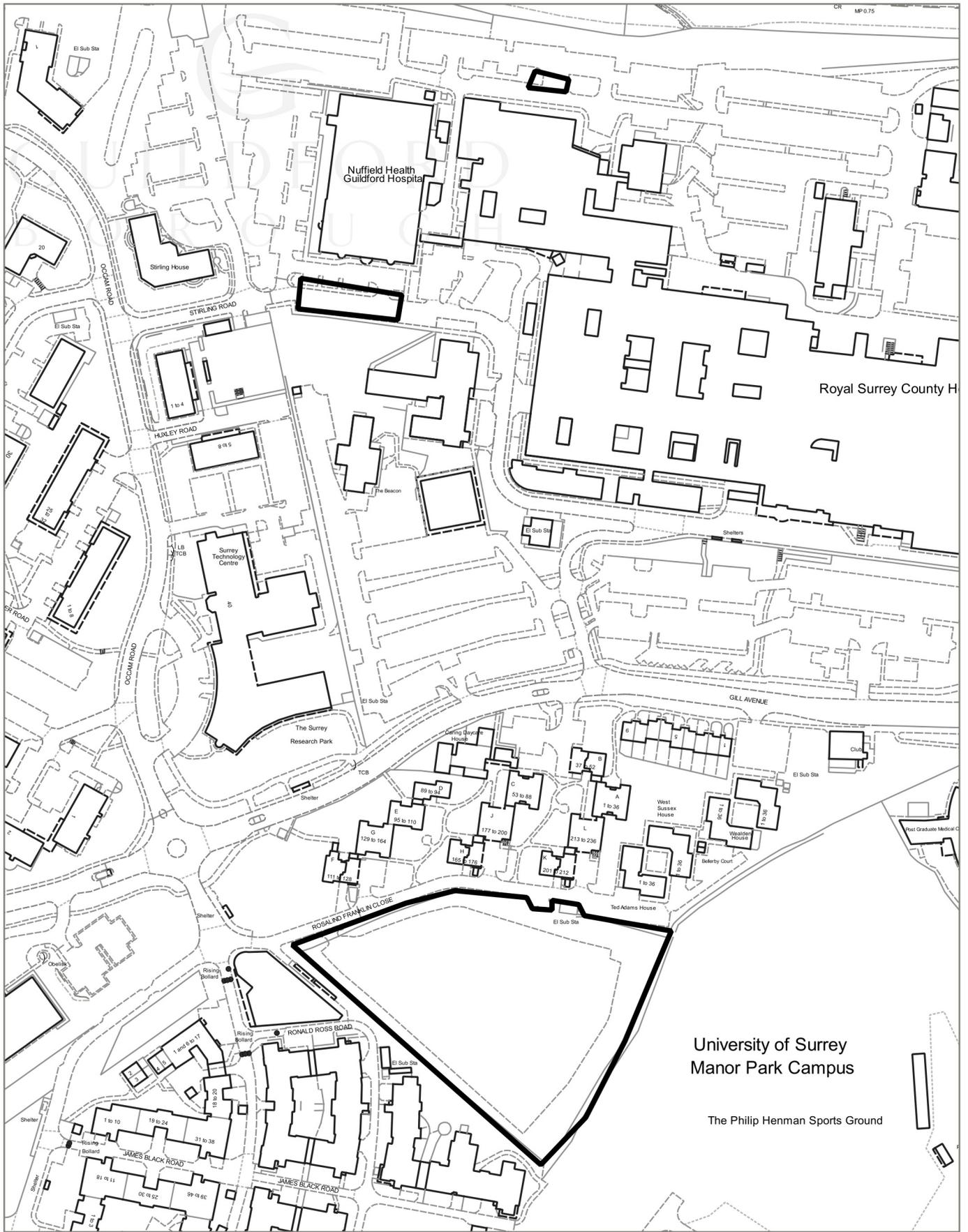


# 21/P/00817 - Royal Surrey County Hospital, Egerton Road, Guildford



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This map is for identification purposes only and should  
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Print Date: 21/12/2021

