officer: Hannah Yates

8 Wk Deadline: 18/06/2021

Parish: Wisley
Agent : Miss Beckett
Savills
244-246 High Street
Guildford
GU1 3JF

Ward: Lovelace
Applicant: Camille Soor
Taylor Wimpey UK Limited
20 Air Street
London
W1B 5AN

Location: Land at Wisley Airfield, Hatch Lane, Ockham, GU23 6NU
Proposal: Detailed application for engineering operations to form a new roundabout and stub road.

Update following deferral

Members may recall that this application was heard at planning committee in May this year where it was resolved to defer the application until after 12 November 2021, until a decision had been made on the M25 /A3 Junction 10 works Development Consent Order (DCO). Since that deferral by Members, the applicant has followed two strategies, namely lodging an appeal against non-determination on this application, and also by submitting a new application for a very similar, near duplicate development, which appears as a separate item on this agenda. Should the duplicate application be approved the applicant has advised that they would be minded to withdraw the current appeal.

On 21 October 2021, a Ministerial Statement was laid in Parliament which stated the deadline for the DCO decision is now extended until 12 May 2022 to allow for further consideration of environmental matters. This is the third delay to this decision, and the DCO remains undetermined at the time this appeal scheme is being brought back to committee.

Whilst there has been a further delay on the DCO decision, the application needs to be referred back to Committee as an appeal against non-determination has been submitted by the applicant. The Planning Inspectorate confirmed the appeal was valid on 20 August 2021, however a start date is yet to be issued as the Inspectorate are waiting for a suitable Planning Inspector to become available. The start letter could be issued at any time, and therefore Members need to confirm what their decision would have been on the proposal (had it not been appealed for non-determination) as soon as possible, to ensure the Council's Statement of Case can be prepared in line with the timescales dictated by the Planning Inspectorate.

Although the DCO decision has been delayed again by the Government, Officers remain of the view (as expressed in the May Committee Report) that the proposal is capable of support subject to a Grampian condition. As such, had the Council retained the right to determine this application, the recommendation would have remained as an approval subject to conditions.

The original officer report as sent to committee in May is found below in the Officer report section.

Updates contained on the late sheets for the May committee meeting - all as written on 20/05/2021

Minor amendments to the wording of conditions 2, 4, 7, 9, 18, 19 and 20 as follows:

2. The development hereby permitted shall be carried out in accordance with the following approved plans: Stub Road Location Plan ref.1350-2-153 and Stub Road Red Line plan- Elm Lane One Way-Southern Roundabout ref. 1350-2-152 Rev D received on 08/10/2020 and Wider Site Location Plan ref. 1350-2-186 Rev A received on 13/05/2021.

Reason: To ensure that the development is carried out in accordance with the approved plans and in the interests of proper planning.

Reason for change: Additional plan containing a blue line highlighting other land in the applicant's ownership.

4. No development shall take place until (a) the Highways England Investment Strategy (RIS) improvement to M25 Junction 10/A3 Wisley Interchange Development Consent Order (DCO) has been granted and (b) written confirmation has been obtained from the Local Planning Authority (in consultation with Highways England and Surrey County Council) that the relevant part of the DCO, being the Wisley Lane Diversion, has been implemented/commenced on site.

Reason: The proposed development is only acceptable as part of the diverted Wisley Lane.

Reason for change: Tightening of the wording to provide better clarity.

7. No development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the Planning Authority. This should include further investigation regarding the significance of the historic Wisley and Ockham Parish Boundary. Development shall then take place in accordance with the approved Written Scheme of Investigation.

Reason: To allow adequate archaeological investigation. It is considered necessary for this to be a pre-commencement condition to allow the investigation to take place before any archaeological remains are disturbed by the approved development.

Reason for change: To make clear the works required for the historic boundary.

9. Prior to the first use of the development hereby approved, a verification report carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority. This must demonstrate that the drainage system has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls).

Reason: To ensure the Drainage System is designed to the National Non Statutory Technical Standards for SuDS.

Reason for change: Correction of error relating to occupation of development.

18. Prior to commencement of development, the applicant must submit the following to the Local Planning Authority for its written approval:

(a) a method statement for identification of land contamination including removal of material containing asbestos from site, quantification of loose fibres in soil and a detailed remediation scheme

(b) the approved remediation scheme must be carried out in accordance with its terms unless otherwise agreed in writing by the Local Planning Authority. Following the completion of approved remediation measures identified in the scheme, a verification report must be submitted to the Local Planning Authority for approval in writing. This verification report must provide documented evidence of the remediation work carried out on site.

If monitoring of air borne asbestos fibres during the earthworks is identified as one of the control measures, this must be appended to the verification report on completion along with monitoring data and measures employed to control air borne asbestos fibres on site/at site boundaries.

Reason: To ensure that risks from land contamination to neighbouring land and future users of the land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors. It is considered necessary for this to be a pre-commencement condition because the how asbestos is dealt with needs to be agreed prior to development commencing.

Reason for change: To make clear the scope of the method statement and to address a typo.

19. In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation must be carried out to identify the extent, scale and nature of contamination, and where necessary a remediation scheme must be prepared to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, and other sensitive receptors and is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with condition 18.

Reason: To ensure that risks from land contamination to neighbouring land and future users of the land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

Reason for change: To address typo and link to condition 18, rather than 17.

Update in relation to the Highways England Investment Strategy relating to the M25 Junction 10 and the A3 Wisley Interchange Development Consent Order:

A Ministerial Statement was laid in Parliament on the 12th May which stated "The deadline for the decision is to be further extended to 12 November 2021 (an extension of 6 months) to allow further consideration of environmental matters."

[Officer note: This was taken into consideration prior to the item being confirmed on the agenda for this meeting. It is considered that the delay to the DCO does not affect the ability to determine the application now. It is still reasonable to impose a Grampian condition in the terms proposed on the basis that there is a prospect of the DCO coming forward and being approved.

This is on the basis that it is being promoted by Highways England, itself a public authority, in the public interest who must regard there being a material prospect of the DCO being granted]

Summary of a new objection received from Planning Works on behalf of the Royal Horticultural Society Garden Wisley (RHS):

- The RHS believe that the determination of the application at this point in time cannot be sound because of the delay to the M25 J10 DCO decision due on the 12th May.
- The Committee Report is predicated on the basis that the Highways England DCO order relating to the M25 junction 10/A3 Wisley interchange (including the Wisley Lane Diversion) would have been confirmed on the 12th May 2021. It is therefore now out of date.[Officer note: The report was written prior to the decision to extend the deadline on a decision on the DCO, however, further extension to the deadline was always a possibility that was taken into account when writing the report. The decision to continue to take the application to committee was made after the delay on the DCO was announced as it is considered that the Grampian condition provides adequate protection]
- The rationale for the application determination at this point in time- one of timing and procurement - has gone.
- This issue of timing alone should be sufficient in its own right to seek a deferral of the application at this point in time.
- The Grampian condition cannot be reasonable in these circumstances since it is reliant on a decision yet to be taken.
- It is very unusual for a DCO decision to have been delayed twice, which must cast doubt on the likelihood of it being approved.
- The Committee cannot reasonably consider the proposed conditions without having sight of any highway modelling for the outline planning application for the entire FWA site.
- The roundabout and stub road configuration are not based on the most up-to date TW highway modelling. [Officer note: SCC as Highway Authority are happy with the traffic modelling exercise undertaken, which sought to demonstrate that the proposed roundabout can satisfactorily accommodate traffic movements associated with the DCO scheme, and the future potential for traffic flows associated with adjacent site allocation]
- The application proposals may not be fit for purpose.
- A holistic approach to the delivery of the FWA proposals to include the roundabout/stub road proposals in the application due to be submitted in June 2021 would align with the (current) DCO decision date in November 2021 and be based on the most up to date highway modelling

Speakers addressing the May committee

Prior to consideration of this application in May, the following persons addressed the Committee:

Mr David Alexander (on behalf of the Royal Horticultural Society) (to object);
Ms Imogen Jamieson (Ockham Parish Council) (to object) and;
Mr Antonis Pazourou (Taylor Wimpey) (in support)

Executive Summary

Reason for referral

This application has been referred to the Planning Committee because more than 20 letters of objection have been received, contrary to the Officer's recommendation.

Key information

The application site sits to the north west of the Former Wisley Airfield (FWA), also known locally as Three Farms Meadow. The application site sits partly within and partly outside of the Local Plan allocated site A35, which is proposed to deliver a new settlement of approximately 2,000 dwellings and associated uses. However, the whole site is within the area inset from the Green Belt.

The site is solely within Flood Zone 1, however a very small area of the site around the access point from Elm Lane suffers from surface water flooding, as defined on the EA surface water mapping (1 in 30, 100 and 1000 years). The application site also contains part of the Wisley Airfield Site of Nature Conservation Importance (SNCI).

At its closest point (the access onto Elm Lane), the site is located approximately 175m from the Thames Basin Heaths Special Protection Area and Ockham and Wisley Commons Site of Special Scientific Interest (SSSI). The Ockham and Wisley Local Nature Reserve (LNR) covers the area designated as SSSI, and also extends southwards beyond the SSSI, directly adjacent to the site running along the north western boundary. This area adjacent to the site along the north western boundary is also part of the Elm Corner Woods SNCI, is identified as Priority Habitat deciduous woodland, is Green Belt and part of this area is designated as Ancient Woodland.

The site takes access off Elm Lane which is a Class D road. Elm Lane is directly accessed off the A3. Bridleway 544 runs from Elm lane southwards across the runway, connecting to Hyde Lane and eventually Ockham Lane. No other public rights of way are on the site.

The access portion of the site runs along the edge of the area of hardstanding that previous housed the aircraft hangers. The main body of the site contains a mosaic of scrub, tall ruderal vegetation and a number of trees.

1.15 ha of the application site falls within the proposed land take of the Highways England Development Consent Order (DCO) relating to improvements to M25 junction 10/A3 Wisley interchange. A decision on this project was originally due by 12 January 2021. However, a Ministerial Statement was laid in Parliament on that day which stated "the deadline for the decision is to be extended to 12 May 2021 to enable the Secretary of State to consult further on the application including on the question of appropriate provision of replacement land to compensate for the proposed special category land to be compulsory purchased under the development consent order". The proposed scheme therefore remains undetermined at the time of writing this report, however there is due to be an update prior to the application being heard at Committee which will be reported at the meeting.

