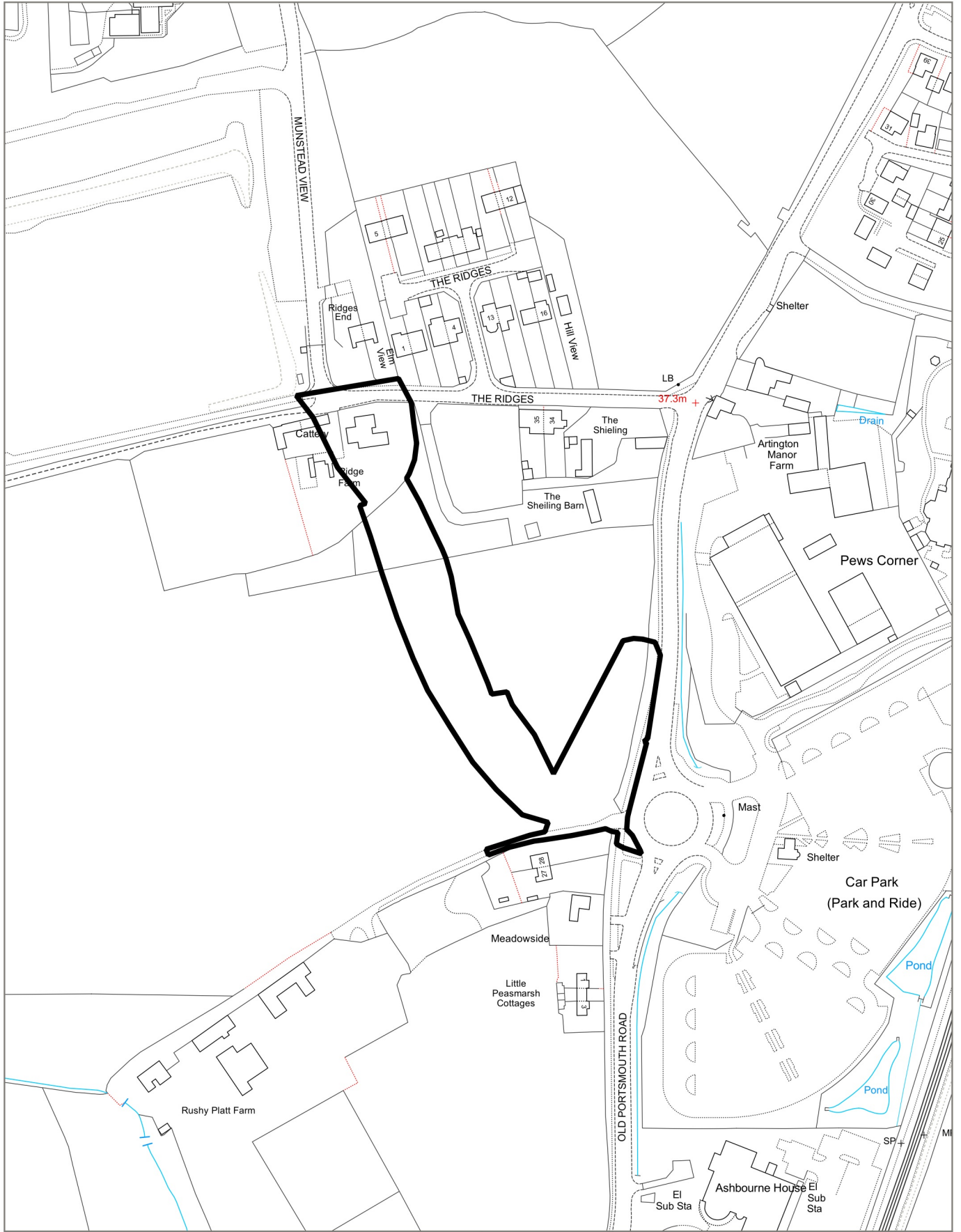


# 24/P/00563 - Surrey County Constabulary Police Headquarters Mount Browne, Sandy Lane, Guildford



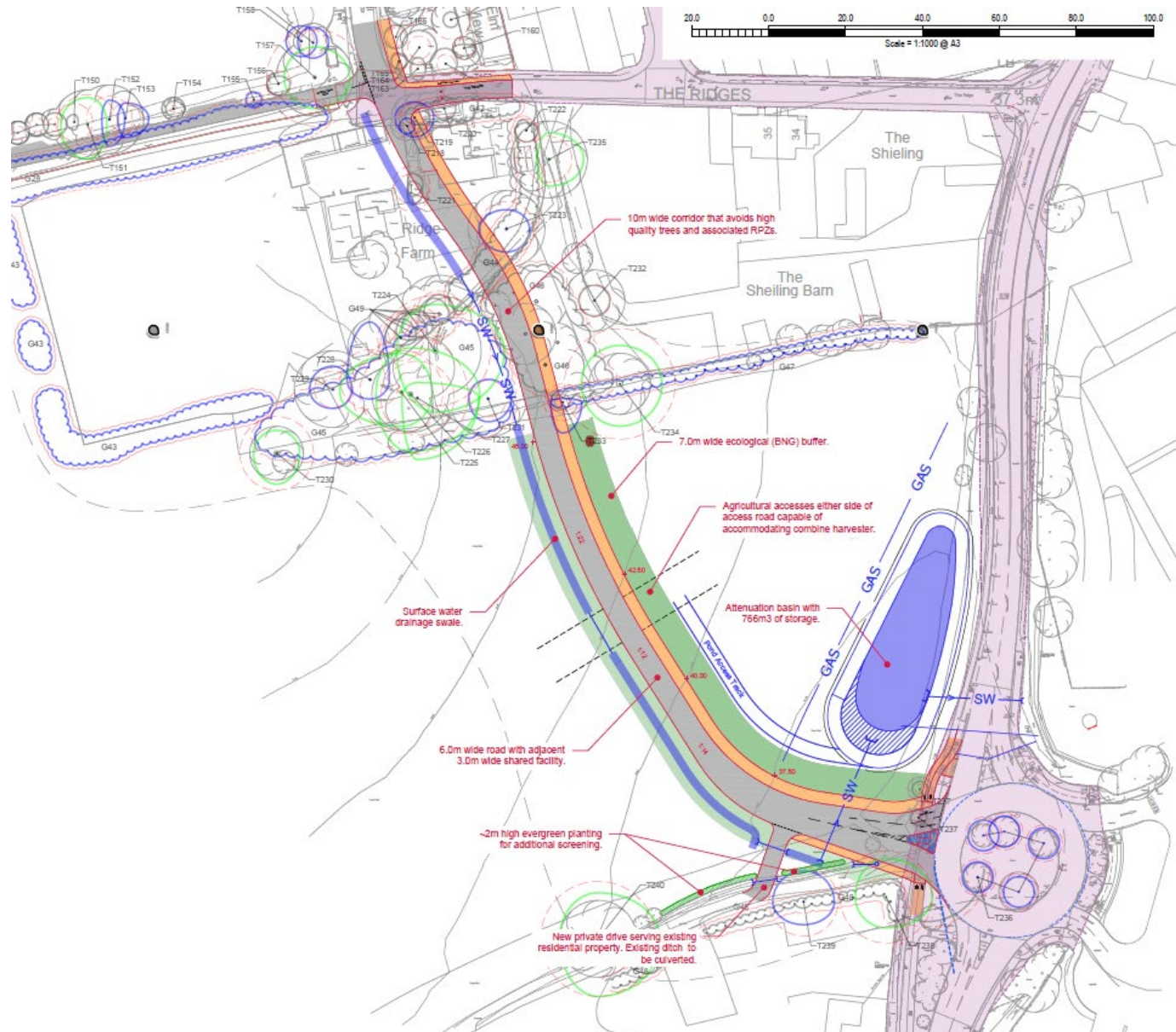
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This map is for identification purposes only and should  
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Print Date: 28/10/2024

Not to Scale

24/P/00563 – Surrey County Constabulary Police Headquarters Mount Browne, Sandy Lane, Guildford





along Sandy Lane and The Ridges as these existing access points would only be used in emergency situations (emergencies on the main site).

- 1.7. The application sits along side the other application on the main site which is included within the agenda (application reference 24/P/00564).

## **2. Executive summary:**

- 2.1. It is acknowledged that there are various harms resulting from the proposal. This includes the harm on the Green Belt, as well as on the Surrey Hills National Landscape and the limited harm on the loss of best and most versatile agricultural land.
- 2.2. However, the benefits of the scheme are substantial and wide ranging. The scheme would deliver a private, safer and more efficiency access for the Police to respond to emergencies, reducing response times over the catchment area. Even small improvements to Police response times can have a large positive impact on how emergencies can be handled. The scheme would also deliver gains in biodiversity well above the national and local plan policies, improved amenity to residents along Sandy Lane and The Ridges, improved pedestrian and cyclist accessibility and improved public awareness of the special qualities of the SHNL. These benefits of the scheme are fundamental and long lasting with substantial benefits to the public.
- 2.3. Notwithstanding certain identified conflicts with relevant development plan policies above, overall the proposal accords with the development plan read as a whole. Following the balancing exercise, it is felt that the harm caused to the Green Belt, as well as the other harm identified, is clearly outweighed by the benefits of the proposal and in particular the benefit of improved police response times. As such, it is recommended that planning permission should be granted.

## **RECOMMENDATION:**

- (i) **That delegated authority be granted to the Assistant Director of Planning to grant permission and make minor amendments to the wording of conditions subject to the applicant entering into a Section 106 Agreement to secure:**
  - **Monitoring of onsite Biodiversity Net Gain (BNG)**
  - **Implementation of the proposed landscaping**
- (ii) **That upon completion of the above, the application be determined by the Joint Assistant Director of Planning. The recommendation is to approve planning permission subject to conditions.**

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

### **Conditions:**

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:

Received 16 April 2024:

Proposed Site Access	79335-CUR-00-XX-DR-TP-06007	P07
Mount Browne Proposed Access Road Demolition Plan	MTB-SBR-SW-XX-DR-A-01121	P01
Access Road – Landscape Sections	MTB-RPS-SW-XX-DR-L-10113	P01
Access Road – Landscape Sections	MTB-RPS-SW-XX-DR-L-10114	P01

Received 30 July 2024:

Access Road Landscape Proposals	MTB-RPS-SW-XX-DR-L-10103	P03
Mount Browne Proposed Access Road Plan	MTB-RPS-SW-XX-DR-A-01126	P03
Mount Browne Proposed Access Road Site	MTB-SBR-SW-XX-DR-A-01132	P03

Received 2 August 2024:

Access Road Landscape Proposals	MTB-RPS-SW-XX-DR-L-10109	P03
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Received 29 August 2024:

Access Road Landscape Proposals	MTB-RPS-SW-XX-DR-L-10103	P04
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Reason: To ensure that the development is carried out in accordance with the approved plans and in the interests of proper planning.

3. No development shall commence until a Construction Transport Management Plan has been submitted to and approved in writing by the Local Planning Authority. The CTMP shall include details of:
- (a) How construction traffic will be managed.

- (b) How the access road will be constructed for the purposes of construction during the build period.
- (c) Programme for completing the access road for construction purposes.
- (d) Remaining works to be undertaken to complete the access road once main construction has been completed.
- (e) Parking for vehicles of site personnel, operatives and visitors.
- (f) Loading and unloading of plant and materials.
- (g) Storage of plant and materials.
- (h) Programme of works (including measures for traffic management).
- (i) Provision of boundary hoarding behind any visibility zones.
- (j) HGV deliveries and hours of operation.
- (k) Vehicle routing.
- (l) Measures to prevent the deposit of materials on the highway.
- (m) Before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused.
- (n) No HGV movements to or from the site shall take place between the hours of 8:30 and 9:15am and 3:15am and 4:00pm (adjust as necessary according to individual school start and finish times) nor shall the contractor permit any HGVs associated with the development at the site to be laid up, waiting, in (specify named roads) during these times.
- (o) On-site turning for construction vehicles.

Thereafter, only the approved details shall be implemented during the construction of the development.

Reason: In order to not prejudicated highway safety nor cause inconvenience to other highway users and to promote sustainable forms of transport in accordance with the requirements of the National Planning Policy Framework 2023.

4. 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 in writing by the Local Planning Authority.

Reason: In order to identify any archaeological deposits and enable appropriate mitigation measures.

5. Prior to the commencement of development, an Arboricultural Method Statement and Tree Protection Plan, in accordance with BS5837:2012 Trees in Relation to Design, Demolition and Construction, shall be submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

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 adequate protection of trees prior to works commencing on site goes to the heart of the planning permission.

6. Prior to commencement of development details of the design of a surface water drainage scheme shall be submitted to and approved in writing by the Local 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 receiving watercourse has onward connectivity and capacity to receive flows from the site.
  - (b) Evidence that the proposed final solution will effectively manage the 1 in 30 (+35% allowance for climate change) & 1 in 100 (+45% allowance for climate change) storm events. If infiltration is deemed unfeasible, associated discharge rates and storage volumes shall be provided using a maximum discharge rate equivalent to 1.1l/s.
  - (c) Construction drawings for all drainage elements including cross sections and detailed drainage layout plan.
  - (d) Evidence that the existing on-site drainage is fit for purpose.
  - (e) An exceedance flow routing plan demonstrating no increase in surface water flood risk on or off site. The plan must include proposed levels and flow directions.
  - (f) Details of drainage management responsibilities and maintenance regimes for the drainage system.
  - (g) Details of how surface water will be managed during construction including measures to protect on site and downstream systems prior to the final drainage system being operational. Including details of how existing watercourse on and adjacent to the site will be protected.