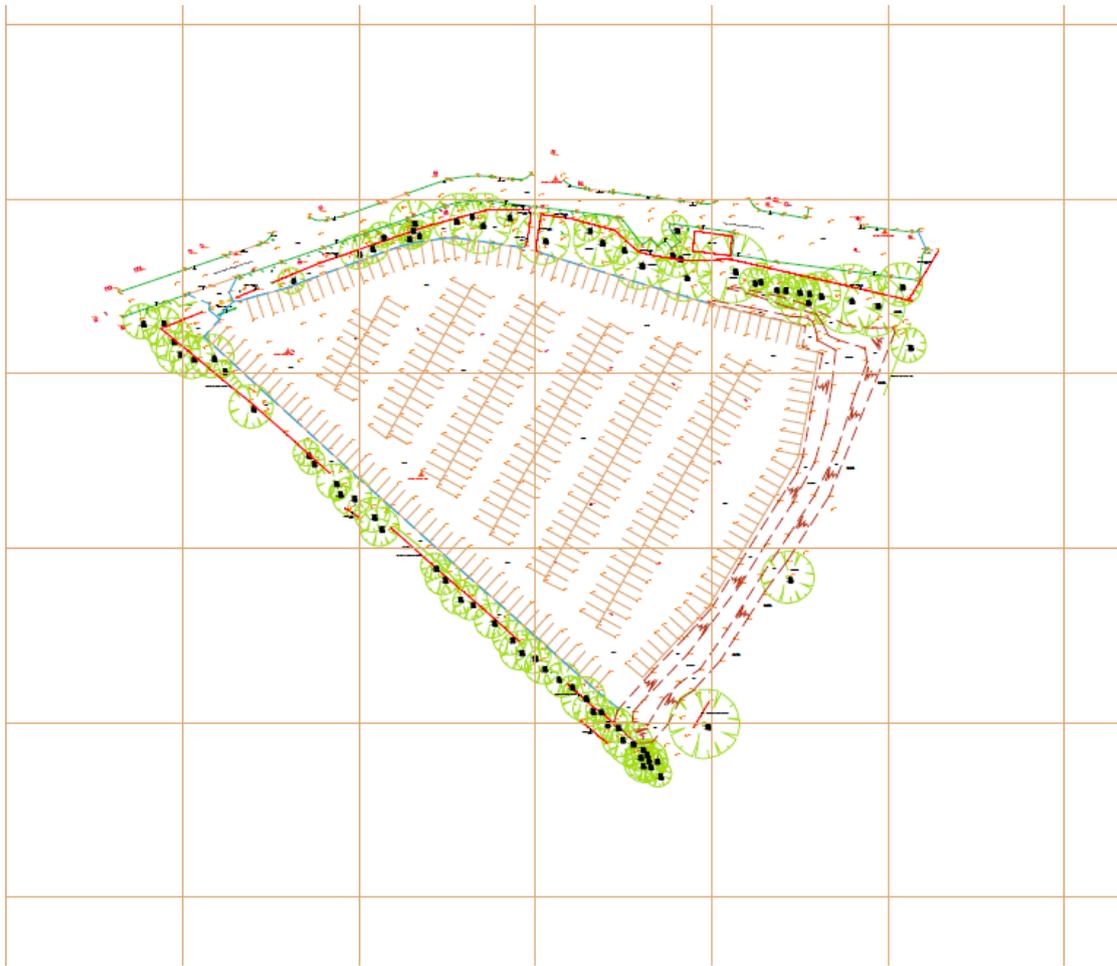


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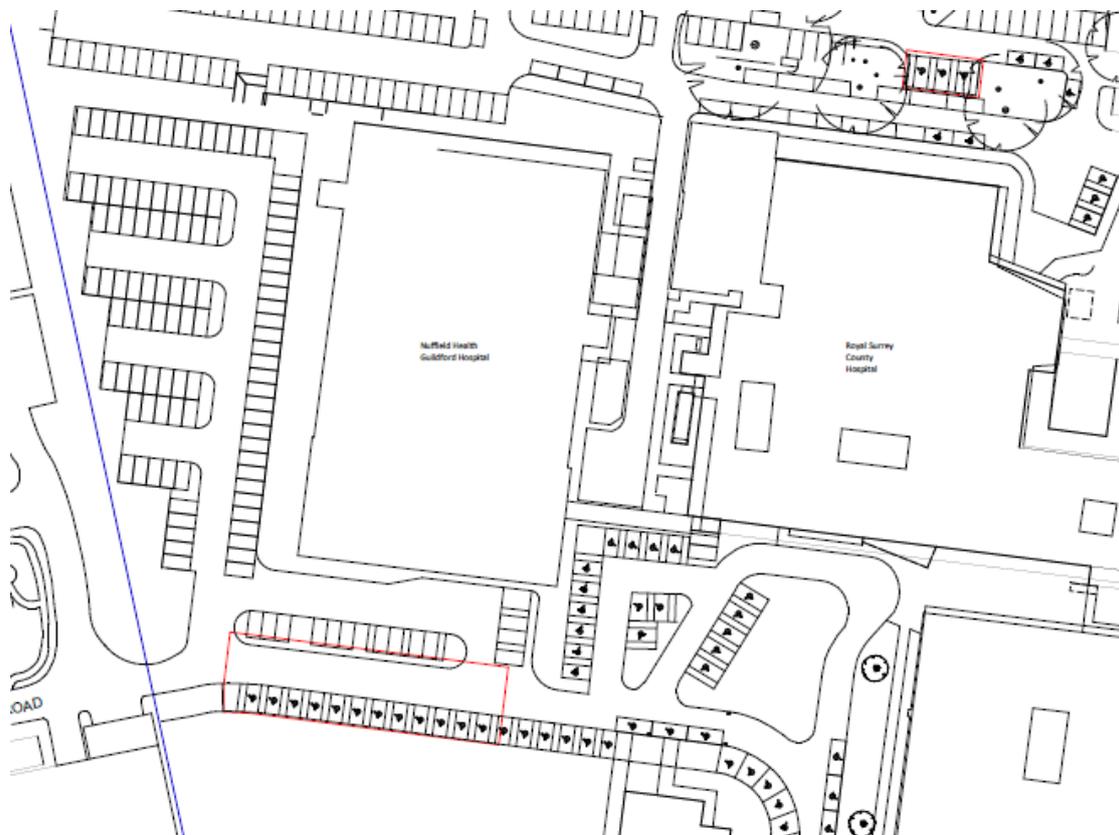
GUILDFORD  
BOROUGH

21/P/00817 – Royal Surrey County Hospital, Egerton Road, Guildford



Not to scale

21/P/00817 – Royal Surrey County Hospital, Egerton Road, Guildford



Not to scale

**App No:** 21/P/00817  
**Appn Type:** Hybrid Application  
**Case Officer:** Paul Sherman  
**Parish:** Onslow  
**Agent :** Mr Chris Wilmshurst  
Vail Williams LLP  
One Crown Square  
Church Street East  
Woking  
GU21 6HR

**8 Wk Deadline:** 04/08/2021

**Ward:** Onslow  
**Applicant:** Prime (UK) Developments Ltd  
Unit 5 The Triangle  
Wildwood Drive  
Worcester  
WR5 2QX

**Location:** Royal Surrey County Hospital, Egerton Road, Guildford, GU2 7XX  
**Proposal:** Hybrid planning application for the development of land known as Plot 23 (land south of Rosalind Franklin Close) comprising: A. Full planning permission for six level multi storey car park to accommodate 598 staff parking spaces and a security office on land at the south of Plot 23 and the creation of 15 disabled parking spaces on main hospital site with associated landscaping, B. Outline planning permission with, matters of landscaping reserved, for new cancer centre and associated car parking on land at the north of Plot 23.

(Amended plans now include detail of access, layout, scale and appearance of cancer centre now submitted)

## **Executive Summary**

### **Reason for referral**

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

### **Key information**

The application is a hybrid planning application. Full planning permission is sought for the multi storey car park (MSCP) and outline planning permission with only landscaping reserved is sought for the new cancer centre.

The MSCP would be six stories with a maximum height of 18 metres providing a total of 598 parking spaces.

The new clinical building would be mainly two storey and include a dedicated parking area with 30 parking spaces and a landscaped sensory garden.

The proposals would replace the existing temporary car parking area.

### **Summary of considerations and constraints**

The site is within the A17 site allocation area within the Adopted Local Plan which seeks to support hospital related development.

Whilst the development comprises two substantial buildings, in the context of the surroundings these do not appear out of place and whilst there would be some harm caused by the MSCP this is outweighed by the collective benefit of the development in terms of improving the hospital related development in the area and improvements to character by the removal of the existing temporary car park.

The development is located in a particularly sensitive area in terms of relationship with the strategic and local highway networks. Highways England and Surrey County Council have raised no objections subject to appropriate conditions and given this, it is considered that the development would not have an adverse impact on either network. The development would also provide a contribution to junction improvement works and other highway works in the area.

The development would also support the delivery of part of the sustainable movement corridor (SMC) with a legal agreement securing land from future development.

**RECOMMENDATION:**

**(i) Subject to a Section 106 Agreement securing:**

- **Submission of an updated Master Travel Plan**
- **Contribution towards the auditing of Master Travel Plan**
- **Contribution towards relevant junction improvement works with the A3**
- **Requirement to undertake a travel study and implement the findings**
- **Contributions to local highway improvements**
- **Safeguarding land for Sustainable Movement Corridor**

**If the terms of the S106 or wording of the planning conditions are significantly amended as part of ongoing S106 or planning condition(s) negotiations any changes shall be agreed in consultation with the Chairman of the Planning Committee and lead Ward Members for Onslow.**

**(ii) That upon completion of the above, the application be determined by the Head of Place**

**(iii) In the event that a satisfactory legal agreement is not completed the Head of Place be allowed to refuse the application**

**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: 0101 PL\_PL04; 0102 PL\_PL04; 0103 PL\_PL04; 0104 PL\_PL04; 0105 PL\_PL04; 0106 PL\_PL04; 0107 PL\_PL04;

0200 REV PL04; 0201 REV PL04; 0300 REV PL\_PL04; 0600 REV PL04; 0900 REV PL05; 090001 REV PL04; 0901 REV PL04; 0905 REV PL04; 0905 REV PL04; 09120 REV PL03; 09140 REV PL03; 09160 REV PL03; 09301 REV PL03; received on 8 June 2021.

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

3. Prior to the commencement of development above the damp proof course (dpc) level details and samples of the proposed external facing and roofing materials including colour and finish shall be submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details and samples.

Reason: To ensure that the external appearance of the building is satisfactory.

4. The MSCP development hereby approved shall not be occupied unless and until the charging points shown on Drawing No. 153905-STL-01-00-DR-A-XXXX-0101 are provided with a fast charge socket (current minimum requirement: 7kw Mode 3 with Type 2 connector - 230 v AC 32 amp single phase dedicated supply) and a further 5% of parking spaces provided with passive charging points. This required infrastructure shall be permanently retained and maintained to the satisfaction of the Local Planning Authority.

Reason: To encourage the use of electric cars in order to reduce carbon emissions.

5. The MSCP development hereby approved shall not be first occupied unless and until space has been laid out within the site in accordance with the approved plans, 153905-STL-01-00-DR-A-XXXX-0101, 0102, 0103, 0104, 0105, 0106 and 0107, for vehicles to be parked, for vehicles to turn so that they may enter and leave the site in forward gear and the controlled accesses implemented. Thereafter the parking, turning and controlled areas shall be retained and maintained for their designated purposes.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users.