This application proposes the construction of a new access to serve the Former Wisley Airfield strategic site allocated under policy A35 of the Local Plan: Strategy and Sites 2015 - 2034. The access is proposed to be taken from the proposed Wisley Lane Diversion, which forms part of the DCO.

The proposed works include:

- a 30m diameter three-arm roundabout with kerbed central island;
- a two-lane approach for north-east bound traffic, allowing segregation of right turning traffic into the development from traffic headed to RHS Wisley Gardens and Wisley village;

- a maximum 100m radius entry path deflection to comply with approach speed reduction requirements of the Design Manual for Roads and Bridges (DMRB);
- sufficient highway verges to accommodate the visibility requirements;
- continuity of cycle and pedestrian facilities along the southern side of the Wisley Lane Diversion is provided by way of crossing points to the southern splitter island.

The application also includes for all earthworks, drainage, landscaping, service diversions, signs and road markings, street lighting and other street furniture including vehicle restraint barriers as necessary.

Summary of considerations and constraints

This application proposes the roundabout and stub road as a stand-alone application at a time when there is no defined proposal for how the A35 allocation will be developed. This is for reasons of timing where the applicant is seeking to ensure that the stub road can be constructed at the same time as the M25 Junction 10 DCO works take place, so as to minimise disruption and to avoid the need to take up a recently made road. Each application must be determined on its own merits, and the approval of this application would in no way pre-determine any future application to develop the strategic site. If in the course of considering a subsequent application relating to the A35 allocation it becomes apparent that the stub road and roundabout proposed would in some way be unsuitable for meeting the needs of that development, this could be dealt with through the process of the determination of that application.

It is noted that the proposal would result in some harm to the amenities of neighbouring dwellings at Elm Corner and would lead to a loss of 0.53% of the Wisley Airfield SNCI. However, constructing the roundabout and stub road simultaneously with the Wisley Lane Diversion (which forms part of the DCO) would limit construction impacts on the local community and RHS Wisley and ensure that they are built at the same time to avoid digging up the Wisley Lane Diversion which will have only just been constructed. In addition, the application unlocks potential to develop the land covered by the A35 allocation, by delivering a key piece of infrastructure. The proposal also includes a new area of wildflower grassland and an overall biodiversity net gain.

A Grampian condition is an appropriate way to ensure that this development is tied into the DCO scheme. While it is acknowledged that there is still some uncertainty about the DCO application and what the decision may be, the application is at an advanced stage in the process. Given this, it cannot be argued that *'there is no prospect at all'* of the DCO scheme coming forward during the life of the permission. Therefore, the use of the Grampian condition would only see works commencing, when the DCO scheme has been implemented.

The balancing exercise which has been undertaken concludes that the benefits of the proposal do outweigh the limited identified harm.

This application is the subject of a non determination appeal and therefore the Council are unable to formally determine the application. Instead the Council must resolve to confirm what they would have done had they been in the position to determine this application. Subject to conditions, the application is deemed to be acceptable and had an appeal not been lodged against non-determination, the application would have continued to be recommended for approval.

RECOMMENDATION:

(i) That in the event that the Council could have determined this application the decision would have been to approve subject to the conditions set out in this report, inclusive of the updates on the May late sheets.

(ii) That the decision taken by the Planning Committee shall be used by the Local Planning Authority to formalise its appeal Statement of Case.

Approve - subject to the following condition(s) and reason(s) :-

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

Reason: To comply 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. The development hereby permitted shall be carried out in accordance with the following approved plans: Stub Road Location Plan ref.1350-2-153 and Stub Road Red Line plan- Elm Lane One Way-Southern Roundabout 1350-2-152 Rev D received on 08/10/2020

Reason: To ensure that the development is carried out in accordance with the approved plans and in the interests of proper planning.
3. The development hereby permitted is solely limited to the area shaded purple in plan ref. POTENTIAL ROUNDABOUT ACCESS ON THE PROPOSED WISLEY LANE DIVERSION 0934-SK-079 Rev A.

Reason: To ensure that the development is carried out in accordance with the approved plans and in the interests of proper planning.
4. No development shall take place until written confirmation has been obtained from the Local Planning Authority (in consultation with Highways England and Surrey County Council) that the relevant part of the Highways England Investment Strategy (RIS) improvement to M25 Junction 10/A3 Wisley Interchange Development Consent Order (DCO), the Wisley Lane Diversion, has been implemented/commenced on site.

Reason: The proposed development is only acceptable as part of the diverted Wisley Lane.
5. The proposed roundabout and stub road access shall not be commenced unless and until a scheme has been submitted to and approved in writing by the Local Planning Authority, in consultation with the Highway Authority, to provide the following details;

- earthworks
- drainage
- service diversions
- signs and road markings
- street lighting and;
- other street furniture including vehicle restraint barriers as necessary.

The construction of the roundabout and stub road access shall then be undertaken in accordance with the approved scheme.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users. It is considered necessary for this to be a pre-commencement condition because these measures need to be agreed prior to the development commencing to ensure they are acceptable.

6. No construction works shall commence until a Construction Transport Management Plan, to include details of;

- a) parking for vehicles of construction site personnel, construction site operatives and construction site visitors;
- b) loading and unloading of plant and materials for the construction of the development;
- c) storage of plant and materials for the construction of the development;
- d) programme of construction works (including measures for construction traffic management);
- e) HGV deliveries for construction and hours of construction operation;
- f) construction vehicle routing;
- g) measures to prevent the deposit of materials on the highway;
- h) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused by construction traffic;
- i) on-site turning for construction vehicles;
- j) safeguarding Bridleway users, particularly where they enter the airfield onto Public Bridleway 544 Wisley

has been submitted to and approved in writing by the Local Planning Authority. The construction of the development shall be carried out in accordance with the approved Construction Transport Management Plan.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users. It is considered necessary for this to be a pre-commencement condition because the construction plans need to be agreed prior to the development commencing to the construction commences.

7. No development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the Planning Authority. This should include further details regarding the significance of the historic Wisley and Ockham Parish Boundary. Development shall then take place in accordance with the approved Written Scheme of Investigation.

Reason: To allow adequate archaeological investigation. It is considered necessary for this to be a pre-commencement condition to allow the investigation to take place before any archaeological remains are disturbed by the approved development.

8. The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the planning authority. The design must satisfy the SuDS Hierarchy and be compliant with the national Non-Statutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:
- a) Evidence that the proposed final solution will effectively manage the 1 in 30 & 1 in 100 (+40% allowance for climate change) storm events, during all stages of the development. If infiltration is deemed unfeasible, associated discharge rates and storage volumes shall be provided using a maximum discharge rate to be agreed with SCC as LLFA.
 - b) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.).
 - c) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected.
 - d) Details of drainage management responsibilities and maintenance regimes for the drainage system.
 - e) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.

Reason: To ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site. It is considered necessary for this to be a pre-commencement condition because the satisfactory drainage of the site goes to the heart of the planning permission.

9. Prior to the first occupation of the development, a verification report carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority. This must demonstrate that the drainage system has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls).

Reason: To ensure the Drainage System is designed to the National Non-Statutory Technical Standards for SuDS.

10. Works shall be carried out in full accordance with Section 4 and 6 of the submitted Ecological Impact Assessment prepared by EPR October 2020.

Reason: To safeguard protected species.

11. Works shall be carried out in full accordance with the Ecological Working Method Statement as set out in Appendix 4 of the submitted Ecological Impact Assessment prepared by EPR October 2020. Prior to first use, a post completion ecology report shall be submitted to, and agreed in writing by Guildford Borough Council.

Reason: To safeguard protected species.

12. A detailed lighting strategy will be provided prior to the use of the new roundabout and stub road to ensure there are no adverse impacts to roosting and foraging bats within the area. The development shall be carried out in accordance with the approved Lighting Strategy.

Reason: To safeguard protected species.

13. No development shall take place, until an amended Construction Environmental Management Plan has been submitted to, and approved in writing by, the Local Planning Authority. The approved Plan shall be adhered to throughout the construction period. In addition to the existing requirements, the Plan shall provide for:

- (a) An indicative programme for carrying out of the works
- (b) The arrangements for public consultation and liaison during the construction works
- (c) Measures to minimise the noise (including vibration) generated by the construction process to include hours of work, proposed method of piling for foundations, the careful selection of plant and machinery and use of noise mitigation barrier(s)
- (d) Details of any floodlighting, including location, height, type and direction of light sources and intensity of illumination
- (e) the parking of vehicles of site operatives and visitors
- (f) loading and unloading of plant and materials
- (g) storage of plant and materials used in constructing the development
- (h) measures to control the emission of dust, dirt and run-off during construction
- (i) further details on how the ancient woodland will be protected, and avoid risks by construction vehicles, storage of materials, etc.

Reason: To ensure that satisfactory measures are put in place for addressing occupiers of nearby land and the environment generally. It is considered necessary for this to be a pre-commencement condition because the management of the construction needs to be considered before construction commences.

14. The development hereby approved shall implement the Biodiversity Net Gain measures as detailed within Appendix 5 and map A5.1 of the submitted Ecological Impact Assessment prepared by EPR October 2020. All planting and seeding required as part of these measures shall be carried out in the first planting and seeding season following the completion of the development, or prior to the first use of the development, whichever is sooner.

Reason: To provide net gains in biodiversity.

15. The proposed offsite habitat creation as detailed on map A5.1 as set out in Appendix 5 of the submitted Ecological Impact Assessment prepared by EPR October 2020 shall include management for citation species, due to the loss of 0.53% of Wisley Airfield SNCI. Prior to the creation of this habitat, a report detailing this management will be submitted to and agreed in writing by the Local Planning Authority. The habitat will then be managed in accordance with the approved report.

Reason: To safeguard existing natural features.

16. No development shall take place until an Arboricultural Method Statement (AMS) and finalised Tree Protection Plan (TPP), in accordance with BS5837:2012 Trees in Relation to Design, Demolition and Construction, are submitted to and approved in writing by the Local Planning Authority. The approved Arboricultural Method Statement must be adhered to in full, and may only be modified subject to written agreement from the Local Planning Authority.

Reason: To protect the trees on site which are to be retained in the interests of the visual amenities of the locality. It is considered necessary for this to be a pre-commencement condition because the tree protection measures need to be agreed prior to the development commencing to ensure trees are not damaged by the development.

17. No development shall commence until tree protection measures, as set out in the approved Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP), have been installed and a site meeting has taken place with the site manager, the retained consulting arboriculturalist and the LPA Tree Officer. This tree condition may only be fully discharged on completion of the development subject to satisfactory written evidence of monitoring and compliance by the pre-appointed consulting arboriculturalist.