Reason: To ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk or off site.

7. Prior to first use of the development, a verification report must be submitted to and approved in writing 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), confirming any defects have been rectified. Provide the details of any management company. Provide an 'As-Built' drainage layout and state the national grid reference of key drainage elements.

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

8. Prior to commencement of development, a Habitat management and Monitoring Plan (HMMP) shall be submitted to and approved in writing by the Local Planning Authority. The HMMP shall be based on the proposed impact avoidance, mitigation and enhancement measures specified in the Ecological Impact Assessment and should include, but not be limited to the following:

- (a) Description and evaluation of features to be managed.
- (b) Ecological trends and constraints on site that might influence management.

- (c) Aims and objectives of management.
- (d) Appropriate management options for achieving aims and objectives.
- (e) Prescriptions for management actions, together with a plan of management compartments.
- (f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a 30-year period).
- (g) Details of the body or organisation responsible for implementation of the plan.
- (h) Ongoing monitoring and remedial measures.
- (i) Legal and funding mechanisms by which the long-term implementation of the plan will be secured by the applicant with the management body(ies) responsible for its delivery.
- (j) Monitoring strategy, including details of how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.

The development shall be carried out in accordance with the approved Biodiversity net Gain Statement. The measures to secure biodiversity net gain shall be implemented prior to first use of the development.

Reason: to ensure the delivery and management of the specified biodiversity net gain in accordance with national and local requirements.

9. Prior to commencement of the development, a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The CEMP shall include, but not be limited to the following:
  - (a) Map showing the location of all ecological features.
  - (b) Risk assessment of the potentially damaging construction activities.
  - (c) Practical measures to avoid and reduce impacts during construction, including a Dust Management Plan.
  - (d) Location and timing of works to avoid harm to biodiversity features.
  - (e) Responsible persons and lines of communication.
  - (f) Use of protected fences, exclusion barriers and warning signs.

The CEMP shall thereafter be implemented and maintained during the construction of the development.

Reason: To minimise the impacts of development on biodiversity, in accordance with paragraphs 179 to 190 and section 15 of the National Planning Policy Framework 2023.

10. No development shall take place including site clearance and demolition, until a pre-works badger survey has been carried out. This shall be undertaken by a suitably qualified ecologist, no more than 3 months prior to the commencement of works and the clearance of vegetation to establish the use of the site by badgers.

Reason: To safeguard protected and notable species. This is required to be a pre-commencement condition to ensure all works, inclusive of initial works are implemented in a way to protect this species.



11. Prior to commencement of development, a Precautionary Method Statement for Amphibian and Reptiles written by a suitably qualified ecologist shall be submitted to and approved in writing by the Local Planning Authority and thereafter, it shall be implemented and maintained throughout the construction of the development.

Reason: To minimise the impacts of development on biodiversity, in accordance with paragraphs 179 to 190 and section 15 of the National Planning Policy Framework 2023.

12. Prior to first use of the development for operational vehicles, details of the educational signboards to be placed adjacent to Public Right of Ways 276 and 277 shall be submitted to and approved in writing by the Local Planning Authority. The details shall include, but not be limited to the following:

- (a) The proposed locations
- (b) The content, including elevations of the text composition, sizing and colour.
- (c) The size and design of the signboard.
- (d) Details of how the signboards would be maintained and repaired.

Thereafter the approved signboards shall be put into the agreed position(s) and maintained and retained in perpetuity.

Reason: To provide greater awareness and education to the public on the special qualities of the Surrey Hills National Landscape.

13. The proposed access road shall not be brought into first use for operational vehicle unless and until the proposed roundabout arm junction with Old Portsmouth Road has been constructed and provided with dropped kerbs and tactile paving, and visibility zones in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority and thereafter the visibility zones shall be kept permanently clear of any obstruction over 0.6m high.

Reason: In order to not prejudicated highway safety nor cause inconvenience to other highway users and to promote sustainable forms of transport in accordance with the requirements of the National Planning Policy Framework 2023.

14. The proposed access road shall not be brought into first use for operational vehicles unless and until:
  - (i) Droppable bollards on The Ridges;
  - (ii) A continuous footway where the access road meets The Ridges; and
  - (iii) The access to the existing Sports Field has been widened

Have been provided in accordance with the approved plans, Drawing No. 79335-CUR-00-XX-DR-TP-06008 Rev P01, and thereafter shall be permanently retained and maintained.

Reason: In order to not prejudicated highway safety nor cause inconvenience to other highway users and to promote sustainable forms of transport in accordance with the requirements of the National Planning Policy Framework 2023.

15. The proposed access road shall not be brought into first use for operational vehicles unless and until a pedestrian and cyclist route has been provided from the proposed roundabout access leading up to Munstead View in accordance with the approved plans and thereafter shall be permanently retained and maintained.

Reason: In order to not prejudicated highway safety nor cause inconvenience to other highway users and to promote sustainable forms of transport in accordance with the requirements of the National Planning Policy Framework 2023.

16. Prior to first use of the development for operational vehicles, full details of both hard and soft landscape proposals including a schedule of landscape maintenance for a minimum period of ten years, shall be submitted to and approved in writing by the Local Planning Authority. The proposals shall include details of
  - a) Proposed earthworks, showing existing and proposed finished levels or contours;
  - b) The proposed tree and hedgerow /shrub planting including their species, numbers, sizes (age and form) and positions, together with grass seeded/turfed areas and written specifications (including cultivation and other operations associated with plant and grass establishment i.e. depth of topsoil, mulch etc.
  - c) The existing trees and hedgerows to be retained as well as those to be felled;
  - d) The hard landscaping, including hard surface area for vehicles, means of enclosure/boundary treatments and proposed lighting structures.
  - e) Particulars of all materials to be used, including details of the colour of fencing and hard surfacing.

The approved landscape scheme (with the exception of planting, seeding and turfing) shall be implemented prior to first use of the development.

Reason: To ensure the provision, establishment and maintenance of an appropriate landscape scheme to protect the surrounding landscape and visual amenities of the locality.

17. All planting, seeding or turfing approved (for the whole scheme) shall be carried out in the first planting and seeding season following the occupation of each phase or the completion of the development, whichever is the sooner. Any trees or plants which, within a period of ten 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 to protect the surrounding landscape and visual amenities of the locality.

18. The lighting proposed shall be implemented in accordance with the mitigation measures set out under Sections 7.3, 7.5 and 8.6 of the Lighting Environmental Impact Assessment, prepared by Ramboll, dated November 2023, as well as the approved lighting plans, reference MTB-RAM-XX-DRC-13001 through to MTB-RAM-XX-XX-DR-C-13003.

Reason: To protect residential amenities and the landscape character of the locality as well as to minimise the impact on light sensitive species.

19. The mitigation measures set out under Section 8 of the Air Quality Assessment, dated February 2024 shall be implemented in full and retained throughout the duration of construction.

Reason: to protect residential amenities and to minimise the ecological impact from construction activities.

## **Officer's Report**

### **3. Site description**

- 3.1. Mount Browne is the current headquarters of Surrey Police. It is located approximately 1.5 miles to the south-west of Guildford town centre and 1.5 miles to the north of Peasmarsh. The application area is 0.75 hectares, however, this encompasses only a small part of the wider estate which in total has an area of 21.47 hectares.
- 3.2. The site is currently in full operation as a police headquarters providing a range of operational commands and supporting services. This includes, but is not limited to, the Office of the Police and Crime Commissioner, special crime, contact and deployment, dog school, public protection and commercial and financial services.
- 3.3. Mount Browne has two access points, one from Old Portsmouth Road via The Ridges and another from Sandy Lane which is also off Old Portsmouth Road.
- 3.4. The elevation of the site rises towards the south-west with elevation change being 10 metres over the length of the proposed road.
- 3.5. In terms of designations, the site is entirely located within the Green Belt and the Surrey Hills National Landscape (SHNL). A Public Right of Way (PRoW), footpath 276, runs along the southern boundary of the wider Mount Browne site, with the proposed access road connecting to the eastern end of the PRoW.
- 3.6. There are a number of listed buildings within the vicinity of the site, including The Shieling at The Ridges and the Granary and Store and the Artington Manor Farm House on Old Portsmouth Road.
- 3.7. The surrounding area is mixed in character. To the north of the site, along Sandy Lane, there are a number of mainly detached and semi-detached residential dwellings. To the north-east is the former University of Law campus which is also an allocated site in the Local Plan. The University has now vacated these premises and is currently vacant.. To the south-east is The Ridges which is a small cluster of semi-detached dwellings which are located off Old Portsmouth Road. To the immediate east of the site are a number of paddocks and to the west is open countryside.

### **4. Proposal**

- 4.1. Proposed new access road associated with police operations at the existing Mount Browne headquarters with associated landscaping, drainage, including attenuation pond, lighting and supporting engineering works.
- 4.2. The site of the proposed access point extends from Artington Road roundabout, upwards towards the current site compound area, at the south-eastern side of the site. The area of land designated for the proposed access road is currently farmland with large, open views over the landscape.
- 4.3. The proposed road would run west from the Artington Roundabout for a length of 269m. The

road has been designed with a 6m wide vehicle carriageway that widens upon the approach to the Artington Roundabout to provide two 3.1metre exit lanes onto the roundabout. The entry lane onto the main access road from the roundabout would be 7m in width. A central refuge is proposed for pedestrian and cyclists to cross the new access road, which would range in width from 3m where pedestrians would cross to 5.5m where cyclists would cross. A 3m wide shared pedestrian/cycle facility is proposed on the northern side of the access road that would connect to Munstead View within the site.

- 4.4. An attenuation basin would be situated at the base of the access road with a swale running along the southern boundary of the road.
- 4.5. The proposed column lighting would be installed along both sides of the access road with heights ranging from 5m – 8m.
- 4.6. The principal reason for the proposed access road is to reduce emergency response times. If approved, the scheme would also reduce vehicle movements along Sandy Lane and The Ridges as these existing access points would only be used in emergency situations.
- 4.7. The application is supported by the following technical documents:

- Utility Statement
- Flood Risk Assessment
- Archaeological Desk Based Assessment
- Landscape Masterplan
- Tree Survey and Arboricultural Impact Assessment
- Outline Drainage Strategy
- Landscape and Ecology Management Plan
- Noise Impact Assessment
- Air Quality Assessment
- Heritage Statement
- Landscape and Visual Impact Assessment
- Lighting Impact Assessment
- Transport Statement
- Biodiversity Net Gain Assessment
- Biodiversity Metric Calculation
- Ecological Impact Assessment
- Ground Level Tree Assessment
- Landscape Strategy Report

**5. Relevant planning history**

5.1. As the site has been the operational headquarters of Surrey Police for over 70 years, it has a long and varied planning history. However, none of the historic applications are considered relevant to the proposals now before the Council.

<b>Reference:</b>	<b>Description:</b>	<b>Decision Summary:</b>	<b>Appeal:</b>
24/P/00564	Redevelopment of Mount Browne headquarters including demolition of	Reported elsewhere on this	N/A

	existing dog school and operational policing buildings and development of replacement dog school with associated staff accommodation, replacement core operational police buildings, ground maintenance compound and refurbishment of core operational building including courtyard wing, old building and sports building. Construction and refurbishment of associated parking including new decked car park. Associated landscaping, engineering operations and ancillary works.	agenda	
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## 5.2. Other relevant planning history in the surrounding area

<b>Reference:</b>	<b>Description:</b>	<b>Decision Summary:</b>	<b>Appeal:</b>
23/P/01850 – The University of Law Braboeuf Manor, Portsmouth Road, GU3 1HA	Full planning application for the demolition and retention of existing buildings and erection of new buildings to provide extra care housing (Use Class C2) and associated ancillary accommodation and amenity space, public realm works, at-grade car parking (existing), plus restoration and upgrade works to Braboeuf Manor (ancillary accommodation and amenity space) and the refurbishment of Pound Cottage for use as a single dwelling (Use Class C3) (amended plans received and description changed on 31/07.24, additional plans dated 10 <sup>th</sup> September 2024).	To be determined	N/A

5.3. The above application at the University of Law does not materially impact on this proposal but has been included to make members aware.

## 6. Consultations

### Statutory consultees

6.1. County Highway Authority: Do not object to the proposal subject to the imposition of conditions.

6.2. County Archaeologist, Surrey County Council: No objection subject to the imposition of a

condition requiring the implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation.

- 6.3. Shalford Community Council: No objection to the proposal as it would be an improvement to those accessing Mount Browne, as well as other road users. Note that the site is sensitive as located within the AONB. Suggest an increase in screening along footpath to the south to reduce the visibility of the road and retain natural vista of the area.
- 6.4. Artington Parish Council: Do not object to the proposal but raise the following matters for consideration:
- No indication of how houses in police ownership would be disposed of [*Officer note: this does not form part of the proposal and is not a material planning consideration*].
  - Request conditions be imposed to manage duration of works and for traffic management.
  - Light pollution from access road lighting – request further consideration of alternative lighting [*Officer note: the submitted Lighting Impact Assessment has considered alternative lighting options including bollard lighting and it was not deemed appropriate*]. .
  - Insufficient thought given to impact from sound and environmental pollution from large amount of traffic and parking.
  - Drainage/water run-off from new access road.
  - Request consideration on why the access road could not be cut-in to the hillside to mitigate noise and light pollution.
  - Suggest access from The Ridges and Sandy Lane be for emergency vehicles only and should be restricted via condition.