6. The MSCP development hereby approved shall not be first occupied unless and until directional signage has been erected within the local area to direct staff, visitors, ambulances, deliveries and drop-offs to ensure the free flow of vehicles within the application site, in accordance with a scheme to be submitted to and approved in writing by The Local Planning Authority.

Reason: To ensure an acceptable flow of traffic.

7. No development including any works of demolition or preparation works prior to building operations shall take place on site until a Construction Transport Management Plan has been submitted to, and approved in writing by the local planning authority. The approved statement shall be adhered to throughout the construction period and shall include:
  - (a) parking for vehicles of site personnel, operatives and visitors
  - (b) loading and unloading of plant and materials

- (c) storage of plant and materials
- (d) programme of works (including measures for traffic management)
- (e) HGV deliveries and hours of operation
- (f) measures to prevent the deposit of materials on the highway
- (g) on-site turning for construction vehicles has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users.

8. No development shall commence until a Temporary Visitor Car Parking Management plan, to include details of management of visitor parking during construction of the multi-storey car park has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.

Reasons: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and are in recognition of Section 9 "Promoting Sustainable Transport" in the National Planning Policy Framework 2021.

9. No development shall commence until a Temporary Staff Car Parking Management plan, to include details of:
- a) management of staff parking during construction of the multi-storey car park
  - b) temporary park and ride facilities have been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.

Reasons: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and are in recognition of Section 9 "Promoting Sustainable Transport" in the National Planning Policy Framework 2021.

10. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.  
Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.

Reason: To ensure sufficient capacity exists.

11. Prior to first occupation of the development hereby permitted, the improvement to the A3 Egerton Road Roundabout will be carried out in accordance with *Drawing B/NHSROYALSURREY.1/03* or such other scheme of works or variation substantially to the same effect, as may be

approved in writing by the Local Planning Authority (in consultation with Highways England and Surrey County Council).

Reason: To mitigate any adverse impact from the development on the A3. To ensure that the A3 continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

12. The development of the MSCP or the cancer care building hereby permitted shall not commence until details of the design of a surface water drainage scheme for the relevant building 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 (+20% allowance for climate change) storm events, during all stages of the development. The final solution should follow the principles set out in the approved drainage strategy. Associated discharge rates and storage volumes shall be provided using a maximum discharge rate of 3.1 l/s.
  - 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 from increased flood risk.
  - 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 that the principles of sustainable drainage are incorporated into the development.

13. Prior to the first occupation of the MSCP, 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 surface water drainage system has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls), and confirm any defects have been rectified.

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

14. Prior to the first use of the MSCP both hard and soft landscape measures

set out on the approved plans (with the exception of planting, seeding and turfing) shall be implemented and retained.

Reason: To ensure the provision, establishment and maintenance of an appropriate landscape scheme in the interests of the visual amenities of the locality.

15. All planting, seeding or turfing approved as part of this permission shall be carried out in the first planting and seeding season following the occupation of the development or the completion of the development, whichever is the sooner. Any trees or plants which, within a period of five years after planting, are removed, die or become seriously damaged or diseased in the opinion of the local planning authority, shall be replaced in the next available planting sooner with others of similar size, species and number, unless otherwise agreed in writing by the local planning authority.

Reason: To ensure the provision, establishment and maintenance of an appropriate landscape scheme in the interests of the visual amenities of the locality.

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

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

17. No development shall commence until a Site Waste Management Plan has been submitted to and approved in writing by the Local Planning Authority that demonstrates how waste generated from construction and excavation activities would be dealt with in accordance with the waste hierarchy. The Site Waste Management Plan will subsequently be kept up-to-date throughout the development process in accordance with the established methodology.

Reason: To ensure that the development takes waste hierarchy into account to manage waste. It is considered necessary for this to be a pre-commencement condition because waste will begin to be generated as soon as any development commences on the site.

18. The development hereby permitted shall be constructed in accordance with the measures in the 'Energy and Sustainability Statement' prepared by Hydrock dated 30 March 2021 and achieve or improve upon the standards set out in those documents. The development shall be built in accordance with the approved details and thereafter maintained.

Reason: To ensure that the development would reduce carbon emissions in accordance with the energy hierarchy.

19. Application for approval of the reserved matters shall be made to the local planning authority before the expiration of three years from the date of this permission.

- Reason: To comply with the provisions of Section 92 of the Town and Country Planning Act 1990 as amended by Section 51(2) of the Planning and Compulsory Purchase Act 2004.
20. The development hereby permitted shall be carried out in accordance with the following approved plans: PL001; PL002; PL010; PL011; PL101; PL102; PL200; PL201; PL300; PL301; PL400; PL401; 020.067 EX01 REV P2; 020.067 EX02 REV P2; 020.067 EX03 REV P1 received on 27 July 2021.

- Reason: To ensure that the development is carried out in accordance with the approved plans and in the interests of proper planning.
21. Prior to the commencement of development above the damp proof course (dpc) level until details and samples of the proposed external facing and roofing materials including colour and finish shall be submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details and samples.

- Reason: To ensure that the external appearance of the building is satisfactory.
22. The cancer centre development hereby approved shall not be occupied unless and until the charging points shown on Drawing No.4767, PL.011 are provided with a fast charge socket (current minimum requirement: 7kw Mode 3 with Type 2 connector - 230 v AC 32 amp single phase dedicated supply). This required infrastructure shall be permanently retained and maintained to the satisfaction of the Local Planning Authority.

- Reason: To encourage the use of electric cars in order to reduce carbon emissions.
23. The cancer centre development hereby approved shall not be first occupied unless and until space has been laid out within the site in accordance with the approved plans, Drawing No.4767, PL.011, for vehicles/cycles to be parked, for vehicles to turn so that they may enter and leave the site in forward gear and the controlled accesses implemented. Thereafter the parking, turning and controlled areas shall be retained and maintained for their designated purposes.

Reasons: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and are in recognition of Section 9 "Promoting Sustainable Transport" in the National Planning Policy Framework 2021.

#### **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

In this case pre-application advice was sought and provided which addressed potential issues, the application has been submitted in accordance with that advice and no further issues have arisen.

2. This development involves work to the public highway (strategic road network and local road network) that can only be undertaken within the scope of a legal Agreement or Agreements between the applicant and Highways England (as the strategic highway company appointed by the Secretary of State for Transport) and, as necessary and appropriate, the Local Highway Authority. Planning permission in itself does not permit these works. It is the applicant's responsibility to ensure that before commencement of any works to the public highway, any necessary Agreements under the Highways Act 1980 are also obtained (and at no cost to Highways England). Works to the highway will normally require an agreement or agreements, under Section 278 of the Highways Act, with Highways England and the Local Highway Authority.

3. **Highway Informatives**

- 1) The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders. (Highways Act 1980 Sections 131, 148, 149).
- 2) 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
- 3) It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. Please refer to:  
<http://www.beama.org.uk/resourceLibrary/beama-guide-to-electric-vehicle-infrastructure.html> for guidance and further information on charging modes and connector types.
- 4) Notwithstanding any permission granted under the Planning Acts, no signs, devices or other apparatus may be erected within the limits of the highway without the express approval of the Highway Authority. It is not the policy of the Highway Authority to approve the erection of signs or other devices of a non-statutory nature within the limits of the highway.
- 5) All bridges, buildings or apparatus (with the exception of projecting signs) which project over or span the highway may be erected only with the formal approval of the Transportation Development Planning Team of Surrey County Council under Section 177 or 178 of the Highways Act 1980.
- 6) The permission hereby granted shall not be construed as authority to obstruct the public highway by the erection of scaffolding, hoarding or any other device or apparatus for which a licence must be sought from the Highway Authority Local

Highways Service.