Reason: To protect the trees on site which are to be retained in the interests of the visual amenities of the locality. It is considered necessary for this to be a pre-commencement condition because the tree protection measures need to be checked prior to the development commencing to ensure they are adequately installed.

18. Prior to commencement of development, the applicant must submit the following to the Local Planning Authority for its written approval:

(a) a method statement for removal of asbestos containing material from site, quantification of loose fibres in soil and detailed remediation scheme
(b) the approved remediation scheme must be carried out in accordance with its terms unless otherwise agreed in writing by the Local Planning Authority. Following the completion of approved remediation measures identified in the scheme, a verification report must be submitted to the Local Planning Authority for approval in writing. This verification report must provide documented evidence of the remediation work carried out on site.

If monitoring of air borne asbestos fibres during the earthworks is identified as one of the control measures, this must be appended to the verification report on completion along with monitoring data and measures employed to control air borne asbestos fibres on site/at site boundaries.

Reason: To ensure that risks from land contamination to neighbouring land and future users of the land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors. It is considered necessary for this to be a pre-commencement condition because the how asbestos is dealt with needs to be agreed prior to development commencing.

19. In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation must be carried out to identify the extent, scale and nature of contamination, and where necessary a remediation scheme must be prepared to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, and other sensitive receptors and is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with condition 17.

Reason: To ensure that risks from land contamination to neighbouring land and future users of the land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

20. Prior to the first use of the development hereby approved, full details of the treatment of the stub road in relation to any fencing/barriers to prevent access to land beyond the stub road shall be submitted to and agreed in writing by the Local Planning Authority.

Reason: In the interests of visual amenity.

Informatives:

1. This statement is provided in accordance with Article 35(2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. Guildford Borough Council seek to take a positive and proactive approach to development proposals. We work with applicants in a positive and proactive manner by:
 - Offering a pre application advice service
 - Where pre-application advice has been sought and that advice has been followed we will advise applicants/agents of any further issues arising during the course of the application
 - Where possible officers will seek minor amendments to overcome issues identified at an early stage in the application process

However, Guildford Borough Council will generally not engage in unnecessary negotiation for fundamentally unacceptable proposals or where significant changes to an application is required.

In this case pre-application advice has been sought regarding the wider Wisley Airfield site. As regards this proposal, further information and justification was provided during the course of the application. The application is now deemed to be acceptable.

2. Lead Local Flood Authority Informatives:

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

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

3. County Highway Authority Informatives:

The Highway Authority has no objection to the proposed development, subject to the above conditions but, if it is the applicant's intention to offer any of the roadworks included in the application for adoption as maintainable highways, permission under the Town and Country Planning Act should not be construed as approval to the highway engineering details necessary for inclusion in an Agreement under Section 38 of the Highways Act 1980. Further details about the post-planning adoption of roads may be obtained from the Transportation Development Planning Division of Surrey County Council.

The permission hereby granted shall not be construed as authority to carry out any works on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a permit and, potentially, a Section 278 agreement 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. All works on the highway will require a permit and an application will need to be submitted to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road. Please see www.surreycc.gov.uk/roads-and-transport/road-permits-and-licences/the-traffic-management-permit-scheme. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/floodingadvice.

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).

The developer is advised that as part of the detailed design of the highway works required by the above condition(s), the County Highway Authority may require necessary accommodation works to street lights, road signs, road markings, highway drainage, surface covers, street trees, highway verges, highway surfaces, surface edge restraints and any other street furniture/equipment.

Section 59 of the Highways Act permits the Highway Authority to charge developers for damage caused by excessive weight and movements of vehicles to and from a site. The Highway Authority will pass on the cost of any excess repairs compared to normal maintenance costs to the applicant/organisation responsible for the damage.

Officer's Report

Site description

This site measuring approximately 1.35ha sits to the north west of the Former Wisley Airfield (FWA), also known locally as Three Farms Meadow. The application site sits partly within and partly outside of the Local Plan allocated site A35, which is proposed to deliver a new settlement of approximately 2,000 dwellings and associated uses. However, the whole site is within the area inset from the Green Belt.

The site is solely within Flood Zone 1, however a very small area of the site around the access point from Elm Lane suffers from surface water flooding, as defined on the EA surface water mapping (1 in 30, 100 and 1000 years). The application site also contains part of the Wisley Airfield Site of Nature Conservation Importance (SNCI).

At its closest point (the access onto Elm Lane), the site is located approximately 175m from the Thames Basin Heaths Special Protection Area and Ockham and Wisley Commons Site of Special Scientific Interest (SSSI). The Ockham and Wisley Local Nature Reserve (LNR) covers the area designated as SSSI, and also extends southwards beyond the SSSI, directly adjacent to the site running along the north western boundary. This area adjacent to the site along the north western boundary is also part of the Elm Corner Woods SNCI, is identified as Priority Habitat deciduous woodland, is Green Belt and part of this area is designated as Ancient Woodland.

The site takes access off Elm Lane which is a Class D road. Elm Lane is directly accessed off the A3. Bridleway 544 runs from Elm lane southwards across the runway, connecting to Hyde Lane and eventually Ockham Lane. No other public rights of way are on the site.

The access portion of the site runs along the edge of the area of hardstanding that previous housed the aircraft hangers. The main body of the site contains a mosaic of scrub, tall ruderal vegetation and a number of trees.

1.15 ha of the application site falls within the proposed land take of the Highways England Development Consent Order (DCO) relating to improvements to M25 junction 10/A3 Wisley interchange. A decision on this project was originally due by 12 January 2021. However, a Ministerial Statement was laid in Parliament on that day which stated "the deadline for the decision is to be extended to 12 May 2021 to enable the Secretary of State to consult further on the application including on the question of appropriate provision of replacement land to compensate for the proposed special category land to be compulsory purchased under the development consent order". The proposed scheme therefore remains undetermined at the time of writing this report, however there is due to be an update prior to the application being heard at Committee which will be reported at the meeting.

Proposal

Detailed application for engineering operations to form a new roundabout and stub road.

This application proposes the construction of a new access to serve the Former Wisley Airfield strategic site allocated under policy A35 of the Local Plan: Strategy and Sites 2015 - 2034. The access is proposed to be taken from the proposed Wisley Lane Diversion, which forms part of the DCO.

The proposed works include:

- a 30m diameter three-arm roundabout with kerbed central island;
- a two-lane approach for north-east bound traffic, allowing segregation of right turning traffic into the development from traffic headed to RHS Wisley Gardens and Wisley village;
- a maximum 100m radius entry path deflection to comply with approach speed reduction requirements of the Design Manual for Roads and Bridges (DMRB);
- sufficient highway verges to accommodate the visibility requirements;
- continuity of cycle and pedestrian facilities along the southern side of the Wisley Lane Diversion is provided by way of crossing points to the southern splitter island.

The application also includes all earthworks, drainage, landscaping, service diversions, signs and road markings, street lighting and other street furniture including vehicle restraint barriers as necessary.

On 7 January 2021, the applicant submitted an additional plan ref. 0934-SK-079-A which highlights in purple the area where this application differs from the proposed DCO. This plan does not change the application in any way, hence re-consultation was not required, however it does make it clear what development is being sought consent for under this application.

Relevant planning history.

The site has a long and complex planning history. The following applications are most relevant to the consideration of this application:

Reference:	Description:	Decision Summary:	Appeal:
20/P/01709	Detailed application for enabling works (engineering operations in the form of landform alterations) to facilitate part phase 1 SANG works.	Pending	N/A
20/S/00004	Request for a screening opinion under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) in regards to the proposed development of permanent access through provision of a roundabout and stub road at the former Wisley Airfield	Screening Decision: Negative – EIA Issued 16/10/2020	N/A
15/P/00012	Outline planning permission for the phased development of a new settlement of up to 2,068 dwellings incorporating up to 60 sheltered accommodation units and associated infrastructure including accesses onto the A3 (Ockham Interchange), Ockham Lane and Old Lane and revised access to Elm Corner, a primary/secondary school, community provision, nursery provision, health facility, a local centre (incorporating food & drink, retail, a visitor centre and offices), employment area, 8 travellers pitches, sports and recreational facilities (incorporating a floodlit sports pitch and pavilion). Sustainable Drainage Systems and an area of Suitable Alternative Natural Greenspace (SANG) incorporating a landform feature and car parking. The erection of associated utilities infrastructure.	Refuse 08/04/2016	Dismissed 13/06/2018

The development proposal to incorporate the demolition/ removal of the runway and VOR Beacon (and any associated outbuildings). Matter for determination is access (with matters of scale, appearance, landscaping and layout reserved).

12/P/00533	Consultation from Surrey County Council for a fully enclosed invessel composting facility with a new vehicular/pedestrian access from the approved A3 Ockham roundabout comprising a new site access road, with a bridge over the stream to a purpose-built enclosed composting building, ancillary staff building and vehicle parking for staff/visitors together with landscape mounding and planting, and an attenuation pond; without compliance with Condition 10 of Appeal decision APP/B3600/A/09/2098568 to allow the phased construction of the site access; alterations to the A3 southbound slip road; and the Ockham roundabout.	No objection raised 19/04/2012, SCC approved 01/08/2012	N/A
08/P/01472	Consultation from SCC for construction of a fully enclosed invessel composting facility for the reception and processing of green, kitchen and animal wastes on a site of approximately 16.75ha, comprising a composting building, control office, car parking facilities, landscaping, internal access roads, rainwater storage tank, leachate storage tank, package sewage treatment, diesel storage tank, attenuation pond, perimeter fencing, and new access off the A3 Ockham roundabout.	Objection raised 03/10/2008	Allowed on appeal 08/03/2010

Consultations

A summary of all the responses is contained below. This is not a verbatim report and full copies of all representations received are available on the electronic planning file, which is available to view online.

Statutory consultees

Highways England: Having examined the application Highways England (HE) do not offer an objection to the proposal. They support the applicant's intention to agree a Grampian style condition that restricts commencement until after the DCO has been made. [Officer Note: A Grampian style condition has been recommended which restricts the commencement of the development to after the implementation of the DCO works. This condition has been forwarded to HE who have raised no objections].

County Highway Authority: The proposed development has been considered by the County Highway Authority who having assessed the application on safety, capacity and policy grounds, raise no objection subject to the addition of conditions (approved plan; further details of earthworks, drainage, service diversions, signs, road markings street lighting and other street furniture including vehicle restraint barriers as necessary; stub road to remain closed until rest of the A35 allocation comes forward and a CTMP).