#### Internal consultees

- 6.5. Head of Environmental Health and Licensing: No objection subject to the imposition of conditions.
- 6.6. Tree Officer: No objection subject to the imposition of a condition requiring the submission of an Arboricultural Method Statement and Tree Protection Plan, prior to commencement of development.

#### Non-statutory consultees

- 6.7. Surrey Hills Area of Outstanding Natural Beauty Planning Advisor (AONB Planning Advisor) : The AONB Planning Advisor throughout the application process raised concerns that the development would result in significant harm to the SHNL, and the new duty introduced by the Levelling Up and Regeneration Act 2023 has not been considered or met. After discussions, the final comments received maintained that the application has not gone far enough to meet this test as the Applicant has not amended the proposal to include the triangular piece of land to the east within the scheme for woodland enhancements/planting. [*Officer note: the impact on the SHNL and the new duty under the LURA will be discussed in detail below*].

#### Amenity groups / Residents Associations

- 6.8. Guildford Society: Support the development in principle as it would remove traffic from The Ridgeway and Sandy Lane. Concerns raised about the configuration of the Artington Roundabout with the cycle path on the western side of the Portsmouth Road and how it relates to the new access road. Concerned about cycle safety.

### Third party comments

6.9. Four letters of representation have been received, noting that one was logged as neutral and two as support but raised concerns. The letters of representation raised the following objections and concerns:

- Modelling doesn't account for if road is not constructed [Officer Note: the County Highway Authority has considered the impact on highway safety and capacity if the road is not constructed and conditions are recommended accordingly].
- Transport Assessment highlights reduction in residual capacity at Broadford Road intersection which was not explained [Officer Note: the County Highway Authority has considered the modelling and the associated impact on highway safety and capacity].
- Loss of agricultural land.
- Danger to cyclists going north on the A3100 noting increase in response vehicles exiting site in haste.
- Safety issues with children using the Gymnastic Factory.
- Danger to pedestrians crossing at Artington Road roundabout.
- Cumulative impact of approving major developments in area.
- Impact from increased traffic on residents close to road not considered.
- Air quality concerns from increase in vehicle movements.
- Air quality concerns during construction.
- Noise impact on amenity due to increase in vehicle movements, particularly during construction.
- Visual impact from loss of open field.
- Light pollution.
- Unclear what alternative access arrangements have been considered, including whether a new access through the ancient woodland to better screen the development would be appropriate.
- Note existing occupational health building would partially shield proposed road (and reduce noise), but with this demolished, what would be put in its place [Officer Note: the main site application (24/P/00564) includes a new maintenance compound area, to include additional buildings in this location].
- Proposed lighting should be on a sensor.
- Drainage concerns, particularly where the footpath to the south of the playing field meets The Ridges.
- Inadequate justification for lighting along access road.
- Request speed limit of 30mph to start just to the south of the junction with the Artington roundabout and extend into Guildford [Officer Note: *this was not deemed necessary by the County Highway Authority to make the development acceptable in planning terms.*].
- Requests that the field to the east of the road is maintained, with measures imposed to ensure this [Officer Note: the field referenced is outside the ownership of the Applicant]

6.10. Bell Cornwall (Planning consultants): Object and have raised the following matters:

- The two planning applications for the site (24/P/00564 and 24/P/00563) should be connected and one should not be approved without the other [Officer note: *the access road application could be approved in isolation but the main site application would be intrinsically linked to the access road.*].



- A change of use is occurring which is not reflected in the description of development..
- Both developments would be considered inappropriate development and very special circumstances have not been sufficiently evidenced and demonstrated to outweigh the harm.
- The transport assessment fails to consider the applications on their own [*Officer note: this has been considered by the Officer and the interconnectedness of both applications have been considered*]]
- There is limited information on the design of the new road, but further information is necessary to understand the landscape impact – site levels, sections and lighting details. [*Officer note: the application information includes site levels, sections and lighting details (within the Lighting Impact Assessment. This information has been publicly available since the submission of the application).*]
- The development would result in noise and light impacts for both local residents surrounding the site and those on Portsmouth Road into the town centre with the introduction of sirens and lights from vehicles now responding to emergencies in substantive volume from the countryside site [*Officer note: there would already be such vehicles travelling along Portsmouth Road.*]

6.11. It should be noted that the objection received related to both this application and the main site application (24/P/00564) and only the relevant points for this application have been included above. Further, the objection goes into more detail and the above is a summary of the concerns presented.

## 7. Planning policies

### 7.1. National Planning Policy Framework (NPPF)

- 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 12: Achieving well-designed and beautiful places
- Chapter 13: Protecting Green Belt land
- 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

### 7.2. Guildford Borough Local Plan: Strategy and Sites (LPSS) 2019

- Policy S1: Presumption in favour of sustainable development
- Policy S2: Planning for the borough - our spatial strategy
- Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value
- Policy P2: Green Belt
- Policy P4: Flooding, flood risk and groundwater protection zones
- Policy P5: Thames Basin Heaths Special Protection Area
- Policy D1: Place shaping
- Policy D2: Climate change, sustainable design, construction and energy

Policy D3: Historic environment  
Policy ID3: Sustainable transport for new developments  
Policy ID4: Green and blue infrastructure  
Policy A33: Surrey Police Headquarters, Mount Browne, Sandy Lane, Guildford

### 7.3. Guildford Borough Local Plan: Development Management Policies (LPDMP) March 2023

Policy P6: Protecting Important Habitats and Species  
Policy P7: Biodiversity in New Developments  
Policy P11: Sustainable Surface Water Management  
Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness  
Policy D5: Protection of Amenity/Provision of Amenity Space  
Policy D11: Noise Impacts  
Policy D12: Light Impacts and Dark Skies  
Policy D14: Sustainable and Low Impact Development  
Policy D15: Climate Change Adaptation  
Policy D16: Carbon Emissions from Buildings  
Policy D17: Renewable and Low Carbon Energy Generation and Storage  
Policy D18: Designated Heritage Assets  
Policy ID10: Parking Standards for New Development

### Surrey Hills AONB Management Plan (AONBMP) 2020-2025

Planning Management Policies, P1, P2, P3 and P6

### 7.4. Supplementary planning documents

Climate Change, Sustainable Design, Construction and Energy SPD (2024)  
Landscape Character Assessment (2007)  
Green Belt SPD (2023)

### 7.5. Environmental Impact Assessment

The proposed development is Schedule 2 development as it exceeds the threshold in column 2. The site is also within a 'sensitive area'. However, it is concluded, having regard to the selection criteria within Schedule 3, the proposal is not EIA development. A EIA screening opinion was issued under reference 24/S/00005.

## 8. **Planning considerations**

The main planning considerations in this case are:

- Loss of agricultural land
- Impact on the Green Belt
- Impact on heritage assets
- Landscape and visual impact
- Access, highway safety and capacity
- Flooding and drainage
- Air quality
- Impact on residential amenity
- Impact on trees and ancient woodland

- Impact on ecology, nature conservation and biodiversity
- Legal agreement requirements
- Planning balance and conclusion

## **8.1. Loss of agricultural land**

- 8.1.1. Paragraph 180(b) of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by (inter alia) ‘recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland’. The NPPF defines the best and most versatile agricultural land as land in grades 1, 2 and 3a of the Agricultural Land Classification.
- 8.1.2. The NPPF also notes that LPAs should seek to:
- Protect and enhance landscapes, biodiversity, geology and soils.
  - Recognise soils as a natural capital asset that provide important ecosystem services.
  - Consider the economic and other benefits of BMV agricultural land, and try to use areas of poorer quality land instead of higher quality land.
  - Prevent soil, air, water, or noise pollution, or land stability from new and existing development.
- 8.1.3. The PPG notes that decisions ‘should avoid unnecessary loss of BMV land’.
- 8.1.4. Policy E5(3) of the LPSS requires agricultural land to be protected as set out in national policy.
- 8.1.5. Natural England provides a series of regional maps which show the application site to be grade 3. The maps do not divide grade 3 into subgrades 3a and 3b. A conservative approach has been taken and the land is assumed to be subgrade 3a in the absence of information to say otherwise. It should also be noted that the land within this subgrade extends around the full extent of the Mount Browne site, meaning that there would be no alternative location outside BMV land.
- 8.1.6. The application site totals an area of 0.78ha, or 7,800sqm. The loss of this area of land would not be substantial in comparison to the wider agricultural site and would not result in a significant impact on the overall economic productivity of the wider area.
- 8.1.7. Concerns have been raised by the AONB Officer and through public comments that the scheme would segregate the eastern part of the site and leave an isolated field. The proposed access road design includes a gateway and crossing for vehicles and machinery to access this area of land, enabling the ongoing use for livestock or hay/crops, if required by the owner.
- 8.1.8. While the proposal would result in a small loss of BMV land, as set out above, it would not be a significant loss and the wider site could still be used for agricultural purposes, including the isolated pocket of land to the eastern corner. There are also no alternatives outside of BMV land. The proposal would not conflict with Policy E5 of the LPSS and

paragraph 180(b) of the NPPF.

## **8.2. Impact on the Green Belt**

- 8.2.1. The NPPF sets out that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt are their openness and their permanence. Paragraph 155 of the NPPF sets out that other forms of development [outside of those identified under paragraph 154) are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. Paragraph 155(b) identifies engineering operations as one of these exceptions. The proposed access road would be considered an engineering operation.
- 8.2.2. The Council's Green Belt SPD sets out that the concept of openness has two dimensions; spatial and visual. The spatial dimension relates to the physical scale of the development itself whereas the visual dimension is the extent to which the development can be seen. This means that the absence of visual intrusion, or the presence of screening, does not in itself mean that there is no impact on the openness of the Green Belt as a result of the development. Equally this does not mean that the openness of the Green Belt has no visual dimension. Instead, any assessment of the impact of a proposal on the openness of the Green Belt must include consideration of both its spatial impact as well as its visual impact.
- 8.2.3. The proposed access road would extend off the existing Artington Roundabout as a new western arm, with a length of 269m. The road has been designed with a 6m wide vehicle carriageway that widens upon the approach to the Artington Roundabout to provide two 3.1m exit lanes onto the roundabout. The entry lane onto the main access road from the roundabout would be 7m in width. The access road would follow the contours of the site and have a maximum gradient of 1:12. A central refuge is proposed for pedestrian and cyclists to cross the new access road, which would range in width from 3m where pedestrians would cross to 5.5m where cyclists would cross. A 3m wide shared pedestrian/cycle facility is proposed on the northern side of the access road that would connect to Munstead View within the site.
- 8.2.4. The proposal would also include a 7m wide ecological buffer to the northern side of the access, a drainage swale to the south wide and an attenuation basin at the base of the access. Lighting would be erected along the length of the access consisting of column lighting ranging from 4-10m in height.
- 8.2.5. The proposed materiality of the access road would vary with concrete asphalt used for the carriageway and resin bonded gravel for the pedestrian paving where it runs along the access road. Fencing along the length of the access would consist of galvanised estate rail to a height of 1.5m.
- 8.2.6. It should also be noted that access to the field to the eastern side of the access would be retained with a gateway and fencing erected to maintain free access.
- 8.2.7. The proposed access road and associated landscaping and hardstanding would cross an existing open field where the site levels rise towards the Mount Browne site with very little existing landscaping to provide screening. The addition of any road within such a

landscape would be visually prominent and as a result, the design can only seek to minimise this impact through appropriate and sensitive design.

- 8.2.8. The northern section of the road where it connects to the Mount Browne site would be enclosed by the existing mature tree belt which would significantly reduce the visibility of this section of the road. Measures would also be incorporated within the remaining section of the road including a landscaping strategy to create a semi-rural landscape setting, use of softer, less hard engineered drainage systems like drainage swales and an attenuation basin, low height fencing and some use of permeable surfacing. The positioning of the road would also be at a lower elevation to make better use of the contours of the site and avoid extensive lengths of road.
- 8.2.9. The landscaping scheme would incorporate two rows of trees, on either side of the proposed road with hedgerows between. The hedgerow would extend along the northern section of the road frontage adjacent to the A3100 before terminating at the northern end of the attenuation basin. It is understood that the landscaping has been chosen to integrate the road into the rural landscape with species, positioning and heights chosen to reflect this character.
- 8.2.10. Notwithstanding this and the other measures to reduce the visual and spatial impact of the proposed road, the proposal would be visually prominent and would be harmful to the openness of the Green Belt. It is therefore not considered that the proposal would preserve the openness of the Green Belt and it would therefore be inappropriate development.
- 8.2.11. Paragraph 152 of the NPPF states that 'inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances'. Paragraph 153 goes on to note that 'when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations'.
- 8.2.12. The applicant has set out a case for very special circumstances within the submitted Planning Statement. In summary, they are:
- The new access road would create a suitable and appropriate private access for Surrey Police to use for its operational vehicles to enable Surrey Police to improve response times by up-to 2 minutes.
  - Reduction in traffic using The Ridges and Sandy Lane as operational vehicles would utilise the new access road.
  - Improved rural character of Sandy Lane and associated St Catherine's Conservation Area through reduction in disturbance from traffic.
  - Proposed access road would make an important contribution to achieving Surrey Police's aspiration for Mount Browne in relation to the overall campus masterplan which they are seeking to achieve to provide a headquarters which will meet the policing needs for Surrey into the future
  - Delivery of a biodiversity net gain in excess of the national 10% and local 20% requirements.