## **Officer's Report**

### **Site description**

The application site comprises approximately 1.3ha of land located to the south of Rosalind Franklin Close and forms part of the wider Royal Surrey County Hospital (RSCH) estate. The site is bounded by Rosalind Franklin Close to the north with staff accommodation associated with the RSCH located beyond. To the south the site bounds the University of Surrey's Manor Park Campus with a number of large buildings containing student accommodation adjacent to the boundary of the application site.

Access to the site is from Rosalind Franklin Close via Gill Avenue; both of which are private roads within the ownership of the RSCH. Gill Avenue adjoins the public highway at the junction with Egerton Road. The site is currently used as staff car park for the RSCH and provides approximately 406 car parking spaces; this is subject to a temporary planning permission granted (on appeal against an Enforcement Notice) on 12th July 2019. This planning permission will expire in July 2024.

Other than the hard surfacing and various lighting columns and signage associated with the use of the site as a car park the application site contains little existing development. The majority of the site has also been cleared of vegetation although the trees and hedges marking the boundaries of the site have generally been retained. In particular the northern boundary of the sites is marked by a number of mature trees of reasonable quality. The site also includes a noticeable level change falling from the high point at the access to the south and east of the site, with total level changes across the site of 5.1m and 7.4m respectively.

The application site is located within the urban area and is allocated for development by Policy A17 of the Guildford Local Plan: Strategy and Sites 2015-34. The site is also within the 400m to 5km Zone of Influence of the Thames Basin Heaths Special Protection Area.

### **Proposal**

The application is a hybrid application which seeks full planning permission for the erection of a multi-storey car park (MSCP) and outline planning permission for a new cancer centre associated with the RSCH.

The outline application for the cancer centre includes matters of access, layout, scale and appearance with landscaping the only matter being reserved. The application describes this building as being a new 'cancer centre' to be operated by Genesis Care, a private sector provider of cancer treatments who are currently located at the Mount Alvernia Hospital on Harvey Road. While the applicants intention is for the building to be used by Genesis Care, and used to provide cancer treatments, Genesis Care are not the applicant for the development and the applicant has not sought to limit the use of the new building to cancer treatment. In any event, it would not be reasonable for the Council to prescribe the clinical uses that the building would be used for or whether this be used directly by the NHS or by a provider of healthcare. Accordingly, this application should be considered as providing new clinical facilities and should not be considered to be limited to being a cancer treatment centre or that it would be limited to the private occupier currently intended to occupy it (i.e. Genesis Care). In the event that the building was to be used for another clinical use, be it by the NHS directly or by another private provider of health care, this

would likely not require a further planning permission.

Access to the site would remain from the existing access point on Rosalind Franklin Close and this access would serve both the proposed new MSCP and the new cancer centre. The MSCP would be located to the rear of the site adjacent to the boundary with the Manor Park Student accommodation while the proposed clinical building would be located to the front of the site, between the MSCP and the RSCHs staff accommodation on Gill Avenue.

The MSCP would comprise a large rectangular building approximately 80m in length and 35m deep. It would have a height of between 15m and 18m and will include 6 split level parking decks providing a total of 598 car parking spaces. The building would have two cores with lift and stair access located at the north and south ends of the building with a security office also located in the north section of the building at lower ground floor level. Vehicle access to the building will be from the south west corner of the building while pedestrian access and egress will be from the north of the building and will link to a new footpath linking the building to Rosalind Franklin Close, in turn this will pass through the staff accommodation site and across Gil Avenue to the RSCH. The building would have a functional appearance with the stair cores constructed from cast concrete and the elevations of the building clad a metal mesh skin and solid anodised aluminium panels to serve as headlight screens. The trees on the boundaries of the site will be retained with additional planting provided adjacent to the eastern site boundary which is shared with Manor Park Campus.

The clinical building would be predominantly two-storey but would include a roof mounted plant room over part of the building. The building would have height of 8.6m with a maximum height of 11.1m including the roof top plant. It would have a length of approximately 48m with a depth of approximately 27m. The building would have a contemporary appearance with elevations of dark brick at ground floor level with lighter coloured aluminium cladding used on the upper sections of the building. The first floor would also be cantilevered to provide an overhang giving shelter to pedestrians accessing the building and a glazed curtain wall feature making the entrance and reception areas. The building would benefit from a dedicated parking area, providing 30 car parking spaces, which would be located to the front of the building. There would also be landscaped sensory garden between the car parking area and the entrance to the building which would be available for staff and patients / visitors. The landscaping on the site boundaries is also shown to be retained and supplemented where necessary.

### **Relevant planning history**

15/P/00976 - Temporary parking provision for 388 spaces for a period of 2 years at land off Rosalind Franklin Close for hospital use.  
Approved (11/11/2015)

17/P/02554 - Variation of condition 1 of 15/P/00976 approved 11/11/2015, to allow the continued use of land to south of Rosalind Franklin Close as parking provision for 388 spaces for a period of 3 years.  
Refused (14/03/2021)

ENF/17/00405 - Unauthorised use of the land as a car park following expiry of temporary permission 15/P/00976 on 31st December 2017.  
Enforcement Notice issued (16/03/2018), appeal allowed and enforcement notice quashed (12/06/2019). Planning permission granted for a temporary period of 5 years.

19/P/01869 - Variation of Condition 2 (parking layout) and 3 (travel and parking plan) of planning application as approved on appeal (APP/Y3615/C/18/3200526) on 12/07/2019.  
Approved (24/01/2020)

## **Consultations**

### Statutory consultees

National Highways (formally Highways England): No objection subject to a planning condition to secure an improvement to the A3 Egerton Road Roundabout.

County Highway Authority: No objection subject to conditions and a legal agreement to secure improvements to the local highway network and measures to promote sustainable travel.

Environment Agency: No comments received at the time of writing

### Internal consultees

Head of Environmental Health and Licensing: No objection subject to conditions to control light spill from the proposed car park.

### Non-statutory consultees

Surrey Police Crime Reduction Officer: I am pleased to report that I have been working with the development team for this project, based on the work we have completed the Car park is on track subject to a final inspection I am confident this will achieve a Park Mark Accreditation.

### Amenity groups / Residents associations:

University of Surrey Students Union: Object to the application due to the impact on safety and privacy of students residing in Manor Park.

Guildford Society: Objects on the following grounds:

- design
- traffic impact
- light pollution
- sustainability

## **Third party comments**

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

- impact on the occupants of the adjoining student accommodation
- impact of noise, light, and air pollution
- impact on the wellbeing of the occupants of the student accommodation
- overlooking / impact on privacy
- loss of currently pleasant views from the student accommodation units
- loss of daylight to adjoining student accommodation
- increase traffic on local roads
- increased congestion limiting access to the Research Park
- lack of need for additional parking

- impact on pedestrian safety
- poor design / impact on the character of the area
- detrimental to public transport / sustainability
- scale of the building is inappropriate to the local area
- fails to consider impacts of climate change
- restricted access to Research Park will have wider economic impact

154 letters of support have been received principally outlining the following positive comments:

- need for extra parking at RSCH
- benefit of additional clinical facilities
- improved working conditions for staff
- no adverse impact on local highway network
- benefits for staff and visitors to the site
- reduced parking in surrounding residential streets
- need to support NHS / hospital related development

### **Planning policies**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be taken in accordance with the Development Plan unless material considerations indicate otherwise. This introduces a presumption in favour of development that accords with the development plan, and a presumption against development that does not.