For the avoidance of doubt, the Highway Authority advise that this formal consultation response is based solely on an assessment of the technical design of the proposed roundabout and stub road access, to enable this infrastructure to be constructed in conjunction with the Wisley Lane Diversion. The proposal has been assessed on its own technical merits, and should not be construed as providing any endorsement by the Highway Authority on any future development proposals on the former Wisley Airfield, for which a separate planning application will be required and assessed by the Highway Authority on its own merits.

The above recommendation is made on the understanding that this form and scale of junction is necessary to serve the level of vehicular traffic that was based on work submitted for the recent planning appeal. The Highway Authority advise that if a Transport Assessment submitted in support of any future hybrid planning application on the former Wisley Airfield, demonstrated that these levels of vehicular traffic had changed for any reason, then Highway Authority would encourage the design of a more appropriately scaled and form of junction that could better provide for the levels and types of traffic proposed.

The Highway Authority have assessed the technical design of the proposed roundabout and stub road access, and is satisfied that it accords with the required highway design standards. A Stage 1 Road Safety Audit (RSA) has been undertaken which has not identified any major highway safety problems with the design of the roundabout and stub road access. Some minor safety recommendations have been made in the RSA report, which will be addressed at the detailed design stage, when a Stage 2 RSA is undertaken.

Additional comments provided by the County Highway Authority: The Highway Authority support the construction of the roundabout during the HE DCO construction works. Whilst the DCO application includes the Wisley Lane Diversion (WLD), there would not be any planning permission granted for the roundabout element of that new construction. Constructing the WLD and the roundabout at the same time would avoid significant abortive works, both in avoiding the need to break out a newly constructed road for a new roundabout, but also having to realign the newly laid road either side of the roundabout location. Constructing the WLD and the new roundabout access into Wisley Airfield at the same time, whilst traffic was not running over that section, clearly makes sense for obvious reasons. None of this predetermines the assessment of a future planning application for the Wisley development, which would still be subject to the full planning application appraisal process.

Surrey County Council as Lead Local Flood Authority: Original objections have been overcome with the addition of additional information. We 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. We are satisfied that the proposed drainage scheme meets the requirements set out in the aforementioned documents and are content with the development proposed, subject to conditions the addition of conditions (SuDS Scheme and Verification Report).

Natural England: No objection. Based on the plans submitted, Natural England (NE) considers that the proposed development will not have significant adverse impacts on designated sites Ockham and Wisley Commons Site of Special Scientific Interest (SSSI) which forms part of Thames Basin Heaths Special Protection Area (SPA) and has no objection.

However, in regards to the Construction Environmental Environment Plan document (CEMP), Natural England are of the opinion as it currently stands, it requires more detail in relation to impacts on ancient woodland and a detailed lighting design. They advise the following:

- the CEMP must specify protective measures to avoid risks to the ancient woodland in terms of incursion into the woodland by construction vehicles, storage of materials, dumping of spoil, etc
- the new roundabout and stub road to have a good lighting design due to the presence of roosting natterer's bats in a tree in this area of woodland.

NE advise that an appropriate planning condition or obligation is attached to any planning permission to secure these measures.

This application does not appear to result in additional land take from the woodland adjacent which is a Local Nature Reserve. However, there are additional risks of impacts on the ancient woodland over and above those arising from the J10 improvement works from the construction of a new roundabout, from incursion into the woodland by construction vehicles, storage of materials, dumping of spoil, etc so the CEMP must specify protective measures to avoid those risks.

The protected species surveys carried out for the J10 improvement project identified the presence of roosting natterer's bats in a tree in this area of woodland. This tree will be lost as a result of construction of the new link road to Wisley RHS and mitigation will be proposed by Highways England. Those efforts could be undone if the new roundabout and stub road have a poor lighting design.[Officer Note: The conditions recommended by NE will be secured as part of any decision].

Thames Water: The proposed development does not impact Thames Water assets, as such they had no comments to make.

NATS (National Air Traffic Services): The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

Historic England: On the basis of the information available to date, we do not wish to offer any comments. Seek the views of your specialist conservation and archaeological advisers, as relevant.

Internal consultees

Head of Environmental Health and Licensing: No objections raised. The proposed development is at low risk from any land contamination on site. However, due to presence of asbestos containing material and loose asbestos fibres in the area formerly for hangars and hardstanding for the airfield, there is a potential for asbestos fibres becoming airborne during the groundworks. Other issues raised include the impact of lighting and construction noise. [Officer Note: Conditions are recommended requiring a method statement for removal of asbestos and the reporting of unexpected contamination. As noted above, any lighting will also be controlled through condition. Construction noise is an unavoidable consequence of any major development. However, conditions are recommended which will ensure that any noisy activity is limited to business hours].

Non-statutory consultees

Archaeological Officer, Surrey County Council: No objection subject to a condition to secure the implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation.

Countryside Access Officer, Surrey County Council: Notes the affect of the proposed development to Public Bridleway 544 Wisley. This office has no objection to the application subject to a Construction Design Management Plan being conditioned to safeguard Bridleway users particularly where they enter the airfield onto Public Bridleway 544 Wisley. Standard informatives are also recommended.

Parish Councils

Ockham Parish Council: Object. We would like to put on record that we consider this planning application, submitted by Taylor Wimpey, is premature as it relies on the approval of the Secretary of State for Transport to the Development Consent Order application made by Highways England to make changes to M25J10/A3 interchange. In addition, the applicant has not submitted a planning application to develop the Former Wisley Airfield which again is another factor for our statement that the application is premature as it is inextricably linked with development of FWA.

- condition required: very thorough data showing the anticipated effects on Ockham Park roundabout and local road network should be provided
- condition required: temporary closure of bus stop during the construction process
- condition required: protection for all users of the PROW, alternatively a safe diversion must be instated for the duration of the construction process.
- condition required: limited working hours (weekdays and daylight only). No artificial lighting used at any time including on the construction compound
- condition required: no work at all, without exception, to take place prior to full approval of the DCO by the Secretary of State, to include determination by the courts if a judicial review of the decision takes place
- conditions required: greater clarity for mitigation measures for prevention of release of asbestos fibres when disturbed. Compound is moved to no closer than 100m from residential boundaries

Effingham Parish Council: Object, concern that this application is premature. It is premature both as there is no planning permission yet granted for the site and secondly the Secretary of State has not yet made a decision on J10 of the M25 and related decisions that might affect the A3 in the area. If permission were to be granted ahead of the decisions on any future planning application and decisions on highways, then Wisley Airfield could end up with an unusable and abandoned road.

West Horsley Parish Council: Object. Insufficient transport assessment and information in order to assess if the application is acceptable. We are of the opinion that the present application is premature and until the Highways England proposals for the M25 Junction 10/A3 improvements are confirmed this application should be withdrawn.

[Officer Note: As regards the concerns raised by the Parish Councils about prematurity it is noted that this is not the case. There is no reason to prevent the Local Planning Authority from determining this application before the formal decision on the DCO is known. If the planning application is approved, it will include a condition which restricts the commencement of the development for which the application seeks planning consent for until after the implementation of the DCO proposal, if it is approved. Further detail on both prematurity and pre-determination are found below in the principle of development section].

Amenity groups / Residents associations

Ockham and Hatchford Residents Association: Object. Put on record that we consider this planning application, submitted by Taylor Wimpey, is premature as it relies on the approval of the Secretary of State for Transport to the Development Consent Order application made by Highways England to make changes to M25J10/A3 interchange. In addition, the applicant has not submitted a planning application to develop the Former Wisley Airfield which again is another factor for our statement that the application is premature as it is inextricably linked with development of FWA.

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- condition required: no work at all, without exception, to take place prior to full approval of the DCO by the Secretary of State, to include determination by the courts if a judicial review of the decision takes place.
- conditions required: greater clarity for mitigation measures for prevention of release of asbestos fibres when disturbed. Compound is moved to no closer than 100m from residential boundaries

Wisley Action Group: Object to the application for the formation of a stub road and roundabout for eleven reasons (in no particular order of significance) which include, but are not limited to the following issues:

- prematurity
- predetermination
- inconsistencies in the documents supporting the application
- lack of robust transport modelling and failure to address sustainable transport
- impact on the safety of other road users

- impact on the environment, ecology, biodiversity, wildlife habitats
- impact on flooding
- impact on neighbouring amenity
- impact on public rights of way (PROWs)
- impact on heritage
- failure to consult statutory bodies - specific mention of proximity of a gas pipeline [Officer Note: The nearest Gas Pipeline is shown as being located over 2km from the site, and at this distance the proposed development will not impact on this existing infrastructure, therefore no consultation is required on this basis]

Third party comments

A summary of all the responses is contained below. This is not a verbatim report and full copies of all representations received are available on the electronic planning file, which is available to view online

55 letters of representation have been received raising the following objections and concerns:

- application is premature - both in relation to the site allocation and the decision on the DCO
- pre-determination of any development at the wider site
- the proposed roundabout and stub road has no purpose in its own right
- very dangerous access from Elm Lane
- inadequate traffic data to assess the application - the full data showing the anticipated effects on Ockham Park roundabout and local road network has not yet been provided
- keeping the bus stop nearby on the A3 open would compromise highway safety
- failure to address sustainable transport
- Ockham Park roundabout will be over capacity if the proposed development goes ahead
- existing traffic issues exacerbated
- out of character with the existing landscape, proposal is visually unattractive
- negative impact on neighbouring amenity - properties to the north and south in relation to noise and disturbance
- asbestos has been found on site, this is not adequately addressed in the application
- increased pollution
- no air quality or noise assessment provided with the application
- harm to health and wellbeing of nearby residents
- negative impact on ecology - inclusive of all sensitive sites on and adjacent to the site
- insufficient ecological surveys
- negative impact on the Conservation Area and other heritage assets inclusive of listed buildings
- out of scale with the existing historic settlement of Ockham
- impacts on use of the site for recreation and exercise
- impacts to users of public rights of way
- increase to flood risk
- the application contradicts the aims of the Local Authority's Commitment to the Climate Change and Environmental Crisis
- due to COVID – 19, UK public finances are under considerable pressure, resulting in road projects scaled back or dropped
- Three Farms Meadow has always been a protected area and never been a commercial working airfield
- economic costs of destroying the area's natural habitat and woodlands would vastly outweigh any benefit from unnecessary roads
- negative impact on the adjacent Green Belt

- the site should be returned to Green Belt, and the allocation in the Local Plan is not required
- there is no explanation of what has changed since the last time a planning application was determined on the Former Wisley Airfield and was refused
- there are a number of erroneous and misleading statements in the application documents
- a number of letters reiterating the objections raised in the Ockham Parish Council objection
- a number of letters reiterating the objections raised in the Wisley Action Group objection

One letter of support has been received from the Surrey Chambers of Commerce raising the following comments:

- important to get the correct infrastructure and ensure access is as effective as possible. These works also often take a great deal of time, causing delays to traffic, much of which is business related. If this pre-work can be combined with other planned work it will be hugely appreciated by all concerned and I am sure will also make economic sense.