8.2.13. The Green Belt harm, and any other harm, will be balanced against the benefits of the proposal in the final section of this report and a conclusion on whether very special circumstances exist will be made.

### **8.3. Impact on heritage assets**

8.3.1. As noted above, the application site is situated within the setting of a number of listed buildings, including The Sheiling, Artington Manor Farmhouse and Granary and Store 10 yards South West of Artington Manor House. All of the buildings are Grade II listed.

8.3.2. Case-law has confirmed that, when concerned with developments that would cause adverse impacts to the significance of designated heritage assets (including through impacts on their setting) then this is a factor which must be given considerable importance and weight in any assessment.

8.3.3. In terms of planning policy, chapter 16 of the National Planning Policy Framework 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 201 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.

8.3.4. Paragraph 205 of the NPPF applies to designated heritage assets. It 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'. This policy reflects the statutory duty in section 66(1). Paragraph 206 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'.

8.3.5. Policy D3 of the LPSS is generally reflective of the NPPF and it states:

- the historic environment will be conserved and enhanced in a manner appropriate to its significance. Development of the highest design quality that will sustain and, where appropriate, enhance the special interest, character and significance of the borough's heritage assets and their settings and make a positive contribution to local character and distinctiveness will be supported; and
- the impact of development proposals on the significance of heritage assets and their settings will be considered in accordance with case law, legislation and the NPPF.

8.3.6. Policy D16 of the LPDMP on designated heritage assets and it emphasises the requirements in the NPPF as regards the assessment of applications concerning heritage assets.

8.3.7. *The Sheiling (Grade II listed)*

8.3.8. The Sheiling is a property with late 16th century origins to the north of the application site, on the southern side of The Ridges, A3100 (Portsmouth Road) junction.

8.3.9. The significance of The Sheiling can be summarised as:

- Is a building of special interest as reflected by its Grade II listing status;
- Is illustrative of the evolution of agricultural practices within the area;
- Use of vernacular material and traditional building techniques in its construction;
- Legibility, albeit limited, of the property's historical and functional association with the surviving listed buildings and surrounding land that historically formed Artington Manor Farm; and
- Signals the original/historic rural character beyond the town boundary.

8.3.10. In terms of the impact of the proposal on the building's setting, by virtue of the intervening development and screening, there would be extremely limited viewing opportunities. The retention of arable land closest to the heritage asset would also help to ensure that the asset's prevailing character and setting is substantially maintained. Furthermore, the proposal would not alter or diminish the current legibility of the property's historical and functional association with the surrounding land and buildings that historically formed the Artington Manor Farmstead. Therefore, the proposed development would not affect the significance of this heritage asset and thus no harm has been identified.

8.3.11. *Artington Manor Farmhouse (Grade II listed)*

8.3.12. This heritage asset is situated on the east side of Portsmouth Road, close to the junction with The Ridges. It is set back slightly from the roadside and benefits from a good degree of screening from the existing boundary tree/hedge boundary.

8.3.13. The significance of the Artington Manor Farmhouse can be summarised as:

- Is a building of special interest as reflected by its Grade II listing status;
- Is illustrative of the evolution of agricultural practices within the area;
- Use of vernacular material and traditional building techniques in its construction;
- Legibility, albeit limited, of the property's historical and functional association with the surviving listed buildings and surrounding land that historically formed Artington Manor Farm; and
- Signals the original/historic rural character beyond the town boundary.

8.3.14. Similar to the impact on the setting of the Sheiling, by virtue of the intervening development and screening, there would be limited opportunities to view the proposed development in conjunction with the heritage asset. The retention of the arable land closest to the asset would also maintain the prevailing character of the asset and its setting. The proposed access road would also not alter or diminish the current legibility of the property's historical and functional association with the surrounding land and buildings that historically formed the Artington Manor Farmstead. Therefore, the proposed development would not affect the significance of this heritage asset and thus no harm has been identified.

8.3.15. Granary and Store South West of Artington Manor House (grade II listed)

8.3.16. This heritage asset is situated prominently on the east side of Portsmouth Road (A3100), directly opposite the junction with The Ridges and neighbouring the building and grounds of the grade II listed Artington Manor Farmhouse.

8.3.17. The significance of the Granary and Store South West of Artington Manor House can be summarised as:

- Is a building of special interest as reflected by its Grade II listing status;
- Is illustrative of the evolution of agricultural practices within the area;
- Use of vernacular material and traditional building techniques in its construction;
- Legibility, albeit limited, of the property's historical and functional association with the surviving listed buildings and surrounding land that historically formed Artington Manor Farm; and
- Signals the original/historic rural character beyond the town boundary.

8.3.18. For the same reasons outlined above, being the intervening development and screening, retention of arable land and retention of the legibility of the property's historical and functional association with the surrounding land and buildings that formed part of the Artington Manor Farmstead, there would be no impact on the significance of the heritage asset. Accordingly, no harm is identified.

8.3.19. Summary on heritage assets:

8.3.20. Due to the design and siting of the proposal, the development would not lead to any harm to the setting and significance of The Sheiling, the Artington Manor Farmhouse or the Granary and Store 10 yards South West of Artington Manor House. As such, the proposal is considered to be consistent with policy D16 of the LPDMP, policy D3 of the LPSS and the provisions set out in the NPPF.

**8.4. Landscape and visual impact**

8.4.1. The application site is located within the SHNL and AGLV, both of which encompass this site and the main Mount Browne Site.

8.4.2. Paragraph 182 of the NPPF requires 'great weight' to be given to conserving and enhancing landscape beauty in Areas of Outstanding Natural Beauty. Furthermore, paragraph 182 also requires the scale and extent of development within an Area of Outstanding Natural Beauty to be limited. Paragraph 183 of the NPPF sets out that when considering development within a National Landscape, permission should be refused for major development other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. It goes on to set out the considerations in this regard which will be discussed further on in this report. For clarity, it should be noted that the NPPF and the Local Plan Policies still refer to National Landscapes as Areas of Outstanding Natural Beauty. Any reference to Areas of Outstanding Natural Beauty should be read as referring to National Landscapes.



- 8.4.3. Policy P1 of the LPSS sets out that the National Landscape will be conserved and enhanced to maximise its special landscape qualities and scenic beauty, and that great weight will be given to the conservation and enhancement of the natural beauty of the National Landscape and development proposals must have regard to protecting its setting. It is therefore clear that National Landscapes should be afforded the highest level of protection in relation to landscape and scenic beauty.
- 8.4.4. Policy D1 of the LPSS requires new developments to achieve high quality design that responds to the distinct local character of the area, which is reinforced by Policy D4 of the LPDMP. Policy D4 sets out that development proposals are required to demonstrate how they contribute to local distinctiveness through consideration of the history of a place, significant views, surrounding context, built and natural features of the interest, prevailing character, landscape and topography. Regard should be had to the relevant national and local design guidance, including the ten characteristics of well-designed places set out in the National Design Guidance.
- 8.4.5. The Surrey Hills AONB Management Plan 2020 – 2025 sets out a vision and policies for the conservation of the natural beauty of the Surrey Hills landscape. The vision for the Surrey Hills recognises that the landscape will change but ensures that it changes in a way that conserves and enhances its special qualities. In doing so, it also needs to maintain the social and economic viability of the Surrey Hills in a sustainable manner.
- 8.4.6. Policy P1 of the Surrey Hills AONB Management Plan reflects paragraph 176 of the NPPF outlined above. Policy P2 of the Management Plan gives attention to potential impacts on ridgelines, public views and tranquillity; as well as material colour and dark skies. Policy P6 of the Surrey Hills Management Plan 2020 -2025 states that 'development that would spoil the setting of the AONB by harming public views into or from the AONB will be resisted'.
- 8.4.7. Also relevant to the landscape impacts of this proposal is the Guildford Landscape Character Assessment (GLCA). This is a technical report and is part of an integrated assessment of the character of Guildford including its rural, rural-urban fringe and townscape areas which provides a tool for understanding the landscape environment of these areas, how they came to be, how they may change and considerations for decisions. This was part of the evidence base for the LPSS and LPDMP.
- 8.4.8. The application site falls within the J1: Loseley Mudstone Plateau landscape character area, which is covered by the rural-urban fringe assessment. The land to the east of the site is located within the H3: Peasmarsh Gravel Terrace character area and to the north is character area L1: Shackleford Open Greensand Hills
- 8.4.9. The Loseley Mudstone Plateau comprises an essentially agricultural, predominantly pastoral, landscape, within medium-large fields enclosed by hedgerows. The key positive landscape attributes within J1, which should be conserved and enhanced area:
- Local rural views up the gently sloping landform to the wooded ridge of the Greensand Hills;
  - Loseley House, gardens, parkland and wider estate land and associated buildings and features;
  - Function in providing an intact rural landscape between Guildford and Godalming (Farncombe)

- Quiet, intact rural character;
- Woodland shelterbelts and copses; and
- The rural lanes.

8.4.10. Due to the proximity to and close relationship with character area L1: Shackleford Open Greensand Hills, the landscape attributes are considered relevant also. Key positive landscape attributes of these areas that should be conserved and enhanced include:

- Pastoral, rural, peaceful character.
- Hedgerows and hedgerow trees.
- A distinctive landform with wooded slopes and agricultural valley.
- Local views to the wooded hills to the east of Guildford (The Chuntries).
- Function in providing an intact rural landscape between Guildford and Godalming.
- The historic buildings and features associated with the Estates.

8.4.11. The landscape strategy for the Loseley Mudstone Plateau landscape type “is to conserve the rural character of J1: Loseley Mudstone Plateau and its role in providing an intact rural landscape between Guildford and Godalming.” Relevant land management and build development should consider the following relevant matters:

- Continue and ensure appropriate long term management of the woodlands and plantations on the hill slopes and associated with the estate. Seek to encourage sustainable and multi-purpose woodlands.
- Encourage management and retention/restoration of the hedgerow network including the retention and management of standard trees.
- Seek to ensure continuing management and restoration of the historic parkland landscape associated with Loseley.
- Maintain rural views across the rural landscape to the wooded greensand hills.
- Maintain the character of the quiet rural lanes and in particular seek to manage pressures associated with high recreational use.
- Maintain the essentially undeveloped, rural character.
- Conserve the character of rural lanes. Resist urbanisation and pressures for widened, kerbing, signage, traffic calming etc. Which would change the rural character.

8.4.12. It should be noted that the Landscape and Visual Impact Assessment submitted with the application incorrectly describes the site as being within Area H3 and therefore lists the incorrect positive attributes and considerations. Notwithstanding this, the positive attributes are similar with emphasis places on the rural/agricultural character with views of Greensand Hills.

8.4.13. The application is supported by a Landscape and Visual Impact Assessment (LVIA) which considers a study area of 3km from the development position and includes a Zone of Theoretical Visibility (ZTV) and visualisations from viewpoints representative of receptors within this study area. The Assessment Methodology in the LVIA has been undertaken broadly in line with best practice guidance as set out in the Guidelines for Landscape and Visual Impact Assessment (Third Edition) 2013 (GLVIA3).

8.4.14. *Furthering the purpose of protected landscapes*

- 8.4.15. The Levelling-Up and Regeneration Act 2023 introduced for proposed developments within a National Landscape a new and stronger legal requirement for relevant authorities. This states:
- 8.4.16. In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority, other than a devolved Welsh Authority, must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty”.
- 8.4.17. The AONB Planning Advisor has asked the LPA to be satisfied that the applicant has complied with this greater duty. The Applicant has provided through a further supplementary statement the measures proposed to demonstrate these duties have been met.
- 8.4.18. In doing this, the statement provides justification as to why the suggestions by the AONB Planning Advisor could not be fully adopted, including adopting an amended road design that would sink the road into the landscape, and providing additional planting within the triangular piece of land to the east of the application site. Both options would require the Applicant to purchase additional land of which was not possible despite discussions being held with the current owner.
- 8.4.19. The application did however propose additional planting at the Mount Browne (northern) end of the site, which consisted of approximately 7,000sqm of planted woodland. This landscaping went above and beyond what was originally proposed. This landscaping would also further count towards the overall biodiversity net gain achieved on site, essentially doubling what was originally proposed at submission of the application.
- 8.4.20. The proposal also proposes to include the erection of an educational signboard which would be used to educate the users of the adjoining PRow (in this case the PRow that runs along the southern side of the Mount Browne site) of the special landscape qualities and beauty of the SHNL This signboard would be in the public interest and its location, design and content would be agreed through condition.
- 8.4.21. Through implementation of these measures it is considered that Applicant has met this further duty.
- 8.4.22. *Landscape impact*
- 8.4.23. A summary table of the landscape impact can be found in Appendix 1 of this report. The summary was produced by the Council’s independent consultant, HDA who were engaged to review the submitted LVIA.
- *Construction*
- 8.4.24. During construction the proposed development would result in significant disturbance to a largely open, rural landscape. While construction activities would be temporary in nature, they would result in the farmed landscape being lost. The proposed works would be undertaken solely within MP1, albeit at the far eastern end of this landscape character

area. While the rising ground to the west would offer some containment, it is clear that the open character would make it difficult to assimilate the proposed access road into this high value landscape. This is reflected in the LVIA where it concludes that the magnitude of impact of the construction phase would be assessed as locally major, which, for a landscape receptor of high sensitivity, would equate to a temporary, but local large adverse significance of effect. HDA agree with this assessment.