### **Planing policies**

The Development Plan comprises,

- Guildford Borough Local Plan: strategy and sites 2015-2034 (LPSS)
- Guildford Local Plan 2003 (LP2003)
- South East Plan 2009 (SEP)

#### Guildford Borough Local Plan: strategy and sites 2015-2034

Policy S1: Presumption in favour of sustainable development  
 Policy P4: Flooding, flood risk and groundwater protection zones  
 Policy D1: Place Shaping  
 Policy D2: Climate change, sustainable design, construction and energy  
 Policy ID1: Infrastructure and delivery  
 Policy ID3: Sustainable transport for new developments  
 Policy ID4: Green and blue infrastructure  
 Policy A17: Land south of Royal Surrey County Hospital, Rosalind Franklin Close, Guildford

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

Policy G1: General Standards of Development  
 Policy G5: Design Principles  
 Policy NE4: Species protection  
 Policy NE5: Development affecting trees, hedges and woodlands

#### South East Plan 2009

## Policy NRM6: Thames Basin Heaths Special Protection Area

While the Development Plan is the starting point for decision making, there are a number of other documents that are material considerations when exercising a planning decision. The weight to be attributed to these documents will be a matter for the decision maker but national planning policy statements should be afforded the highest level of weight, followed by locally made documents that have been adopted for decision making. Other documents should normally be afforded lesser weight but can play a significant part in decision making, especially where they have been subject to public consultation.

### The National Planning Policy Framework

The following sections of the NPPF are considered to be most relevant to this application:

Chapter 2: Achieving sustainable development  
Chapter 4: Decision-making  
Chapter 6: Building a strong, competitive economy  
Chapter 8: Promoting healthy and safe communities  
Chapter 9: Promoting sustainable transport  
Chapter 11: Making effective use of land  
Chapter 11: Achieving well-designed places  
Chapter 14: Meeting the challenge of climate change, flooding and coastal change  
Chapter 15: Conserving and enhancing the natural environment

### National Planning Practice Guidance

The following sections of the NPPG are considered to be most relevant to this application:

- Air quality
- Climate change
- Design: process and tools
- Flood risk and coastal change
- Health and safe communities
- Light pollution
- Natural environment
- Travel Plans, Transport Assessments and Statements
- Use of planning conditions

### Other National Planning Guidance Documents

The following Written Ministerial Statements are material considerations:

- Sustainable Drainage Systems (House of Commons: Written Statement HCWS161)
- Parking / Planning Update (House of Commons: Written Statement HCWS488)

### Supplementary Planning Documents

- Climate Change, Sustainable Design, Construction and Energy SPD
- Planning Contributions SPD
- Vehicle Parking Standards SPD

## **Planning considerations**

The main planning considerations in this case are:

- the principle of development
- the impact on the character of the area
- the impact of the development on residential amenities
- the impact of the development on the local and strategic highway networks
- the impact of the development on the need to promote sustainable transport choices
- the impact of the development on air quality
- the impact of the development on Flood Risk and Sustainable Drainage
- sustainable design and construction
- legal agreement requirements

### The principle of development

The application site is located within the urban area where the principle of development is generally considered to be acceptable. The site is allocated for development by Policy A17 of the Local Plan which states seeks to support 'hospital related development' on the site as well as development which supports the operation of the Royal Surrey County Hospital (RSCH).

Policy A17 of the Local Plan requires that any proposals for the site should:

- be for development related to the RSCH
- must ensure that the proposed layout does not prevent the provision of the Sustainable Movement Corridor (SMC), and
- must contribute towards encouraging use of the SMC

The Local Plan policy also identifies opportunities for the development of the site which include, the provision of staff accommodation, the provision of medical facilities and to encourage cycling and pedestrian movements within the local area. Key considerations for applications are identified as being the existing use of the site as a temporary car park and the impact of any development on the local and strategic highway network.

The application proposes the use of the site for a Multi-Storey Car Park (MSCP) as well as new clinical facilities. The development proposed would clearly meet the requirement for being related to the RSCH in that it would provide new clinical facilities as well as parking for staff working at the RSCH. The proposed development would not be located on land needed for the SMC and would not prevent or impair the provision of this piece of essential infrastructure. The final consideration is therefore whether the proposed development, in particular the creation of a new MSCP, would encourage use of the SMC and whether this would be compatible with the need to promote sustainable modes of transport. These matters will be considered in the relevant sections of the report set out below.

Having regard to the above, it is clear that the proposed development would clearly meet the requirement that the development be hospital related. The implications of the development on the SMC and whether the proposal meets the requirement to support the use of sustainable modes of transport will be assessed in the following sections of this report. Subject to these considerations, the development is considered to comply with the objectives of Policy A17 as well as the objectives of Policy ID3 of the Local Plan. Accordingly, it is concluded that the development is acceptable in principle subject to the consideration of the impact on transport sustainability and the SMC.

### The impact of the development on the character and appearance of the area

The application site is located to the west of Gill Avenue and south of Rosalind Franklin Drive; the site is currently largely undeveloped and is in use as a temporary car park associated with the RSCH. The site comprises part of the wider RSCH site but while the main hospital site is characterised by unplanned development which has responded to the needs of the hospital, the development in the surrounding area generally comprises large buildings set in well landscaped plots. This character is evident on the existing development to the west of Gill Avenue as well as the existing buildings on the research park, and the development on the University's Manor Park campus.

The development proposed includes the erection of a new clinical building and a MSCP. While this is a hybrid application there is nothing binding in the application to suggest that both elements of the scheme would be built at the same time, or even that both elements of the scheme would be built. Accordingly, it is necessary to consider the impact of each element of the scheme, as well as the cumulative impact of the developments, on the character and the appearance of the area.

For the purposes of this application, the applicant has split the site in to two elements. The southern part of the site is to be used for the MSCP while the northern part of the site is to be used for the clinical facilities building. The application for the MSCP is made in full and while the application for the clinical building is at outline, only matters of landscaping are reserved at this stage. Given that matters of layout, scale, design and appearance are provided there is considerable detail available to assess the impact of this building, such details would be secured by condition in the event that planning permission was to be granted.

The application site is located in an area that includes a wide range of building scales and types. The site is adjoined by RSCH staff accommodation which is predominantly three-storey as well as student accommodation at the University of Surrey's Manor Park Campus which includes large buildings of up to five-storeys. The wider area also includes the large buildings of the RSCH and a number of large commercial buildings located on the Surrey Research Park.

The MSCP would comprise a very large building measuring 80m in length and 35m in depth; it would include 6 car parking decks and would have a total height of approximately 18m. The proposed building would be set to the rear of the site and on the lowest part of the site and although the existing buildings largely screen the development from Gill Avenue the proposed structure would be visible from Rosalind Franklin Close and in glimpsed views from Alexander Fleming Road, James Black Road and Daphne Jackson Road within the University's Manor Park Campus. The MSCP would have a functional appearance and while the use of metal mesh cladding and solid aluminium panels goes some way to break up the visual mass of the building it would still appear as a large and somewhat imposing building. It is however also accepted that the very nature and requirements of the building make interesting architectural design challenging and large car parks are inherently unlikely to be of the highest architectural or design quality.

In this instance, while it is undeniably a large and uncompromising building, its impact on the character of the area is limited by its location and it would be seen against, and in the context of, other large buildings in the local area most notably the large student accommodation blocks on the Manor Park campus. The impact of the development could also be further mitigated by additional planting on the site boundaries which while this would not screen the full height of the

development it would soften the appearance of the development in shorter range views. Accordingly, it is considered that while the development would have a minor adverse impact on the character or the appearance of the area this impact is not so severe as to warrant the refusal of the application on these grounds alone. This adverse impact should be weighed against the benefits of the scheme and the presumption in favour of delivering hospital related development on this site.

The proposed clinical building would be located broadly within the centre of the site with an area of parking and a landscaped sensory garden area located to the front of the building and south of Rosalind Franklin Close. The building would be two-storey (with a roof top plant area) and while the proposed building would have a relatively large footprint it would be broadly consistent in height with the existing RSCH staff accommodation and would be lower than a number of the University buildings which adjoin the site to the south. The scale and location of the building mean that it would be almost entirely screened from the principal routes within the Manor Park Campus and from Gill Avenue. Views from Rosalind Franklin Close would be limited to those from the access point with other views largely screen by existing and proposed landscaping. The building would have a contemporary appearance and has been carefully designed to provide a high-quality building that would sit comfortably within its site and the wider area. The development would also remove the existing temporary car park and the provision of the building and a high quality hard and soft landscaping scheme would enhance the character and appearance of this part of the hospital's estate.