Planning policies

National Planning Policy Framework (NPPF):

Chapter 2. Achieving sustainable development
 Chapter 4. Decision-making
 Chapter 5. Delivering a sufficient supply of homes
 Chapter 6. Building a strong, competitive economy
 Chapter 8. Promoting healthy and safe communities
 Chapter 9. Promoting sustainable transport
 Chapter 11. Make an efficient use of land
 Chapter 12. Achieving well-designed places
 Chapter 14. Meeting the challenge of climate change, flooding and coastal change
 Chapter 15. Conserving and enhancing the natural environment

Chapter 16. Conserving and enhancing the historic environment

Planning Practice Guidance

Manual for Streets and Design for Roads and Bridges

South East Plan 2009:

Policy NRM6 Thames Basin Heath Special Protection Area

Guildford Borough Local Plan: Strategy and Sites 2015-2034:

The Guildford Borough Local Plan: Strategy and Sites 2015-2034 was adopted by the Council on 25 April 2019. The policies considered relevant to this proposal are set out below.

S1 Presumption in favour of sustainable development
 S2 Planning for the borough - our spatial strategy
 P4 Flooding, flood risk and groundwater protection zones
 P5 Thames Basin Heaths Special Protection Area
 D1 Place shaping
 D2 Sustainable design, construction and energy
 D3 Historic environment

ID1 Infrastructure and delivery
ID2 Supporting the Department for Transport's "Road Investment Strategy
ID3 Sustainable transport for new developments
ID4 Green and blue infrastructure

Guildford Borough Local Plan 2003 (as saved by CLG Direction 24 September 2007):

Although the Council has now adopted the Guildford Borough Local Plan: Strategy and Sites 2015-2034 (LPSS), some policies of the saved Local Plan 2003 continue to be relevant to the assessment of planning applications and carry full weight. The extant policies which are relevant to this proposal are set out below.

G1 (non superseded parts) General standards of development
HE12 Historic Parks and Gardens
NE4 Species protection

Lovelace Neighbourhood Plan:

The Lovelace Neighbourhood Plan has been passed at Referendum on Thursday 6 May. It now forms part of the Development Plan, and carries full weight in planning decisions.

LNPEN2 Biodiversity and Natural Habitats
LNPEN3 Flooding
LNPEN4 Light pollution
LNPEN5 Air Quality and Traffic
LNP11 Infrastructure
LNPI3 Cycling and Walking

Supplementary planning documents:

Thames Basin Heaths Special Protection Area Avoidance Strategy SPD
Climate Change, Sustainable Design, Construction and Energy SPD
Strategic Development Framework SPD

Planning considerations

The main planning considerations in this case are:

- background
- the principle of development
- highway considerations
- the visual impact and impact on the character of the area
- the impact on neighbouring amenity
- impact on ecology and trees
- the impact on flood risk and the proposed surface water drainage strategy
- the impact on heritage assets
- the planning balance

Background

It is useful to provide a brief summary of the more recent history relating to this site and the surrounding land, and what, if any relevance this has to the current application before Committee.

In December 2014, the Department for Transport (DfT) published the Road Investment Strategy (RIS) for 2015-2020. The RIS identifies improvements to M25 J10/A3 Wisley Interchange as one of the key investments in the Strategic Road Network (SRN) for the London and South East region. The proposals include: "improvement of the Wisley interchange to allow free-flowing movement in all directions, together with improvements to the neighbouring Painshill interchange on the A3 to improve safety and congestion across the two sites". This scheme is also identified in the Infrastructure Schedule found at appendix 6 of the LPSS.

The DCO will provide for a diverted Wisley Lane ("the Wisley Lane Diversion"). The Wisley Lane Diversion is proposed on the western part of A35 allocation, prior to it crossing over the A3 connecting onto Wisley. Part of the transport requirements of policy A35 require primary vehicular access to the site allocation be via the A3 Ockham interchange, with a through vehicular link between the Ockham Interchange and Old Lane. The applicant has stated that the purpose of the submission of the planning application at this time (pre the submission of further applications for the development of the A35 allocation and pre the decision on the DCO), is to construct the roundabout and stub road simultaneously with the Wisley Lane Diversion avoiding the need for separate construction of the site access on a newly built Wisley Lane Diversion, and to ensure the works can tie in with the construction program of Highways England.

An outline planning application was submitted in December 2014 (Ref: 15/P/00012) for the development of a new settlement at land at the FWA for up to 2,068 dwellings and associated infrastructure including accesses onto the A3 (Ockham Interchange), Ockham Lane and Old Lane and revised access to Elm Corner, a primary/ secondary school, health facility, employment area, and an area of Suitable Alternative Natural Greenspace (SANG). This application was refused by the Council in May 2016 and subsequently dismissed at appeal in June 2018.

Subsequently the site has been removed from the Green Belt and is now included in a wider landholding allocated in the adopted LPSS – A35 for approximately 2000 homes, 100 sheltered / extra care homes, eight gypsy and traveller pitches, 4,300sqm of employment floorspace, 1,100m of retail, 1050 of community uses and services in a new Local Centre, and two schools (one primary and one secondary). As indicated above, it is a requirement of A35 for primary vehicular access to the site allocation will be via the A3 Ockham interchange.

Since the appeal was dismissed in June 2018, the new Local Plan has been adopted and carries full weight as part of an up to date development plan. This is clearly a material change in circumstances since the appeal was decided.

The principle of development

The site sits partly within and partly outside of the A35 allocation, however the large majority of the area for which planning permission is sought (the area shaded purple on plan reference 0934-SK-079-A), is within the allocation. The whole site is within the area inset from the Green Belt. Therefore the principle of development is acceptable subject to accordance with the relevant policies identified above.

A large number of the objections from the Parish Councils, residents groups and individual third parties raise prematurity and pre-determination of the wider site allocation as issues. Addressing these in turn:

Paragraph 014 (Reference ID: 21b-014-20140306) of the Planning Practice Guidance highlights in what circumstances it might be justifiable to raise prematurity as an issue. It states that in the context of the NPPF and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than where it is clear that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, taking the policies in the Framework and any other material considerations into account. Such circumstances are likely, but not exclusively, to be limited to situations where both:

(a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging Local Plan or neighbourhood planning; and

(b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.

It is clear in relation to the assessment of this application, prematurity cannot be an issue. The LPSS has been adopted and carries full weight as part of an up to date development plan, therefore the application cannot undermine the plan-making process in any way.

It is also noted that the development could be restricted from commencing until such time that the DCO has been implemented, through a Grampian style condition. In relation to Grampian conditions, the PPG notes that: *'conditions requiring works on land that is not controlled by the applicant, or that requires the consent or authorisation of another person or body often fail the tests of reasonableness and enforceability. It may be possible to achieve a similar result using a condition worded in a negative form (a Grampian condition) – ie prohibiting development authorised by the planning permission or other aspects linked to the planning permission (eg occupation of premises) until a specified action has been taken (such as the provision of supporting infrastructure). Such conditions should not be used where there are no prospects at all of the action in question being performed within the time-limit imposed by the permission'*.

Even a limited or some prospect of the action being performed within the time-limit of the permission (in this case the implementation of the DCO scheme), then a Grampian condition could be appropriate in principle. While it is acknowledged that there is still some uncertainty about the DCO application and what the decision may be, the application is at an advanced stage in the process. Given this, it cannot be argued that *'there is no prospect at all'* of the DCO scheme coming forward during the life of the permission. Therefore, the use of the Grampian condition would only see works commencing, when the DCO scheme has been implemented.

This application proposes the roundabout and stub road as a stand-alone application at a time when there is no defined proposal for how the A35 Allocation will be developed. As discussed above this is for reasons of timing where the applicant is seeking to ensure that the stub road can be constructed at the same time as the DCO works take place, so as to minimise disruption and to avoid the need to take up a recently made road. Each application must be determined on its own merits, and the approval of this application would in no way pre-determine any future application to develop the strategic site.

If in the course of considering a subsequent application relating to the A35 allocation it becomes apparent that the stub road and roundabout proposed would in some way be unsuitable for meeting the needs of that development, this could be dealt with through the process of the determination of that application.

The proposal is in accordance with the specific site access requirements of policy A35, as well as the Strategic Development Framework Supplementary Planning Document which recognises that the access for the Airfield will be from the realigned Wisley Lane. Therefore, it is in accordance with an up to date development plan in this regard.

Highway considerations

The proposed roundabout would be located on the proposed Wisley Lane Diversion and would facilitate the primary access to the strategic site allocation. The proposed works include:

- a 30m diameter 3-arm roundabout with kerbed central island;
- a two-lane approach for north-east bound traffic, allowing segregation of right turning traffic into the development from traffic headed to RHS Wisley Gardens and Wisley village;
- a maximum 100m radius entry path deflection to comply with approach speed reduction requirements of the Design Manual for Roads and Bridges (DMRB);
- sufficient highway verges to accommodate the visibility requirements;
- continuity of cycle and pedestrian facilities along the southern side of the Wisley Lane Diversion is provided by way of crossing points to the southern splitter island

The works would be subject to detailed design and technical approval prior to construction, at which time details would be provided of all earthworks, drainage, landscaping, service diversions, signs and road markings, street lighting and other street furniture including vehicle restraint barriers as necessary. A condition will require the submission and agreement of these details prior to the commencement of development. The applicant has stated the works would be offered up for adoption and /or maintenance by the local highway authority, Surrey County Council (SCC).

Conformity with the DCO

The DCO scheme in the vicinity of the site includes:

- an enlarged signalised roundabout junction with the M25;
- free-flow left turn lanes at the new roundabout;
- improved slip road layouts;
- widening of the A3 north of Ockham Interchange to 4 lanes in both directions;
- signalisation of the Ockham Interchange and improvements to its slip roads onto the A3; and
- improvements to pedestrian and cycling facilities.