8.4.25. While only a small part of the proposed development is situated within area GO1, it is situated in close proximity and the development is directly linked to the wider Mount Browne site, which is located within this landscape character area. The positive attributes of MP1 include protection of views up to the wooded slopes of GO1, which is a clearly characteristic of the site. The LVIA notes that construction activities would be visible within views from some parts of the landscape character area that are at a higher elevation, which includes Mount Browne itself. The temporary construction works would result in some locally adverse characterising effects, but these would be no greater than Moderate and would be local to the area directly impacted. The proposed development would therefore result in a local and temporary moderate adverse significance of effect.

8.4.26. The LVIA assesses other landscape character areas, including townscape character areas. However on review HDA note that as these are detached from the site there would be no direct effects on these areas. It is agreed that the impact on these areas would be slight adverse significance of effect.

8.4.27. The LVIA concludes that the impact on the SHNL during construction would be a temporary very large adverse significance of effect due to the local major magnitude of change.

- *Operation*

8.4.28. While only a small part of MP1 would be directly impacted during the operation of the development, a key attribute of the character area is the open farmland with some woodland and hedgerows. The area would permanently change this character with the addition of a large engineered road as well as the associated traffic and lighting. The LVIA notes that proposal would result in a local large adverse significance of effect at year 1, which would remain in year 15.

8.4.29. While only a small part of the development would be within GO1, the proposal would still result in additional traffic within this landscape character area. This would impact the rural tranquillity of the landscape, result in a slight adverse significance of effect at both year 1 and year 15.

- *Night – time Effects*

8.4.30. The proposed development would result in new external light sources within an open, rural landscape. The LVIA notes that new lighting for the project would permanently and directly impact a small and contained part of the landscape character area of MP1, which would result in a change to the night-time landscape. The lights would be set within a landscape that already has sources of lighting, including the lighting around the Artington roundabout, along The Ridges and along the A3100.

8.4.31. The LVIA concludes that the impact on the MP1 would be large adverse significance of

effect. The impact on GO1 would be slight adverse significance of effect noting that the lights would predominantly be situated within MP1. Where the lighting would extend into GO1, this would be within the context of the maintenance compound which has existing lighting and forms part of main site application.

8.4.32. The impact on the Mount Brown townscape character would be neutral significance of effect owing to the presence of existing external lighting and locality within a built-up area. This character area would also not be directly impacted as there would be no increase in external lighting within this area with the only evident change being light from vehicle headlights.

8.4.33. There would be a large adverse significance of effect on the SHNL for the same reasons as the MP1 character area.

8.4.34. Visual impact

- *Construction*

8.4.35. The LVIA concludes that there would be a large adverse significance of effect at construction on non-motorised users of the A3100 (viewpoint 11) and on users of the public footpath by Ridge Farm (near viewpoint 10). The proposals would continue to be visually prominent in the views of public receptors using The Ridges during operation of the access road, with the significance of effect remaining large adverse at year 15, though the significance of effect would reduce further to the west.

8.4.36. Construction activities would be immediately visible from viewpoint 12 (track to Rushy Platts Farm) due to the close proximity with largely open views. Accordingly, the LVIA concludes that there would be a large adverse significance of effect during both winter and summer.

8.4.37. Construction activities would also be noticeable within the broader, panoramic views from both representative viewpoints 1 and 2 (Pewley Down). However the area visible would be small and at a distance of 2km, the potential impact would be reduced. Accordingly, there would be a temporary minor magnitude of change and a temporary moderate adverse significance of effect.

8.4.38. Part of the proposed development would be visible from viewpoint 10 (The Ridges) set against the backdrop of the existing gated access to the lower part of the Mount Browne site. However, there would be little change to the overall balance of features within the view. Accordingly, the LVIA concludes that there would be a slight adverse significance of effect.

8.4.39. There would be a negligible magnitude of change from viewpoint 16 (Farley Hill). Accordingly, the LVIA concludes that there would be a temporary slight adverse significance of effect.

8.4.40. While existing vegetation would filter views from viewpoint 19 (Artington Park & Ride), the replacement lighting columns along part of the A3100 would be noticeable. Accordingly, the LVIA concludes that there would be a temporary slight adverse significance of effect.

- 8.4.41. During winter months, construction activities would be visible from viewpoint 20 (Footpath 276 by sport buildings). While the ridgeline and vegetation would offer some screening, there would be a clear change against the existing rural setting. The LVIA concludes that there would be a temporary moderate adverse significance of effect with no change evident during summer months as the existing vegetation would screen the view.
- 8.4.42. For all other views construction activities would be generally screened, with at worst, a temporary slight adverse significance of effect upon views from those representative viewpoints which may be used by high sensitivity visual receptors (i.e. users of public footpaths).
- *Operation*
- 8.4.43. Two visual receptors are identified as experiencing large adverse significance of effect during operation, these being the users of the private track to Rushy Platts Farm and the Old Dairy House (Viewpoint 12 ), and users of The Ridges, where the public footpath crosses the Project (Viewpoint 10).
- 8.4.44. From the remainder of public footpath continuing west from The Ridges, the significance of effect during operation is assessed as moderate adverse (near Viewpoint 10). The same level of significance of effect during operation is assessed for views experienced by non-motorised users from the A3100 (Viewpoint 11), from Pewley Down (Viewpoint 2) and from the public footpath along the southern boundary of Mount Browne (Viewpoint 6). This level of significance of effect would prevail at night-time for these receptors.
- 8.4.45. The wider operation of the application site is 24/7 which would extend to the use of the proposed access track. While some mitigation could be put in place to reduce the degree of harm from the operation of the proposed road, inclusive of traffic and lighting, it would not be possible to fully do this. The proposed LIA includes measures to reduce the impact on the landscape and sensitive receptors which are outlined below but include use of light shields, landscape screening, restrictions on intensity of light, dimming and restrictions on height of the lighting columns. In this regard, the LVIA's conclusion that a moderate adverse significance of effect would remain at night would be justified, even with the mitigation measures proposed.
- 8.4.46. *Conclusion on landscape and visual impact*
- 8.4.47. It is considered that the current mitigation measures as proposed for the access road would be sufficient to reduce the potential landscape and visual effects to a level that would not be considered to be significant by year 15. HDA note in their review that this is not reflected in some of the judgements made within the LVIA. For example, the significance of effect on landscape character area MP1 is stated as remaining as large adverse in year 15, suggesting that despite the planting along its length, the access road would be difficult to assimilate into the landscape, which HDA do not agree with. However, as the degree of impact would remain as large adverse, it is apparent that the proposed development would not respond positively to the requirements of the NPPF, the AONB Management Plan or Policy P1 of the LPSS. This harm will be balanced against the potential benefits of the scheme below.
- 8.4.48. *Major development in the Surrey Hills National Landscape*

8.4.49. Paragraph 183 of the NPPF sets out that when considering development within a National Landscape, permission should be refused for major development other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. In determining whether the proposal would be a major development the Local Planning Authority must take into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.

8.4.50. The proposed development would introduce a prominent feature to an open, rural landscape within the SHNL and AGLV. While in isolation the access road, lighting, drainage and landscaping may not constitute major development under paragraph 183, the works are fundamentally linked to the wider application for the development of Mount Browne (which form part of application 24/P/00564 that is also reported on this agenda). When the cumulative scale and potential impact of both developments is considered, they would amount to major development in the SHNL and therefore, in accordance with the NPPF, they should not be approved unless there are exceptional circumstances, and it can be demonstrated that the development is in the public interest. Consideration of such applications should include assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
- The Applicant has addressed these points within the Supplementary Planning Note dated August 2024.

- *Need*

8.4.51. The new access road would create a suitable and appropriate private access for the Surrey Police to use for its operational vehicles to enable improved response times by up-to 2 minutes. Whilst a 2 minute margin would appear small, they become critical when responding to locations such as Farnham and Clandon in under 15 minutes. The two existing access points are narrow residential roads where officers would face obstructions that delay emergency response times. This would not only offer a benefit to the operational requirements of the Surrey Police, but would also benefit the local community by responding to emergencies faster.

8.4.52. The proposed access road would reduce traffic movements along both The Ridges and Sandy Lane, which would improve traffic safety for users entering/exiting onto Old Portsmouth Road, as well as the amenity of the residents that live along these roads. As this would benefit a limited number of residents along these roads.

8.4.53. The proposed access road would make an important contribution to achieving Surrey Police's aspiration for Mount Browne in relation to the overall campus masterplan which

they are seeking to achieve to provide a headquarters which will meet the policing needs for Surrey into the future. As the access road is to be assessed in isolation and could be implemented as such.

- *Cost of, and scope of, developing outside designated area*

8.4.54. If the access road is not delivered it would prohibit the deliver of the campus masterplan which would secure the future of the Surrey Police Headquarters at the Mount Browne site. This masterplan would ensure that the Police can continue to deliver high quality policing to support the Borough and the wider Surrey area. Guildford and the wider Surrey area have a growing population resulting in additional demand and strain placed on Police services. Surrey Police's estate therefore needs to be fit for purpose to meet these needs of which the proposed masterplan will make an important contribution towards.

8.4.55. As set out above, the access road would deliver a safe, private access to improve response times by up to 2-minutes. If not delivered, the existing access points would become increasingly dangerous and inefficient to adapt to the growing population and demand for services.

8.4.56. It should also be emphasised that there are no alternative locations for the access road that are outside the Green Belt, SHNL or AGLV.

- *Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated:*

8.4.57. The site is not currently used for recreational purposes, with the wider site being an already established use. There are existing PRoWs around the site, which provide views of the policing activities and of the access road location. The access road is located on privately owned land with no access to the public. There would be no loss of recreational opportunities.

8.4.58. While there would be a large or very large adverse impact on landscape character (MP1 and SHNL) and on the visual amenity of viewpoints 10 – 12, the design of the road has considered the impact and mitigated and minimised impacts where possible. Additional enhancement measures are proposed including additional tree planting along the access road and at the northern corner. The proposed development would not result in detrimental effects on the environment, landscape or recreational opportunities.

- *Conclusion*

8.4.59. It is considered that exceptional circumstances have been demonstrated and that the development would be in the public interest.

## **8.5. Access, highway safety and capacity**

8.5.1. Paragraph 104 of the NPPF requires significant development to be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a



genuine choice of transport modes. Paragraph 111 explains that “development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”.

- 8.5.2. Paragraph 116 states that development should give priority to pedestrian and cycle movements, both within the scheme and within neighbouring areas; and second – so far as possible – to facilitate access to high quality public transport, with, inter alia, facilities that encourage public transport use.
- 8.5.3. Policy ID3 of the LPSS says that new development will be expected to contribute to the delivery of an integrated, accessible and safe transport system, maximising the use of sustainable transport modes, and establishing a set of steps for development to take into account in order to achieve this objective.
- 8.5.4. A further document which is a material consideration is the Local Transport Plan (LTP4), 2022 – 2032 produced by the County Highway Authority (CHA). This identifies policy areas to deliver the CHA’s objectives of ‘avoid travel’, ‘shift travel mode’ and ‘improve energy and operational efficiency of travel’, the latter covering ‘efficient network management’ as a policy area.
- 8.5.5. Mount Browne is currently accessed via The Ridges to the south and Sandy Lane to the north, both of which are in turn accessed from the A3100 Old Portsmouth Road. Internally, the site has two main roads, Munstead View and The Drive. These roads distribute traffic throughout the site. Munstead View is the main spine road that connects to the Ridges and extends through the centre of the site before connecting to The Drive at the northern end. The Drive extends from Sandy Lane and provides access to the Main Building and western car parking areas. There is one further internal road which serves the sports field. This road extends from the Ridges and extends westwards to provide access to the lower section of the site.
- 8.5.6. The proposed access road would deliver the following benefits:
  - It would provide free egress from Mount Browne directly onto the A3100.
  - It would significantly reduce vehicle movements from Sandy Lane and The Ridges with these access points only used for emergencies on the Mount Browne Site and all other vehicles directed down the new access road.
  - The scheme would reduce response times and provide a much safer access point for operational and response vehicles.
  - The new road would reduce noise and disruption from vehicles using Sandy Lane and The Ridges, improving amenity of residents along these roads.
- 8.5.7. The proposed development would, in short, deliver a more efficient and safe access point for both emergency and operational vehicles which would result in both local and community benefits.
- 8.5.8. The proposed access would extend from the Artington roundabout and create a new western arm. As set out above the road would feature a 6m wide vehicle carriage way that widens upon the approach to the roundabout to provide two 3.1 metre exit lanes. The entry lane onto the main access road from the roundabout would be 7m in width.

The design would accommodate pedestrian access on the right (northern) side of the access which would connect to the pedestrian facilities on the main site.