It is therefore considered that while the proposed MSCP would give rise to a minor adverse impact on the character and the appearance of the area these should be weighed against the benefits of the proposal and the policy presumption in favour of hospital related development on this site. The clinical building would be of a high design quality and would enhance the character and the appearance of the area and accordingly it is concluded that individually these elements are acceptable in this regard. In the event that both elements of the scheme were to be built out it is noted that the proposed clinical building would also have the benefit of providing additional screening or the MSCP in views from the north and from Rosalind Franklin Close. There are no cumulative adverse impacts from the development of both buildings and there would be some benefit from both of the buildings being constructed.

Having regard to all of the above it is concluded that the developments, individually and cumulatively, meet the objectives of Policy D1 of the LPSS and the relevant guidance set out in the NPPF. In the event that planning permission is to be granted suitable conditions to control the use of external materials and the hard and soft landscaping of the sites should be included.

#### The impact of the development on residential amenities

The application site is located on a parcel of land located between the University's Manor Park campus and the hospitals staff accommodation located south of Gill Avenue. The development proposed has the potential to impact on the residential amenities currently enjoyed by the occupants of the residential developments though the scale of the proposed buildings, the potential increase in the intensity of the use of the site, as well as from environmental impacts such as increased noise and light pollution.

The application seeks permission for two distinct elements, namely the clinical facilities to be located within the northern part of the site and the MSCP located within the southern part of the site. Given that the application is a hybrid application, and that it is possible that either one of the applications could be implement without the other, it must be shown that both individually and

cumulatively, the development would not result in a material adverse impact on the amenities enjoyed by the occupants of the surrounding residential properties.

The multi storey car park is located to the eastern part of the site and is in close proximity to a number of student accommodation blocks. Whilst it is of a significant size, the relationship to nearby student buildings is sufficient to ensure that the structure itself would not adversely impact on the amenities of these occupiers. Furthermore, additional landscaping can be provided around the site boundary to soften the appearance of the building. Therefore in this respect the development would not be harmful. In terms of the use of the building as a car park, there would be some noise generation, however, this would not be significant and the building is designed to minimise light spillage to the surrounding properties.

The clinical building is located further to the west of the site and its proximity from nearby properties is such that it would not negatively impact in terms of loss of light etc. Whilst it benefits from a modest car park the vehicle movements associated would not be significant and are unlikely to give rise to concerns over neighbouring amenity. The use of the building as a clinical facility is unlikely to give rise to significant levels of noise and disturbance.

In the event that both elements of the scheme were to be implemented it is not considered that this would result in any greater impact on the residential amenities of the occupants of the surrounding residential properties identified above. The MSCP would screen the clinical building from the occupants of the student units and the clinical building would also create a buffer between the MSCP and the adjoining hospital staff accommodation. Given that both elements of the scheme have been considered to be acceptable in their own right, there is no reason to consider that the combined impact of the two elements is not acceptable. While this would increase the intensity of the use of the site it is not considered that this would be to such a significant degree that it would result in any material disturbance of occupants such as to be detrimental to the amenities of the occupants of these properties.

#### The impact of the development on the local and strategic highway networks

While as is noted above, the two elements of the scheme could be provided individually or cumulatively, the impact on transport matters is very much more relevant in terms of the impact from the MSCP. While the proposed clinical facilities would result in additional vehicle movements these are de-minimis in terms of the existing clinical facilities which are provided by the RSCH while the creation of new parking spaces within the MSCP has the potential to significantly increase the number of car trips to the hospital and increase the number of movements on the already congested road network.

The application site is accessed from Rosalind Franklin Close; this is a private road which is accessed from Gill Avenue which is also a private road owned and controlled by the applicant. Gill Avenue joins the public highway network at the junction with Egerton Road. Both the MSCP and the clinical building will use the proposed access from Rosalind Franklin Close with the vehicle movements split within the site to give individual access to the MSCP and the clinical building. The application site is located on a part of the highway network which is known to be congested. In addition to the hospital, Gill Avenue also serves the Surrey Research Park which is another major employer in the borough and a significant contributor to the traffic on the local road network. Both the RSCH and Surrey Research Park are accessed along Gill Avenue where queues form leading into the sites in the AM peak and away from the sites in the PM peak.

Both the NPPF and the Local Plan seek to ensure that new development does not impact on the

operation of the Local Highway Network; neither document seeks to extend this consideration to the impact of development on private roads. The NPPF also makes clear that planning permission should not be refused on transport grounds unless the impact on the highway network is severe. Policy ID3 of the LPSS seeks to ensure that new development does not adversely impact on the local highway network and supports development which would contribute to the delivery of an accessible and safe transport system which maximising the use of the sustainable transport modes such as walking, cycling and the use of public transport.

The application site is currently used for car parking associated with the RSCH and provides approximately 406 car parking spaces. The current car parking is subject to a number of controls and restrictions, enforced by a permit system, which are intended to ensure that the majority of trips to and from the site are outside of peak hours with the intention being that the impact on the public highway is reduced as far as possible. While the site is currently used for car parking this is only subject of a temporary planning permission and the appeal decision which granted this temporary permission was clear that the use of this site for car parking contributes to the congestion on the network and that the period for the temporary permission should be used to agree a permanent solution to the parking difficulties associated with the RSCH while mitigating the impact on the transport network. While these measures are controlled by planning conditions it is not clear how effectively these are working as when officers have visited the site a number of vehicles have been seen to be parked without the correct permit and a number of vehicles were observed to be parked outside of the bays.

The RSCH is one of the major employers in the borough with approximately 5000 members of staff, including those directly and indirectly employed. There are currently approximately 1100 parking spaces available for use by staff which includes c.700 on the main hospital site and the c.400 spaces on Plot 23. This means that there is parking for 23% of staff although it must be acknowledged that not all of the 5000 members of would be working at the same time and therefore a higher proportion of staff are likely to be accommodated during their shifts.

The development proposed would see the current provision of c.400 temporary car parking places replaced with a new permanent MSCP providing 598 permanent car parking spaces for use by staff at the RSCH, this would be in addition to the 30 spaces intended to serve the new clinical building. The proposal also includes changes to the parking arrangements on the main RSCH site which would see 170 existing staff parking space be made available for visitor parking. The development would therefore increase the number of visitor parking spaces from c.460 to c.630 while the number of staff parking spaces would increase by 28 (including those spaces subject to temporary planning permission).

The Councils Parking Strategy SPD sets out a maximum parking standard of 1 car parking space per 4 members of staff plus 1 parking spaces per 3 daily visitors. It should however be noted that these parking standards date back to 2006 and that the Written Ministerial Statement on parking has suggested that maximum parking standards should not be rigidly applied unless there is clear and up to date justification to do so. The scale and the complexity of an organisation such as the RSCH also makes applying a specific parking standard problematic given the number of different ways and staff numbers can be considered, shift working patterns and number or timing of visitors attending the site. It is beyond doubt that the RSCH has struggled for some time to be able to offer the number of spaces that both staff and visitors to the site expect to be provided and this is evidenced by the applicant in a number of staff and visitor surveys undertaken over several years. It is also clear that there has been an impact from the current pandemic both on the number of people using services at the RSCH but also on the ability of people to feel safe in using public transport to access the site. It is therefore considered that it would be inappropriate

to seek to apply a maximum parking standard to the RSCH and a more flexible bespoke consideration to the level of staff and visitor parking should be applied.

The need to control, and not to over-provide car parking spaces has a number of legitimate objectives and this includes seeking to ensure that sustainable transport choices are prioritised. The restriction on parking availability should ensure that people use other modes of transport available and this in turn should ensure vehicle movements on the local highway network do not increase to the point that it would have an unacceptable impact on the operation of the network. It is therefore considered that rather than applying a specific parking standard to the RSCH, the level of parking should not be viewed as unacceptable provided it can be shown that all reasonable measures to promote sustainable transport choices have been taken and that the additional trips generated by the additional parking would not have an adverse impact on the operation of the local or strategic road network.