In addition, the DCO scheme proposes the closure of the Wisley Lane and Elm Lane Junctions onto the A3. The Wisley Lane junction would be replaced with a new road called the Wisley Lane Diversion. That would form a new arm off the Ockham Interchange and run north-east through the northern fringe of the Wisley Airfield site then turn north over the widened A3 via a new bridge for traffic, pedestrians and cyclists. Elm Corner would be accessed via Old Lane and an improved Elm Lane.

The alignment of the roundabout has been based on the latest plans submitted by Highways England to the DCO Examination, which closed in June 2020.

The Wisley Lane Diversion has been designed as a 40mph design speed road and the roundabout has also been designed for this speed, specifically in terms of visibility requirements.

The proposal would only be appropriate if the DCO is approved, and therefore, and as set out above, the applicant has proposed the use of a Grampian style condition which would ensure development on this current application could not commence until development on the Wisley Lane Diversion element of the DCO had commenced on the site. This is considered to be an appropriate way to control the development, and would meet all the relevant conditions tests set out in the PPG.

Traffic impacts

The proposed roundabout and stub road will not generate any traffic, or additional movements on the highway network. Delays to traffic caused by the roundabout are not expected to be significant as there will be no opposing flows of turning traffic in and out of the stub road to the Airfield.

Construction impacts

The submitted Construction Environment Management Plan and Construction Transport Management Plan state that it is currently anticipated that all construction vehicles will access the stub road and roundabout site from the north off Elm Lane, accessed directly from the A3, and that all site traffic will access and egress Elm Lane via the A3. All vehicles will turn left onto Elm Lane from the A3 when accessing the site, and turn left onto the A3 from Elm Lane when egressing the site.

It is noted that the existing Elm Lane is signposted as unsuitable for HGVs, however Highways England have confirmed it is proposed to be used as one of the access points for the construction of the DCO if approved. As this application is controlled by a Grampian condition, if the access will be used for the DCO, it would also be appropriate to be used for the current application. To ensure the two tie together, it is considered to condition the submission of both the CEMP and CTMP for submission and agreement, to ensure the details remain tied into the DCO construction access plans. On this basis, over and above the DCO scheme, the proposal would not result in any greater harm to highway safety in terms of construction vehicles accessing or existing the site.

Consultation responses

Highways England have raised no objection to the application. They are supportive of the use of a Grampian condition, that would prevent the implementation of this development until the DCO is made.

Surrey County Council have commented on this application twice, raising no objection. In their most recent comment the Highway Authority stated their support for the construction of the roundabout as part of the Highways England DCO construction works. They consider that constructing the Wisley Lane Diversion and the roundabout at the same time would avoid significant abortive works, both in avoiding the need to break out a newly constructed road for a new roundabout, but also having to realign the newly laid road either side of the roundabout location. It is their view that to carry out these works prior to the road being open to traffic has clear benefits to the smooth operation of this road.

The Highway Authority have also undertaken an assessment of the technical design of the proposed roundabout and stub road access in relation to the level of traffic generated by the previous appeal scheme at the adjacent site, which in relation to what was proposed is comparable to the allocation in the LPSS. They are satisfied that the application accords with the required highway design standards. A Stage 1 Road Safety Audit (RSA) has been undertaken which has not identified any major highway safety problems with the design of the roundabout and stub road access.

Both Highways England and Surrey County Council have been consulted on the wording of the Grampian condition proposed as requested.

Location and type of junction

The applicant has sought to demonstrate they are proposing the best type of junction, in the best location to provide a suitable access into the FWA. The precise location chosen for the roundabout was based on the following engineering considerations:

- locating it away from the adverse topography in the western part of the Wisley Lane Diversion and thus avoiding unnecessary additional engineering works;
- locating it away from the southern approach embankment to the new Wisley Lane/A3 over bridge, also to avoid unnecessary additional engineering works;
- locating the carriageway no closer to the Ancient Woodland area between the Wisley Lane Diversion and the A3;
- locating the stub road away from the line of the existing north-south hedgerow in this area;
- locating the roundabout away from the works compound planned to be formed by Highways England's contractor while building the DCO scheme works.

A priority T-junction was discounted early as not having sufficient capacity to accommodate the likely traffic flows from the former Wisley Airfield and RHS Wisley. Whilst both traffic signal-controlled and roundabout options were put forward for consideration, officers at SCC favoured a roundabout as being appropriate as the primary form of access required by the site allocation. A roundabout in this location strikes a better balance between performing a speed control function on the Wisley Lane Diversion and not impeding the free-flow of traffic to RHS Wisley and the village of Wisley further north on Wisley Lane.

Both the Transport Statement and supplementary Technical Note produced by the transport consultant for the applicant state that the proposal would have sufficient capacity, with headroom, to serve the FWA. This would maximise potential at the FWA allocation.

The proposals would facilitate a potential suitable access into the FWA from the Wisley Lane Diversion, which would be in conformity with LPSS policies ID3 and A35 and the SDF SPD. The proposals are also in compliance with neighbourhood plan policies LNP11 and LNP13.

The visual impact and impact on the character of the area

Policy D1 (place shaping) of the LPSS states that as an over-arching principle, 'all new developments will be required to achieve high quality design that responds to distinctive local character (including landscape character) of the area in which it is set.

Essential elements of place making include creating economically and socially successful new places with a clear identity that promote healthy living; they should be easy to navigate, provide natural security through layout and design with attractive, well enclosed, and overlooked streets, roads and spaces with clear thought given to the interrelationship of land use to external space'.

Policy LNPEN1B of the Lovelace Neighbourhood Plan states developments should be designed to respect the existing landscape character set out in the Guildford Landscape Character Assessment and the important local views across the Lovelace landscape from within or from outside the area. This proposal would not directly impact on view point 10 - Elm Corner at Ockham.

The main body of the site contains scrub, tall ruderal vegetation and a number of trees, and is located in the Ockham and Clandon Wooded Rolling Claylands Character Area as defined by the Guildford Landscape Character Assessment (GLCA) and Guidance. As detailed above, the proposal cannot be built unless the Wisley Lane Diversion element of the DCO is commenced. This DCO scheme will result in significant changes to the landscape and views in this area, changing the baseline significantly.

On its own, this proposal would create a 'floating' piece of road infrastructure which would be an incongruous addition, out of character with the existing site. However, the use of a Grampian condition would ensure this proposal does not come forward unless the DCO comes forward. Considering the proposal alongside the DCO is therefore an appropriate way to assess the impacts.

The roundabout proposed is quite large in size, so the application will result in considerably more hardstanding and other operational development associated with the road than would be provided by the Wisley Lane Diversion. The stub road will form a dead end, and a road which doesn't lead to a destination will have the potential to appear unsightly, however in the context of the DCO this is not considered to result in any significant harm to the character of the site and wider area beyond that caused by the DCO due to the change in character brought about the heavily engineered road. A condition will be added requiring further details of the treatment of the stub road in relation to any fencing/barriers to prevent access to land beyond the stub road, to ensure this is done in a way that is as considered and visually appropriate as possible.

Whilst some limited harm has been identified in relation to the visual impact of the stub road, there is no specific conflict with the design policies identified above. In addition, the proposal would not result in any conflict with the overall design aims of the A35 allocation.

The impact on neighbouring amenity

During construction works the proposal has potential to result in some loss of amenity to some neighbouring properties from noise, possible vibration and light pollution. The nearest neighbour is RHS Wisley. As this is separated by the A3 the likely impact of the proposed development on this property is limited.

The residential properties most likely to be impacted are those situated to the north west at Elm Corner. Saved policy G1(3) requires that "the amenities enjoyed by occupants of buildings are protected from un-neighbourly development in terms of privacy, access to sunlight and daylight, noise, vibration, pollution, dust and smell".

The impacts arising from the construction of the proposal would be of a temporary nature and could be reduced and controlled through a condition requiring the submission and approval of a Construction Environmental Management Plan (CEMP). The CEMP would include details of the construction processes, the routing of HGVs and mitigation measures such as limiting construction hours and controlling noise and vibration. These measures would be required to be undertaken to ensure the amenity of existing residents is protected in accordance with policy G1(3). A requirement for HGVs to access and egress via the A3 would ensure that no construction vehicles would be required to travel through Ripley Village centre, Ockham Road North, Ockham Lane, Old Lane or the existing Wisley Lane, thereby protecting the amenities of residents in those areas.

As regards light pollution, policy G1(8) of the saved Local Plan and policy LNPEN4 of the Lovelace Neighbourhood Plan require that the impact of artificial lighting is designed to minimise the ecological impact and the spillage of light from the site. The objectives of these policies during the construction phase can be secured through the CEMP and this will limit any harm to the amenity of surrounding residents.

Finally on construction impacts it is noted that the Council's Environmental Health Officer has commented that the site may include asbestos material remanent from the previous use of the site as an airfield. While the control, treatment and disposal of asbestos is primarily a matter covered by legislation outside of the planning system, a condition has been recommended which requires the applicant to provide further details on this matter, including how any asbestos material will be removed from the site and safely disposed of and how the site will be remediated. As an aside, it is also noted that a condition is also recommended to control the presence of any unknown contamination which may be present on the site.

Operational effects

The stub road and roundabout would only become operational if and when the DCO is made and the wider Highways England RIS improvements to the Strategic Road Network are implemented. Ongoing light pollution would be controlled by that process. However, it is noted that modern highway lighting is unlikely to result in significant light spillage and in any case, this could be controlled by condition. While road traffic using the stub road and roundabout would generate additional noise, this would be no greater than that resulting from the DCO proposal.

Given the low sensitivity of the identified receptors and the limited period during which any impacts would be felt it is not considered that any moderate or significant adverse effects are likely as a result of the proposal. Any adverse effects which might occur during the construction process have to be weighed against the benefits of ensuring that the construction of the Stub Road and roundabout takes place at the same time as the construction of the Wisley Land Diversion, thereby avoiding the need to dig up recently constructed roads with its attendant disruption and environmental and energy wastage. It would also avoid, as far as reasonably possible, any further disruption to users of the highway network by carrying out additional or extended road works.

Impact on ecology and trees

Habitats

At its closest point the application site lies approximately 175m to the south-west of Ockham and Wisley Commons SSSI, which is a component site within the wider Thames Basin Heaths SPA network of protected heathland sites. The SPA and SSSI are important features at the International and National levels respectively. However they are considered to fall outside of the zone of influence of the proposals due to the nature of the works and the physical separation between the SPA/SSSI and the works area.