- 8.5.9. In addition to the construction of the access road, the proposal would also include works to The Ridges interface. These works include widening the approach to the sports field gate from 3.2 metres to 5m to allow two vehicles to pass, installing droppable bollards to restrict vehicle access to The Ridges and providing a continuous footway where the access road meets The Ridges. The bollards would provide a physical barrier for vehicles to emphasise that The Ridges is no longer the main access point to the site. Both the continuous footway and widening of the sports field access would provide improved connectivity with the public transport network and the internal system within the site, which combined with the proposed dropped kerbs and tactile paving at the roundabout and the facilities proposed within the carriageway of the road, would deliver a continuous and safe pathway for pedestrians and cyclists and promote sustainable forms of transportation in accordance with Policy ID3 of the LPSS.
- 8.5.10. While the proposed development would reduce traffic volumes along Sandy Lane also, as this falls outside the application site boundary it is not proposed to include a droppable bollard at this access.
- 8.5.11. To ensure the deliverability of the benefits set out above conditions are recommended requiring the installation of the droppable bollards, a continuous footway where the access road meets The Ridges and the widening of the existing Sports Field access.
- 8.5.12. The County Highway Authority have reviewed the proposed development and have recommended the imposition of conditions requiring the submission of a scheme to show dropped kerbs and tactile paving and acceptable visibility zones at the roundabout arm junction with Old Portsmouth Road, for works to proceed in accordance with the approved plans, including the provision of a pedestrian and cycle route from the proposed roundabout access into the site. The visibility zones are necessary to ensure adequate line of sight from vehicles entering and exiting the access road, particularly where emergency response vehicles are responding to an emergency.
- 8.5.13. While not required by the County Highway Authority, it is also considered necessary to require the submission of a Construction Transport Management Plan prior to commencement of development to ensure construction traffic is appropriately managed to avoid potential highway safety concerns.
- 8.5.14. Subject to the imposition of the above conditions, it is considered that the proposed development would not result in an unacceptable impact on highway safety and capacity and would comply with Policy ID3 of the LPSS and the NPPF.

## **8.6. Flooding and drainage**

- 8.6.1. Paragraph 165 of the NPPF requires that development should not increase flood risk elsewhere and at paragraph 175, major schemes should incorporate sustainable drainage systems (SuDs). In accordance with these requirements, policy P4 of the LPSS requires that development proposals demonstrate that land drainage will be adequate

and not result in an increase in surface water run-off. Policy P11 of the LPDMP deals with sustainable surface water management and sets out the requirements for all development, including major schemes. Development proposals are required to follow the discharge hierarchy and prioritise the use of Natural Flood Management (NFM) and SuDs for all surface water that is not captured for later use.

#### 8.6.2. Flooding

8.6.3. The application site is located within Flood Zone 1 and in an area of very low risk of surface water flooding, as shown in the Environment Agency Maps. Along the northern boundary of the site there are areas of low risk associated with the current road infrastructure. The application is supported by a Flood Risk Assessment which concludes the following:

- The annual probability of flooding is classified as less than 0.1% (1 in 1,000) of flooding in any given year in the absence of any defences.
- Due to the distance inland from the sea, the site is considered to have a negligible risk of tidal flooding and a low risk of fluvial flooding.
- The proposed land use is classified as 'less vulnerable' and such uses are generally considered appropriate within Flood Zone 1.
- Flood risk from sewers is considered to be low.
- Surface water can be managed through implementation of a suitable surface water drainage strategy which will be discussed below.
- The risk of flooding from groundwater sources is considered to be low.

8.6.4. The sequential test must be applied where major development is proposed in areas at risk of flooding but will not be required where the site is in an area at low risk from all sources of flooding. In this case the site is located within an area at low risk of flooding and the sequential test is not required. As application of the sequential test is not required, the exception test does not apply to the proposed development.

8.6.5. Subject to the recommended mitigation measures set out in the FRA, which are summarised in section 12 of the report, the proposed development would be acceptable. These measures include sizing the sewers on site appropriately to accommodate the potential increase in flow and the preparation and implementation of an appropriate surface water drainage strategy.

#### 8.6.6. Drainage

8.6.7. The proposed development would lead to an increase in impermeable surface from hardstanding. Any increase in impermeable areas may lead to an increase in surface water run-off rates and volumes and has the potential to increase the downstream flood risk due to overloading of sewers, water courses, culverts and other drainage infrastructure.

8.6.8. The application is supported by an Outline Drainage Strategy for phase 1 (ODS1) of the development which includes the new access road and aspects of application 24/P/00564. It is understood that phase 1 can act independently from phases 2 and 3.

The LLFA have considered this approach and have not raised an objection subject to the imposition of conditions.

- 8.6.9. The ODS1 sets out that it is proposed to discharge surface water runoff into the existing site drainage network, as infiltration observed on site has shown to be unviable. It was assumed that based on CCTV footage the existing network discharges into the surrounding highways ditches. The strategy has accounted for future flooding with a +45% additional runoff for climate change considered. The ODS1 notes that all flooding for storm events up to and including the 1 in 100 year (+45%) would be managed on site, below ground and/or within attenuation basins within the soft landscape.
- 8.6.10. It was also set out that the access road attenuation basin has poor infiltration rates and therefore cannot discharge directly to ground. It is therefore proposed to attenuate the flows associated with the access road catchment and outfall into the existing field ditch via a pump, restricted to a greenfield rate of 1.1/s. The attenuation basin would capture surface water run off from the access road.
- 8.6.11. Sustainable Drainage Systems (SuDs) are proposed and designed in accordance with CIRIA 753 The SuDs Manual. Table 2 of the ODS1 summarises the analysed measures where the following were considered as suitable:
- Balancing pond.
  - Subsurface storage.
  - Permeable paving.
  - Detention basin.
  - Enhanced dry swale.
  - Enhanced wet swale.
  - Conveyance swales.
  - Rills.
  - Rainwater harvesting.
- 8.6.12. Of these measures, an attenuation basin, permeable paving and swales were selected as appropriate SuDs measures. The attenuation basin would also be used as a water quality treatment measure to ensure there would not be an adverse impact on the water quality of discharged runoff.
- 8.6.13. The ODS1 makes the following relevant conclusions with respect to the proposed drainage network for phase 1:
- The surface water network for the access footways and access roads are designed to convey and store surface water from the site for a 1 in 100-year storm plus a 45% allowance for climate change.
  - Drainage network will be provided for the proposed access road which will be attenuated before being pumped into the surrounding drainage ditches at 1.1/s.
- 8.6.14. The LLFA have reviewed all the relevant documents and are satisfied that the proposed drainage scheme meets the requirements of the NPPF, its accompanying PPG and the Non-Statutory Technical Standards for sustainable drainage systems, subject to the recommended conditions. The recommended conditions require the submission of

details of the design of a surface water drainage scheme to include points (a) - (g) of the LLFA's consultation response, as well as the submission of a verification report for each phase prior to occupation.

- 8.6.15. Subject to these conditions the proposed development would comply with Policy P4 of the LPSS, Policy P11 of the LPDMP and the NPPF.

## **8.7. Air quality**

- 8.7.1. Paragraph 192 of the NPPF requires opportunities to improve air quality to be sought, or for the identification of measures to mitigate the impact. Policy ID3 at paragraph 4.6.31 of the LPSS recognises that well designed developments may actively help to enhance air quality and reduce overall emissions, therefore reducing possible health impacts. Policy P9 of the LPDMP, seeks for proposals to improve air quality and reduce effects of poor air quality, not have adverse effects, include an Air Quality Assessment (AQA) with avoidance and mitigation measures as necessary.
- 8.7.2. The Air Quality Assessment submitted in support of the proposed development considered both the impacts on air quality during the construction stage and the operational stage (emissions from vehicles). It should however be noted that the impact from vehicle movements is to be considered as part of the application for the main site application (reference 24/P/00564) and will not be discussed here. The report has been prepared in accordance with the Air quality Management guidance.
- 8.7.3. The AQA concludes that the overall dust risk from the site is predicted to be low risk subject to the implementation of the mitigation measures detailed in Chapter 8 of the AQA.
- 8.7.4. The Council's Environmental Health Officer has reviewed the submitted AQA, as well as the transport assessment. In their response it was noted that should the application be recommended for approval a pre-commencement condition is recommended requiring the submission of a Construction Environmental Management Plan (CEMPT). No objections were raised in terms of the impacts on air quality during the construction stage.
- 8.7.5. In addition to the CEMP, a condition would be recommended (should the application be recommended for approval) requiring works to proceed in accordance with the mitigation measures provided under the AQA.
- 8.7.6. Whilst the Local Authority must be conscious of any development that affects air quality, the Environmental Health Officer is satisfied that the report has demonstrated that the site is being developed within the guidelines currently in place. Subject to the imposition of the above recommended conditions, the development would be reasonable in terms of air quality impact.
- 8.7.7. There would not be a materially harmful impact on air quality in accordance with Policy ID3 of the LPSS, Policy P9 of the LPDMP and the NPPF and conditions would mitigate and manage the impact from construction works.

## **8.8. Impact on residential amenity**

- 8.8.1. As noted above, the site is in a relatively remote location, however, there are a number of residential properties in the general vicinity. These include the dwellings to the north of the site which are accessed from The Ridges, as well as those to the south, accessed from Old Portsmouth Road and the access track towards Rushy Platt Farm and The Old Dairy House.
- 8.8.2. Policy D5 requires development proposals to avoid having an unacceptable impact on the living environment of existing residential properties, which includes the impact from artificial lighting. Policy D12 requires development proposals to be designed to minimise obtrusive light and the adverse impacts of obtrusive light on sensitive receptors.
- 8.8.3. *Lighting*
- 8.8.4. The application is supported by a Lighting Impact Assessment (LIA), which classifies the sensitivity of surrounding residential properties as 'High'.
- 8.8.5. The application site is currently unlit, but there are sources of external light within the surrounding area. These include at the south end of the proposed access road, which includes lighting for the A3100, the Artington Roundabout and the commercial/industrial areas to the south of the site. There is also lighting provided for the west section of The Ridges (north of the application site) approaching the access to Mount Browne. The access track that serves Rushy Platt Farm and The Old Dairy House has no external lighting. The LIA has undertaken a baseline survey to establish the existing lighting situation, which is to be considered in conjunction with drawing MTB-RAM-XX-EX-DR-C-13004 Access Road Baseline Survey Results. This drawing shows that the measurement locations were taken from a number of points along The Ridges (points 12 – 19 and point 22), Munstead View (point 21), Ridge Farm (point 20), Old Portsmouth Road (points 9 – 12), at Artington Roundabout (points 6 – 8), within the south-eastern corner of the site, close to the roundabout (point 5) and along the farm track providing access to Rushy Platts Farm (points 1 - 4).
- 8.8.6. Drawing MTB-RAM-XX-ER-D-C-13005 P01 shows the observer locations, which includes to the rear of 35 The Ridges and Rushy Platts Farm (observer points OB14 and OB3).
- 8.8.7. The proposed development includes column lighting along the length of the access road with heights ranging from 5m to 8m in height. The scheme will incorporate the design mitigation measures set out under Sections 7.3.1, 7.5.4 - 7.5.7 and 8.6 of the LIA. These measures include:
- The use of luminaires with zero light output at and above the horizontal plane to reduce glare and sky glow.
  - The luminaires (when installed) will meet the luminous intensity class G3 to G6, in accordance with BS EN 13201-2: Table 1, to reduce glare.
  - Light source colour temperature to be warm white, 2,700K CCT to reduce potential impact on ecology and provide a more pleasing ambient night-time scene for observers. The peak wavelength to be greater than 550nm to reduce UV and impact on bats as recommended in ILP GN08/23 document.

- The use of optimal light distributions for their specific location and orientation to focus on the task areas only.
- Luminaires to be at a low mounting height as possible (generally 5m) to reduce light spill and daytime visual impact.
- Luminaires to include internal rear shields at manufacture where available. Otherwise, external rear shields to be installed.
- Lighting is to automatically dim to 75% from 22:00 to 05:00;
- The use of photocell control to turn the lighting on at dusk and off at dawn and Constant Light Output, 'CLO' function enabled.
- Provision of 2m height screening in the form of evergreen foliage adjacent to the Rushy Platts farm access track.

8.8.8. The LIA concludes that the glare on the identified sensitive receptors would be within limits pre-curfew (22:00hrs) but marginally above the required amount of 0cd after curfew for an E1 environmental zone due to potential view of the light sources. Additionally, mitigation is recommended on this basis and has been summarised above.

8.8.9. The vertical illuminance on residential windows was assessed for both Rushy Platts and the rear of 35 The Ridges where lux levels were below the required pre and post curfew limits for an E1 zone, thus compliant with the ILP GN01 limits.

8.8.10. It was therefore concluded that compared to the base-line lighting conditions, the impact on light sensitive receptors would be minor. With the mitigation measures, the impact would be reduced to minor-neutral, equivalent to no impact.

8.8.11. The Council's EHO has reviewed the LIA and concluded that overall, the proposed lighting would be an improvement over the existing lighting. No concerns were raised subject to the imposition of a condition requiring the lighting scheme to achieve levels as specified in the Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations, 2nd Edition (CIE 150:2017), with respect to illuminance and luminous intensity.

8.8.12. *Noise*

8.8.13. The proposed access road would change the noise environment for surrounding sensitive receptors as it would result in a reduction or negligible change in noise from vehicle movements and sirens from properties along The Ridges and Sandy Lane. This is evidenced in the submitted noise assessment, which sets a reduction in noise for noise sensitive receptors 1 – 3 and 7 – 8. The proposed development would therefore result in a clear benefit to these receptors. These receptors are situated along Sandy Lane (receptors 1 – 3) and The Ridges (receptors 7 – 8). There would be an increase in noise levels to receptors 4 – 6 and 9 who are situated along the A3100 (receptors 4 -6) and The Ridges (receptor 9).