The strategic highway network, in this instance the A3, is managed by National Highways. The principal concern of National Highways in respect of this application is the impact of the development on the operation of the A3 and in particular traffic seeking to leave the A3 at the Egerton Road junction and whether this would cause delays on the slip road backing back on to the A3 carriageway. This junction has recently been upgraded with a longer slip road to order to alleviate a pre-existing issue and to improve the flow of traffic on the strategic road network.

National Highways have been consulted on the application. While it initially raised concerns with the proposed development the applicant has provided additional information and proposed mitigation to the Egerton Road / A3 junction. Following consideration of this information National Highways has advised that they have no objection to the proposed development subject to conditions which would ensure that the Egerton Road / A3 junction was re-lined to increase its capacity. Subject to this condition National Highways has confirmed that it has no objection to the development based on the impact on the strategic road network.

The local road network is managed and controlled by Surrey county Council however its remit is limited to consideration of the impact of developments on the adopted public highway. In this instance the public highway begins at the signalised junction of Egerton Road and Gill Avenue; Gill Avenue and Rosalind Franklin Close are private roads owned by the applicant.

The County Highway Authority has considered the application and has advised that, based on the information provided, the provision of the MSCP will not result in significant increase in staff numbers travelling to the site by private car. While this may be true, and the changes to the number of staff parking spaces may be modest, it is necessary to ensure that the objective to reduce private car travel to the hospital is maintained and this would be secured through planning conditions which will be discussed in the next section of this report.

While the total increase in staff parking numbers is relatively modest, the development would include the rearrangement of much of the on-site parking to provide c.170 additional visitor car parking spaces. While it is a clear benefit to visitors to be able to park on site this benefit needs to be balanced, if necessary, against the objective of ensuring the safe and efficient operation of the local highway network. The applicant has suggested that there has been a reduction in visitors and staff on site due to the current pandemic, and that this will continue post-covid due to appointments being able to be undertaken remotely and which should therefore result in a reduction of trips associated with the site on the network. While this is at best uncertain, if true, it would appear to undermine the need for additional parking which is the cornerstone of this application.

Given that the application results in a significant increase in the number of parking spaces on site, be it staff or visitors, it is reasonable to assume that this would lead to a corresponding increase in the number of vehicle trips on the local highway network. While the applicant states this would not be the case for a number of reasons, including the pandemic limiting face-to-face meetings, this is likely to be a short / medium term impact and it seems unlikely that a public sector organisation would provide additional parking if it did not feel that this would be used in the longer term. The provision of these spaces has a cost, in particular the cost associated with the creation of the MSCP, and while the applicant states that there would be minimal additional vehicle movements associated with the proposed development it is unlikely that the applicant would provide c.170 additional visitor car parking spaces if these were unlikely to be used and if they were unlikely to contribute to parking revenue generated on the site.

Notwithstanding the claims by the applicant, it is clear that the proposed development has the potential to increase the number of trips by private car to the RSCH and the impact of these additional trips on the local highway network should be mitigated to ensure that the proposed development does not have an adverse impact. The County Highway Authority have advised that any planning permission for the new MSCP should include conditions in respect of sustainable transport (assessed below) and to secure highway improvements in the vicinity of the site. This would include a contribution to improve the A3 / Egerton Road junction (also requested by NH) as well as a contribution of £100,000 towards improvement works to the public highway within the vicinity of the site. Subject to these conditions and contributions the County Highway Authority is satisfied that the development would not impact on the safe and efficient operation of the local highway network.

A number of representations, including those raised by the University of Surrey, have identified concern with the impact of the development on the operation of the roundabout junction of Gill Avenue / Priestly Road/ Occam Road as well as the capacity of Gill Avenue to accommodate the additional vehicle movements associated with the proposed development. It is evident from site visits undertaken by officers that Gill Avenue is subject to queuing both in the AM and PM peak with vehicles trying to access or egress these sites through the Egerton Road junction. It is however noted that these impacts arise on private land and accordingly the County Highway Authority has not commented on these potential issues. While the development has the potential to exacerbate some existing issues on these private roads, these are matters for the relevant landowners to address and neither the LPSS or the NPPF give the Local Planning Authority scope to consider the impact of development on private roads. While the development could result in additional queuing and delays on these roads, there is no suggestion that this would be detrimental to public safety and accordingly there is no scope for the LPA to withhold planning permission on these grounds. Officers would instead encourage the relevant parties to engage and to explore what improvements could be made to the relevant junctions, although this is likely to fall outside the scope of this planning application.

Having regard to all of the above it is concluded that the development should not be assessed strictly against the maximum parking standards currently in place and that the development should be supported provided that the impact on the local and strategic highway network is acceptable. In this regard, neither National Highways nor Surrey County Council have objected to the proposal (subject to conditions) in respect of the impact of the development on their highway networks. While the development would enable additional trips to the site by private car, this is not in itself unacceptable, provided that all reasonable options for encouraging sustainable modes of transport are supported. For these reasons the development is considered to comply with the objectives of Policy ID1 and ID3 of the LPSS and the relevant objectives of the NPPF.

### The impact of the development on the need to promote sustainable transport choices

As part of the documents supporting this planning application the applicant, the RSCH, has reaffirmed their support for seeking to encourage sustainable transport and this is said to include support for the Sustainable Movement Corridor (SMC) and the provision of a new train halt on land adjacent to the hospital. The applicant has also reaffirmed their commitment to creating a wide reaching Travel Plan to cover the existing RSCH operations and the elements of the new development. Notwithstanding this, the provision of a new MSCP and an increase in parking provision on the site is likely to encourage, and enable, more staff at the hospital to travel to the site by private car. Policy ID3 of the Local Plan requires that development seek to promote use of sustainable transport choices and accordingly the provision of additional parking for private vehicles is likely to be contrary to the objectives of Policy ID3 unless it can be shown that suitable compensatory measures are included which would also promote sustainable transport.

The application site is located in close proximity to Gill Avenue which is identified by the LPSS as forming part of the proposed Sustainable Movement Corridor. While the development itself does not impact on land needed for the SMC it is essential that a development which would have the effect of promoting vehicle trips by private car should also contribute to the delivery of the SMC. Following discussions with the applicant, it has been agreed that an area of land adjacent to Gill Avenue would be safeguarded from any further development and that this land would be made available for improved pedestrian and cycleway infrastructure in the future, which would form part of the SMC works. While a detailed design of this part of the SMC is not currently fixed, and would likely be dependant on other development in the area, the commitment of the applicant to safeguard this land and to make it available for pedestrian and cycle movements associated with the SMC provides a clear benefit to off-set the car focused nature of the current scheme. The land identified and the mechanism for securing its release for future sustainable transport uses are to be included in a Planning Obligation that should be completed before any planning permission for the development is issued.

While officers have also considered the need for the dedication of land to support the delivery of the Guildford West rail halt, this project is not suitably advanced to either determine the exact location of the rail halt or to know what land may be of benefit to delivering the project. While this application therefore does not seek to secure the dedication of this land, Officers are encouraged that the RSCH has made clear their intention to work with the Council and other landowners to deliver the proposal in the future.

In addition to enabling the delivery of physical improvements to the walking and cycling network it is also necessary that the applicant make all reasonable efforts to promote sustainable transport choices by their staff and those who will use the proposed development; this includes the MSCP and the new clinical building. The RSCH has a long standing Travel Plan which seeks to meet these objectives but the current proposal, in particular the provision of a large MSCP should ensure that the Travel Plan for the site is reflective of this significant change of circumstances on the site. Accordingly a condition is recommended to secure the submission and approval of a new Master Travel Plan which would cover the wider hospital site as well as the new development now proposed. This should be in place before the MSCP is first brought into use, should include measurable targets for reducing trips by private car, regular reporting, and enforcement measures that can be taken by the Council or the County Council in the event that the requirements of the Travel Plan are not implemented.