The Ockham and Wisley Local Nature Reserve (LNR) covers the area designated as Ockham and Wisley Commons SSSI, and also extends southwards beyond the SSSI to within 4m of the northern boundary of the application site. It is noted that Local Nature Reserves are described by Natural England as being “for both people and wildlife” and owing to their designation type are considered to be of importance at the County level.

In terms of non-statutory designated sites Wisley Airfield SNCI falls partly within the wider FWA boundary. The SNCI as a whole was selected for the variety of habitats it supports, plus species criteria including its assemblage of rare or notable vascular plants, foraging areas for bats and amphibians and reptile populations. The majority of the application site (1.23 ha) is located within the Wisley Airfield SNCI. The SNCI habitats are in an unfavourable condition due to lack of management and the influence of the neighbouring intensive arable operations. As a whole, Wisley Airfield SNCI is of County level importance.

Elm Corner Woods SNCI runs parallel to the north-west of the Application site boundary and is part of the Ockham and Wisley LNR. Part of Elm Corner Woods is shown on Natural England's Provisional Ancient Woodland Inventory as ancient semi-natural woodland. This SNCI is open access and consists of mixed woodland. As well as forming part of the Ockham and Wisley LNR, the SNCI is well connected to other designated nature conservation sites, including Ockham and Wisley Commons SSSI and the Thames Basin Heaths SPA. It is therefore considered to be of County importance.

The proposals will not cause the direct loss of any part of Elm Corner Woods. In total, 0.17ha of the application site area falls within the 15m buffer zone that is typically implemented to protect ancient woodland. This 0.17ha sits fully within the proposed permanent land take of the Highways England DCO scheme, and as such the proposals will not affect any additional areas of the buffer zone beyond that to be impacted by the DCO works. In the absence of targeted mitigation the earthworks associated with the proposals have the potential to cause damage to the woodland through accidental pollution, dust generation, damage to tree roots and hydrological changes. This could be reversible or permanent depending on the nature of the damage, however any impacts of this nature would be unlikely to undermine the structure and function of the woodland completely and would therefore be significant at the zone of influence level only. The applicant notes that with mitigation, no significant residual impacts on Ockham and Wisley LNR or Elm Corner Woods SNCI and Provisional Ancient Woodland are predicted.

As regards the Wisley Airfield SNCI the only part that will be directly affected by the proposals beyond that already impacted by the DCO is an area of tall ruderal and scrub measuring 0.15 ha in size. This represents 0.53% of the total SNCI area. The applicant notes that the area to be affected is unlikely to support any of the vascular plants for which the SNCI was selected (these plants are associated with disturbed acid grassland and arable margins).

The change of 0.53% of the SNCI from tall ruderal and scrub to hardstanding is unlikely to compromise the structure or function of the SNCI or the species it supports. As such, the applicant concludes that this impact is not significant.

Protected species

In terms of protected fauna, the applicant's Ecological Impact Assessment notes that the closest active badger sett (an outlier) is over 170m from the application site boundary. The Badger population is therefore unlikely to be significantly affected by the proposals and falls outside of the zone of influence.

As regards bats, walked transect surveys carried out by the ecologists in 2016, 2018 and 2019 recorded very low numbers of bats foraging in the vicinity of the application site. The most commonly recorded species were Common Pipistrelle. In both 2016 and 2019, an automated detector was positioned on the edge of the dense scrub and secondary woodland within the application site. In both years, this detector recorded the lowest number of bat passes out of the four detectors positioned around the wider FWA site. Common and Soprano Pipistrelle accounted for the majority of passes. The applicant also notes that Chapter 7 of the Environmental Statement for the Highways England DCO scheme, walked transect surveys carried out by Atkins in 2017 and 2018 produced similar results, with Common and Soprano Pipistrelle representing over 75% of all bat passes. Pockets of Serotine activity were also recorded in Elm Corner woods to the north. No bat roosts or high potential trees have been identified by either the applicant or Atkins within the application site boundary. However, it is acknowledged that there are a number of bat roosts within close proximity of the site boundary. The applicant notes that the bat assemblage within the zone of influence of the proposals is considered to be of local ecological importance. The applicant notes that impacts on bats during construction can be managed through the Construction Environmental Management Plan and for instance, ensuring construction takes place in daylight hours. As the development will only come forward as part of the DCO, the impact from the actual operation of the new road will be assessed and controlled through the DCO. As such, the impacts on bats can be managed and mitigated effectively.

In terms of Great Crested Newts, surveys carried out by the ecologists in 2015, 2019 and 2020 for the wider FWA scheme confirmed the presence of four GCN breeding ponds off-site within the surrounding landscape. All four of these are located around 1km to the east and south-east of the application site boundary, and support 'small' populations of GCN. The applicant notes that it is possible that GCN use the scrub and woodland habitats within the application site during their terrestrial phase, although given the distance to the breeding ponds, numbers are likely to be very small. The applicant notes that given the distance from the application Site to the nearest known breeding ponds (1km), the risk to GCN is considered to be very low and a European Protected Species Mitigation Licence (EPSML) should not be required, providing that works proceed under a precautionary Environmental Working Method Statement (EWMS).

As regards other reptiles presence/likely absence surveys carried out by the ecologists in 2015, 2016 and 2019 recorded Grass Snake, Slow-worm and Common Lizard within the vicinity of the application site. Surveys carried out by Atkins in 2017 (Highways England, 2019a) also recorded all three species in the same general area. It is noted that Adder have been recorded historically, but no evidence of this species has been found in any surveys since 2015. It is noted that the clearance of tall ruderal and scrub vegetation has the potential to cause direct harm to reptiles, however, this will be avoided through the implementation of the applicant's EWMS.

The precautionary working methods for GCN will also apply to reptiles. Adherence to these measures will reduce the risk of harm to reptiles to a negligible level.

The submitted Ecological Impact Assessment notes that subject to the implementation of the proposed impact avoidance and mitigation measures, the proposals will not have any residual significant negative effects on important ecological features, and will conform to all applicable nature conservation related legislation and policy. This will be secured through conditions.

Trees

For the majority of the site, the proposed layout has minimal impact on trees and the Arboricultural Officer does not raise an objection subject to conditions requiring tree protection measures. The roundabout element of the application does project within the 15m buffer zone allocated to the Ancient Semi-natural Woodland that lies to the north, outside the site. The intrusion is directly as a result of the need for the roundabout to lie within the DCO land take and the road arrangement being brought forward under that Order. The implementation of the roundabout need not result in direct harm to the retained trees and nor does it place a form of new land use proximate to the Ancient Semi natural Woodland that would give rise to its harm above that already created by the DCO land use.

Policy LNPEN2 of the Lovelace Neighbourhood Plan states at point e) that any trees removed or lost as a result of development, other than those that are dead, dying or dangerous and of no ecological importance, should be replaced at a ratio of 2:1. Development affecting ancient trees should follow standing advice on ancient woodland and veteran trees. The tree removal required is also required for the DCO, and the area which contains the roundabout and stub does not require the removal of any further trees. As the application doesn't require further tree removal beyond that of the DCO, it would not be considered reasonable in this case to require the replacement tree planting.

Biodiversity net gain

Applying the DEFRA Metric 2.0 biodiversity net gain tool the proposed works would result in a loss of 2.12 biodiversity units using the post DCO 'future baseline'.

This loss would be offset, and a net gain provided offsite, on land to the east of the application site, in the applicant's ownership. An area of 0.4 ha of arable land would be converted to wildflower grassland and managed for biodiversity to achieve a 20% net gain.

Ecology assessment

The Council's ecology consultant states that the applicant's Ecological Impact Assessment has provided a full suite of surveys and has identified the likely impacts to arise on site to both habitats and protected species. They note that a detailed mitigation strategy has been provided which will ensure the favourable conservation status and protection of these species and habitats. As such, no objection is raised in this regard. The Council's consultant also acknowledges that the development will lead to a loss of 0.53% of the Wisley Airfield SNCI. Although it is in agreement that the habitat to be lost does not contain the citation features, the DCO application will also impact upon this SNCI. There will be a cumulative impact through these proposals as well as the recent planning application 20/P/01709, and the emerging application for the wider strategic site. The loss of any SNCI habitat will need to be mitigated for. It is noted that 0.43ha of wildflower grassland will be created to offset the loss of biodiversity.

It is therefore considered that this habitat should include citation features from the Wisley Airfield SNCI (if soil conditions permit), and include management prescriptions for the citation species including bats, reptiles and amphibians. While the loss of some of the SNCI is of course regrettable, with conditions to secure the mitigation, it is noted that no objections have been raised in this regard by the Council's ecology consultant.

Finally, regarding biodiversity net gain it is noted that the NPPF requires a net gain in biodiversity on all development sites. Policy ID4 of the LPSS requires that new development must aim to deliver gains in biodiversity. The accompanying Ecological Impact Assessment submitted by the applicant and the Biodiversity Metric 2 Calculations demonstrate that the development can achieve this. The calculation tool was assessed in accordance with details provided through the training provided by CIEEM on the Metric 2 and it is noted that the calculation will achieve the 20% net gain as identified.

Natural England have also been consulted on the application and raised no objection but did ask that the submitted CEMP be updated to specify protective measures to avoid risks to the Ancient Woodland in terms of incursion into the woodland from construction vehicles and the storage of materials etc as well as a lighting design to protect roosting natterer's bats in a tree in the Woodland. A condition is recommended to ensure that the stub road and roundabout would not become operational until a detailed lighting scheme is approved by the Local Planning Authority.

Habitats Regulations Assessment

The Council has undertaken a Habitats Regulations Assessment (HRA) as part of its assessment of the application. The proximity of the proposed development site to the Thames Basin Heaths SPA triggers the need for a HRA for potential significant effects of this designated site. The site lies within 175 metres and therefore this project should be subject to HRA screening in combination with other projects. The *HRA for Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2017 update)*, which includes details on allocation A35 of the Local Plan, states that there is a requirement for an application level HRA. The two potential impacts identified include recreational disturbance and air quality. Although this application will not result in recreational impacts there is potential for reduction in air quality and therefore this needs to be addressed.

The applicant has submitted additional information in this regard which concludes that the stub road scheme is unlikely to result in significant adverse effects on the TBH SPA due to changes in air quality during the operational phase, either alone or in-combination with other plans and projects, including the DCO or scheme to come forward as part of the LPSS allocation. The additional information received from the applicant has been forwarded to the Council's consultant. They note that the information provided is considered to be sufficient to inform the HRA with the conclusion that there are no likely significant effects on the Thames Basin Heaths SPA from a reduction in air quality.