8.8.14. The noise assessment notes that where the increase in traffic noise is less than 1.0dB the impact would be negligible. This would apply to receptors 4 – 6. Receptor 9 would experience an increase in noise of 4dB due to the proximity to the internal road (Munstead View). This increase would be perceptible and would result in a moderate adverse impact. It should be noted that as this impact would be created through an

increase in traffic within the main site, it should be considered within the main site application. As such, it is not considered necessary to consider this further under this application.

8.8.15. It is therefore considered that the proposed access road would not have an unacceptable adverse impact on the surrounding sensitive receptors and therefore, would comply with Policy D11 of the LPDMP.

8.8.16. Subject to this condition, the proposed lighting would not have an unacceptable adverse impact on the amenity of surrounding residential properties, in compliance with Policies D5 and D12 of the LPDMP.

### **8.9. Impact on trees and ancient woodland**

8.9.1. Mount Browne is a heavily wooded site, with many large, mature trees distributed over the site. The application site where the proposed road would be constructed is largely open countryside but would involve the removal of trees where it joins Mount Browne.

8.9.2. There are no areas of Ancient Woodland, TPOs or veteran on the site or within the vicinity. The site is also not within and does not adjoin a Conservation Area.

8.9.3. Paragraph 186(c) of the NPPF states that 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists'.

8.9.4. Policy P6 of the LPDMP requires development proposals for sites that contain or are adjacent to irreplaceable habitats or priority habitats to preserve the relevant ecological features through the application of a mitigation hierarchy, and to deliver enhancements to the ecological features in line with Policy P7. The habitats should be protected by appropriate buffers and, if necessary, barriers in order to prevent adverse impacts, including those resulting from recreational use. Where development proposals would result in the loss, damage or deterioration of irreplaceable habitats, they should be refused unless there are wholly exceptional reasons, and the exceptional benefits of the proposal outweigh the loss of the habitats.

8.9.5. Policy P6(4) requires the following where the site falls within or is adjacent to Ancient Woodland:

- (a) The submission of information setting out the location of all significant ancient or veteran trees (a BS5837 Survey).
- (b) An appropriate buffer between the development and the ancient woodland of a minimum of 15 metres or a greater distance if specified by national policy.
- (c) A clear separation between the woodland and the rest of the development, delineated by a physical feature such as a wildlife permeable barrier, a cycle lane, path or lightly trafficked road.
- (d) Site design that discourages harmful activities such as the use of the woodland as a cut through where well-used paths do not currently exist.

8.9.6. The proposed development is supported by a Tree Survey and an Arboricultural Impact Assessment (AIA). The site tree survey, which the AIA was based on was undertaken



on the 4th, 7th and 22nd of November 2022.

- 8.9.7. The AIA notes that the removal of 7 trees (3 Category B and 4 Category C) will be required to facilitate the proposed access road. Additionally, the removal of a section of G44 and all of G46 will be required, which would equate to approximately 22% and 100% reduction in canopy cover area.
- 8.9.8. Two trees to be removed are situated along the south-east boundary of the site, where it adjoins the Artington Road roundabout. Other trees to be removed, including the groups, are situated on the southern border of Mount Browne.
- 8.9.9. The Council's Tree Officer has reviewed the proposal and raised no arboricultural object. It was further noted that the British Standard (BS5837:2012) Trees in relation to design, demolition and construction, states that trees in categories 'A', 'B' and 'C' are all a material consideration in the development process, and that the retention of category 'C' trees, being of low quality or of only limited or short-term potential, will not normally be considered necessary should they impose a significant constraint on development. For 'A' and 'B' grade trees they should be retained where possible and only proposed for removal when all other alternative options have been explored.
- 8.9.10. While the removal of these trees would be visually noticeable, it is clear that tree removal has been kept to a minimum and protection measures are proposed to protect other trees on site. Further, it is not considered that the removal of the category B trees would have an unacceptable adverse impact on the wider character of the area and their removal would facilitate the retention of more prominent trees. The proposal would also avoid the removal of any trees within the Ancient Woodland or Conservation Area, and any veteran trees, in compliance with paragraph 186(c) of the NPPF.
- 8.9.11. In addition to the above, the proposed development also includes significant new tree planting along the access road and a 7000sqm area to be planted in woodland. The delivery of this landscaping would be ensured through condition and through the planning obligations set out below.
- 8.9.12. The Tree Officer noted that if the proposal is recommended for approval, a condition should be imposed requiring the submission of an Arboricultural Method Statement and Finalised Tree Protection Plan to ensure retained trees are adequately protected.
- 8.9.13. Subject to the Tree Officer's recommended condition, as well as a condition requiring details of the proposed physical barriers to prevent unsolicited car parking within sensitive areas, the proposed development would comply with the NPPF and Policies P6 and P7 of the LPDMP.

#### **8.10. Impact on ecology, nature conservation and biodiversity**

- 8.10.1. Paragraph 186 of the NPPF sets out the principles that should be applied to habitats and biodiversity. Policy ID4 of the LPSS seeks to contribute to biodiversity. Policies P6 and P7 of the LPDMP is for the strategic delivery of biodiversity in new developments and as well as the protection of important habitats and species.
- 8.10.2. The application is supported by an Ecological Impact Assessment (EIA), Ground Tree Assessment, Biodiversity Net Gain Assessment, the Statutory Biodiversity Metric, a

Landscape and Ecology Management Plan and a Functional Lighting Environmental Impact Assessment.

8.10.3. Designated and protected species

- Badgers

8.10.4. The submitted EIA identified active badger sets within the wider Mount Browne site but none within the application site. While no setts were identified within the site, badgers are known to inhabit the surrounding area and signs of badger activity was identified within proximity to the site. As badgers are highly transitory in nature and can evacuate a new sett at any time, including since the site was surveyed, there is the potential for badgers to become trapped during excavation, injured where new roadways are implemented or be impacted by other construction activities. Mitigation measures were therefore recommended within the EIA. These measures are summarised as follows:

- A pre-construction survey should be undertaken to identify the use status of previously identified setts and to identify any new setts present in the proposed work areas and land within 30m of the proposed works.
- Access to foraging areas should be maintained during the development and into the future.
- Any open deep excavations to be sloped or securely boarded/fenced to prevent entrapment.
- All rubbish to be picked up daily and stored appropriately.
- Excavations to be checked for trapped animals daily.
- Any hazardous materials to be stored in a secure store.
- Site personnel to be briefed concerning a method statement, the presence of badgers, the mitigation measures to be followed, relevant legislation, the penalties imposed and who to contact should they need to.
- The above should be managed under a Precautionary Method of Works.

8.10.5. Surrey Wildlife Trust (SWT) in their review have recommended that a badger survey be undertaken prior to commencement of development within the proposed development boundary and a 30m buffer, to search for active setts. This is a precautionary measure as badgers are mobile and further setts may be created in the future. By undertaking a further survey prior to commencement of development it would enable any new setts to be identified and mitigation measures put in place if necessary. This is aligned with the recommendations of the EIA. If active setts are detected, a suitable course of action shall be submitted to and approved in writing by the LPA to prevent harm of the species. The SWT also advised that the following measures be implemented:

- construction activities on site have regard to the potential presence of terrestrial mammals to ensure that species do not become trapped in trenches, culverts or pipes. Trenches should also be left open overnight to include a means of escape for any animals that may fall in.
- Any close-boarded fencing should have holes of 20cm x 20cm to allow badgers to move freely through the site.
- To ensure continued connectivity of areas of habitat for commuting and foraging badgers, it was recommended that a tunnel suitable for badgers be constructed

underneath the access road, to facilitate the continued movement of this species through the site and wider landscape.

8.10.6. Notwithstanding the above measures, as there were no identified badger setts on the application site, only a condition requiring the pre-commencement survey is recommended. Should any active setts be identified, mitigation measures will be required at that time.

- Bats

8.10.7. The EIA identified the presence of active roosts within a building adjacent to the development site. The eastern portion (one-storey section) is proposed to be demolished to facilitate the access road. However, the roosts would not be directly impacted as they are located within the roof of the two-storey section. SWT in their review recommended that measures to protect bat roosts during construction should be included within a Construction Environmental Management Plan (CEMP).

8.10.8. The proposed development involves the removal of trees. In their initial response, the SWT requested that a ground level tree assessment be undertaken prior to determination. In response, the applicant has submitted this report which did not identify any suitable active bat roost within the trees to be impacted by the development. The SWT confirmed in their response that the report appeared to be appropriate in scope and methodology, but did note that bats are highly mobile and move roost sites frequently. Accordingly, it is recommended that tree T233 be felled using a precautionary approach.

8.10.9. To ensure bats are not impacted by external lighting, the SWT recommend that a condition be imposed requiring the development to proceed in compliance with the submitted Lighting Plans. Any changes should be checked by a suitably qualified ecologist to ensure that bat roosting, commuting and foraging routes will not be impacted.

- Breeding birds

8.10.10. The EIA identified that the woodland, scattered trees and buildings offer suitable habitat for nesting birds with these habitats and the grassland considered to offer suitable foraging habitat for a range of bird species. The arable field was considered to offer suitable habitat for a range of farmland and ground nesting birds, and therefore, there may be limited impacts on these species during construction / operational phases of the road.

8.10.11. The EIA recommends that to avoid damaging or destroying active nests during site clearance works, prior to construction, it is recommended that vegetation clearance be undertaken outside of the breed season (March – August inclusive).

8.10.12. The EIA also concludes that there is sufficient resource in the wider immediate area for farmland birds, and the development is not considered to impact them in the long term.

8.10.13. SWT in their response did not raise differing conclusions, and agreed that site clearance should be undertaken to avoid breeding season.

- Hazel Dormouse
- 8.10.14. The EIA confirms the likely absence of hazel dormouse from the proposed development site. Accordingly, they are not considered to be a constraint to the development.
- Amphibians and reptiles
- 8.10.15. The application site is located within the amber and red Great Crested Newt Impact Zones. The EIA concludes that there are no Great Crested Newt aquatic or terrestrial habitat present within the site and it is highly unlikely that the species poses a constraint to works.
- 8.10.16. The reptile surveys identified a low population of slow worm. As slow work are protected through part of Section 9 of the Wildlife & Countryside Act 1981, the intentional or reckless injuring or killing of protected reptiles is prohibited. It was therefore recommended in the EIA that a Precautionary Method of Working be complied with. SWT therefore recommended a condition be imposed requiring the submission of a reptile precautionary method of working to be submitted to the LPA prior to commencement of development.
- 8.10.17. *Biodiversity net gain*
- 8.10.18. Paragraph 180(d) of the NPPF states that ‘minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures’ should be a requirement of both plan making and decision taking’
- 8.10.19. There is a national requirement for qualifying developments to deliver a biodiversity net gain (BNG) of 10%, as set out under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).
- 8.10.20. Policy P7 of the LPDMP requires development proposals to achieve a BNG of at least 20%, measured using the national biodiversity net gain calculation methodology.
- 8.10.21. The submitted Biodiversity Net Gain Assessment details that the proposal has a feasibility to provide a net gain of 88.03% in biodiversity units on-site.
- 8.10.22. The proposed net gain measures include retention and management of existing habitats, including areas of woodland. Enhancement measures include:
- Creation of new areas of ‘other, semi-improved neutral grassland’
  - Planting of new trees.
  - Creation of a small area of broadleaved woodland within the north-eastern corner of the application boundary.
  - New areas of mixed scrub planting totalling an area of 0.07ha.
  - A programme of removal of non-natives.
  - Tree management comprising regular inspections of mature trees and management actions as necessary to improve tree health.
- 8.10.23. The applicant has demonstrated that the proposal would achieve at least a 20% net gain

in compliance with the mandatory national requirement and local plan policies. Subject to the implementation of the measures outlined in the biodiversity net gain assessment, the development proposal would be in accordance with Policy ID4 of the LPSS, Policy P7 of the LPDMP and the NPPF.

#### **8.11. Legal agreement requirements**

8.11.1. The three tests as set out in Regulation 122(2) require S106 agreements to be:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

8.11.2. The proposed development includes the delivery of an overall biodiversity net gain of 88.03. In conjunction with a condition requiring the submission of a Habitat Management and Monitoring Plan, it is considered necessary to secure the monitoring of the net gain for a period of 30 years via legal agreement. This would be necessary to ensure the measures implemented are maintained and retained for the duration of the agreement.

8.11.3. In addition, an obligation is required to ensure the delivery of the proposed landscaping measures where it is proposed within land outside of the Applicant's ownership.

8.11.4. It is considered that the legal agreement would meet the tests set out in Regulation 122(2).

#### **8.12. Planning balance and conclusion**

8.12.1. 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 judgement regarding whether the development accords with the development plan when read as a whole. It is also reminded that paragraph 152 of the NPPF states that inappropriate development is 'by definition, harmful to the Green Belt and should not be approved except in very special circumstances' ... the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations'. This consideration of the Green belt and other harms versus the benefits of the scheme will be carried out below.

##### **8.12.2. Harms resulting from the development**

- *Green Belt harm*

8.12.3. It was determined that the proposed access road would amount to inappropriate development in the Green Belt. Paragraph 152 of the NPPF states that 'inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances'. Paragraph 153 goes on to note that 'when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. Substantial weight is therefore afforded to harm to the openness of the Green Belt.