### The impact of the development on air quality

The application site is not located in an area which is known to be of poor air quality and there is no Air Quality Management Area (AQMA) in the vicinity of the site which is likely to be impacted by the proposed development. The proposal is however adjacent to a number of sensitive receptors for air quality which includes the student accommodation on the Manor Park Campus and the staff accommodation located on Gill Avenue. The proposed development, in particular the MSCP is likely to increase vehicle trips to and from the site as well as movements on the surrounding road network and has the potential to increase vehicle base emissions.

The application is supported by a detailed Air Quality Assessment which assess the potential impacts of both the MSCP and the clinical building, as well as the in-combination impacts. This advises that the modelled background concentrations at the site are well below the relevant air quality objectives for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>. It also notes that the closest GBC NO<sub>2</sub> monitoring locations to the site also illustrate concentrations well below the annual mean NO<sub>2</sub> objective. The report concludes that even with the proposed development operational the relevant air quality objectives would not be exceeded and would remain well within acceptable levels. The Councils Environmental Health Officers have reviewed the application and the Air Quality Assessment provided and agree with the reports conclusion that the development would not result in any adverse air quality impacts in the vicinity of the site.

The application site is also located in close proximity to the A3 which has recently been assessed as suffering from significant issues around air quality. Given that the proposal would increase the number of parking spaces available at the RSCH it is likely that additional vehicle movements will take place on the road network and a proportion of these additional movements are likely to use the A3 to travel from and to the site. While this section of the A3 suffers from a known air quality issue it has not been designated as an AQMA and National Highways, who are responsible for the truck road network including the A3, has not raised any concerns in respect of the development on air quality grounds. It should also be noted that while the development may increase vehicle movements on the A3 any increase is likely to be negligible in the context of the current volume of traffic using the A3 and would be imperceptible both in terms of the number of movements and the emissions currently generated. Accordingly, there is no evidence to suggest that the development would result in a worsening of air quality on this section of the A3 and no justification to withhold planning permission for the development on these grounds.

Having regard to all of the above it is concluded that the development would not give rise to an adverse impact on air quality and would not increase the number of people exposed to vehicle emission relates pollution. For the same reasons the development is considered to comply with the objectives of Policy P4 of the LPSS and the relevant guidance set out in the NPPF.

#### The impact of the development on Flood Risk and Sustainable Drainage

The application site is located within Flood Zone 1 as identified by the Environment Agency and as such is not in an area that is at risk of fluvial flooding. The application site is however large, and the proposal for a major development, and accordingly it is necessary to ensure that the proposed development is not at risk of surface water flooding and that the proposed development does not increase surface water runoff and put other properties at risk from surface water flooding. The existing site is largely surfaced with compacted aggregate and it is not clear what, if any, measures have been included in the construction of the temporary car park to drain surface water to control run-off from the site.

The application is supported by a Drainage Strategy Report which assess the foul and surface

water drainage options for the MSCP as well as Addendum Foul and Surface Water Drainage Strategy Report which seeks to assess the drainage impacts of the part of the site containing the clinical building. Surrey County Council, in its role as Lead Local Flood Authority, has 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. It has advised that it is satisfied that the proposed drainage schemes, both individually and cumulatively, meet its requirements and recommended that planning conditions are included to ensure that the SuDS schemes are properly implemented and maintained throughout the lifetime of the development.

Thames Water have also been consulted on the application in respect of foul drainage requirements of the proposed developments. Thames Water has advised that they have been unable to confirm that existing capacity is available in the surrounding area to accommodate the needs of the proposed developments, either individually or cumulatively, and has request a Grampian style condition which will require any necessary off-site mitigation is provided prior to the developments first being brought in to use. Subject to this condition it has advised that they raise no objection to the proposed developments in respect of foul water drainage.

It is therefore considered that, subject to suitable conditions, the proposed development would not be subject to an adverse risk of surface water flooding, would not increase the risk of flooding to adjoining properties and would not adversely impact on the local foul sewer network. Accordingly, the development is considered to comply with the objectives of Policy P3 of the LPSS and the relevant guidance set out in the NPPF and the nPPG.

#### Sustainable design and construction

The NPPF emphasises the need to plan proactively for climate change and new developments are required to meet the requirements of para. 152 through climate change adaption, provision of green infrastructure and reduction of greenhouse gas emissions. Para. 155 then states new development should comply with local requirements for decentralised energy supply and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

Policy D2 of the LPSS is the Council's policy to require new development to take sustainable design and construction principles into account, including by adapting to climate change, and reducing carbon emissions. The Council has adopted the Climate Change, Sustainable Design, Construction and Energy SPD in December 2020. This carries full weight in decision making. This application was submitted after April 2019, therefore, compliance with policy D2 is required. The applicant has submitted an Energy and Sustainability Statement.

#### *Energy*

The scheme achieves a carbon reduction of 38%. Through the use of a fabric first approach which would comprise air tightness and use of natural ventilation. The use of the building would not require heating.

This can be ensured by condition.

#### *Waste*

Separating waste into reuse, recycle and dispose is the established best practice approach. The applicant has confirmed they would follow the waste heirarchy however, no details have been provided, so details of a waste management plan shall be secured by conditio.

### *Sustainable lifestyles*

30 electric vehicle charging points would be provided 5% of the total parking spaces (598). This would be satisfactory.

This would meet the requirements of the Climate Change, Sustainable Design, Construction and Energy SPD 2020, policy D2 and the NPPF.

### Legal agreement requirements

As is noted above, there is a clear need for development in this area to contribute to the delivery of the SMC. There is also a clear need for development in the vicinity of the SMC to ensure that development promotes and maximises the use of the SMC. In this instance, the development proposes the erection of a new MSCP which could, if not mitigated, encourage people to drive to the RSCH rather than to use public transport or sustainable transport which are currently available, or those which the Council and the County Council are seeking to support in the future.

While the proposed development is not located in an area which would prejudice the delivery of the SMC in terms of land use, the provision of new parking facilities is highly relevant to the objective of promoting the use of the SMC and the objective to ensure people use sustainable transport options.

### **Conclusion**

The application seeks a hybrid planning permission; this includes an application for full planning permission for the erection of a new Multi-Storey Car Park and an outline planning permission for a new clinical building notionally stated to be a new cancer centre. Given that the elements of the scheme are distinct and separate consideration must be given to whether the schemes are each acceptable in their own right as well as whether the combined impact of the scheme is acceptable.

The MSCP would allow the provision of a modest increase in staff car parking but combined with the changes to the parking on the main site would deliver a significant increase in the visitor parking available. While this would encourage move movements to the site by private car, and additional movements on an already congested highway network, this would be mitigated by the applicants new Master Travel Plan and an undertaking by the applicant to support the future delivery of the SMC which includes the safeguarding of land for this purpose. The erection of the clinical building would have a minimal impact on the local highway network but would be of clear benefit to the facilities available on the RSCH site and would be of significant benefit to the local population.

While the MSCP would have a very minor impact on the character and appearance of the area, the benefits of the development and the presumption in favour of hospital development clearly outweigh this harm. The clinical building would have a positive impact on the character of the area and it is considered that, either individually or cumulatively, the impact on the character of the area is acceptable. The development would not materially impact on the residential amenities enjoyed by the occupants of the surrounding residential properties, would not impact on air quality objectives and would not increase the risk of flooding to these properties.

For all of the above reasons it is concluded that planning permission should be granted for the

hybrid planning permission sought, which includes the full planning permission for the MSCP and the outline planning permission for the clinical building. Both developments are considered to comply with the Development Plan and the relevant material considerations outlined above.