In conclusion, the proposal will lead to a loss of 0.53% of the Wisley Airfield SNCI which is regrettable. This harm will be assessed in the final section of this report. However, the loss is compensated for through the provision of a wildflower grassland on another part of the wider FWA site and the applicant's assurance that the proposal will deliver net gain in biodiversity of 20%. The impacts on other habitats and species can be mitigated.

A benefit of the proposed application is that, having been designed to enable access to the proposed A35 allocation site, it could be constructed in conjunction with the Wisley Land Diversion element of the DCO scheme, such that any impacts associated with the construction phase would only arise once instead of twice. This is in accordance with the principle of mitigation hierarchy which is to design a scheme which avoids ecological impacts in the first instance.

The impact on flood risk and the proposed surface water drainage strategy

A Flood Risk Assessment and Drainage Plan form part of this application submission.

The application site lies entirely within Flood Zone 1 which is defined as land assessed as having a less than 1 in 1,000 annual probability of flooding. The NPPF and Planning Policy Guidance (PPG) confirm that all types of development are appropriate within this Zone in terms of flood risk.

In terms of Surface Water, the Environment Agency's online mapping shows the site of the roundabout and stub road is not affected by any predicted flow pathways or ponding areas.

A drainage strategy has been identified which draws on the Wisley Lane Diversion drainage strategy. Only preliminary design information is available from Highways England at present, as the details will come at a later stage. The Flood Risk Assessment and the additional information submitted detail a drainage strategy which demonstrates that a viable and deliverable means of surface water attenuation can be achieved.

This strategy can be summarised as follows:

- HE drainage proposals will be retained with alignments adjusted as required to accommodate the deflection for the roundabout;
- runoff from the additional impermeable areas created by the stub road and roundabout (0.036ha over and above the DCO scheme) will be managed with a new soakaway trench;
- if soak away test rates prove to be slow, an overflow to the adjacent existing ditch will be provided with flows limited.

The Flood Risk Assessment and additional flood risk information has been considered by the Lead Local Flood Authority who have advised that they have no objection, subject to conditions to secure the detailed design and future maintenance of the SuDS scheme.

The submitted FRA and Drainage Plan demonstrate that the proposal would not increase surface water run-off. The proposal there complies with policy P4 of the LPSS which requires that "all development proposals are required to demonstrate that land drainage will be adequate and that they will not result in an increase in surface water run-off" and LNP policy LNPEN3 which requires developers to provide a surface water plan for major proposals.

The impact on heritage assets

Conservation areas and listed buildings

Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 states that 'in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.' Section 72 of the same Act calls for special regard to be paid to the desirability of preserving or enhancing the character or appearance of a conservation area. This duty under section 72 applies only to development within a conservation area.

It is one of the core principles of the NPPF that heritage assets should be conserved in a manner appropriate to their significance. Chapter 16 of the National Planning Policy Framework at paragraphs 189 - 199 sets out the framework for decision making in planning applications relating to heritage assets and this application takes account of the relevant considerations in these paragraphs. Paragraph 190 sets out that 'local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal'. Paragraph 193 of the NPPF states that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'. Paragraph 194 goes on to note that 'any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification'. This applies to all designated heritage assets, including conservation areas.

Historic England (HE) have been consulted on the application. They did not wish to offer any comments and suggested that the views of the Council's specialist conservation and archaeological advisers were sought.

There are a total of seven listed buildings, one Registered Park and Garden, and three conservation areas within a 1km radius of the site. These are:

- walls and gates to Ockham Park (Grade II) – Listed Building
 - RHS Wisley Gardens offices (Grade II) – Listed Building
 - Chimneys (Grade II) – Listed Building
 - Park Cottage (Grade II) – Listed Building
 - Millwater (Grade II) – Listed Building
 - Millstream House (Grade II) – Listed Building
 - barn 30m NE from Bridgefoot Farm House (Grade II) – Listed Building
 - RHS Wisley – Grade II* - Registered Park and Garden
-
- Ockham – Conservation Area
 - Ockham Mill – Conservation Area

- Ripley – Conservation Area

These are sited approximately 830m (NW), 830m (S) and 980m (SW) from the application site, respectively.

The Council's Conservation Officer raises no objection and raises the following comments.

In approaching an assessment of the impact (if any) of the proposed development on the setting of the listed building there are two principal factors to be taken into account. First, the architectural quality or interest of the listed building itself is a material consideration in assessing the setting of that building. The nature and character of the listed building is clearly an important factor in judging its setting. Secondly, it is necessary not only to consider the listed building itself but also the nature and appearance of the existing surroundings of the listed building immediately prior to the proposed development being carried out.

It is not considered that any of these heritage assets would be affected by direct physical change rather any likely affect would be to their setting. Therefore, it is necessary to assess the nature, extent and importance of the significance of a heritage asset and the contribution of its setting.

The heritage asset mostly likely to be affected by such matters is the Registered Park and Garden of RHS Wisley. Although physically close at approximately 130m to the north west of the site, RHS Wisley has no real relationship with the application site which falls outside its setting, by virtue of intervening A3 in particular and also from existing mature trees. The gardens are already subject to significant levels of road traffic noise from the A3 which impacts on its character and how the asset is experienced. It is not considered that any additional noise, vibrations and light spill from the proposed development would be that significant to distinguish amplified harm. Any impacts in this regard from the construction phase would be of a temporary nature and hard to distinguish from the construction phase of the DCO. Ockham Mill and Ripley Conservation Areas as well as Millwater, Millstream House are also separated from the proposed development by the A3.

The listed barn at Bridgefoot Farm, approx. 1km to the south west of the application site draws its significance from its historic fabric and its close association with other listed buildings on Bridgefoot Farm. It is not considered that the application site makes any contribution to the setting and the proposed development would not result in harm to the asset.

The wall and gates to Ockham Park, being sited approximately 700m to the south of the application site, draw their significance from their architectural form and association with Ockham Park. The Ockham Conservation Area, Chimneys and Park Cottage also draw their significance from their fabric, form and setting within the historic core of the settlement of Ockham and Ockham Park and it is not considered that these contributing factors would be affected by the proposal.

In conclusion it is considered that there would not be any harm caused to the setting of the identified heritage assets as a result of the proposed development.

Archaeology

In accordance with the policy requirement the application is accompanied by a desk-based assessment. This considers the site to have a generally low-moderate potential for archaeological remains dating from the earlier prehistoric and Bronze Age periods with a low potential for later periods based on the fact that there are few recorded archaeological sites or finds listed on the Historic Environment Record (HER) within the vicinity.

However, the County Archaeologist suggests that with recent archaeological work carried out in the vicinity the potential for prehistoric archaeology is moderate rather than low. It is therefore considered that there is the need for further archaeological work, in line with the National Planning Policy Framework and Local Plan policy. The application site forms part of the planned Junction 10/A3 interchange scheme for which a detailed programme of archaeological evaluation would be required. As the current proposal would not be implemented except as part of the wider DCO scheme a condition would be necessary to ensure that the required evaluation work is conditioned to be carried out prior to the commencement of development.

The report also notes that the historic Parish boundary between Wisley and Ockham runs through the site and appears to survive as an earthwork within an area of dense vegetation. This feature will need to be archaeologically recorded but the report suggests that this feature may be considered as an Important Historic feature under the 1997 Hedgerow Regulations and so further expert advice will be required as to the significance of this feature and whether further work is required to satisfy the regulations. The further investigation work, and any appropriate recording of this information can be captured under the archaeological condition.

No harm has been identified to any heritage assets, and therefore the proposal is in accordance with policy D3 of the LPSS and HE12 of the Local Plan 2003.

Planning balance

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires decisions to be taken in accordance with the development plan unless material considerations indicate otherwise. This requires a broad judgement regarding whether the development accords with the plan read as a whole.

Paragraph 11 of the NPPF also states that 'plans and decisions should apply a presumption in favour of sustainable development...For decision-taking this means...approving development proposals that accord with an up-to-date development plan without delay'.

The proposal is in accordance with the specific site access requirements of policy A35, as well as the Strategic Development Framework Supplementary Planning Document which recognises that the access for the Airfield will be from the realigned Wisely Lane. No significant conflict with relevant Development Plan policies arise, and so it can be concluded that the development accords with the plan when read as a whole.

Notwithstanding this, it is noted that all the harms identified above must be considered and balanced against the benefits of the proposal. For clarity, weighting is used in the following order, with the highest level of weight at the top and the lowest level of weight at the bottom:

- substantial
- considerable

- significant
- moderate
- modest
- limited
- little

Harm

The proposal would result in some harm to the amenities of neighbouring dwellings at Elm Corner. However, this would be mainly during the construction phase, when there will also be activity present on the site from the work associated with the DCO. As such, the impacts resulting from this proposal will be limited. Due to the limited nature of this harm as set out above, this is afforded **modest weight** against the proposal.

The development will lead to a loss of 0.53% of the Wisley Airfield SNCI. However, it is noted that Natural England do not object to the proposal and the Council's ecology consultants also raise no concerns. In addition, it is noted that the loss of a small section of the SNCI would be somewhat offset by the 0.43ha of wildflower grassland that will be created as part of the development. **Moderate weight** is afforded to this harm.

Benefits

Constructing the roundabout and stub road simultaneously with the Wisley Lane Diversion (which forms part of the DCO) would limit construction impacts on the local community and RHS Wisley and ensure that they are built at the same time to avoid digging up the Wisley Lane Diversion which will have only just been constructed. This accords with the economic objective of coordinating the provision of infrastructure set out in NPPF paragraph 8. This benefit is afforded **significant weight**.

The application unlocks potential to develop the land covered by the A35 allocation, by delivering a key piece of infrastructure. This would help to bring forward development in accordance with the spatial strategy outlined in the LPSS. This benefit is afforded **moderate weight**.

It is noted that the proposal includes a new area of wildflower grassland and an overall biodiversity net gain. **Moderate weight** is afforded to this matter.

Conclusion

The proposal is in accordance with the specific site access requirements of policy A35, as well as the Strategic Development Framework Supplementary Planning Document which recognises that the access for the Airfield will be from the realigned Wisely Lane. Therefore, it is in accordance with an up to date development plan in this regard and benefits from the statutory presumption in section 38(6) of the Planning and Compulsory Purchase Act 2004, and from the presumption in favour of sustainable development paragraph 11(c) of the NPPF, as well as according with the plan-lead approach to planning decision making (NPPF para. 15).

The balance which has been undertaken concludes that the benefits of the proposal do outweigh the limited identified harm and therefore, planning permission should be granted.