- *Harm to Surrey Hills National Landscape and Area of Great Landscape Value*

- 8.12.4. The proposed development was determined to result in a 'large adverse' or 'very large adverse' significance of impact on:
- Landscape character area MP1 during construction and at year 15.
  - Surrey Hills National Landscape during construction, reducing to large adverse at year 15.
  - Viewpoint 10 (The Ridges – east end), remaining at large adverse at year 15.
  - Viewpoint 11 – A3100 (and at nighttime), reducing to moderate adverse a year 15.
  - Viewpoint 12 (track to Rushy Platts Farm), remaining at large adverse at year 15.
- 8.12.5. Appendix A: Methodology of the LVIA states that “effects of Moderate and below are not considered to be significant”. As these effects remain large or greater, they are considered to be significant.
- 8.12.6. Paragraph 182 of the NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty of national landscapes. Accordingly, substantial weight is afforded to the harm on the SHNL, and on visual amenity of the landscape.
- *Loss of agricultural land*
- 8.12.7. The proposed development would result in the loss of BMV agricultural land. While there would be a loss, the area to be loss would be small in the context of the surrounding area. A conservative approach has also been taken in assuming that the land would fall within subgrade 3a, which while falling within the definition of BMV agricultural land, is not the highest quality (grades 1 and 2). For these reasons only limited weight is afforded to this harm.
- 8.12.8. Set against the considerable weight of these identified other harms are a range of other considerations set out in support of the proposals.
- 8.12.9. *Benefits of the scheme*
- 8.12.10. The new access road would create a suitable and appropriate private access for the Surrey Police to use for its operational vehicles to enable improved response times by up-to 2 minutes. Whilst a 2 minute margin would appear small, they become critical when responding to locations such as Farnham and Clandon in under 15 minutes. The two existing access points are narrow residential roads where officers would face obstructions that delay emergency response times. This would not only offer a benefit to the operational requirements of the Surrey Police, but would also benefit the local community by responding to emergencies faster. This is a benefit afforded substantial weight.
- 8.12.11. The proposed access road would reduce traffic movements along both The Ridges and Sandy Lane, which would improve traffic safety for users entering/exiting onto Old Portsmouth Road, as well as the amenity of the residents that live along these roads. As this would benefit a limited number of residents along these roads, this is afforded substantial weight.

- 8.12.12. By reducing traffic movements on both Sandy Lane and The Ridges it would decrease noise and disruption, improving the overall tranquility and quiet setting of these roads. It would therefore improve the rural character of these roads. As these roads are within a rural-urban setting with development at a denser standard than a typical rural setting, only limited weight is afforded to this benefit.
- 8.12.13. The proposed development would include improved cyclist and pedestrian facilities. As these would have been a policy requirement through Policy ID3 of the LPSS, limited weight is afforded to this.
- 8.12.14. The proposed scheme would deliver a biodiversity net gain of 88.03% over the site, which is well in excess of the national requirement of 10% and the local requirement of 20%. It should be noted that the original scheme proposed a net gain of 44.75%. The proposed scheme was amended throughout to address concerns raised by consultees, resulting in a significantly greater biodiversity net gain. This benefit is afforded significant weight.
- 8.12.15. The proposed access road would make an important contribution to achieving Surrey Police's aspiration for Mount Browne in relation to the overall campus masterplan which they are seeking to achieve to provide a headquarters which will meet the policing needs for Surrey into the future. As the access road is to be assessed in isolation and could be implemented as such, limited weight is afforded to this benefit.
- 8.12.16. The proposal includes the introduction of a new educational signboard adjacent to the Public Right of Way at the southern boundary of the site. This is intended to bring greater awareness of the SHNL for those walking through this area. This benefit is afforded significant weight.

### **8.13. Final balance**

- 8.13.1. It is acknowledged that there is substantial and serious harm resulting from the proposal. This includes the harm on the Green Belt, as well as on the SHNL and the limited harm on the loss of BMV agricultural land.
- 8.13.2. However, the benefits of the scheme are also substantial. The scheme would deliver a private, safer and more efficiency access for the Police to respond to emergencies, reducing response times over the catchment area. The scheme would also deliver gains in biodiversity well above the national and local plan policies, improved amenity to residents along Sandy Lane and The Ridges, improved pedestrian and cyclist accessibility and improved public awareness of the special qualities of the SHNL. These benefits of the scheme are fundamental and long lasting with substantial benefits to the public.
- 8.13.3. Notwithstanding certain identified conflicts with relevant development plan policies above, overall the proposal accords with the development plan read as a whole. It is considered that other material considerations include harms and benefits resulting from the proposal scheme. Overall, the benefits clearly outweigh the harms, and in particular the benefit of improved police response times.
- 8.13.4. Following the balancing exercise, it is felt that the harm caused to the Green Belt, as

well as the other harm identified, is clearly outweighed by the benefits of the proposal. As such, it is recommended that planning permission should be granted.



Appendix 1: Summary of Landscape Impact (produced by HDA)

Landscape Receptor	Sensitivity	Magnitude of change Construction/ Year 0	Significance of Effect at Construction	Magnitude of change Year 1	Significance of Effect at Year 1	Magnitude of change Year 15	Significance of Effect at Year 15
Area MP1 #5.51 (#5.65 nighttime)	High #5.3	Major Adverse	Large Adverse	Moderate Adverse	Large Adverse	Moderate Adverse	Large Adverse
Area GO1 #5.53 (#5.67 nighttime)	High	Moderate Adverse	Moderate Adverse	Minor Adverse	Slight Adverse	Minor Adverse	Slight Adverse
Area RV6 #5.55	High	Minor Adverse	Slight Adverse	Minor Adverse	Slight Adverse	Minor Adverse	Slight Adverse
Area RV6 #5.66 nighttime	High			Negligible	Neutral	Negligible	Neutral
Area RF8 #5.56	High	Minor Adverse	Slight Adverse	Negligible	Slight Adverse	Negligible	Slight Adverse
Area GW3 #5.59	High	Negligible	Slight Adverse	Negligible	Slight Adverse	Negligible	Slight Adverse
Area GO2 #5.59	High	Negligible	Slight Adverse	Negligible	Slight Adverse	Negligible	Slight Adverse
Area CR2 #5.59 (plus others)	High	Negligible	Slight Adverse	Negligible	Slight Adverse	Negligible	Slight Adverse
Mount Browne #5.60 (#5.68 nighttime)	Medium	Minor Adverse	Slight Adverse	Negligible	Neutral	Negligible	Neutral
7B Warwick's Bench #5.61	Medium	Negligible	Slight Adverse	No Change	Neutral	No Change	Neutral

Shalford #5.62	Medium	No Change	Neutral	No Change	Neutral	No Change	Neutral
Godalming #5.62	Medium	No Change	Neutral	No Change	Neutral	No Change	Neutral
Surrey Hills AONB #5.63 (#5.69 nighttime)	High (value) #3.46	Major Adverse	Very Large Adverse (#5.24)	Moderate Adverse	Large Adverse	Moderate Adverse	Large Adverse

Appendix 2: Summary of visual impact (produced by HDA)

Visual Receptor	Sensitivity	Magnitude of change Construction/ Year 0	Significance of Effect at Construction	Magnitude of change Year 1	Significance of Effect at Year 1 (winter)	Magnitude of change Year 15	Significance of Effect at Year 15 (summer)
Vpt 1 – Pewley Down	High #3.54	Minor Adverse #5.27	Moderate Adverse	Minor Adverse #5.71	Slight Adverse	Negligible #5.71	Slight Adverse
Vpt 2 - Pewley Down	High 3.55	Minor Adverse #5.27	Moderate Adverse	Minor Adverse #5.72	Moderate Adverse	Negligible #5.72	Slight Adverse
Vpt 2 - Pewley Down Nighttime	High			Minor Adverse #5.103	Moderate Adverse	Minor Adverse #5.103	Moderate Adverse
Vpt 3 – Chantries	High #3.56	Negligible #5.41	Slight Adverse	Negligible #5.73, #5.98 & #5.104 (night)	Slight Adverse	Negligible #5.73, #5.98 & 5.104	Slight Adverse
Vpt 4 – St Catherine's Lock	High #3.57	Not provided	Slight Adverse #5.38	Negligible #5.74 Minor Adverse #5.95	Slight Adverse	Negligible #5.74 Minor Adverse #5.95	Slight Adverse #5.74 Slight Adverse/No Change #5.95
Vpt 4 – St Catherine's Lock Nighttime	High			Negligible #5.105	Slight Adverse	Negligible #5.105	Slight Adverse
Vpt 5 – Wey South Path	High #3.58	Not provided	Slight Adverse #5.38	Negligible #5.75 Minor Adverse #5.95	Slight Adverse	No Change #5.75 Minor Adverse #5.95	Slight Adverse #5.75 Slight Adverse/No Change #5.95

Vpt 6 – Fpth 276 west of sports bldgs	High #3.59	Minor Adverse #5.28	Moderate Adverse	Moderate Adverse #5.76	Moderate Adverse	Minor Adverse #5.76	Slight Adverse
(Vpt 6) – Fpth 276 west of sports bldgs. ( & Nighttime)	High	Minor Adverse #5.39	Moderate Adverse		Moderate Adverse #5.106		Moderate Adverse #5.106
Vpt 7 – Loseley Park	High #3.60	No view		No change #5.77	Neutral	No Change #5.77	Neutral
Vpt 8 – east (should be west) of Peasmarsh	High #3.61	No view		Negligible #5.78	Slight Adverse	No Change #5.78	Neutral
Vpt 8 – east of Peasmarsh Nighttime	High			Minor Adverse #5.107	Slight Adverse	Minor Adverse #5.107	Slight Adverse
Vpt 9 – east (should be west) of Peasmarsh	High #3.62	No view		Negligible #5.79	Slight Adverse	No Change #5.79	Neutral
Vpt 10 – The Ridges ( & Nighttime)	Medium (just motorists ?) #3.63	Minor Adverse #5.29	Slight Adverse	Moderate Adverse #5.80 & 5.108	Moderate Adverse	Moderate Adverse #5.80 & 5.108	Moderate Adverse
(Vpt 10) – The Ridges – east end	High	Major Adverse #5.39	Large Adverse	Major Adverse #5.96	Large Adverse	Major Adverse #5.96	Large Adverse
(Vpt 10) – The Ridges	High	Moderate Adverse	Moderate Adverse	Minor Adverse	Moderate Adverse	Minor Adverse #5.96	Slight Adverse

– compound		#5.39		#5.96			
Vpt 11 – A3100 (& Nighttime)	Medium (assuming this is for non-motorised users - #3.64)	Major Adverse #5.26	Large Adverse	Moderate Adverse #5.109	Moderate Adverse #5.81	Moderate Adverse #5.109	Moderate Adverse #5.81
Vpt 11 – commercial premises east of A3100 & agricultural workers	Low (for people at work - #3.79)	Major Adverse #5.43	Moderate Adverse	Moderate Adverse #5.100	Slight Adverse	Moderate Adverse #5.100	Slight Adverse
A3100 – motorists (near Vpt 11)	Low #3.80	Major Adverse #5.44	Moderate Adverse	Moderate Adverse #5.101	Slight Adverse	Moderate Adverse #5.101	Slight Adverse
Vpt 12 – track to Rushy Platts Farm	Medium #3.65	Major Adverse #5.26	Large Adverse	Major Adverse #5.82	Large Adverse	Major Adverse #5.82	Large Adverse
Vpt 13 – Quadrum Park	Medium #3.66	No view		Negligible #5.83	Neutral	No Change #5.83	Neutral
Vpt 14 – Chinthurst – Fpth 262	High #3.67	No view		No Change #5.85 – for Vpt 15?	Neutral	No Change #5.85 – for Vpt 15?	Neutral
Vpt 15 – Shalford Common	High #3.68	No view		No Change #5.84 – for Vpt 14?	Neutral	No Change #5.84 – for Vpt 14?	Neutral
Vpt 16 – Farley Hill	High #3.69	Negligible #5.30	Slight Adverse	Negligible #5.86	Slight Adverse	Negligible #5.86	Slight Adverse

Vpt 17 – Holloway Hill	Medium #3.70	No view		No Change #5.87	Neutral	No Change #5.87	Neutral
Vpt 18 – St Catherine’s Hill	Medium #3.71	No view		Negligible #5.88	Minor Adverse (should be Slight?)	No Change #5.88	Neutral
Vpt 19 – Artington P&R	Medium (people at bus stop) #3.72	Negligible #5.31	Slight Adverse	Minor Adverse #5.89	Slight Adverse	Negligible #5.89	Neutral
Artington P&R (near Vpt 19)	Medium #3.80	Slight Adverse (should be Minor Adverse) #5.45	Moderate Adverse	Moderate/ Minor Adverse #5.102	Slight/ Moderate Adverse	Moderate/ Minor Adverse #5.102	Slight/ Adverse Moderate
Vpt 20 – Fpth 276 by sports bldgs	High #3.73	Medium Adverse (should be Moderate?) #5.32	Moderate Adverse	Minor Adverse #5.90	Slight Adverse	No Change #5.90	Neutral
Fpth 277 western edge of Mount Browne site. No Vpt.	High #3.78	Minor Adverse #5.40	Slight Adverse	Minor Adverse #5.97	Slight Adverse	No Change #5.97	Neutral
Mount Browne – People at Work. No Vpt.	Low #3.79	Minor Adverse #5.42	Slight Adverse	Minor Adverse #5.99	Slight Adverse	Minor Adverse #5.99	Slight Adverse